USDA
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Marketing and Regulatory Programs

Animal and Plant Health Inspection Service

Legislative and Public Affairs

Freedom of Information

4700 River Road
Unit 50
Riverdale, MD
20737-1232

November 7, 2019

Erin Parrish
Missouri State University
901 S. National Ave.
Springfield, MO 65897

Initial Submitter Notification: Registration 43-R-0052

Dear Dr. Parrish,

We are preparing to post records that your research facility submitted to USDA's Animal Care program to our website. Before posting the records, however, we want to hear your views on whether they contain any privileged or confidential trade secrets, commercial information, or financial information.

For your 2015, 2016 and 2017 annual report, your research facility submitted attachments containing: (1) An explanation of the procedures producing pain or distress on animals and the reason drugs were not used; and/or (2) a summary of exceptions to the Animal Welfare Act regulations and standards. In accordance with the Freedom of Information Act (FOIA), USDA makes these types of records available to the public on its website,[1] with redactions to protect trade secrets and commercial or financial information obtained from a person that is privileged or confidential.[2]

What We Need

We have enclosed a copy of the attachments to your annual report.

If you do not object to disclosure of any of the information, please notify us of your position in writing.

If you do wish to object to disclosure of any of the information in the attachments, you must provide a written statement fully explaining all grounds upon which disclosure is opposed.[3] Specifically, you should:

1. Identify the specific information you believe should be protected;
2. Describe the nature of the information (e.g., is it a trade secret, commercial information, or business information, and why); and
3. Explain how the information is confidential, which means the information is of the type that you customarily and actually treat as private.

Please be aware that any statements you submit in response to this notice may themselves be subject to disclosure if we receive a FOIA request for them.

1 5 US.C. § 552(a)(2).
2 5 U.S.C. § 552((b)(4).
3 *See* Executive Order 12,600 and 7 C.F.R. § 1.8.

When We Need It

We need your response no later than 5 p.m. on December 9, 2019. If you do not to respond by this deadline, we will assume that you do not object to the disclosure of the information.

Where You Should Send It

Please include your facility name and registration number on your response and all accompanying documents and send them by mail or email to:

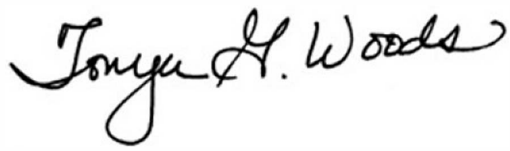
Animal and Plant Health Inspection Service
Legislative and Public Affairs
1400 Independence Ave. SW
Room 1147-S
Washington, DC 20250
Attn: Andrea McNally
Email: FOIA.ACAnnualReports@usda.gov

What Happens Next

APHIS is responsible for deciding what information will be disclosed or protected. If you object to disclosure of any information, APHIS will carefully consider your response in making a final determination. If we determine that the information is protected, we will post the attachments to our website with the appropriate redactions. However, if you object to the disclosure of information and we decide to release it over your objections, or if you fail to respond to this notice, we will notify you in writing before we post the attachments so that you have the opportunity to seek judicial intervention.

If you have any questions, please call Andrea McNally at 202-799-7026 or the FOIA office at (301) 851-4102.

Sincerely,



Tonya G. Woods
Director
Freedom of Information & Privacy Act
Legislative and Public Affairs

Enclosure
Annual Report Attachments

COLUMN E EXPLANATION

1. REGISTRATION NUMBER
   43-R-0052

2. NUMBER OF ANIMALS USED IN THIS STUDY
   30

3. SPECIES (COMMON NAME) OF ANIMALS USED IN THE STUDY
   Bats

4. EXPLAIN THE PROCEDURE PRODUCING PAIN AND/OR DISTRESS
Researchers did not "produce" pain or distress. The purpose of this study was to test the efficacy of a newly-developed treatment as a deterrent to growth of the fungus that causes white-nose syndrome (WNS) in bats. This is the only way to test treatment/prevention strategies for WNS, which is only known to effect hibernating bats.

Hibernating bats do not typically have access to food during the winter in nature, and lose mass as the winter progresses as a result of using stored body fat. Healthy bats may lose 25 percent of their prehibernation mass and survive the winter in good health. WNS-infected bats appear to use their fat sooner, so the mass loss will be more rapid, possibility leading to emaciation and eventually death. The changes indicated are a normal part of hibernation or the pathology of WNS. Since the objective of this study is to monitor the prevalence, severity, and potential treatment of WNS, the researchers did not interrupt the study. No steps were taken to interfere with the progression of hibernation, with or without WNS.

Letting WNS infections run their course is critical to determining whether or not the newly-developed treatment is effective. The information is needed as the conservation community debates the best methods (if any) of protecting bats from this devastating disease.

Bats were exposed to WNS (although pre-study tests showed after analysis that the bats were already carrying the fungus). It is not clear the extent that hibernating animals feel pain or distress. Bats which developed white-nose syndrome could have been in some pain or distress, and researchers let the disease develop to see if the treatment was helpful in reducing mortality and morbidity. Bats receiving the treatment may have experienced less distress if the treatment is found to be effective at preventing WNS. Bats were categorized into Category E due to researchers not relieving any distress/discomfort of bats under-going the normal progression of the naturally-occurring disease.

