

August 9, 2013

Dr. Robert Gibbens, DVM
Director, Western Region
USDA/APHIS/AC
2150 Center Ave.
Building B, Mailstop 3W11
Fort Collins, CO 80256-8117
Via e-mail: acwest@aphis.usda.gov

Dear Dr. Gibbens:

On behalf of In Defense of Animals, I request that the Animal Plant and Health Inspection Service immediately investigate the University of California, Davis, (UCD) whose registration certificate number is 93-R-0433, for failure to follow appropriate protocols pertaining to animals undergoing lengthy procedures under general anesthesia.

Our concern relates to information contained in a routine USDA APHIS Inspection Report of the facility, dated June 5, 2013, which revealed multiple, serious shortcomings relating to the monitoring of 23 animals (species not identified) undergoing lengthy invasive procedures requiring general anesthesia.

The June 5 report describes failings by the facility to adequately monitor 23 juvenile animals undergoing lengthy procedures intended to last up to 36 hours. These deficiencies occurred in violation of the facility's own protocol, as approved by the IACUC, and undoubtedly placed animals' welfare in danger. Further, animals experienced unnecessary pain and distress by the facility's failure to provide adequate monitoring.

Failure to monitor heart rate

UCD failed to follow its own protocol in either monitoring or increasing anesthesia in response to the animals' heart rate during anesthesia.

- Despite a protocol that defines an increase in heart rate as indicative of inadequate level of anesthesia, none of the 23 animal care records had obtained a baseline heart rate to work from.
- One animal, undergoing a 27 hour procedure, went nine consecutive hours without any heart monitoring.
- Another animal experienced an elevated heart rate for five hours, with no intervention.

Failure to monitor vital respiratory parameters

- Oxygen saturation, a critical indication of cellular oxygen perfusion, was not monitored adequately or monitored at all in 14 of 23 animals.
- According to UCD's protocol, elevated CO2 is considered an indication of inadequate anesthesia. Six animals experienced elevated levels of CO2 "for significant periods" (according to the USDA report) with no increase in anesthesia.
- One animal went four hours without any monitoring of CO2 level.

Failure to provide adequate nutritional needs during procedures

According to the UCD protocol, animals were supposed to receive intravenous dextrose to supply caloric needs, yet 14 of the animals received no dextrose in their IV fluids. Effectively, in addition to the stress of undergoing the lengthy procedure, these animals were starved as well, of particular significance in young animals.

Failure to monitor and maintain adequate body temperature

Despite UCD's protocol stating that an animals' body temperature should be maintained between 36° and 37° C (96.8° – 98.6°F), one animal was left at a body temperature of 30.7 °C (87.3° F) for over five hours. Severe hypothermia is considered to occur at below 95°F.

All of these citations, which are detailed on the June 5 report, are indicative of inexcusably careless practices and inadequate veterinary care. All of these omissions, which occurred in violation of UCD's own protocol, are indicative of egregious failings of the most basic veterinary monitoring.

Accordingly, IDA requests that APHIS investigate this matter to determine whether to impose appropriate enforcement actions or fines on this facility which has displayed a grave disregard for following adequate procedures for the appropriate monitoring of animals. These serious failings demonstrate a lack of the most basic veterinary protocols for sound monitoring of live animals under anesthesia.

Thank you for your attention to this matter.

Sincerely,
Barbara Stagno, R.N.

Barbara Stagno
Program Director,
Responsible Research Campaign
In Defense of Animals
T: 914.479.5276
F: 914.231.6602
barbara@idausa.org
www.idausa.org



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