



October 29, 2019

Donald Unmussig
County Administrator
Cumberland County
1 Courthouse Circle
P.O. Box 110
Cumberland, VA 23040

Via e-mail: [REDACTED]

Dear Administrator Unmussig,

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 request that your office promptly open an investigation into the 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”).

Background

As you likely know, [an August 2017 U.S. Department of Agriculture \(USDA\) inspection](#) of the Envigo facility documented serious and egregious violations of federal animal welfare regulations at the Cumberland facility, 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.
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.

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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.

PETA's Request for Intervention by Cumberland County Animal Control

On November 17, 2017, Elisabeth Custalow, an attorney with the PETA Foundation, notified Cumberland County Animal Control of the issues documented by the USDA and requested that the agency initiate its own investigation of the facility. On January 11, 2018, two officers from Cumberland County Animal Control inspected the Envigo facility and concluded that they “did not find anything that determines that the animals are being neglected, or are being treated in a cruel manner at this time.” In response to a Virginia Freedom of Information Act request, PETA obtained photographs taken by the officers during their visit of the Envigo facility. Curiously, the officers did not take photographs of any of the thousands of puppies and dogs at the facility—and restricted the subjects of their photographs to food bins and repairs made to the wire flooring in the enclosures where dogs are held.

It seems that the inspection carried out by the Cumberland County Animal Control officers closely followed the USDA's inspection. In their report, the officers reveal that they learned that several of the dogs whose poor condition had been documented in the USDA's inspection had been euthanized. However, it is not clear that the officers took the opportunity of the visit to closely examine the health status of dogs still at the facility.

Photographs and Video Footage Shot by USDA Inspectors

On January 9, 2018, PETA submitted a Freedom of Information Act request to the USDA for copies of photographs and video clips related to the August 2017, inspection report of the Envigo facility. PETA recently received a cache of photos and video clips from the investigation revealing [stunning neglect and horrifying conditions](#). The problems documented in these images suggest systemic problems and a culture of contempt for animal welfare at the Envigo facility. It does not seem to us that these problems could be rectified simply by euthanizing a few of the more overtly suffering dogs and patching up a few rusted areas of flooring. We are concerned that the February 2018 inspection by Cumberland County Animal Control officers may have been carried out in a disinterested and perfunctory manner.

We respectfully request that your office conduct a thorough, unannounced investigation of the Envigo facility, looking specifically at a number of key issues:

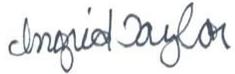
1. Are dogs being housed on wire flooring? Is there any rust buildup on the flooring and cage wires? Are there exposed wires, holes, sharp points, or broken areas? Wire flooring is unsafe, uncomfortable, and does not enhance sanitation or disease prevention. Dogs' paws, feet, and toenails can become entrapped in wire flooring, causing painful injuries, and consistently laying on wire flooring can lead to pressure sores, abrasions, lacerations, skeletal problems, and decreased mobility. Feces

become caught within the wire grid and are difficult to remove, and when cages are stacked, urine and feces contaminate the lower levels, risking disease transmission and contributing to an overall unhygienic environment.

2. Are some dogs chewing flooring or cage wires? Such behavior could indicate boredom, lack of stimulation, and mental distress consistent with poor welfare. Chewing and ingesting parts of the flooring or cages can lead to gastrointestinal obstructions, broken teeth, lacerated gums, and other injuries.
3. Are the enclosures and the surrounding environment, including food storage areas, exercise areas, whelping pens, and any other areas, free of dirt, hair, insects, rodent droppings, and fecal buildup? Accumulations of fecal matter and rodent and insect infestations create a situation that is high-risk for the spread of infectious diseases. Gastrointestinal infections, such as parvovirus, and bacteria and intestinal parasites can be spread via fecal-oral contact. Feces contain bacteria that can contaminate areas of skin that are injured, inflamed, or traumatized, leading to more severe infections. Inhalation of aerosolized fecal material and ammonia build-up can cause irritation and discomfort to the eyes and sinuses and exacerbate respiratory infections and allergic conditions such as asthma. Rodents carry fleas and ticks that can transmit intestinal parasites and vector-borne diseases. These diseases cause significant illness and can be life-threatening, and some can transmit to humans. Flea bites cause uncomfortable itching, skin inflammation and infections, and in some cases severe allergic skin reactions.
4. Are the noise levels excessive? Are dogs barking constantly, jumping at the doors of cages, spinning and/or pacing? These are all signs of understimulation and mental distress indicative of poor welfare. Constant noise prevents dogs from getting proper rest and stresses their immune systems, promoting illness and a lack of well-being.
5. Are dogs being provided with timely and adequate veterinary care? Is there evidence of infectious and/or allergic disease: missing or thinning fur; reddened, itchy areas of skin; lacerations; abrasions; reddened, swollen ears; discharge from the eyes or nose; lumps or areas of swelling on the skin; or any other evidence of illness among the dogs? Where and how are veterinary records being kept?
6. Are dogs' nails being trimmed and maintained at appropriate lengths? Are there dogs with fractured, missing, bleeding, or malformed nails indicating a lack of proper preventative care? Keeping dogs' nails trimmed to appropriate lengths reduces the risk of nails becoming entrapped or fracturing and is an important aspect of animal husbandry; however, it does not mitigate the issues of housing dogs on wire floors.
7. Are the dogs being fed a safe, nutritious, and palatable diet? Is the diet free of insects, insect larvae, mold, rodent feces, and other contaminants? Feeding a healthy and palatable diet is necessary for well-being and health. Food contaminated with mold, bacteria, and insects can lead to severe gastrointestinal illness, vomiting, diarrhea, dehydration, and painful cramping. Many dogs will not eat contaminated or unpalatable food, which can lead to weight loss, lethargy, immune suppression, mental distress, pain and discomfort from unalleviated hunger, nausea, and weakness.

Thank you for your attention to this request. I'm happy to provide further information regarding these concerns, and I look forward to your response.

Sincerely,



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