June 3, 2020

Santa Tumminia, Ph.D.
Acting Director
National Eye Institute
31 Center Drive MSC 2510
Bethesda, MD 20892-2510

Via email: tumminias@nei.nih.gov

Dear Acting Director Tumminia,

On behalf of the New England Anti-Vivisection Society (NEAVS), I am writing to relay our concern with regard to troubling evidence of animal suffering taking place in Vanderbilt University Medical Center facilities as part of a research protocol funded by the National Eye Institute. The grant in question is entitled "Developing Alternative Approaches to Reduce Retinal Toxicity and Prevent Vision Loss in the Treatment of Intraocular Retinoblastoma," Project Number 1K08EY027464-01, led by Anthony Brent Daniels.

Documents We Reviewed

We reviewed two sets of documents in formulating the recommendation in this letter. The first is an inspection report from the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) Animal Care division, dated February 19, 2020, which is publicly available in APHIS's online database.[1] The second set of documents we reviewed contain photos from this inspection taken by the APHIS Veterinary Medical Officer, as well as related internal documents from VUMC. NEAVS obtained this second set of documents in response to a Freedom of Information Act request to APHIS dated March 6, 2020.

Rabbit 113330 Six Days After Injection

Our Concerns

The documents we received contained several troubling findings:

- No analgesic was administered before or after rabbits were given injections into their eyes.

[1] *Inspection Report*, U.S. Dep't of Ag. Animal & Plant Health Inspection Serv. (Feb. 19, 2020), https://acis.aphis.edc.usda.gov/ords/f?p=118:21:::NO::RXQIZAVXA:2016082569738228&cs=16F2D72B3D1A6575BC983FBA105C5EF5D (last visited Jun. 3, 2020).

- Rabbits not eating should have been considered a sign of pain or distress. Alarmingly, lab staff observed a rabbit was not eating and had lost up to 7% of its body weight, but the lab staff ignored these indicators of pain and suffering and declared the rabbit to not be in pain or distress despite documented evidence to the contrary. Several similar incidents occurred with multiple other rabbits.
- The Primary Investigator wrote, and VUMC's IACUC approved, a protocol that lacked any information related to animal monitoring or treatment for potential eye issues.

APHIS Inspection Revealed Problematic Protocol

On Feb 19, 2020, APHIS Investigator Susanne Brunkhorst, DVM, noted that:

> *"The protocol was unclear about whether or not pre and post procedural analgesics were to be administered for this part of the study. In one section it stated that the analgesic ketoprofen would be administered every 12 to 24 hours. In another section it simply stated that analgesics may be administered. The records reviewed documented that ketoprofen was not administered to any of the rabbits before, during or after the procedure."*[2]

Inspector Brunkhorst's report also noted that:

> *"Review of procedural records of the previous drug injections administered to these rabbits also showed several similar eye issues being noted/monitored by both lab staff and veterinary staff post-injection but* ***no treatments were documented****"* [emphasis added].

For the reasons stated above, we request you end funding for this grant given Vanderbilt University Medical Center's inability to protect animals it is using in medical research from unnecessary pain and suffering.

Thank you for your consideration of this request, and we look forward to hearing from you.

Sincerely,

Nathan Herschler
Executive Director
New England Anti-Vivisection Society (NEAVS)

[2] *Id.*