



Citizens for Alternatives to Animals Research & Experimentation

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[www.caareusa.org](http://www.caareusa.org)

October 21, 2015

Phyllis K. Fong  
Inspector General  
U.S. Department of Agriculture  
Via email: [phyllis.k.fong@usda.gov](mailto:phyllis.k.fong@usda.gov).

Dear Inspector General Fong:

Thank you for releasing the interim report on the U.S. Meat Animal Research Center in Clay Center, Nebraska, as well as for conducting the investigation into USMARC. As you are aware, the reports of animal mistreatment at this facility have alarmed many Americans, and rightly so.

I am writing on behalf of Citizens for Alternatives to Animal Research & Experimentation (CAARE), a national non-profit which advocates for replacing animals used in research with non-animal alternatives. We also work to oppose inhumane research practices on animals.

Of concern in the interim report are the many practices at USMARC that were affirmed as accurate, but were explained as being “industry norms.” Quite a few practices fall into this category, including hundreds of piglet deaths due to accidental maternal crushing, (a result of high birth numbers), cows dying from exposure to the elements, and the “pasture lamb” research, among others.

Labeling an inhumane practice as an “industry norm” does not mean that the practice is not cruel and should continue unquestioned. We expect that the OIG will use this investigation as a starting point to address what appears to be the widespread mistreatment of animals under the Agricultural Research Service.

Regarding the pasture lambing project, the OIG interim report states:

We have reviewed USMARC documentation and performed extensive research into the sheep industry. We have found that pasture lambing is a common management practice in the United States that has been utilized by producers for a number of years. Additionally, researchers outside of USMARC have studied pasture lambing prior to the commencement of the research at USMARC.

While it may be the case that pasture lambing is not unique to USMARC, this does not justify the abject neglect of vulnerable newborn animals resulting in their deaths. As confirmed in your report, the OIG noted that 25 lambs died over a two-day period from starvation and predation. (Statement #4). The full investigation into another 110 deaths due to exposure during a hailstorm is still pending. (#13)

The New York Times reported in its January article that a Cornell professor of animal science, Michael L. Thonney, described how oversight at his university would not have allowed staff to “ignore vulnerable lambs” in their pasture lamb research. Under the Cornell protocol, any lamb that appeared to be abandoned was rescued and given necessary aid. Professor Thonney condemned the pasture lamb project at USMARC, telling the Times, “There is no reason to allow animals to have that kind of suffering.”

We agree and hope that the OIG will take the necessary steps to ensure that this does not continue.

The OIG report confirmed that more than 245 animals died from abscesses since 1985 and that 6,500 animals have starved in that same time period. These areas also need additional investigation to ensure that such inexcusable suffering is not allowed to continue.

The OIG interim report was structured around the review of 33 statements from the New York Times article of January 19, 2015. CAARE is concerned that a large number of disturbing practices detailed in the Times report were not addressed by these 33 statements. These include:

- Modifying sows to have so little body fat that one in five females cannot reproduce
- Pigs locked in steam chambers to test their appetites at various temperatures, including six deaths due to equipment failures.
- The death of eight cows in a similar trial of appetite and heat tolerance
- Ovaries removed from pigs to test the importance of the uterus in fertility
- “Gently crushing” piglets in utero to make room for more piglets

We hope that these serious allegations will also be addressed in the final OIG report, in addition to the topics reported as having “no observations at this time” which include:

- #3 - Cows retooled to have twins and triplets, which are deformed, weakened and die in large numbers.
- #10 – Mastitis killing more than 625 animals
- #15 – Experimental surgeries performed by untrained, unskilled and unsupervised staff.
- #12, 13 – Additional allegations about extreme neglect in pasture lamb research

We appreciate the work done by the OIG to investigate this serious matter. To reiterate, we hope that the mistreatment of animals at US MARC or any ARS facility will not be rationalized as “industry norms.” Accordingly, we ask that a wider investigation be conducted of animal care at all 40 ARS facilities.

Thank you for your work to address these issues.

Sincerely,



Barbara Stagno, President  
Citizens for Alternatives to Animal Research  
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CC: Tom Vilsack, Secretary of Agriculture [agsec@usda.gov](mailto:agsec@usda.gov).