

# Nothing to Hide?

**Animal welfare violations  
University of California Los Angeles  
August 2010 – December 2012**

**Progress for Science**

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Animal welfare violations: University of California, Los Angeles 2010 - 2012

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University of California, Los Angeles laboratories,  
August 2010 – December 2012**

**Progress for Science**

**Los Angeles, CA  
August 2013**

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## INTRODUCTION

This report details publicly accessible information regarding animal welfare violations committed by the University of California, Los Angeles (UCLA) between August 2010 and December 2012. According to citation details provided by the Animal Plant and Health Inspection Service (APHIS), an agency of the United States Department of Agriculture (USDA), UCLA routinely disregards the most basic guidelines of animal care.

### WELFARE FOR ANIMALS: FOR WHICH ONES AND TO WHAT EXTENT?

Experiments on nonhuman animals in an attempt to understand human health are problematic. In the words of Dr. Ray Greek, “vivisection is currently sold to society based on the falsehood that animal experimentation can predict human response to drugs and disease” ([Greek 2013](#)). Setting aside the issue of whether vivisection—experiments on live animals—is predictive, necessary, productive or a responsible use of money available for research, the well being of the animals is a critical factor to take into account. There are minimal oversight mechanisms in place both at the federal and, in the case of universities, at the institutional level, but these guidelines are not effective in guaranteeing animals even a modicum of care and relief from pain and suffering if they are not followed. UCLA’s track record confirms these misgivings.

The medical and scientific research programs at the University of California, Los Angeles are richly endowed. UCLA annually receives a tremendous amount of money in the form of private and tax-funded public grants for research purposes (see Figure 1). In 2011, UCLA was ranked 10th among all US institutions in the amount of money received from the government-funded (i.e. tax-payer funded) National Institutes of Health (NIH) alone ([OVCR 2012](#)). Approximately a fourth of all grant money going to UCLA, amounting to a minimum of \$200 million, is used for studies involving animals ([ORA 2013](#)).

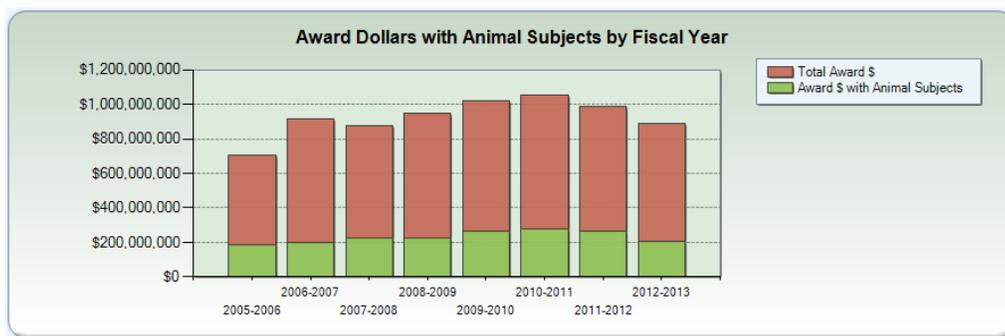


Figure 1: UCLA Research Grant Funding, from UCLA Office of Research Administration (ORA 2013)

The only legislation that claims to offer minimal protection to animals used in experiments is the [Animal Welfare Act](#) (AWA), which is enforced by the USDA. The AWA does not extend any protection to birds, fish, mice, and rats despite the fact that these animals make up over 95% of all animals used for research purposes, according to [Speaking of Research](#), a pro-animal experiment group (see Figure 2). With the basic welfare of only 5% of the animals who are used in experiments taken into account, it is imperative that those who experiment on animals meet, at minimum, the one federal law in the US that regulates the treatment of animals used in experiments.

