

**From:** [Kumble Subbaswamy](#)  
**To:** [Crystal Daugherty](#)  
**Subject:** FW: Summary  
**Date:** Friday, July 31, 2020 4:22:12 PM

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CONFIDENTIAL

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**From:** Kumble Subbaswamy <swamy@umass.edu>  
**Date:** Friday, July 31, 2020 at 4:21 PM  
**To:** Mike Malone <mmalone@umass.edu>  
**Cc:** Tricia Serio <tserio@umass.edu>  
**Subject:** Summary

I am summarizing our phone call with the PETA folks. Mike, please edit and amend as you see fit.

The call lasted 45 minutes (the allotted time). I don't have the names of the three attendees handy; Mike please add them. The PETA folks for totally professional and polite during the entire meeting. That is not to understate the philosophical gap between their thinking and university-based scientists. All three PETA attendees have scientific credentials and two of them have done long years of work in industry or university/field. They first introduced themselves, gave their credentials, and their current responsibilities with PETA. Most of the time was spent on the use of non-human primates. Clearly, ever since Novak, we have been under their scrutiny, and they know a lot about us. They first spoke about how the scientific community eventually realized the "lack of return" on the use of chimps (both from the maintenance of colonies and fiscal perspective, and from the lack of translatability of results to humans) and pointed to the closure of various primate centers. Mentioned the shutting down of centers at Harvard (2015), U of Oklahoma (baboon; 2019), and said the University of Washington Primate Center was in "free fall." [I am merely reporting what I remember was said; I am not attesting to these as facts]. Then the attention turned to our continued use of marmosets. They described them as latecomers among the animal models (new world monkeys), and that researchers like them because of their relatively short life span (5-7 years). They said there were serious problems with using marmosets: (1) low supply (therefore being caught in the wild—with its own set of ethical issues); (2) lack of well established standardization (and therefore reproducibility); (3) fragility (prone to marmoset wasting syndrome); (4) considerable mortality and morbidity among laboratory animals; (4) lack of adequate molecular, imaging, and other standard methods (not sure I understand). They were familiar with Dr. Lacreuse's lab. They understand that the short life span is an attraction in studying hormone impact on aging, but feel the lack of translatability (because the marmoset wasting syndrome confounds the very thing the investigator is studying) renders the validity of this model questionable. I pushed back by saying that NIH clearly thinks this research has value or else they wouldn't be funding it. Not unexpectedly, their answer was the animal testing community has a vested interest, protects the use of animal models at all cost, is slow to change, has a great deal of inertia, etc. I said we follow all NIH rules and community guidelines and IACUC policies, and that I can't simply tell our scientists how to do their research. They said they understood, but that there was work going on at well known research universities to find alternatives to animal models wherever possible. They mentioned the Johns Hopkins Center for Alternatives to Animal Testing (<https://caat.jhsph.edu/>) and a similar

effort at Harvard (<https://www.fiercebiotech.com/deals/harvard-astrazeneca-partner-to-replace-animal-testing-organs-on-chips>) as efforts we might want to look at. Then they brought up tickborne diseases and whether we used cats and dogs in such research. Mike said we currently didn't. They were interested in antibodies research at UMMS and wondered if we could connect them to Mass Biologics to have them consider recombinant animal-free antibodies research.

They wanted to know whether a next meeting should be scheduled. I mentioned emphatically that we were extremely busy with fall opening, dealing with the pandemic, and that raising these questions with our scientific community would be neither quick nor easy. [REDACTED] chimed in with I won't let them off the hook. That ended the meeting. After Mike finalizes this summary, I will schedule a meeting for the three of us.

Thanks,  
Swamy

**From:** [Chancellor Kumble Subbaswamy](#)  
**To:** [Kumble Subbaswamy](#)  
**Subject:** Fw: Thank you, and follow-up  
**Date:** Monday, August 10, 2020 8:24:54 AM

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Just wanted to clear this draft with you, given [REDACTED]'s involvement. OK to send?

Thanks,  
Susan

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**From:** Mike Malone <mmalone@umass.edu>  
**Sent:** Monday, August 10, 2020 6:57 AM  
**To:** Chancellor Kumble Subbaswamy <chancellorswamy@umass.edu>  
**Subject:** RE: Thank you, and follow-up

Dear Amy et al.,

Thank you for the follow up and additional background information and the centers at Johns Hopkins and U of Windsor. We will include this in our discussions and considerations of best practices related to our research programs.

