INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE
INFORMATIONAL MEMO

In order to provide better service to our principal investigators, research staff, and administrative managers, the Office of Institutional Animal Care and Use has compiled this informational memo. Please feel free to call the Office of Institutional Animal Care and Use staff at 966-5569 if you have any questions about any items in this memo. Also, please refer to the Institutional Animal Care and Use Committee (IACUC) web page (listed above) which includes such topics as recent updates, guidelines, standard operating procedures, current application forms, and training information.

REVISED AND NEW IACUC POLICIES

As a result of the IACUC’s investigation into allegations from People for the Ethical Treatment of Animals (PETA) that UNC-Chapel Hill was engaging in inhumane practices, the IACUC has reevaluated many of its existing policies and established some new ones. These policies will be enforced and are effective as of September 20, 2002. Please see the listing of revised/new policies below. Go to the IACUC website http://www.med.unc.edu/iacuc/ in the News and Updates section to view each policy.

1. UNC-CH IACUC Policy on Cage Population Densities for Breeding Mice
2. Carbon Dioxide Euthanasia Chamber Policy
3. Euthanasia Adult Rodents and Rodent Pups
4. Guidelines for the Euthanasia of Mouse and Rat Fetuses and Neonates
5. Proper Disposal of Dead Rodents
6. Rodent Tail Cut Method – Blood Collection (rats, mice)
7. Acceptable Methods of Rodent Blood Withdrawal
8. Rodent Tumor Burden Policy
9. Reviewing Requests for Exceptions to Regulations, Policies, and Nationally Accepted Standards
UPDATE FOLLOWING THE FIVE MONTH INVESTIGATION
INTO THE “PETA” ALLEGATIONS

On Friday, September 20, 2002 Dr. Robert Lowman, Associate Vice Chancellor for Research and Institutional Official for the UNC-Chapel Hill animal care program submitted a 44 page plus attachment response to the Office of Laboratory Animal Welfare (OLAW). OLAW is the regulatory branch of the NIH responsible for ensuring compliance with the Public Health Policy on the Humane Care and Use of Animals. Below is the introductory section of the University’s response that summarizes the response taken by the University to investigate the PETA allegations.

“To be certain we had the facts, and to be certain we corrected any violations discovered, UNC engaged in a thorough self-study of animal care and use, beginning the very day the PETA charges were announced in April 2002. The Institutional Animal Care and Use Committee (“IACUC”) at UNC and IACUC staff have spent between fifteen hundred and two thousand person-hours since April investigating the PETA charges. They interviewed dozens of faculty and staff, examined hundreds of documents and observed individual research procedures as they believed necessary for a full understanding of the charges. The Division of Laboratory Animal Medicine (“DLAM”) has spent hundreds of person-hours examining its procedures, training, staffing and compliance activities. As the Institutional Official at UNC, I have worked closely with all parties to coordinate our activities and assure a comprehensive response.

“To aid in our study, we invited three nationally recognized experts on the humane care and use of laboratory animals to serve as an outside evaluation team, and we asked them to give us a candid appraisal of laboratory animal care and use at UNC without pulling any punches. As timing would have it, UNC was scheduled for its AAALAC site visit in July 2002. In part because of the public charges made by PETA against UNC, and in part because of the size and complexity of the laboratory animal programs at UNC, AAALAC sent four of its most experienced site visitors to UNC in July. We discussed the PETA charges frankly and openly with the AAALAC site visitors, and we used their presence on campus as an additional source of data regarding modifications necessary not only to comply with the Policy and the Guide, but also to achieve excellence in laboratory animal care and use.

“We regret to say that we did find some violations of the Policy and the Guide. Some of the violations were serious enough that they should have been reported to OLAW, and this letter serves as our official notification in those cases. The IACUC suspended the laboratory animal privileges of two investigators for serious violations—as already reported to OLAW. We also placed two additional investigators on probation. In other cases, we required investigators to obtain additional training or required modifications in their procedures. We changed the management of the Thurston-Bowles laboratory animal unit to be certain we had leadership in place committed to working with UNC to make whatever changes were necessary to assure compliance and maintain a smoothly operating facility.
“The IACUC has revised a substantial number of its policies. We do not believe that the old policies violated either the Policy or the Guide, but they had apparently been sufficiently ambiguous or misunderstood to allow interpretations that differed significantly from what the IACUC intended. In a few cases, which will be explained in this letter, the IACUC is continuing its investigations or is still in the process of adopting revised policies. We do not believe it is possible to announce at any arbitrary time that UNC has completed its investigation of all PETA charges, made every necessary correction, and now has a “perfect” program of laboratory animal care in place. A program the size of ours is constantly evolving as projects start and finish, staff accept and terminate employment, new students start and old students complete their degrees, and new facilities come on line or older facilities go off line for renovations. Some of the protocols on which violations of the Policy or the Guide were alleged have since been completed; new protocols that raise new issues and require vigilance in new ways may already have begun.”

REPORTING OF NON-COMPLIANCE

During the process of the five-month investigation, OLAW has informed Institutional Official and the IACUC that the University has been under-reporting issues of non-compliance. Below is a quote from the University’s response to OLAW. Please be advised of the new “lower threshold” used for reporting non-compliance to our animal regulatory agencies and make every assurance that you and your research staff are in compliance with IACUC requirements.

“Reporting. We have failed to report violations to OLAW as required; because we placed the threshold for reporting much higher than we now understand is appropriate. This letter contains many reports of violations not previously brought to the attention of OLAW, and we will be reporting in accordance with a much lower threshold for violations in the future. The IACUC is discussing our obligation to report at its meeting of September 20, 2002. DLAM will develop Standard Operating Procedures for reporting to the IACUC following that meeting. The IACUC will report violations to me as Institutional Official, and I will report violations to OLAW. Of course, we hope the number of violations will be low, and the major changes in policy and practice that have resulted from this investigation should help us to accomplish that goal.”

The following is the written statement provided by OLAW to UNC-Chapel Hill regarding reporting of animal concerns.

“Reporting: Describe the mechanisms for promptly reporting instances of noncompliance with the PHS Policy and institutional policies, deviations from the Guide. Please note the requirements for prompt reporting to OLAW as described in Enclosure 6. They include, but are not limited to

a. failures to adhere to iacuc-approved protocols
b. initiating animal work that has not been reviewed and approved by the IACUC
c. deviations from approved SOPs
d. conduct of animal-related activities by unauthorized or unqualified individuals
e. ongoing, unresolved problems (e.g. overcrowding)
f. shortcomings in the program of animal care and use that are not corrected in a timely manner, conditions (not authorized by the IACUC) that jeopardize the health and well being of animals or cause their death.”

REQUIRED CERTIFICATION AND/OR TRAINING OF RESEARCH PERSONNEL IN PHYSICAL EUTHANASIA OF UNANESTHETIZED RODENTS

The IACUC is instituting mandatory observation and/or training of all research personnel conducting unanesthetized physical euthanasia (cervical dislocation and decapitation) in rodents. Each individual in the laboratory who performs physical euthanasia without anesthesia must be observed and/or trained by a designated Division of Laboratory Animal Medicine technician, Tonya Hargett. Alternatively, observation of proper technique by the IACUC Training and Compliance Coordinator, Rhonda Lewallen, will satisfy the requirements. Initially, the IACUC will identify investigators and research staff needing certification through the application approval process. The IACUC will contact investigators in writing as applications are reviewed. Investigators will have a grace period to ensure that their research personnel have fulfilled this new requirement. Following the grace period applications will be suspended until all personnel listed on the application who perform physical euthanasia have been observed and/or trained.