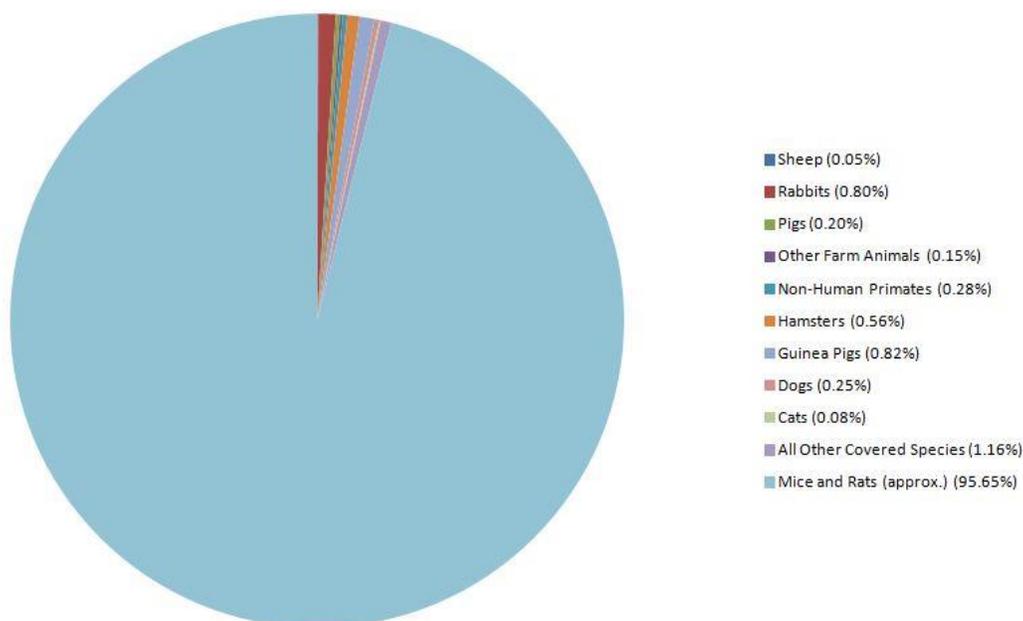


Figure 2: US Statistics of Animals Used in Laboratories, from Speaking of Research (SOR 2008)

### UCLA VIOLATES THE ANIMAL WELFARE ACT

UCLA is home to a number of highly paid professors; it is also where tens of thousands of animals are caged and experimented on each year. The University has admitted to using 150,000 animals ([Wilson 2011](#)) in experiments in a single year; these animals include bats, bobcats, cats, chinchillas, dogs, marmots, mule deer, nonhuman primates, pigs, rabbits, reptiles, sugar gliders, sheep, and zebras as well as the birds, fish, mice, and rats not covered by the AWA (USDA 2012). UCLA is required by the federal government to provide basic welfare, such as sanitary housing, adequate food, and clean water to only about 5% of these animals. Though the welfare standards that they are asked to meet are minimal and cover only the most widely loved animals, such as cats, dogs, and monkeys, UCLA has been cited regularly over the past three years with animal welfare violations.

### Types of AWA Violations

There are two types of violations of the AWA, known as noncompliance incident (NCI) violations—direct and indirect. UCLA has been cited with both types of violations on numerous occasions in the years under review—[2010-2012](#).

**Direct NCI Identified Violation:** A direct noncompliance is a breach that is currently posing a threat to the wellbeing of animals, or has the high potential of causing harm to animals in the near future. Examples provided by APHIS include instances of severe illness or injury, debilitated animals with no care provided, and severe infestation of parasites.

In 2010 alone, UCLA was cited for two accounts of direct violations.

**Indirect NCI Identified Violation:** An indirect noncompliance is a breach that poses a threat to the wellbeing of animals; that threat has the potential to be major but is not immediately imminent. Examples provided by APHIS include a lack of veterinary care for non life-threatening conditions.

UCLA was cited for four accounts of indirect violations in 2010 (USDA 2010) and two accounts in 2012 (USDA 2012). Below, each violation committed by UCLA is listed, the text of the law violated is provided, details on how UCLA violated that law for each citation are outlined, and an explanation of what those violations mean is provided.

### **August 2010- December 2012: EIGHT AWA VIOLATIONS**

#### **2010: Two Direct Violations**

##### **2.33(a)(2): Attending Veterinarian and Adequate Veterinary Care**

All animal experiment facilities must have an attending veterinarian who has the authority to provide and ensure proper veterinary care and other aspects of care. (See Appendix A for full regulation text).

