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UNIVERSITY
of HAWAI'I
SYSTEM

Office of Research Compliance
Animal Welfare and Biosafety Programs

16 March 2018

Dr. Axel Wolff
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
RKL1, Suite 1050 (MSC 9782)
6705 Rockledge Drive
Bethesda, Maryland 20892-7982

Re: University of Hawai'i Animal Welfare Assurance #A3423-01
Adverse Incident Resulting in Fish Mortalities; COMM-OLAW-2018-2

Dear Dr. Wolff,

Pursuant to your email response dated 23 February 2018 to the UH initial adverse incident report, I am providing this follow-up report to OLAW which resulted in the death of 7 adult koi, *Cyprinus rubrofuscus*. The initial report to OLAW was filed on 22 February 2018.

To revisit the adverse incident, fish were housed in several small holding tanks that were kept on the premises and in a locked converted shipping container on the University of Hawai'i (UH), Hilo campus Teaching Farm on the Island of Hawai'i. The fish were being held to support instructional activities only and were not being used in research activities. PHS, VA, or NSF funding was not being used to support the instructional activities that used these fish.

Follow-up and Implementation of Security Measures

Since the initial report of the adverse incident was made, two follow-up reports were provided by the Hilo campus Aquaculture Program Director which details security measures that have since been implemented, while though still early have shown to be effective.

- The retrofitted shipping containers that are used to hold fish have been rekeyed. Now only a few selected employees and the Aquaculture Program Director has access to the key which permits entry to these holding units.
- The combination lock for the fish quarantine system has been changed.
- The Hilo campus security office installed a motion sensitive camera on the facility premises. The camera alerts security and the Faculty Farm liaison when motion is detected prompting immediate attention.
- Extensive testing of the low-water valve system of the reservoir tank to ensure full functionality.

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- Removal of unused and extraneous items about the facility premises so that these items cannot be inappropriately used to vandalize and disable the water and air-delivery systems.
- The Hilo campus security continues its efforts by working with the campus Auxiliary Service dept. to interview and retrieve facility keys from former employees. An improved system of tracking keys is being developed by the Auxiliary Service dept.
- The campus security has increased its patrol presence by visiting the Teaching Farm during the day and evenings. Furthermore, the Hilo campus now employs its own security force leading to more accountability and helpfulness. Until recently, the security services were outsourced.
- Until recently, the Teaching Farm had been short-staffed and relied upon part-time employees. A full-time employee was recently hired; therefore, the individual's presence will add to the increased layer of facility security.
- If funding becomes available, cyclone fencing will be installed around the open building where fish are also kept.

IACUC

The adverse incident and security improvements made by the University of Hawai'i at Hilo Aquaculture Program and Hilo campus security were discussed during the committee's March 15, 2018 business meeting. The IACUC was pleased to be informed that the measures now in place at the Hilo facility have been effective in deterring malicious activities from recurring. The IACUC will recommend to the Director a policy change for the recovery of keys from employees that leave the Hilo Aquaculture Program. The IACUC will assess and confirm the effectiveness of the recently implemented measures in the next semiannual facility inspection being scheduled for mid-April 2018.

Please contact me at (b) (6) or riveravg@hawaii.edu with any questions.

Sincerely,

(b) (6)

Victoria G. Rivera, MPA
Interim Director, Office of Research Compliance
Institutional Official, Animal Welfare Program

c: Manuel G. Himenes, Jr., Chair, UH IACUC
(b) (6)

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Tuesday, March 20, 2018 7:57 AM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: University of Hawaii Provides Follow-up Report to Adverse Incident

Follow Up Flag: Follow up
Flag Status: Completed

Thank you (b) (6) for this follow up report. Dr. Wolff will respond soon.

Regards,
Joan

From: (b) (6) [mailto:(b) (6)@hawaii.edu]
Sent: Monday, March 19, 2018 4:02 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Victoria Rivera <riveravg@hawaii.edu>
Subject: University of Hawaii Provides Follow-up Report to Adverse Incident

Good Afternoon Dr. Wolff and OLAW Compliance Staff:

On behalf of Ms. Victoria Rivera, Interim Director for Research Compliance, Institutional Official for the UH Animal Welfare Program, pleased find the attached follow-up report.

Sincerely,

(b) (6)



UNIVERSITY
of HAWAII
SYSTEM

Office of Research Compliance
Animal Welfare and Biosafety Programs

A3423-2A

Obtained by Rise for Animals. Uploaded 07/09/2020

22 February 2018

Dr. Axel Wolff
Director, Division of Compliance Oversight
Office of Laboratory Animal Welfare
RKL1, Suite 1050 (MSC 9782)
6705 Rockledge Drive
Bethesda, Maryland 20892-7982

Re: University of Hawai'i Animal Welfare Assurance #A3423-01
Adverse Incident Resulting in Fish Mortalities; COMM-OLAW-2018-1

Dear Dr. Wolff,

I am writing to OLAW to report an adverse incident which resulted in the death of 7 koi, *Cyprinus rubrofuscus*. The fish were housed in several small holding tanks that were kept on the premises and in a locked converted shipping container on the University of Hawai'i (UH), Hilo campus Teaching Farm on the Island of Hawai'i. The fish were being held to support instructional activities only and were not being used in research activities. PHS, VA, or NSF funding was not being used to support the instructional activities that used these fish, nevertheless, the University desires to inform OLAW of the incident.

Timeline and Response

On Sunday, 18 February 2018, a UH Hilo campus aquaculture program staff member reported an incident of vandalism resulting in the death of the fish. The incident had occurred between the morning of 17 February 2018 and the morning of 18 February 2018 when routine inspections were made on each of the respective days.

As reported by the Director of the Hilo campus Aquaculture Program, the shipping container holding the fish was found unlocked. The water supply to the holding tanks that held these fish were turned off, furthermore, the air-lines delivering oxygen to the holding tanks for these fish were either removed or turned-off.

The aquaculture program buildings and converted shipping containers are routinely locked and checked after the staff depart. Campus security and the Hilo Police Department have been contacted and are coordinating a full investigation. It is believed that the person or persons had a key to the container, and may have had knowledge of the aquaculture section and current activities.

IACUC

The adverse incident will be brought to the attention of the IACUC for discussion during its March 15, 2018 business meeting. We have requested the Hilo campus administration to keep the Animal Welfare Compliance Program Office updated as the local enforcement investigation proceeds, and to plan counter measures to prevent and deter this kind of incident from recurring.

Please contact me at (b) (6) or riveravg@hawaii.edu with any questions.

Sincerely,

(b) (6)

Victoria G. Rivera, MPA
Interim Director, Office of Research Compliance
Institutional Official, Animal Welfare Program

c: Manuel G. Himenes, Jr., Chair, UH IACUC

(b) (6)

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Friday, February 23, 2018 7:45 AM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: University of Hawaii Reports Adverse Incident

Thank you for this report, (b) (6). We will open a new case file and look forward to receiving the final report from the IO after the IACUC has completed its investigation.

Axel Wolff, M.S., D.V.M.
Deputy Director, OLAW

From: (b) (6) [mailto:(b) (6)@hawaii.edu]
Sent: Thursday, February 22, 2018 4:16 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Victoria Rivera <riversav@hawaii.edu>
Subject: University of Hawaii Reports Adverse Incident

Good Afternoon Dr. Wolff and OLAW Compliance Staff:

On behalf of Ms. Victoria Rivera, Interim Director for Research Compliance, Institutional Official for the UH Animal Welfare Program, please find the attached report.

Sincerely,

(b) (6)