June 3, 2020

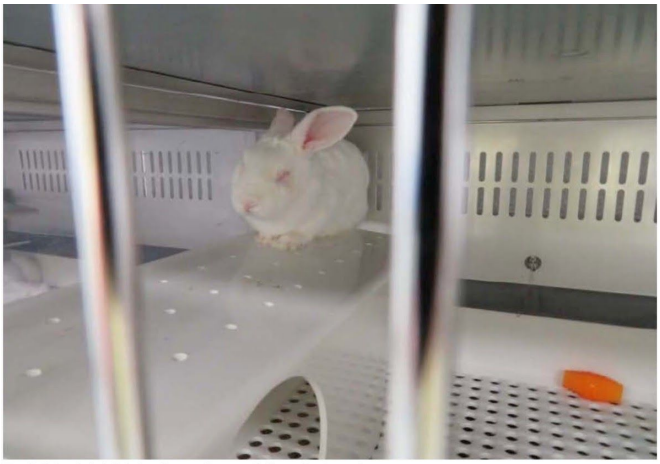
Gordon R. Bernard, M.D.
Executive Vice President for Research
Vanderbilt University Medical Center
1211 Medical Center Dr Nashville, TN 37232
Via email: chenoa.jacobs@vanderbilt.edu

Dear Executive Vice President Bernard:

On behalf of the New England Anti-Vivisection Society (NEAVS), including our membership in Tennessee, I am writing to relay our concern with regard to troubling evidence of animal suffering taking place in Vanderbilt University Medical Center facilities and to respectfully ask that you consider ending the medical experiments taking place that cause this suffering.

**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 One Day After Injection

**Our Concerns**:

- No analgesic was administered before or after rabbits were given injections into their eyes.
- Alarmingly, lab staff observed a rabbit was not eating and had lost up to 7% of its body weight, but 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.

[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).

- 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 Raised Concerns About Protocol**

On February 19, 2020, APHIS inspector Susanne Brunkhorst, DVM, noted that: *"The protocol was unclear about whether or not pre and post procedural analgesics were to be administered for this [early] 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]

Rabbit 113329 One Day After Injection

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].

**Request: End Rabbit Experiments, Investigate IACUC Failures**

We ask that you end this study and all related studies involving rabbits. We understand this research is being funded at least in part by the National Eye Institute grant 1K08EY027464-01, and we are writing to the NEI to request that this grant be terminated. We also request you open an inquiry into your IACUC, as it approved a protocol that USDA-APHIS determined was unclear, inconsistent, and incomplete. There is no justification for an IACUC to approve a protocol that fails to ensure animal monitoring or treatment.

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)

CC: Padma Raghavan, Vice Provost for Research, Vanderbilt University Via email: padma.raghavan@vanderbilt.edu

[2] *Id.*