

ANIMAL RESEARCH AT GEORGIA REGENTS UNIVERSITY
A HUMANE SOCIETY OF THE UNITED STATES
INVESTIGATION REPORT

Background

For 76 days in 2013, an HSUS undercover investigator worked as an animal caretaker for rodents, dogs, and primates in a laboratory at the Georgia Regents University (GRU).¹ GRU is required to comply with the Animal Welfare Act (7 U.S.C. §§ 2131 *et seq.*; 9 C.F.R. Parts 1-3) and, because the laboratory receives Public Health Service funding for animal research,² it must also comply with Public Health Service's Policy on Humane Care and Use of Laboratory Animals ("PHS Policy") and the corresponding standards in The Guide for the Care of Use of Laboratory Animals (*The Guide*). See 48 C.F.R. § 352.270-5. However, our investigation revealed substantial noncompliance with federal law and policy.

Findings

- Dogs used in unnecessary dental implant experiments were obtained from a random source Class B Dealer who has been under federal investigation for several years and who was recently charged by the USDA with multiple serious violations of the Animal Welfare Act.
- Inadequate veterinary care for all animals caused unnecessary suffering.
- A malnourished dog was used for experimental surgery and stopped breathing during the procedure, potentially due to the dog's nutritional deficiencies.
- Inadequate enrichment was provided for primates caged in isolation, who engaged in stereotypic and self-injurious behaviors.
- Staff was poorly trained and there was an inadequate number of staff to care for animals
- Dental experiments were conducted on dogs that may have been performed without proper approval.

GRU's Use of Dogs Obtained from a Random Source Class B Dealer

For two months, the HSUS investigator fed, watered, played with, and cleaned the cages of six large hound dogs being used in, and eventually killed for, dental implant experiments at GRU. Records obtained from the Minnesota Board of Animal Health reveal that all six dogs came from Kenneth Schroeder—a USDA-licensed Class B Dealer located in Wells, Minn. who has

¹ The investigator spent the majority of her time at GRU's Carl Sanders Research and Education Building, but she also did some work at GRU's Gracewood facility, an aging complex that houses all but five of GRU's primates. GRU was formed when the Medical College of Georgia, Georgia Health Sciences, and Augusta State University merged.

² GRU receives federal funding from the National Institutes of Health for drug abuse experiments on primates. See

http://projectreporter.nih.gov/project_info_description.cfm?aid=8233427&icde=15139451&ddparam=&dvalue=&ddsub=&cr=1&csb=default&cs=ASC

been charged by the agency for violations of the federal Animal Welfare Act (AWA), including for obtaining dogs from unauthorized sources. The six dogs who were killed at GRU could potentially have been former pets.

Random source Class B Dealers can obtain dogs from a variety of sources, including animal pounds or shelters, auction sales, or anyone who did not breed and raise the dogs on their own premises. Most shelters have policies against releasing homeless dogs and cats to Class B Dealers and some states have laws forbidding it, including Minnesota (where Schroeder is licensed). However, the three states bordering Minnesota—Iowa, South Dakota, and Wisconsin—allow pound seizure, meaning that lost pets can end up sold to labs for invasive and even lethal research.

Schroeder is known to frequent the Sportsman's Exchange flea market in Osage, Iowa, where dogs, goats, rabbits, fowl, and hunting equipment are sold and traded.

Public records show that GRU has been buying dogs from Schroeder for years – amounting to 186 dogs between 2005 and 2012.³ According to the American Anti-Vivisection Society, between 2004 and 2006 Schroeder sold a total of 1,484 animals, most of them for research.⁴

Dental Experiments on Dogs

In November 2012, the six hound dogs GRU bought from Kenneth Schroeder arrived at GRU's Gracewood facility. Just months before, in July 2012, the USDA cited GRU for failure to provide adequate temperature control in its dog kennels, noting that temperatures rose over 100 degrees in Augusta during July, as did the temperatures in the uncooled dog area.⁵

In March 2013, the dogs were transferred to GRU's Carl Sanders Research and Education Building, where the HSUS investigator worked. One of the dogs was malnourished and terrified of everything – particularly men. The HSUS investigator named the dog Shy Guy and developed a strong bond with him. GRU's veterinarian suggested that Shy Guy may have been abused before coming to the university, which could have contributed to the dog's anxiety.

Starting on March 22, 2013, Shy Guy and the five other dogs underwent surgery to have their teeth removed and dental implants inserted into their jaws. Shy Guy stopped breathing on the surgical table during the removal of his teeth, but survived. On May 21 and 23, 2013, Shy Guy and the other dogs were euthanized, the blood was drained from their bodies, and their jaws were sawed to take a bone sample.

