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Submitted via email nareee@ars.usda.gov
Michele Esch, Designated Federal Officer and Executive Director
National Agricultural Research, Extension, Education, and Economics Advisory Board
US Department of Agriculture
1400 Independence Avenue SW STOP 0321
Washington, DC 20250-0321

RE: The HSUS Comments on Agricultural Research Service – Animal Handling and Welfare Review Panel Report, “Findings and Recommendations on the Animal Care and Well-Being at the U.S. Meat Animal Research Center to the Secretary of Agriculture and the REE Under Secretary” to the National Agricultural Research, Extension, Education, and Economics Advisory Board

On behalf of The Humane Society of the United States and our members and supporters, thank you for the opportunity to submit public comment in response to the report released on March 9th entitled “Findings and recommendations on the animal care and well-being at the U.S. Meat Animal Research Center to the Secretary of Agriculture and the REE Under Secretary.”

There has been overwhelming public outcry in regards to the findings of an investigative piece by *The New York Times* on the U.S. Meat Animal Research Center, located in Clay, Nebraska. The *NY Times* based the piece on information provided by various whistleblowers as well as extensive records obtained through Freedom of Information Act. The public outcry pertains to two major concerns:

- The unimaginable suffering of thousands of animals used in experiments, such as locking pigs in steam chambers; abandoning newborn lambs in pasture where they are subjected to severe weather and predators; failure to provide routine care, resulting in the death of at least 6,500 animals from starvation; among many other egregious activities
- The fact that our own government is funding research and development in order to turn profits for the factory farming industry

We appreciate Secretary Vilsack’s quick action to assemble a panel to investigate matters at USMARC and provide a report within 60 days. Unfortunately, however, the process undertaken for the review of the USMARC was far from satisfactory. A key failure was that the panel didn’t investigate specific allegations brought forth

by the *NY Times* or examine historical records, which we are certain would have uncovered a number of serious problems at the Center. Further, the inspection was pre-announced, which gave the Center an opportunity to address problems in advance and clean up their act for the three-day visit.

It is apparent from the report, however, that USDA's own policies regarding review and oversight of animal research protocols, training and standards weren't being followed and the panel identified some root problems, including

- A woefully inadequate Institutional Animal Care and Use Committee
- The lack of a formal training process and whistleblower policy
- Unclear lines of authority regarding animal welfare between USMARC and University of Nebraska-Lincoln

We express our support of the panel recommendations laid out in the March 9th report that pertain to these significant problems. We are pleased with Secretary Vilsack's decision to prohibit new research projects until the Institutional Animal Care and Use Committee's procedures and accountability are strengthened and in place.

While we believe this initial panel review has been inadequate in terms of truly addressing all of the problems at USMARC, we look forward to the Office of Inspector General audit that has been requested by Secretary Vilsack. We hope that it will be a thorough, forensic look into how appalling abuses were allowed to occur at the Center and provide recommendations that will bring these practices to an immediate end.

The Humane Society of the United States has urged USDA to take further action and we ask the NAREEE Advisory Board to advise the USDA to take this action as well: Apply the basic protections of the Animal Welfare Act to all animal research activities at USDA's own facilities. The USDA, which enforces the Animal Welfare Act at research institutions throughout the US, should be a leader in animal welfare oversight at its own facilities regardless of the types of animals used or the purpose of the research.

1. Require each USDA facility to submit an annual report of animal research activities, as research institutions are required to do under the Animal Welfare Act. This will add much-needed transparency at these taxpayer-funded facilities.
2. Appoint APHIS inspectors to ensure that all recommendations are properly implemented and followed into the future. APHIS should also carry out rigorous, unannounced inspections. It is clear that the USMARC has been functioning independently and that review by a party with qualifications regarding assessment of animal research standards and oversight is necessary to provide checks and balances.
3. Adopt a peer-review process in order to ascertain justification for research that is undertaken at the Center with taxpayer funding, in light of public demand for humane agricultural practices and a rejection of factory farming practices.

Secretary Vilsack should clearly identify for the public the process that the agency is taking to review and update its animal welfare policies, and associated timelines for agency actions.

Thank you again for the opportunity to comment and we do hope you will advise Secretary Vilsack to take further action, as we've requested.