5. EXPLANATION WITH THE REASON(S) FOR WHY ANESTHETICS, ANALGESICS, AND TRANQUILLIZERS COULD NOT BE USED.
The only way researchers could have changed the study to reduce the distress bats may have felt would have been to open the environmental chambers regularly, handle the bats, and check them for WNS. To do this would have ruined the study, as regular disturbance would prevent the bats from hibernating, in which case, the project would not have been a hibernation study. WNS only effect bats while they are hibernating.

6. WHAT, IF ANY, FEDERAL REGULATIONS REQUIRE THIS PROCEDURE?
   None

COLUMN E EXPLANATION

1. REGISTRATION NUMBER
   43-R-0052

2. NUMBER OF ANIMALS USED IN THIS STUDY
   41

3. SPECIES (COMMON NAME) OF ANIMALS USED IN THE STUDY
   Tricolored Bats

4. EXPLAIN THE PROCEDURE PRODUCING PAIN AND/OR DISTRESS
   Researchers did not "produce" pain or distress. The purpose of this study was to test the efficacy of a newly-developed potential treatment as a deterrent to growth of the fungus that causes white-nose syndrome (WNS) in bats. This is the only way to test treatment/prevention strategies for WNS, which is only known to effect hibernating bats.

   Hibernating bats do not typically have access to food during the winter in nature, and lose mass as the winter progresses as a result of using stored body fat. Healthy bats may lose 25 percent of their prehibernation mass and survive the winter in good health. WNS-infected bats appear to use their fat sooner, so the mass loss will be more rapid, possibility leading to emaciation and eventually death. The changes indicated are a normal part of hibernation or the pathology of WNS. Since the objective of this study is to monitor the prevalence, severity, and potential treatment of WNS, the researchers did not interrupt the study. No steps were taken to interfere with the progression of hibernation, with or without WNS.

   All bats were exposed to WNS fungus during this study. Letting WNS infections run their course is critical to determining whether or not the newly-developed treatment is effective. The information is needed as the conservation community debates the best methods (if any) of protecting bats from this devastating disease.

   It is not clear the extent that hibernating animals feel pain or distress. Bats which developed white-nose syndrome could have been in some pain or distress, and researchers let the disease develop to see if the treatment was helpful in reducing mortality and morbidity. Bats receiving the treatment may have experienced less distress if the treatment is found to be effective at preventing WNS. Bats were categorized into Category E due to researchers not relieving any distress/discomfort of bats under-going the normal progression of the naturally-occurring disease.

5. EXPLANATION WITH THE REASON(S) FOR WHY ANESTHETICS, ANALGESICS, AND TRANQUILLIZERS COULD NOT BE USED.
   The only way researchers could have changed the study to reduce the distress bats may have felt would have been to open the environmental chambers regularly, handle the bats, and check them for WNS. To do this would have ruined the study, as regular disturbance would prevent the bats from hibernating, in which case, the project would not have been a hibernation study. WNS only effect bats while they are hibernating.

6. WHAT, IF ANY, FEDERAL REGULATIONS REQUIRE THIS PROCEDURE?
   None

NP 1/8/18

COLUMN E EXPLANATION

1. REGISTRATION NUMBER
   43-R-0052

2. NUMBER OF ANIMALS USED IN THIS STUDY
   40

3. SPECIES (COMMON NAME) OF ANIMALS USED IN THE STUDY
   Tricolored Bats

4. EXPLAIN THE PROCEDURE PRODUCING PAIN AND/OR DISTRESS
   Researchers did not "produce" pain or distress. The purpose of this study was to learn more about the role played by the immune system in the pathology of white-nose syndrome (WNS) in bats. Our understanding of immune function during hibernation is to study bats with WNS, which is only known to effect hibernating bats.

   Hibernating bats do not typically have access to food during the winter in nature, and lose mass as the winter progresses as a result of using stored body fat. Healthy bats may lose 25 percent of their prehibernation mass and survive the winter in good health. WNS-infected bats appear to use their fat sooner, so the mass loss will be more rapid, possibility leading to emaciation and eventually death. The changes indicated are a normal part of hibernation or the pathology of WNS. Since the objective of this study is to monitor the WNS prevalence and severity, and the immune response to the WNS pathogen, the researchers did not interrupt the study. No steps were taken to interfere with the progression of hibernation, with or without WNS.

   All bats were exposed to WNS fungus during this study. Half were also treated with an anti-inflammatory (meloxicam) to inhibit immune function. Letting WNS infections run their course is critical to determining changes in immune function and it's role. The information is needed as the conservation community seeks to better understand this devastating disease.

   It is not clear the extent that hibernating animals feel pain or distress. Bats which developed white-nose syndrome could have been in some pain or distress, and researchers let the disease develop to study the immune system changes. Bats receiving the treatment may have experienced less distress if the treatment is found to be effective at preventing WNS. Bats were categorized into Category E due to researchers not relieving any distress/discomfort of bats under-going the normal progression of the naturally-occurring disease.

5. EXPLANATION WITH THE REASON(S) FOR WHY ANESTHETICS, ANALGESICS, AND TRANQUILLIZERS COULD NOT BE USED.
   The only way researchers could have changed the study to reduce the distress bats may have felt would have been to open the environmental chambers regularly, handle the bats, and check them for WNS. To do this would have ruined the study, as regular disturbance would prevent the bats from hibernating, in which case, the project would not have been a hibernation study. WNS only effect bats while they are hibernating.

6. WHAT, IF ANY, FEDERAL REGULATIONS REQUIRE THIS PROCEDURE?
   None