³USDA Certificates of Health Examination (form 7001) and Minnesota Certificates of Veterinary Inspection

⁴<http://www.dyingtolearn.org/findOut.html>

⁵July 5, 2012, USDA Inspection Report

It appears that the dental experiments documented by the HSUS investigator may have been conducted without an approved protocol in place. While the investigator was not given access to research protocols, The HSUS submitted two state public records requests to GRU and received three dog research protocols in response. The first request asked for records pertaining to dental experiments involving dogs at GRU. GRU's response to this request revealed details of two old protocols, neither of which covered the dates of the experiments witnessed by the HSUS investigator after the dogs arrived on March 22, 2013. Indeed, GRU confirmed that the two dental research protocols provided to HSUS expired on March 18, 2013 and July 16, 2012.

The HSUS's second request to GRU asked for protocols corresponding to the specific dogs used in the dental experiments documented by the HSUS investigator (dog ID numbers 18287, 18278, 18304, 18322, 18299, and 18362—all received from Kenneth Schroeder in November 2012). GRU finally provided a heavily redacted research protocol specific to Shy Guy and the five other dogs, but that protocol does not seem to have been approved prior to March 22 (as the researcher did not even conduct a search for non-animal alternatives for the study until April 18, 2013—well after the dog experiments had already started).

One of the experimental protocols supplied by GRU includes a reference to the looming expiration of GRU's patent on a previously developed dental implant product and states that “competing technologies are being developed,”⁶ suggesting that the research was conducted to maintain a competitive advantage by developing a new product. However, there are already a number of FDA-approved dental implants on the market that have been used for decades by oral surgeons. Most implants are strictly for cosmetic purposes.

Non-human Primates at GRU

There are approximately 50 primates at GRU who appear to be singly caged simply for the lab's convenience, which is contrary to standards set by the Public Health Service's Policy and *The Guide* as well as Animal Welfare Act regulations, which emphasize the need for laboratories to provide social housing. Social housing is of utmost importance for primates; there is no substitute for the stimulation and reassurance provided by living in a primate social group.

⁶“Recombinant human Bone Morphogenetic Protein-2 (rhBMP-2), a bone growth stimulating protein, in an absorbable collagen sponge carrier (INFUSE[®] Bone Graft, Medtronic Inc., Memphis, TN, USA) has been approved by the Food and Drug Administration to support bone healing in patients including the jaw bone. We are part of the team that developed this commercially available treatment for bone formation around teeth and dental implants. As the rhBMP-2 patents soon expire competing technologies are being developed. This will considerably reduce the cost to patients. The objective of this study is to evaluate one such competing novel rhBMP-2 technology and compare with the established INFUSE[®] Bone Graft product.”

The Guide makes it clear that single housing of primates cannot be justified by financial considerations.⁷ However, during the HSUS investigation, the attending veterinarian told the HSUS investigator that if GRU had the right model of cages, the animals could be housed together to address their social needs.

The HSUS investigator was trained by a fellow employee to provide husbandry to the five primates at the Carl Sanders Research and Education Building. The primates' names are Peanut, Crosby, Cherry, Grape, and Ovechkin. These five primates all suffer from psychological distress, as evidenced by their behavior and appearance (including stereotypies like self-injurious behaviors and repetitious movements). GRU has failed to manage these animals' distress as required by *The Guide* and the Animal Welfare Act.

GRU staff who attend to the primates lack training and knowledge in primate behavior, which is required by the Animal Welfare Act. As an example, the HSUS investigator was incorrectly told by a coworker that repetitive movements such as head flipping by the monkeys are "happy dances." However, self injury was properly explained as being the result of boredom and frustration, indicating that staff knew the animals were suffering from deprived conditions.

A primate named Peanut repeatedly drank his own urine. The investigator was told by a veterinary technician that "nothing that monkey does is normal," indicating that staff knows the extent to which Peanut's psychological welfare is compromised.

Dozens of other primates at GRU's Gracewood facility are in the same conditions—both physically and psychologically – as the animals at GRU's Carl Sanders Research and Education Building. Primates held at Gracewood have extreme hair loss from self-injurious behavior—one of them, named Bonzo, is hairless. They engage in repetitive behaviors and are housed in social isolation.

Mice and rats at GRU

GRU also receives federal funding for research conducted on mice and rats, and thus must comply with *The Guide's* standards for mouse and rat use. During the HSUS investigation, our investigator found the following ubiquitous deficiencies in the care of mice and rats at GRU:

- Overcrowding that was not alleviated even when the overcrowding was officially documented
- Caretakers instructed not to document overcrowding on weekends

⁷ See OLAW, *Position Statement 1* (May 29, 2012), at http://grants.nih.gov/grants/olaw/positionstatement_guide.htm. See also NIH Notice No. NOT-OD-12-020.

- A failure to provide veterinary care or euthanasia for unrelieved barbering, severe wounds, prolapses, and other illnesses or injuries
- A lack of adequate staff to care for the number of mice and rats
- Filth in both macro- and micro-environments including mold in cages – particularly in the cages of mice who had been made diabetic; dust and mold on food; and filthy air intake valves in sealed enclosures

Conclusion

Animal care and use at GRU routinely fails to comply with federal law and policy and the laboratory has systemic management problems that undermine the welfare of the animals used at the research facility.