Sincerely,

Kumble R. Subbaswamy  
Chancellor  
374 Whitmore Administration Building  
University of Massachusetts  
Amherst, MA 01003  
phone: (413)545-2211  
FAX: (413)545-2328

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Michael F. Malone  
Vice Chancellor for Research & Engagement  
Professor of Chemical Engineering  
University of Massachusetts Amherst  
(413) 545-5270  
Assistant: Christine Burnett, [caburnett@research.umass.edu](mailto:caburnett@research.umass.edu)

COVID-19 Information  
UMass: <https://www.umass.edu/coronavirus/>  
Research: <https://www.umass.edu/research/covid-19-resources-guidance>  
Daily Checklist: <https://ehs.umass.edu/onsite-personnel-covid-19-checklist>

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**From:** Chancellor Kumble Subbaswamy <chancellorswamy@umass.edu>  
**Sent:** Friday, August 7, 2020 5:45 PM  
**To:** Mike Malone <mmalone@umass.edu>  
**Subject:** Fwd: Thank you, and follow-up

Mike,  
Please draft a response for the Chancellor, and send it to me here.  
Thanks,  
Susan

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**From:** Amy Clippinger <[amyjc@peta.org](mailto:amyjc@peta.org)>  
**Sent:** Friday, August 7, 2020 4:35 PM  
**To:** Chancellor Kumble Subbaswamy; Mike Malone  
**Cc:** [REDACTED]; Katherine Roe; Dr. Lisa Jones-Engel  
**Subject:** RE: Thank you, and follow-up

Dear all,

Please find below the additional information we promised to send in follow up to our call.

MONKEYS: As a brief summary, on our call, we outlined the [NIH's decision](#) to end the use of chimpanzees in research. This decision was driven by a lack of scientific progress made using chimpanzees, as well as the ethical and financial costs. This was the first step by the scientific community towards acknowledging the misguided anthropomorphic rationale that has for decades promoted the use of primates. Increasingly, scientists are moving beyond using Old World monkeys in their research programs (e.g., see [here](#) and [here](#)), and the use of marmosets is even more ill-advised owing to their [fragility and susceptibility to disease in captivity](#), the [lack of available and adequate molecular, genomic, and imaging tools](#), and the impact [international capture and trade](#) is having on wild populations. Furthermore, artificially induced, oversimplified versions of human conditions in a laboratory setting do not adequately simulate the complex and variable etiology, symptomatology, and treatment responsiveness found in human patients. Marmosets in laboratories cannot mimic the complex genetic, environmental, or epigenetic factors known to influence human health and disease risk. Additionally, fundamental differences in [gene expression and protein function](#), [immune system functioning](#), [neurodevelopment](#), [neuroanatomy](#), and [reproductive physiology](#) between humans and marmosets limit the applicability that data obtained from these experiments will have to human neurological diseases. Moreover, critical differences between humans and marmosets in age-related changes in hormone production, age-related neurodegeneration, and tau isoform expression make marmosets a poor model for conditions associated with aging in humans, including Alzheimer's disease and other dementias.

ANTIBODIES: I briefly mentioned on our call that we've seen a lot of interest from the scientific community in improving the quality of antibodies used in research, diagnostics, and therapeutics (see [here](#) for summary on our website). We've been working to get recombinant (sequence-defined) antibodies into the hands of researchers, and have been collaborating with various companies, academics, and government organizations, including the US National Toxicology Program (NTP) Interagency Center for the Evaluation of Alternative Toxicological Methods ([NICEATM](#)). We have ongoing expert working group meetings to address remaining hurdles to facilitate wider adoption and, if there is anyone on the UMass team with the expertise and interest in joining these discussions, I can connect you with our expert in this area. My previous email also mentioned our ongoing webinar series – a recording of the 1<sup>st</sup> webinar in the series is online and the next two have

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been scheduled for September 16 and October 15 .

In addition, we are currently funding two projects to develop recombinant antitoxins (see [here](#) for summary on our website). Earlier this year, we published a [paper](#) on a recombinant diphtheria antitoxin we developed with the Technische Universität Braunschweig, the UK National Institute for Biological Standards and Control (NIBSC), the World Health Organization, and Public Health England. This group has been in touch with Mass Biologics, which has also developed a diphtheria antitoxin, regarding potential for collaboration. The other project we're funding is for a spider antivenin. Again, we would be happy to schedule a call with UMass experts to discuss recombinant antibodies and antitoxins. I'm also curious to know if UMass has an in-house antibody core facility?

TICKS: As I mentioned on our call, testing related to ticks and ectoparasiticide products is one of our focus areas (see [here](#) for summary on our website). We have been working with researchers from the EPA, USDA, academia, and companies to advance methods to rear parasites and test the safety and efficacy of parasite control products. There are alternatives to using animals for rearing and testing in various stages of development; for example, alternatives are more well-established for some tick species while methods for other species and life stages could use further investment for optimization. We saw [online](#) that UMass is involved in tick borne disease research and are interested in learning more about the types of parasites and insects (e.g., only ticks, or also fleas and mosquitos?) used and methods for maintenance (e.g., rabbits, membrane systems?). We are available to discuss this topic with your UMass experts at a time that is convenient for you.

