January 26, 2015

Mr. Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Vilsack,

Veterinarians are deeply passionate about and committed to the oath they take upon graduation from veterinary school. Our oath is clear about veterinarians’ responsibility to protect animal health and welfare and relieve animal suffering—including when animals are used in activities that support the advancement of scientific knowledge. Accordingly, the American Veterinary Medical Association, which counts more than 86,500 veterinarians among its membership, is deeply concerned about alleged instances of substandard animal care at the U.S. Meat Animal Research Center in Clay Center, Neb., as described in the Jan. 20, 2015, New York Times article “U.S. Research Lab Lets Livestock Suffer in Quest for Profit.”

We urge the USDA to launch a full investigation into conditions at the Clay Center facility and to take appropriate actions to ensure that the animals used for research at this—and other federally supported USDA research facilities—are treated humanely in accordance with best animal-care practices. We fully recognize that much of the research conducted at the Clay Center facility is subject to an exemption under the Animal Welfare Act (AWA) regarding farm animals intended for improving animal nutrition, breeding, management, production efficiency, or the quality of food or fiber. However, we believe that irrespective of its purpose, using animals in any type of research is a privilege carrying with it unique professional, scientific and ethical responsibilities.

In that regard, and consistent with AVMA policy on the Use of Animals in Research, Testing and Education, we have the following suggestions that we believe will assist in ensuring that animals are used responsibly not only at the Clay Center location, but in all USDA-supported facilities:

1. Proposals for research to be conducted in USDA-supported facilities should be thoroughly and independently reviewed. Specifically, such proposals should be in keeping with the principles of the 3Rs: replacement of animals with non-animal methods wherever feasible, reduction in the number of animals consistent with sound experimental design, and refinement of experimental methods to eliminate or reduce animal pain and distress. Establishing an oversight committee, with a composition and charge similar to the Institutional Animal Care and Use Committees currently required under the AWA for other types of research, could be an expedient way to accomplish this type of review.
(2) The number of veterinarians employed by USDA-supported facilities must be adequate to appropriately oversee the care of animals within those facilities, and those veterinarians must be provided with the necessary authority, support personnel, and resources (e.g., facilities, equipment, financial support) to ensure that animal use and care adheres to best practices.

(3) It should be made clear to all facility (and agency) personnel, irrespective of their position within the organization, that providing quality animal care is a priority and that actions not consistent with that will not be tolerated. Expectations for humane care should be regularly reviewed and a system put in place to assure accountability.

(4) Processes should be in place to ensure that procedures to be conducted on animals are appropriate and only performed by those who have been well trained and whose competence has been assured. Similarly, those caring for animals used in facility research must be well trained and competent.

(5) To expediently address concerns raised in the New York Times article, the Clay Center research facility should immediately request voluntary inspection by the Animal Care unit of the USDA’s Animal and Plant Health Inspection Service. Such voluntary oversight has previously been used effectively to address concerns associated with the National Zoo and Veterans Administration research projects.

We appreciate your leadership in ensuring that those who use animals in research fully meet their professional obligations and responsibilities. Please do not hesitate to contact us with questions or to further discuss our recommendations.

Sincerely,

Ted Cohn, DVM
President
American Veterinary Medical Association