*Why was UCLA cited for this?*

- The covered-species animal surgery area was under the control and supervision of the Department of Surgery rather than the Department of Laboratory Animal Medicine (DLAM) veterinarians as stipulated by APHIS.
- None of the three surgical technicians available to assist with surgeries and related care were qualified veterinarians.
- Despite the fact that the Institutional Animal Use and Care Committee (IACUC) has established a communication procedure between the Department of Surgery and the DLAM, laboratory veterinarians were routinely not notified before surgeries took place nor even when complications occurred.

The only persons who are qualified to understand, address, and treat the animals' medical issues are not addressing the animals' most basic welfare. Furthermore, those who are working directly with animals, even during invasive procedures like surgery, lack the minimal amount of expertise and training required by federal law.

##### **2.33(b): Attending Veterinarian and Adequate Veterinary Care**

Each animal experiment facility must establish, maintain, and make available veterinary care that includes appropriate services, facilities, equipment and personnel. Daily observations must be made and emergency, weekend, and holiday care must be provided to ensure that all diseases and injuries are prevented, diagnosed, and treated as need be. Direct and frequent communication with attending veterinarians pertaining to animal wellbeing must take place. Adequate pre- and post-procedural care to the animals must be given. Guidance from veterinarians to all personnel involved with anesthesia, euthanasia,

handling, immobilization, tranquilization and administering painkillers must be provided. (See Appendix B for full regulation text)

*Why was UCLA cited for this?*

- The Emergency Primate Surgery (EPS) room was not at all surgery-ready during the time of inspection—the surgical table was missing, paint directly above the designated surgery area was peeling off the ceiling, the endoscopy machine and cart were covered in dust, and the transport cart was cluttered with supplies. The manager of the Department of Surgery confirmed that the EPS room was converted into a storage space, although the room is a negative pressure room and is necessary for safely operating on macaque monkeys to prevent the spread of viruses to other areas of the laboratory.
- During a monkey emergency the EPS room was still not surgery-ready. Thus, the operation was done in a positive pressure room, which is not designed to prevent the spread of infectious contaminants beyond its confines. In addition, the veterinarian had to use her/his own surgical equipment, as some of the facility's equipment could not be accessed. Equipment was also found not to be in working order—for example, holes were found in the respirator bag.
- The rodent surgery room was not at all surgery ready during the time of inspection—paint was found peeling off of a vent directly above the surgical table, there was standing water in the sink, equipment was covered in dust, a refrigerator and freezer showed a heavy accumulation of mold and mildew, and expired bottles of chemicals were found. The rodent surgery room is a negative pressure room and therefore draws air out of the adjacent storage room, which was in filthy condition.
- The surgical procedure table and surrounding equipment inside the USDA-covered rodent study area showed an accumulation of dust. In addition, an unlabeled syringe filled with an unknown substance was found on the dust-covered procedure table. The floor was also covered in dirt and debris.

The university and its laboratory staff did not exhibit even minimal concern for the animals and the environments in which they are operated on. Daily and emergency protocols were ignored. Proper care procedures for animals both before and after surgery were ignored. The condition of the labs was such that they posed a severe and direct threat to human and animal health. Operating on monkeys outside of a negative pressure room circumvents the necessary precautions that prevent the spread of diseases—putting the health and safety of humans and other animals in the laboratories at risk of zoonosis— infectious diseases transmitted between species. Further, the condition of the equipment, the lack of equipment, and the hygiene standards in the labs pose a severe risk for the animals being operated on—exposing them to unsterile conditions and risking complications during surgery that might prolong their suffering or lead to their death.

**2010-2012: Four Indirect Violations**

**2010 2.31(c)(2): Institutional Animal Care and Use Committee (IACUC)**

University research facilities are required to be inspected once every six months by the University's federally mandated oversight committee, the Institutional Animal Care and Use Committee (IACUC). (See Appendix C for full regulation text).

*Why was UCLA cited for this?*

- The Emergency Primate Surgery (EPS) room—a designated, negative pressure surgical room—was not inspected due to the fact that it was converted into a storage room.

