



October 29, 2019

Leonard Grant  
 Director  
 Office of Acquisition & Grants Services  
 U.S. Food and Drug Administration  
 10903 New Hampshire Ave.  
 Silver Spring, MD 20993-0002

Via e-mail: [REDACTED]

Dear Mr. Grant,

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 6.5 million members and supporters to share some troubling information regarding the treatment of vulnerable beagles at an intensive dog breeding facility in Cumberland, Virginia that was previously owned by Covance Research Products and is now owned by an Indianapolis-based company called Envigo (hereafter, I will refer to this facility as “the Envigo facility”). We understand from published papers that the U.S. Food and Drug Administration (FDA) has purchased dogs from this facility and we are writing to request that you consider the information that we present here in reevaluating your business relationship with Envigo. We further ask that you consider diverting your agency's resources to the development of non-animal research methodologies.

In August 2017, the U.S. Department of Agriculture (USDA) inspected the Cumberland facility and documented serious and egregious violations of federal animal welfare regulations: Dogs were held in squalid conditions, forced to eat food riddled with insect larvae out of moldy bowls, and made to lie in their own waste. Ailing dogs at the facility were left to suffer without veterinary treatment in hellish, decrepit buildings with unsealed and chipped concrete and rusted cages with rotting floors. PETA recently received video clips and photographs taken by the USDA inspector and has posted a compilation of the images [here](#). The USDA's documentation details disturbing neglect and substandard conditions, including the following:

1. Sick and injured dogs were denied adequate veterinary care. A female beagle had a mammary mass the size of a small orange, with a one-centimeter ulcerated area. A male beagle had “red, swollen and thickened” skin inside his ears; “reddened and inflamed” abdomen, groin and armpits; and “a sparse hair coat.” In addition, “[t]he area around the [dog's] lips was reddened and inflamed, as were the paws and toes.” Similarly, a female beagle had sparse hair “around her face, ears, abdomen and groin” and “reddened, inflamed [skin with] scabs.” Another beagle had inflamed paws and a bleeding wound on one toe. Approximately 15-20% of the dogs had excessively long nails, including dogs with nails that curled under to touch the paw pad, were torn and bleeding, or were caught in the flooring.

PEOPLE FOR  
 THE ETHICAL  
 TREATMENT  
 OF ANIMALS

Washington, D.C.  
 1536 16th St. N.W.  
 Washington, DC 20036  
 202-483-PETA

Los Angeles  
 2154 W. Sunset Blvd.  
 Los Angeles, CA 90026  
 323-644-PETA

Norfolk  
 501 Front St.  
 Norfolk, VA 23510  
 757-622-PETA

Berkeley  
 2855 Telegraph Ave.  
 Ste. 301  
 Berkeley, CA 94705  
 510-763-PETA

Info@peta.org  
 PETA.org

Affiliates:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Foundation (U.K.)

2. Dogs were held in dilapidated, ramshackle, and unsafe enclosures. Wire floors had exposed, rusty pieces, holes, and broken, sharp edges. Chain-link doors were heavily rusted at the bottom. Waste dripped from upper-level enclosures into lower enclosures, and there were live and dead roaches present in the enclosures. There were several inches of fecal buildup—with white and black mold—under the flooring. The staff admitted that it was not uncommon to treat the dogs at the facility for pneumonia.
3. The food given to the dogs was contaminated with living and dead insects as well as mold and other contaminants. There were insects and/or insect larvae in the feed, bulk feeders, self-feeders, and transport carts, and the self-feeders also contained mold and rocks. The feed room contained rodent feces, and there were beetles and insect larvae inside the feed bins.

We are confident that the FDA wouldn't want its reputation to become sullied through its association with Envigo. Moreover, we understand that Title 45 Section 75 of the Code of Federal Regulations specifies that recipients of Department of Health and Human Services (HHS) Awards must “comply with Federal statutes, regulations, and the terms and conditions of the Federal award.” In addition, Title 45 Section 75.327(h) of the Code of Federal Regulations stipulates general procurement standards for recipients of HHS awards, stating that recipients of federal awards “must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement.” The regulation further emphasizes the importance of “contractor integrity [and] compliance with public policy.” It seems to us that the conditions documented at the Cumberland facility do not comply with these reasonable expectations aimed at safeguarding taxpayer dollars and preserving the public’s trust. We therefore ask that you reconsider your business relationship with the company—and that you consider diverting your institution's resources to the development of non-animal research methodologies.

Thank you for your time and consideration. I look forward to your response.

Sincerely,



Alka Chandna, Ph.D.  
Vice President  
Laboratory Investigations Cases  
People for the Ethical Treatment of Animals  
1536 16<sup>th</sup> Street NW, Washington, DC 20036  
[REDACTED]