



Citizens for Alternatives to Animals Research & Experimentation

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July 17, 2025

S. Jack Hu
Senior Vice President for Academic Affairs and Provost
University of Georgia
100 Green Street
Athens, GA 30602
Via email to: provost@uga.edu

Dear Provost Hu:

We are writing on behalf of Citizens for Alternatives to Animal Research and Experimentation (CAARE), a national nonprofit organization dedicated to promoting research without using animals. This letter expresses the opinion of our board, staff, consultants, and thousands of supporters.

We were deeply disturbed to learn about ongoing mistreatment and neglect of animals used in research at the University of Georgia (UGA). These have resulted in 17 violations of the federal Animal Welfare Act (AWA) in the last three years alone.

Consider UGA's track record of animal welfare violations

- UGA was fined \$12,000 by the U.S. Department of Agriculture (USDA) in January 2024 for numerous, serious violations of the AWA involving multiple species and spanning years.
- UGA has had 28 violations since 2014 – including 10 “critical” violations, the USDA’s most serious designation.
- Between 2021 and 2024, UGA research on animals has resulted in AWA violations at every single inspection– 59 percent of which were deemed “critical.”
- A USDA inspection report from July 2024 noted multiple violations involving negligent care of macaques resulting in undesirable contact between animals due to personnel error. These encounters resulted in bites, finger amputations and wounds requiring surgical repair. Of note is one instance where an animal sustained a 2-centimeter-long laceration requiring medical attention that went unnoticed for a day.

- This same inspection revealed a failure in the automated lighting system that subjected macaques to 24 hours of light, without periods of darkness to maintain a normal light cycle. This error impacted 7 rooms containing macaques and occurred over a seven-month period. Of great concern is that fact that UGA animal care staff failed to notice this error over that long of a period and it took a USDA inspector to reveal and correct the problem.
- According to federal records, a significant number of UGA's violations stem from a glaring lack of acceptable animal care practices, including (but not limited to) two rabbits who died from incorrect catheter placement, the death of a ferret from poor anesthesia techniques, an emaciated deer likely suffering from pneumonia who died from timely lack of veterinary intervention, one dog suffering burns as a result of experimental error, and two hamsters who died from an inappropriate blood collection procedure that was not approved by the institutional animal care committee.

The experiment concerning the above-referenced dog involved passing potentially harmful electrical currents through anesthetized dogs' limbs – including one who suffered third degree burns, reportedly due to preventable error. Several other dogs also suffered lesser burns because of this study, even when “appropriately” conducted, according to UGA's own personnel, as revealed via public documents obtained by CAARE.

These examples clearly demonstrate a continued pattern of lack of care for animals used in biomedical research over several years, something that should concern an institute of higher learning such as UGA.

The use of live animals in research carries with it a grave responsibility that UGA is clearly failing to uphold. This is in part because such a duty comes with many challenges: Live animals have a great many complex needs, especially those living in confinement. This population of animals undergoes stresses related to confinement (social deprivation, lack of adequate exercise, anxiety), in addition to distress from the injuries and illnesses inflicted by the experiments.

The necessity to phase-out dependence on animal research

Animal research is inherently inhumane, which is why there have been foundational efforts to reduce it going back decades. In 1959 William Russell and Rex Burch, introduced their seminal work: *Principles of Humane Experimental Techniques*, which presented the “3 Rs” of Replacement, Reduction, and Refinement, designed to minimize the use of animals in research.

UGA states on its website that it has a commitment ¹ to reducing and minimizing the use of animals in research and education in accordance with the 3 Rs. However, this commitment needs to be more than just words on a website. UGA must implement a designated plan to reduce the number of animals used in its research. Otherwise, such a commitment is without substance.

Such an effort by UGA would be timely and in accordance with recent governmental initiatives to phase out animals. Never before has there been so much momentum or acknowledgment of the need for this shift. In April, the U.S. Food and Drug Administration (FDA) announced a bold

plan to phase out animal experiments in favor of “more effective, human-relevant methods” over the next three to five years. FDA’s plan will initially focus on replacing animals in safety tests for monoclonal antibody therapies – aiming over time to expand the effort to “make animal studies the exception rather than the norm for preclinical safety and toxicity testing.”²

Shortly following the FDA announcement, the U.S. National Institutes of Health (NIH) revealed a new initiative³ to reduce reliance on animal experiments while expanding human-based research. As part of NIH’s initiative, the agency will launch the Office of Research Innovation, Validation, and Application (ORIVA) to promote the development, validation and use of non-animal research methods, while also expanding funding, training, and infrastructure for non-animal research.

Just last week, on July 7, NIH took its first significant step in this direction by announcing it will no longer fund experiments for animal-only protocols, and that all grant submissions must now include non-animal methods for consideration.⁴

Putting 3Rs principles into action: A goal for universities

A recent academic forum (and corresponding report)⁵ from a collaboration of universities addressed the concern that efforts to adhere to the Three Rs principles – without a clearly detailed and enforceable commitment to fulfillment – is not enough to reduce the number of animals used. The study, “Accelerating Animal Replacement: How Universities Can Lead,” emphasized the need to shift the “entrenched norm” of using animals by focusing on replacement with non-animal methods. The report highlights that universities are uniquely positioned to lead the way in this transition, being one of the key users of animals in research.