All surgical areas and other animal-study facilities must be inspected. A failure to do so for any reason poses a threat to the health and overall welfare of the animals. The pattern of citations reveals that, because this surgery room was converted into a storage room, surgeries on nonhuman primates were being conducted in inappropriate facilities that were not equipped to adequately protect against the spread of disease—putting the health of humans working in the building in danger, as well as conducting surgeries in settings that violate minimal federal animal welfare requirements.

**2010 2.31(d)(1)(ix): Institutional Animal Care and Use Committee (IACUC)**

All surgical procedures must be approved by the IACUC and adhere to standard surgical and veterinary practices with regard to clean and sterile environments and equipment. The IACUC shall also approve all proposed or significant changes in ongoing activities. For instance, major surgeries on non-rodents should only take place in spaces designated for that purpose. These spaces must be maintained in proper sterile conditions. (See Appendix D for full regulation text).

*Why was UCLA cited for this?*

- Dissections are being conducted on animal cadavers in rooms that are designated for live animal surgeries.

Following sanitation procedures is the most rudimentary principal in performing surgery, and to not do so poses the threat of contaminating surgical areas and infecting the live animals undergoing operations. Dissecting dead bodies in rooms designated for live animals is shockingly unprofessional behavior in any operating room.

**2010 2.32: Personnel Qualifications**

The experiment facility must provide proper training and ensure that all laboratory personnel involved in animal care, use, and treatment are qualified to carry out their tasks. Qualifications of animal-handling personnel must be reviewed frequently. Instruction must include humane methods of animal experimentation and care which shall include: 1) species-specific needs 2) proper handling and care for each species 3) proper post/pre-op care 4) aseptic procedures and methods.

Training and instruction must also include information on alternatives to animal models as a means of preventing needless animal experimentation, along with the proper use of pain relievers, anesthetics, and tranquilizers. (See Appendix E for full regulation text)

*Why was UCLA cited for this?*

- An EPS room had been turned into a storage area, so nonhuman primate surgeries were being performed in either the negative pressure rodent room or even in a positive pressure room.
- The director of Surgical Services did not know which surgery rooms were positive, which were negative.
- During the inspection, no written records verifying that the Department of Surgery surgical staff technicians were trained and qualified to conduct species-specific procedures were available.
- The Director of Surgical Services did not know if species-specific courses had been completed or were even available.
- Investigators who conduct experiments were not aware that the veterinary staff, as well as the surgical staff, must be consulted before performing procedures.
- In addition to the above: a) experiment personnel were not aware that APHIS investigators are allowed access to their facilities, b) unscheduled surgeries and surgical complications took place and were not reported to proper authorities, c) surgeries had taken place without the IACUC's verification that the procedures had been approved, d) the veterinary staff was routinely not notified when surgical complications took place.

The distinction between positive and negative pressure rooms is vital. Negative pressure rooms do not allow the spread of viruses beyond the confines of the room and so it is mandated that nonhuman primate surgeries take place in such rooms, while positive pressure rooms do not have this inherent safeguard.

2010 **2.38(b)(1)(iv): Miscellaneous**

All animal experiment laboratories must allow APHIS officials to inspect their facilities and the animals. (See Appendix F for full regulation text)

*Why was UCLA cited for this?*

- USDA inspectors were denied entrance to a room to inspect animal welfare while a surgery was taking place, citing “intellectual property issues.”
- Entry to a USDA-covered rodent species study area was initially physically blocked by laboratory personnel, who claimed that surgeries on species other than rodents were not being performed. The inspector then found a restraining device designed for a non-rodent species covered under the AWA. It was then confirmed that surgeries on non-rodents were indeed taking place in the rodent species study area. As stated in the citation report against UCLA, it is also a violation of the AWA to intentionally lie to the USDA.

