



Stop Animal Exploitation NOW!

Dr. Robert Gibbens
Director, Western Region, USDA/APHIS/AC,
2150 Center Ave.
Building B, Mailstop 3W11
Fort Collins, CO 80526-8117

4/25/2023

Dr. Gibbens,

I am writing to you today to file an Official Complaint against Colorado State University (84-R-0004) for serious violations of the Animal Welfare Act.

As you know, a USDA inspection report dated 2/7/23 cites Colorado State University for a violation of the Animal Welfare Act that resulted in twelve animals suffering unnecessary unrelieved pain and distress. Because Research personnel failed to adhere to humane endpoints, six rabbits were subsequently found dead, and six more were euthanized at a later date. Colorado State University was cited for violating Section 2.31 Institutional Animal Care and Use Committee. However, they should also be cited under Section 2.32 Personnel Qualifications and Section 2.38 Miscellaneous: (f)(1) Animal Handling.

Colorado State University was also cited for violating Section 2.36 Annual Report because the laboratory failed to report 26 animals used in research involving accompanying pain or distress to the animals for which the use of appropriate anesthetics and analgesics were withheld. They should also be cited under Section 2.32 Personnel Qualifications and Section 2.31 Institutional Animal Care and Use Committee.

I know that your office considers major violations of the Animal Welfare Act to be very serious in nature. Since Colorado State University has a long history of Animal Welfare Act violations and was fined \$5,800 on 4/13/22, I must insist that you take the most severe action allowable under the Animal Welfare Act and immediately begin the process of issuing the maximum fine of \$12,722 per infraction/per animal against Colorado State University at the completion of your investigation.

I look forward to hearing from you in the near future about the fate of this facility.

Sincerely,
Stacey Ellison
Research Analyst, SAEN



Inspection Report

Colorado State University
203 Administration 2001 Campus Delivery
FORT COLLINS, CO 80523

Customer ID: **1195**
Certificate: **84-R-0003**
Site: 001
COLORADO STATE UNIVERSITY

Type: ROUTINE INSPECTION
Date: 07-FEB-2023

2.31(e)(4) Critical

Institutional Animal Care and Use Committee (IACUC).

In an IACUC approved protocol for rabbits, the humane endpoints for the study included a body temperature of greater than 41 degrees Celsius (105.8 degrees Fahrenheit). According to study records, twelve rabbits reached temperatures over the humane endpoint but were not euthanized in a timely manner. Six of these rabbits were subsequently found dead, while the remaining six were euthanized at a later date.

Failure of the research personnel to adhere to the humane endpoints in the IACUC approved protocol resulted in these animals experiencing unnecessary unrelieved pain and distress and constitutes a significant change that was not reviewed or approved by the committee. Any proposed significant changes to ongoing activities must be reviewed by the IACUC and must be approved by the committee before the research activity is conducted.

To be corrected from this day forward.

2.36(b)(7)

Annual report.

The IACUC approved a protocol for rabbits that required the withholding of anesthetics and analgesics for scientific purposes; however, no animals used on this protocol in Fiscal Year 2021 were reported in this category on the annual report. According to study records, 26 rabbits should have been reported for being used in research involving

Prepared By: KATIE PRICE
USDA, APHIS, Animal Care
Title: VETERINARY MEDICAL OFFICER

Date:
17-FEB-2023

Received by Title: Attending Veterinarian

Date:
17-FEB-2023



Inspection Report

accompanying pain or distress to the animals for which the use of appropriate anesthetic, analgesic, or tranquilizing drugs would have adversely affected the procedures, results, or interpretation.

Accurate reporting of animals used in research is required to ensure proper oversight and disclosure of animal usage. The facility must accurately report the common names and numbers of animals on future reports. The facility must submit an amended report for 2021 and include an explanation of the procedures producing pain or distress in these animals and the reasons such drugs were not used shall be attached to the annual report.

To be corrected by March 3, 2023.

This inspection and exit interview were conducted with facility representatives..

Additional Inspectors:

MICHAEL TYGART, VETERINARY MEDICAL OFFICER

Prepared By: KATIE PRICE
USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL
OFFICER

Date:
17-FEB-2023

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17-FEB-2023



Species Inspected

| Cust No | Cert No | Site | Site Name | Inspection |
|---------|-----------|------|---------------------------|-------------|
| 1195 | 84-R-0003 | 001 | COLORADO STATE UNIVERSITY | 07-FEB-2023 |

| Count | Scientific Name | Common Name |
|--------|-------------------------------|--|
| 000002 | <i>Lama pacos</i> | ALPACA |
| 000715 | <i>Artibeus jamaicensis</i> | JAMAICAN FRUIT-EATING BAT / JAMAICAN FRUIT BAT |
| 000037 | <i>Felis silvestris catus</i> | CAT ADULT |
| 000007 | <i>Bos taurus</i> | CATTLE / COW / OX / WATUSI |
| 000007 | <i>Muntiacus reevesi</i> | REEVE'S MUNTJAC |
| 000026 | <i>Odocoileus virginianus</i> | WHITE-TAILED DEER |
| 000052 | <i>Cavia porcellus</i> | DOMESTIC GUINEA PIG |
| 000141 | <i>Mesocricetus auratus</i> | SYRIAN / GOLDEN HAMSTER |
| 000085 | <i>Oryctolagus cuniculus</i> | DOMESTIC RABBIT / EUROPEAN RABBIT |
| 000359 | <i>Ovis aries aries</i> | SHEEP INCLUDING ALL DOMESTIC BREEDS |
| 000194 | <i>Peromyscus maniculatus</i> | DEER MOUSE |
| 000028 | <i>Canis lupus familiaris</i> | DOG ADULT |
| 000026 | <i>Capra hircus</i> | DOMESTIC GOAT |
| 000025 | <i>Equus caballus</i> | DOMESTIC HORSE |
| 000010 | <i>Mustela putorius furo</i> | DOMESTIC FERRET |
| 000001 | <i>Lama glama</i> | LLAMA |
| 000004 | <i>Didelphis virginiana</i> | VIRGINIA OPOSSUM |
| 001719 | Total | |