



Stop Animal Exploitation NOW!

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12/13/21

CEO Bayne,

I am contacting you today because the Envigo Global Services Inc. (Cumberland, Virginia) which is currently AAALAC accredited has been documented by the USDA to have committed multiple federal non-compliances which must be addressed by AAALAC. A facility such as this must not maintain AAALAC accreditation.

As you know, AAALAC accreditation standards require that: **“Physical facilities and the methods of care and use for animals should permit their maintenance in a state of well-being and comfort.”**

I would like to refer you to the USDA complaint which SAEN has recently filed against Envigo including the relevant USDA inspection reports, posted here: <https://saenonline.org/news-media-news-2021/Envigo-Federal-Complaint-&-Reports.html>

These documents spell out the many ways in which both the *“physical facilities”* and the *“methods of care”* at this Envigo facility clearly fail to maintain the dogs *“in a state of well-being and comfort.”*

One of the USDA reports discusses in a violation of *“2.40(b)(2) Critical — Attending veterinarian and adequate veterinary care (dealers and exhibitors), Mortality records show that during the time period from 01/01/2021 to 07/22/2021 over 300 puppy deaths were attributed to unknown causes, however, the facility has not taken additional steps to determine the causes of death in order prevent similar deaths of other puppies in the future.”* In other words, there were hundreds of puppy deaths which were virtually ignored, with accurate causes of death not recorded. This flies in the face of the most basic concept of providing adequate veterinary care, especially in large animal colonies. If the causes of death remain undetermined, nothing can be done to prevent similar deaths in the future. This negligence almost certainly led to more deaths.

This same section also discussed over one hundred fifty puppy deaths for which no diagnosis was possible because the corpses were too autolyzed. In other words, Envigo staff had not noticed the dead puppies laying in the enclosures until the corpses had begun to decompose, making any post-mortem analysis impossible.

Clearly these animals are NOT being kept in ***“in a state of well-being and comfort”*** because the staff is so oblivious to their condition that animal deaths are not being noticed in many cases until the animals have begun to decompose. This total lack of care and concern violates the most basic standard of veterinary care, observing the animals to determine their condition.

The second USDA inspection report, of the same day, lists a number of direct violations relevant to individual animals. Clearly, the ***“methods of care”*** clearly fail to maintain the dogs at this facility ***“in a state of well-being and comfort.”*** Many of these dogs are so seriously ill that if they were owned by private individuals, those individuals would have been charged with animal abuse.

Specific dogs are identified with ***“an abnormal right eye,” “severe dental disease,” a severe untreated “ear condition,” “a skin issue,” “an approximately 1-inch diameter area of hair loss with yellow crusts and red skin was identified at the tail base,” “severe dental disease”*** (four more cases), ***“a wound on the outer surface of her left ear. The wound was approximately 1 inch long and 1/2 inch wide, and was covered by a dark brown scab,”*** several dogs were ***“reluctant to stand and bear weight,” on injured feet, “discharge in the left eye,” “large amount of patchy hair loss encompassing approximately 80% of her entire coat.”*** It is beyond my comprehension how so many dogs with serious veterinary conditions could be totally ignored.

One specific incident points to a high level of negligence, yet again. In the citation for ***2.131(b)(1) Handling of animals*** Direct it states: ***“a 3-week-old male puppy was found in the pan below cage # 97-11-15. The puppy was huddled, depressed and not actively vocalizing or searching for his dam. He had dried excreta in his fur. When handled he remained listless and quiet. Upon removing the puppy from the pan and replacing him into the cage above, with his dam (CHBCM), he immediately began crawling towards the rest of the litter.”***

The section for the violation of ***3.12 Direct Employees Daily observation*** states that staff ***“failed to identify 15 dogs with medical issues prior to the inspection.”*** Not to overstate the obvious, but failure to identify dogs with medical issues, does not allot for their maintenance ***“in a state of well-being and comfort.”***

Again, this negligence clearly demonstrates that Envigo’s staff is not paying attention. And while we are discussing failure to pay attention to the animals, it worth noting that at least three dogs are listed only as “missing.” They actually **lost** these animals.

The lack of veterinary care is not the only area of concern. Clearly, the facilities at this Envigo site fails to maintain the dogs at this facility ***“in a state of well-being and comfort.”***

The report section relevant to the violation of ***3.11(a) Cleaning, sanitization, housekeeping, and pest control*** discusses a ***“large accumulation of feces, urine, standing water, insects (both dead and alive) and uneaten food under the raised indoor and outdoor kennel floors.”***

In the part of the inspection which discusses a violation of regulations for Primary Enclosures it states: ***“Records show that during the time frame January 1, 2021 to July 22, 2021, 71 dogs were injured when a body part (such as an ear or tail) was pulled through the wall of the kennel by a dog in an adjacent kennel and bitten. The exact injury varied in each case, however substantial or minor, the dogs were subsequently euthanized.”***

Clearly, Envigo's primary dog enclosures are directly responsible for injuries which led to the euthanasia of 71 dogs — not exactly maintaining the dogs ***“in a state of well-being and comfort.”***

In summary, the Envigo Global Services Inc. (Cumberland, Virginia) failed to utilize the most basic veterinary procedures including recording the causes of death for hundreds of animals. Similarly, hundreds of deaths were not noticed until the corpses has begun to rot. Enclosures allow dogs to fight, leading to the euthanasias of at least 71 dogs. Filthy enclosures had ***“large accumulation of feces, urine, standing water, insects (both dead and alive) and uneaten food.”*** At least fifteen dogs were recognized during the inspection with unnoticed pathological conditions. The fact that a puppy had fallen out of an enclosure and was vocalizing for his/her mother was unnoticed. This is a very small selection of the dozens of federal violations at this facility.

CEO Bayne, the Envigo Global Services Inc. (Cumberland, Virginia) could not possibly be further out of compliance with AAALAC standards. It almost appears as though the goal of the staff of this lab/breeder facility was to intentionally violate AAALAC standards as often as they possibly could. If so, they have succeeded admirably.

Therefore, to protect both the reputation and the scientific integrity of the all other AAALAC accredited institutions, you must immediately investigate the Envigo Global Services Inc. (Cumberland, Virginia) animal care and use program, and at the conclusion of your investigation, the accreditation of this facility, who is allowing their staff to run amuck, must be revoked.

I look forward to hearing from your office within ten business days.

Sincerely,

Michael A. Budkie, A.H.T.,
Executive Director, SAEN