UCLA has been cited for not even allowing APHIS officials to walk through their doors. Every aspect of the AWA is thus rendered null if UCLA bars access to inspectors. This opens the possibility of there being countless more violations that UCLA is committing. “Intellectual property” should not come above the welfare of animals. Professors are given access to tax-payer dollars for these experiments because they agree to uphold minimal welfare standards. Refusing to adhere to animal welfare laws on such a basic level as to not even allow inspectors, who typically conduct inspections only once per year, to check on the welfare of animals is abhorrent and indicates a total lack of respect for the animals they experiment on as well as the public who is, via their taxes, paying for these experiments to occur. It is a violation of federal law to refuse to allow APHIS to inspect animal experimentation facilities. The choice to violate this federal law over allowing the inspector to view the animals suggests that worse violations of the animal welfare law are occurring and that professors at UCLA are actively trying to keep these hidden.

2012 **2.31(c)(7): Institutional Animal Care and Use Committee (IACUC)**

IACUC, as an agent of the laboratory facility, must be consulted and must approve or withhold approval of all significant changes to the treatment and use of animals in ongoing activities. (See Appendix G for full regulation text).

*Why was UCLA cited for this?*

- Records associated with two AWA-covered species indicated that the animals were being left anesthetized for a longer time period than mandated in approved guidelines. IACUC, the committee designated to approve of procedural changes, was not consulted of this change in protocol.

Veterinarians, as people who should be concerned with animal welfare, jeopardized the safety of the anesthetized animals by not getting clearance from the IACUC. The IACUC must approve of proposed changes in laboratory procedures before the changes go into effect. The IACUC also failed by having minimal oversight and by not noticing this breach of protocol.

2012 **3.50(c): Facilities, general**

Storage areas containing animal food and bedding should be kept clean and free of infestation and contamination. (See Appendix H for full regulation text)

*Why was UCLA cited for this?*

- Adult cockroaches were found in the food storage room and in an adjacent hallway.

Failure to adequately control contamination of the animals’ food supplies places them at greater risk than they already are. The fact that the cockroaches were also present outside of the room in which food was kept indicates a degree of infestation that suggests UCLA staff are not regularly monitoring the animals, their living conditions, or maintaining proper hygiene.

### UNDER THE GUISE: MORE ABUSE?

There have likely been more instances of AWA violations occurring in UCLA laboratories during the 17-month period this report covers. Any citation given to the university can be contested and during the process of review it is removed from the APHIS public database pending confirmation. Since violations only remain listed for three years, depending on how long this appeal process lasts, confirmed violations may only appear for a short time or even, in some cases, never appear at all. Therefore, the number of instances of abuse to AWA-covered animals that actually occurred is not publicly available. And of course the frequency and severity of abuse inflicted on all the animals not covered is impossible to know.

### UCLA FAILS THE THREE R'S

In an attempt to minimize the suffering and deaths of animals at the hands of vivisectioners, W.M.S. Russell and R.L. Burch formulated the Three R's in 1959 as guiding principles for the use of animals in experiments. These guidelines seek to:

**Replace** animals in research by developing alternative techniques.

**Reduce** the number of animals used in research and extract as much information as possible from that research.

**Refine** experiments and environmental conditions so that animals suffer as little as possible.

UCLA claims to place value on the Three R's initiative (see [SOR.nd](#)) but according to USDA usage reports from 2010-2012 the numbers of recorded animals used has been increasing. (See Appendix I for full usage report text) This means that instead of *reducing* or even maintaining the number of animals used for experiments, UCLA is increasing the number of animals it uses. This diminishes the University's ability to invest more time and resources in developing and focusing on more effective research techniques, which therefore prolongs the time it takes to *replace* the animals used in experiments and *refine* the experiments themselves.

Although UCLA is known for its research, many are unfamiliar with what that actually entails. Among other studies, professors at UCLA conduct addiction experiments that involve subjecting monkeys and other animals to unnaturally high quantities of methamphetamine, PCP, tobacco and other harmful drugs. After each of these studies come to an end, the addicted animals are often killed and people who would have willingly participated in clinical trials as a part of addiction recovery programs are left untreated.

### THE BARE FACTS: UCLA FAILS TO MEET THE BARE MINIMUM OF CARE

UCLA is required by the AWA to meet just the bare minimum of care for the animals it covers and even this is something they have repeatedly failed to uphold. If UCLA mistreats the few species covered by the AWA, how then are the remaining 95% of animals who are unregulated treated? Unfortunately, there is no way of knowing.

