

THE HUMANE SOCIETY OF THE UNITED STATES®

OFFICERS

David Q. Wiebers, M.D.
Chair of the Board

Anita W. Coupe, Esq.
Vice Chair of the Board

Eugene W. Lorenz
Board Treasurer

Wayne Pacelle
President & CEO

G. Thomas Waite III
Treasurer & CFO

Roger A. Kindler, Esq.
General Counsel & CLO

STAFF VICE PRESIDENTS

Andrew N. Rowan, Ph.D.
*Executive Vice President
Operations*

Michael Markarian
*Executive Vice President
External Affairs*

Patricia A. Forkan
*Senior Vice President
International Programs
& Regions*

Martha C. Armstrong
*Senior Vice President
Domestic Animal Programs*

John W. Grandy, Ph.D.
*Senior Vice President
Wildlife & Habitat Protection*

Heidi Prescott
*Senior Vice President
Campaigns*

Michael C. Appleby, B.Sc., Ph.D.
Farm Animals

Katherine Benedict
*Administration, Information
Services, & Technology*

Nicholas Braden
Communications

Richard M. Clugston, Ph.D.
Higher Education

Randall Lockwood, Ph.D.
*Research & Educational
Outreach*

Jonathan R. Lovvorn, Esq.
Animal Protection Litigation

Steve Putnam
Business Development

Robert G. Roop, Ph.D., SPHR
*Human Resources &
Education Programs*

Melissa Seide Rubin, Esq.
Field & Disaster Services

Martin L. Stephens, Ph.D.
Animal Research Issues

Richard W. Swain Jr.
Investigative Services

Gretchen Wylor
Hollywood Office

DIRECTORS

Leslie Lee Alexander

Patricia Mares Asip

Peter A. Bender

Donald W. Cashen, Ph.D.

Anita W. Coupe, Esq.

Neil Fang

Judi Friedman

Alice R. Garey

David John Jhirad, Ph.D.

Jennifer Leaning, M.D.

Eugene W. Lorenz

William F. Mancuso

Patrick L. McDonnell

Judy Ney

Judy J. Peil

Marian Probst

Joe Ramsey, Esq.

Jeffery O. Rose

James D. Ross, Esq.

Marilyn G. Seyler

Walter J. Stewart, Esq.

John E. Taft

David Q. Wiebers, M.D.

K. William Wiseman

John A. Hoyt

Paul G. Irwin

Presidents Emeriti

Murdaugh Stuart Madden, Esq.
Vice President & Senior Counsel

Printed on 100% post-consumer recycled
paper, processed chlorine free and Green
Seal and FSC certified, with soy-based ink.

July 17, 2000

Dr. Timothy Mulcahy
University of Wisconsin-Madison
327 Bascom Hall
500 Lincoln Drive
Madison, WI 53706-1380

Dear Dr. Mulcahy:

I am writing to you as part of The Humane Society of the United States' (HSUS) Pain and Distress Initiative. The goal of our initiative is to work with research institutions to encourage them to institute programs that will lead to the elimination of all significant pain and distress in laboratory animals by the year 2020. While ambitious, we believe that this goal is achievable.

Statistics from other countries indicate that from 20 to 45% of laboratory animals experience moderate to severe distress during experimental protocols. In the United States, about 8 to 10% of animals are listed under Column E (experience pain and distress without the use of drugs to alleviate it) in the United States Department of Agriculture's (USDA) annual facility reports. Among the top fifty research institutions (as determined by NIH grant funds), only 0.5% of animals are placed in category E. It is the opinion of the HSUS that there is widespread under-reporting of both unalleviated animal pain and especially animal distress.

As part of our Initiative, we have been examining the USDA yearly reports of animal use by state and by selected institutions. We find that some facilities, such as the University of Wisconsin, have reported no animals in Column E for the years 1996 and 1997. We assume that this means that the University of Wisconsin feels that no animals have experienced unrelieved pain and/or distress in its laboratories during these years of reporting.

We have looked at recent research reports published by University of Wisconsin scientists and, assuming that the research reported in these publications might have been undertaken a year or two earlier, would argue

Promoting the protection of all animals

2100 L Street, NW, Washington, DC 20037 ■ 202-452-1100 ■ Fax: 202-778-6132 ■ www.hsus.org

that some animal projects should have been classified in Column E. For example:

- a study of nonhuman primate neonatal responses to nonself antigens from normal and disturbed pregnancies (reference: Prenatal Stress and Immune Recognition of Self and Nonself in the Primate Neonate, *Biology of the Neonate*, 1999, 76 (5), 1999, pp.301-310)
- a study that assesses the potential long-term effects of prenatal stress on the cytokine-related inflammatory response in juvenile rhesus monkeys (reference: Prenatal manipulations reduce the proinflammatory response to a cytokine challenge in juvenile monkeys, *Brain Research*, 1997, 769 (1), pp.29-35)
- a study that assesses behavioral responses to social separation at 8 months of age and cerebrospinal fluid concentrations of biogenic amines and metabolites at 8 and 18 months of age in rhesus monkeys born into either stressed or undisturbed pregnancies (reference: Prenatal stress alters brain biogenic levels in primates, *Development and Psychopathology*, 1998, 10(3), pp.427-440)
- a study of 10 cytotoxic T-lymphocyte epitopes during the course of simian immunodeficiency virus disease progression in macaques (reference: Virus-specific cytotoxic T-lymphocyte responses select for amino acid variation in simian immunodeficiency virus Env and Nef, *Nature Medicine*, 1999, 5(11), pp.1270-1276)
- a study of rhesus macaques infected intravenously with 40 tissue culture infectious doses 50% (TCID₅₀) of a heterogeneous virus stock derived from SIVmac2.39 (reference: Rapid and slow progressors differ by a single MHC class I haplotype in a family of MHC-defined rhesus macaques infected with SIV, *Immunology Letter*, 1999, 66(1-3), pp. 53-59).

These examples appear to involve some animals experiencing moderate to severe distress. Even if the research described in these reports was not actually conducted in 1996 or 1997, most laboratories tend to continue on certain lines of work for sustained periods of time. We have not looked at research involving the other five reportable species but believe that the above provides sufficient evidence that the University of Wisconsin is under-reporting research animal pain and distress.

In some of the recent scientific and policy meetings addressing issues stemming from our pain and distress initiative, we have been criticized for focusing on the reporting system. Our critics maintain that our attention to the shortcomings of the USDA classification and reporting system will not benefit any animals. We strongly disagree. We believe that where animal pain and distress (especially distress) is not looked for, identified and reported, then there is great danger that such distress will be overlooked and/or ignored. Also, there has been virtually no discussion on how we might operationalize pain and distress and develop a systematic set of diagnostic signs to identify when animals are in pain and distress and how to prevent or alleviate such outcomes.

This initiative is not simply an animal welfare issue. We believe closer attention to animal distress in particular will improve the quality of the data obtained, sometimes very significantly. Some recent research detailing the improved quality of data from animals fitted with telemetry devices is one example.

We look forward to hearing from you on your Column E reporting practices. We recognize that all institutions are concerned about these issues. We are prepared to send out a representative to discuss these matters with you, your IACUC and anybody else who might be interested. It is our intention to pursue a constructive and professional dialogue on the matter.

Sincerely,

Andrew Rowan, D. Phil.
Senior Vice President of Research, Education, and International Affairs
The Humane Society of the United States

cc. Dr. W. Ron DeHaven, APHIS/USDA