

July 2, 2008

**Via Facsimile (919-855-7123) and U.S. Mail**

Elizabeth Goldentyer, D.V.M.  
Regional Director  
USDA/APHIS/AC Eastern Region  
920 Main Campus Drive, Suite 200  
Raleigh, NC 27606

**Re: Use of Live Pigs for Advanced Trauma Life Support Courses at the University of Medicine and Dentistry of New Jersey in Newark**

Dear Dr. Goldentyer:

The Physicians Committee for Responsible Medicine (PCRM) requests that the Animal and Plant Health Inspection Service (APHIS) investigate the unlawful use of live pigs in Advanced Trauma Life Support (ATLS) courses at the University of Medicine and Dentistry of New Jersey in Newark (UMDNJ).

We believe that this animal use is a violation of the Animal Welfare Act because there are equivalent alternative non-animal technologies available. The TraumaMan System from Simulab has been approved for use in ATLS courses by the program's national oversight body, the American College of Surgeons (ACS). According to the ACS Subcommittee on ATLS and the Executive Committee to the ACS Committee on Trauma, **“an anatomical human body model or manikin may be used in those areas in which the use of live, nonhuman species or human cadavers is cause for significant concern.”** This 2001 decision (attached) goes on to describe TraumaMan in detail.

**In addition, an ongoing 2007-2008 survey by PCRM has so far received 164 responses from U.S. facilities offering ATLS courses. The survey has found that 150 of those facilities (more than 90 percent) exclusively use non-animal models for instruction and the vast majority of those 150 facilities exclusively use the TraumaMan System.**

Under the Animal Welfare Act, UMDNJ falls under the statutory definition of a “research facility” and is, therefore, required to comply with the Act. As part of this required compliance, any use of live animals for research, testing, or experimentation must be approved by the school's IACUC.

A fundamental goal of the Act is the elimination of the use of animals in research where possible (see 7 U.S.C. § 2143(d)), and the minimization of animal pain and distress via the consideration of non-animal alternatives (7 U.S.C. § 2143(a)(3)). To this end, Section 2143 of the Act and Title 9, Section 2.31(d)(1)(ii), of the Act's implementing regulations require that a principal

investigator (PI) — including course instructors — consider alternatives to procedures that may cause more than momentary or slight pain or distress to any animal used for research purposes.

If the PI determines that no alternatives exist, he or she must provide a written narrative to the institution's IACUC describing the methods and sources used to determine that alternatives were not available. The written narrative should include adequate information for the IACUC to assess that a reasonable and good faith effort was made to determine the availability of alternatives or alternative methods. If a database search or other source identifies a *bona fide* alternative method (one that could be used to accomplish the goals of the animal use proposal), the written narrative must justify why this alternative was not used.

With acknowledgement by ACS that TraumaMan is educationally equivalent to live animals for ATLS training and the overwhelming use of non-animal models at 90 percent of the U.S. facilities that offer the course, **there can be no valid justification for not using TraumaMan in place of live animals.**

The educational research purposes for which live animals are used at UMDNJ undoubtedly cause more than momentary or slight pain or distress. Although animals are anesthetized during the procedures themselves, they are subjected to the trauma of continued confinement, shipping, preparation, and experimentation before death in the laboratory.

Given the availability of non-animal technologies and the fact that more than 90 percent of educational facilities do not use live animals in their ATLS courses, there is no justification for the UMDNJ IACUC's continued approval of live animal use for this purpose. Instructors who request approval for their use, the IACUC that approves their use, and the medical school that offers this lab as part of its curriculum are in violation of the Act.

Accordingly, the Physicians Committee for Responsible Medicine requests that APHIS investigate this matter to find the University of Medicine and Dentistry of New Jersey in Newark in violation of these animal welfare policies, and kindly requests to be notified of actions taken in response to this complaint.

Sincerely,



John J. Pippin, M.D., F.A.C.C.  
Senior Medical and Research Adviser

Enclosure