## Nothing to Hide?

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### Animal welfare violations: University of California, Los Angeles 2010 - 2012

Animal welfare citations issued to UCLA by the federal government reveal that animals at UCLA have been deprived of proper veterinary care, and in some cases were not even looked in upon once a day. This information is incredibly telling of the lack of regard for the animals along with the lack of ethical integrity and responsibility on the part of those who perform animal experiments. Animals used in experiments are stripped of virtually everything natural to them, such as companionship and sunlight. Instead, they are subjected to cruel experiments, often without being provided any pain relief. The least these animals deserve is basic medical care, sanitation, and daily oversight; but they are not receiving it. One can only imagine the care, or rather the lack of care, given to the animals—the rats, mice and birds—who fall outside of the AWA’s coverage.

At a meeting of the National Institutes of Health (NIH) in 2013, the organization’s former director, Dr. Elias Zerhouni, stated that institutions have been over-relying on nonhuman animal data rather than studying human diseases in humans: “The problem is that [animal research] hasn’t worked, and it’s time we stopped dancing around the problem...We need to refocus and adapt new methodologies for use in humans to understand disease biology in humans”(quoted in [McManus 2013](#)).

We urge UCLA to take note of Dr. Zerhouni’s sage advice and turn to more productive, scientifically up-to-date means of achieving its research goals. The life of an animal used for research is bleak—denied sunlight, fresh air, play with peers, and love from family, most animals used for experimental purposes are kept isolated in sterile, metal cages in windowless laboratories where their interactions are limited to humans in white coats who do not have their best interests at heart. These animals are treated as nothing more than tools, statistics, *things*.

UCLA’s animal research programs are a lose-lose situation for all animals, including humans. Animals are routinely hurt and killed for results that often lead science astray. Relying on nonhuman animal models while managing to not meet the very minimum standard of care at that is a waste of life, a waste of tax payer dollars, and is just bad science.

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**APPENDIX A**

**2.33(a)(2) Attending Veterinarian and Adequate Veterinary Care**

"(a) Each research facility shall have an attending veterinarian who shall provide adequate veterinary care to its animals in compliance with this section: (2) Each research facility shall assure that the attending veterinarian has appropriate authority to ensure the provision of adequate veterinary care and to oversee the adequacy of other aspects of animal care and use;"

**APPENDIX B**

**2.33(b) Attending Veterinarian and Adequate Veterinary Care**

"(b) Each research facility shall establish and maintain programs of adequate veterinary care that include: (1) The availability of appropriate facilities, personnel, equipment, and services to comply with the provisions of this subchapter; (2) The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and the availability of emergency, weekend, and holiday care; (3) Daily observation of all animals to assess their health and well-being; Provided, however, That daily observation of animals may be accomplished by someone other than the attending veterinarian; and Provided, further, That a mechanism of direct and frequent communication is required so that timely and accurate information on problems of animal health, behavior, and wellbeing is conveyed to the attending veterinarian; (4) Guidance to principal investigators and other personnel involved in the care and use of animals regarding handling, immobilization, anesthesia, analgesia, tranquilization, and euthanasia; and (5) Adequate pre-procedural and post-procedural care in accordance with current established veterinary medical and nursing procedures."

**APPENDIX C**

**2.31(c)(2): Institutional Animal Care and Use Committee (IACUC)**

"(c) IACUC functions. With respect to activities involving animals, the IACUC, as an agent of the research facility, shall:(2) Inspect, at least once every six months, all of the research facility's animal facilities, including animal study areas, using title 9, chapter I, subchapter A-Animal Welfare, as a basis for evaluation."