You may also be interested in connecting with scientists at centers that focus on alternatives to animal testing, such as the Johns Hopkins University Center for Alternatives to Animal Testing ([CAAT](#)) or the University of Windsor Canadian Centre for Alternatives to Animal Methods ([CCAAM](#)). We're happy to facilitate introductions if you are interested.

Please let me know if you have any questions.

Kind regards,  
Amy

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**From:** Chancellor Kumble Subbaswamy <[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)>

**Sent:** Tuesday, July 28, 2020 1:01 PM

**To:** Amy Clippinger <[amyjc@peta.org](mailto:amyjc@peta.org)>

**Cc:** [REDACTED] Katherine Roe <[KatherineR@peta.org](mailto:KatherineR@peta.org)>; Dr. Lisa Jones-Engel <[LisaJE@peta.org](mailto:LisaJE@peta.org)>; Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>

**Subject:** Re: Thank you, and follow-up

Dear Amy et al.,

Thanks for the helpful conversation. We are sincere in our commitment to best, forward looking practices. We will continue our internal conversations with attention to these.

Sincerely,

Kumble R. Subbaswamy  
Chancellor

374 Whitmore Administration Building  
University of Massachusetts  
Amherst, MA 01003  
phone: (413)545-2211  
FAX: (413)545-2328

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**From:** Amy Clippinger <[amyjc@peta.org](mailto:amyjc@peta.org)>

**Sent:** Tuesday, July 28, 2020 11:56 AM

**To:** Chancellor Kumble Subbaswamy <[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)>; Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>

**Cc:** [REDACTED]; Katherine Roe <[KatherineR@peta.org](mailto:KatherineR@peta.org)>; Dr. Lisa Jones-Engel <[LisaJE@peta.org](mailto:LisaJE@peta.org)>

**Subject:** Thank you, and follow-up

Dear All,

Thank you again for the productive dialog this morning. I think our shared commitment to good science gives us a great foundation for collaboration and advancing research.

I wanted to follow-up quickly today with a link to where you can find the recombinant antibody webinar series that we are co-organizing: <https://www.piscltd.org.uk/our-work/antibodies/>. If you click on the webinar graphic at the top of this landing page, it has the specifics for registering for the next webinar (September 16<sup>th</sup>) and the recording and slides for last week's webinar on COVID that I mentioned.

We'll send some additional promised information in the following week.

Kind regards,  
Amy

Amy J. Clippinger, Ph.D.  
Director  
Regulatory Testing Department  
[amyjc@peta.org](mailto:amyjc@peta.org)  
[REDACTED]

**From:** [Chancellor Kumble Subbaswamy](#)  
**To:** [Kumble Subbaswamy](#)  
**Subject:** Fw: Thank you, and follow-up  
**Date:** Tuesday, July 28, 2020 12:02:47 PM

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FYI. Any response?

--Susan

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**From:** Amy Clippinger <amyjc@peta.org>  
**Sent:** Tuesday, July 28, 2020 11:56 AM  
**To:** Chancellor Kumble Subbaswamy <chancellorswamy@umass.edu>; Mike Malone <mmalone@umass.edu>  
**Cc:** [REDACTED]; Katherine Roe <KatherineR@peta.org>; Dr. Lisa Jones-Engel <LisaJE@peta.org>  
**Subject:** Thank you, and follow-up

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Kind regards,  
Amy

Amy J. Clippinger, Ph.D.  
Director  
Regulatory Testing Department  
[amyjc@peta.org](mailto:amyjc@peta.org)  
[REDACTED]

**From:** [Michelle Goncalves](#)  
**To:** [Kumble Subbaswamy](#)  
**Subject:** FW: Thank you, and follow-up  
**Date:** Monday, September 28, 2020 12:33:22 PM

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Chancellor, This is Amy's second email, signaling she's going to keep emailing until we respond. Would it be helpful to send something like the message below? (note that she keeps copying [REDACTED])

Dear Amy,

We have taken the issues raised seriously and conducted another review of our policies and practices. Based on this review, I am confident that animal models are used in research only when there is no other known approach to address the research question and then only when extensive federal regulations are satisfied. No follow up meeting will be necessary.