The authors outlined specific steps that universities could take to facilitate such a change, without having to wait for legislative or other reforms through such measures as “adopting strategy plans, redirecting curricula, shifting faculty research values, and establishing transition units to successfully coordinate a bold re-direction.” We encourage UGA to examine the full report as a model for steps the university can take to reduce animal use.

The report also pointed out that universities have a heightened responsibility to usher in innovative, non-animal methods, given that they are “well positioned and socially entrusted to lead in terms of safe science innovation, social change, and ethical actions.”

Moving forward

UGA scientists have already proven themselves capable of conducting modern, scientifically superior experiments using non-animal methods. CAARE applauds the work of Drs. Jonathan P. Mochel and Karin Allenspach-Jorn for their groundbreaking work using canine bladder cancer organoids⁶ in place of carrying out experiments on dogs or other animals.

Additionally, CAARE believes that UGA’s dog anesthesia experiment could instead have been conducted as a clinical trial using dogs already undergoing anesthesia at UGA’s veterinary clinic,

rather than purchasing dogs from suppliers and supporting the pipeline of dogs forced to spend their lives in the confinement of a laboratory.

For example, researchers at the Tufts University Cummings School of Veterinary Medicine assessed dogs undergoing general anesthesia for gastroesophageal reflux and regurgitation after premedication in a randomized, blinded, and controlled clinical trial ⁷.

In another example, an international collaboration of veterinary researchers studied the effects of labetalol in anaesthetized dogs that received dexmedetomidine – also via a randomized clinical trial on a group of 20 healthy client-owned dogs undergoing routine surgery.⁸

By replacing confined animals from contract labs with a clinical trial that utilizes family dogs, UGA would avoid the issues inherent with animals in captivity that lead to animal mistreatment: social isolation, lifetime confinement, curiosity-driven experiments and more animals on-site that can reasonably be cared for by a limited staff.

Animal experimentation can never be fully humane. And now key U.S. government agencies regulating biomedical research have clearly acknowledged that medical advances will benefit from phasing out animal experiments. It is imperative that UGA take seriously the need to vastly reduce animals by developing a clear plan to replace animals in its research programs.

CAARE and our supporters would like to see UGA implement a dedicated plan to track and dramatically reduce the number of animals used in research. Only in this manner can UGA avoid animal mistreatment while delivering the best science.

We appreciate your attention to this letter and trust that you will give it your utmost consideration.

Sincerely,
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¹ *Alternatives to the use of animals in research and instruction – Animal Care & Use.* (n.d.). <https://research.uga.edu/oacu/alternatives/>

² Office of the Commissioner. (2025, April 10). FDA announces plan to phase out animal testing requirement for monoclonal antibodies and other drugs. U.S. Food And Drug Administration. <https://www.fda.gov/news-events/press-announcements/fda-announces-plan-phase-out-animal-testing-requirement-monoclonal-antibodies-and-other-drugs>. <https://www.fda.gov/news-events/press-announcements/fda-announces-plan-phase-out-animal-testing-requirement-monoclonal-antibodies-and-other-drugs>

³ “NIH to Prioritize Human-Based Research Technologies.” *National Institutes of Health*, U.S. Department of Health and Human Services, 4 June 2025, www.nih.gov/nih-prioritize-human-based-research-technologies.

⁴ “NIH announces end to funding for animal-only studies,” *Drug Discovery & Development*, 7 July 2025, <https://www.drugdiscoverytrends.com/nih-announces-end-to-funding-for-animal-only-studies/>

⁵ Deckha M, Michel M, Azilagbetor D, et al. Accelerating Animal Replacement: How Universities Can Lead — Results of a One-Day Expert Workshop in Zurich, Switzerland. *Alternatives to Laboratory Animals*. 2025;53(2):106-118. doi:10.1177/02611929251317434. <https://journals.sagepub.com/doi/full/10.1177/02611929251317434>

⁶ Quisenberry, S., Allenspach-Jorn, K., Mochel, J., Nolan, L. K., & Carter, A. H. (2024). University of Georgia College of Veterinary Medicine’s Precision One Health Initiative improves animal and human health by developing alternative models of disease. *American Journal of Veterinary Research*, 1. <https://doi.org/10.2460/ajvr.24.07.0212>. <https://avmajournals.avma.org/view/journals/ajvr/85/10/ajvr.24.07.0212.xml>

⁷ Costa RS, Wetmore LA, Stein A. Randomized, blinded, controlled clinical trial to assess gastroesophageal reflux and regurgitation in dogs undergoing general anesthesia after hydromorphone premedication with or without acepromazine or dexmedetomidine. *Am J Vet Res*. 2021 Sep;82(9):695-700. doi: 10.2460/ajvr.82.9.695. PMID: 34432514. <https://pubmed.ncbi.nlm.nih.gov/34432514/>

⁸ Sáñez I, Martín-Flores M, Portela DA, Márquez-Grados F, Monge-García MI. Haemodynamic effects of labetalol in isoflurane-anaesthetized dogs that received dexmedetomidine: A randomized clinical trial. *Vet Anaesth Analg*. 2024 Mar-Apr;51(2):126-134. doi: 10.1016/j.vaa.2023.10.031. Epub 2023 Oct 23. PMID: 38114389. <https://pubmed.ncbi.nlm.nih.gov/38114389/>