**APPENDIX D**

**2.31(d)(1)(ix): Institutional Animal Care and Use Committee (IACUC)**

"(d) IACUC review of activities involving animals. (1) In order to approve proposed activities or proposed significant changes in ongoing activities, the IACUC shall conduct a review of those components of the activities related to the care and use of animals and determine that the proposed activities are in accordance with this subchapter unless acceptable justification for a departure is presented in writing; Provided, however, That field studies as defined in part 1 of this subchapter are exempt from this requirement. Further, the IACUC shall determine that the proposed activities or significant changes in ongoing activities meet the following requirements: (ix) Activities that involve surgery include appropriate provision for pre-operative and post-operative care of the animals in accordance with established veterinary medical and nursing

practices. All survival surgery will be performed using aseptic procedures, including surgical gloves, masks, sterile instruments, and aseptic techniques. Major operative procedures on nonrodents will be conducted only in facilities intended for that purpose which shall be operated and maintained under aseptic conditions. Non-major operative procedures and all surgery on rodents do not require a dedicated facility, but must be performed using aseptic procedures. Operative procedures conducted at field sites need not be performed in dedicated facilities, but must be performed using aseptic procedures;"

## APPENDIX E

### 2.32: Personnel qualifications

"(a) It shall be the responsibility of the research facility to ensure that all scientists, research technicians, animal technicians, and other personnel involved in animal care, treatment, and use are qualified to perform their duties. This responsibility shall be fulfilled in part through the provision of training and instruction to those personnel. (b) Training and instruction shall be made available, and the qualifications of personnel reviewed, with sufficient frequency to fulfill the research facility's responsibilities under this section and Sec. 2.31. (c) Training and instruction of personnel must include guidance in at least the following areas: (1) Humane methods of animal maintenance and experimentation, including: (i) The basic needs of each species of animal; (ii) Proper handling and care for the various species of animals used by the facility; (iii) Proper pre-procedural and post-procedural care of animals; and (iv) Aseptic surgical methods and procedures; (2) The concept, availability, and use of research or testing methods that limit the use of animals or minimize animal distress; (3) Proper use of anesthetics, analgesics, and tranquilizers for any species of animals used by the facility; (4) Methods whereby deficiencies in animal care and treatment are reported, including deficiencies in animal care and treatment reported by any employee of the facility. No facility employee, Committee member, or laboratory personnel shall be discriminated against or be subject to any reprisal for reporting violations of any regulation or standards under the Act; (5) Utilization of services (e.g., National Agricultural Library, National Library of Medicine) available to provide information: (i) On appropriate methods of animal care and use; (ii) On alternatives to the use of live animals in research; (iii) That could prevent unintended and unnecessary duplication of research involving animals; and (iv) Regarding the intent and requirements of the Act."

## APPENDIX F

### 2.38(b)(1)(iv): Miscellaneous

"(b) Access and inspection of records and property. (1) Each research facility shall, during business hours, allow APHIS officials: (iv) To inspect the facilities, property, and animals, as the APHIS officials consider necessary to enforce the provisions of the Act, the regulations, and the standards in this subchapter;"

## APPENDIX G

### 2.31(c)(7): Institutional Animal Care and Use Committee (IACUC)

"(c) IACUC functions. With respect to activities involving animals, the IACUC, as an agent of the research facility, shall:(7) Review and approve, require modifications in (to secure approval), or withhold approval of proposed significant changes regarding the care and use of animals in ongoing activities;"

**APPENDIX H**

**3.50(c): Facilities, general**

"(c) Storage. Supplies of food and bedding shall be stored in facilities which adequately protect such supplies against infestation or contamination by vermin. Refrigeration shall be provided for supplies of perishable food."

**APPENDIX I**

**UCLA animal usage report, Fiscal Years 2010-2012**

<b>Species*</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>
Bats	.	15	61
Bobcats	.	52	2
Cats	4	0	0
Chinchillas	17	21	37
Dogs	15	4	36
Guinea Pigs	101	93	14
Hamsters	0	0	0
Rabbits	479	404	334
Marmots	.	100	120
Nonhuman Primates	48	23	11
Sheep	0	0	0
Pigs	167	112	121
Zebras	.	2	133
All other covered Species	.	30	2
<b>TOTAL</b>	<b>831</b>	<b>856</b>	<b>871</b>

*From USDA Animal Usage Reports, 2010-2012, accessed August 2013*

\*This chart only reports on those species of animals covered under the Animal Welfare Act.