Sincerely,  
Swamy

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**From:** Chancellor Kumble Subbaswamy <[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)>  
**Sent:** Monday, September 28, 2020 12:10 PM  
**To:** Michelle Goncalves <[michelle.goncalves@umass.edu](mailto:michelle.goncalves@umass.edu)>  
**Subject:** Fw: Thank you, and follow-up

FYAA  
--Susan

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**From:** Amy Clippinger <[amyjc@peta.org](mailto:amyjc@peta.org)>  
**Sent:** Monday, September 28, 2020 12:02 PM  
**To:** Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>; Chancellor Kumble Subbaswamy <[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)>  
**Cc:** [REDACTED]; Katherine Roe <[KatherineR@peta.org](mailto:KatherineR@peta.org)>; Dr. Lisa Jones-Engel <[LisaJE@peta.org](mailto:LisaJE@peta.org)>  
**Subject:** RE: Thank you, and follow-up

Dear Mike and Swamy,

I'm writing to follow-up on our July 28<sup>th</sup> call and to schedule a call to continue our discussion.

Please let me know your availability to reconnect, and if it would be best for us to work through Michelle Goncalves again to schedule.

Thank you,  
Amy

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**From:** Amy Clippinger  
**Sent:** Friday, September 18, 2020 12:28 PM



**To:** Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>; Chancellor Kumble Subbaswamy <[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)>

**Cc:** [REDACTED]; Katherine Roe <[KatherineR@peta.org](mailto:KatherineR@peta.org)>; Dr. Lisa Jones-Engel <[LisaJE@peta.org](mailto:LisaJE@peta.org)>

**Subject:** RE: Thank you, and follow-up

Dear All,

I hope you are well and that UMass had a good start to the Fall 2020 school year.

I wanted to check in on follow-up to our July 28<sup>th</sup> meeting. Can we schedule a call to discuss plans and decisions you have made?

Thank you,  
Amy

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**From:** Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>

**Sent:** Monday, August 10, 2020 12:25 PM

**To:** Amy Clippinger <[amyjc@peta.org](mailto:amyjc@peta.org)>

**Cc:** [REDACTED]; Katherine Roe <[KatherineR@peta.org](mailto:KatherineR@peta.org)>; Dr. Lisa Jones-Engel <[LisaJE@peta.org](mailto:LisaJE@peta.org)>; Chancellor Kumble Subbaswamy <[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)>; Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>

**Subject:** RE: Thank you, and follow-up

Dear Amy,

Thank you for the follow up and additional information on the centers at Johns Hopkins and U of Windsor. We will include this in our discussions and considerations of best practices related to our research programs.

The Chancellor asked me to reply as he is occupied with the reopening of campus for the fall.

Sincerely,

Michael F. Malone  
Vice Chancellor for Research & Engagement  
Professor of Chemical Engineering  
University of Massachusetts Amherst  
(413) 545-5270  
Assistant: Christine Burnett, [caburnett@research.umass.edu](mailto:caburnett@research.umass.edu)

COVID-19 Information

UMass: <https://www.umass.edu/coronavirus/>

Research: <https://www.umass.edu/research/covid-19-resources-guidance>

Daily Checklist: <https://ehs.umass.edu/onsite-personnel-covid-19-checklist>

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**To:** Chancellor Kumble Subbaswamy <[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)>; Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>

**Cc:** [REDACTED]; Katherine Roe <[KatherineR@peta.org](mailto:KatherineR@peta.org)>; Dr. Lisa Jones-Engel <[LisaJE@peta.org](mailto:LisaJE@peta.org)>

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Please let me know if you have any questions.

Kind regards,  
Amy

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**Sent:** Tuesday, July 28, 2020 1:01 PM

**To:** Amy Clippinger <[amyjc@peta.org](mailto:amyjc@peta.org)>

**Cc:** [REDACTED]; Katherine Roe <[KatherineR@peta.org](mailto:KatherineR@peta.org)>; Dr. Lisa Jones-Engel <[LisaJE@peta.org](mailto:LisaJE@peta.org)>; Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>

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Sincerely,

Kumble R. Subbaswamy  
Chancellor  
374 Whitmore Administration Building  
University of Massachusetts  
Amherst, MA 01003  
phone: (413)545-2211  
FAX: (413)545-2328

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**Sent:** Tuesday, July 28, 2020 11:56 AM

**To:** Chancellor Kumble Subbaswamy <[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)>; Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>

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We'll send some additional promised information in the following week.

Kind regards,  
Amy

Amy J. Clippinger, Ph.D.  
Director  
Regulatory Testing Department  
[amyjc@peta.org](mailto:amyjc@peta.org)  
[REDACTED]

**From:** [Chancellor Kumble Subbaswamy](#)  
**To:** [Mark Fuller](#); [Crystal Daugherty](#)  
**Subject:** Fwd: follow up  
**Date:** Tuesday, July 21, 2020 8:30:13 PM

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FYI  
—Susan

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**From:** [REDACTED]  
**Sent:** Tuesday, July 21, 2020 8:21 PM  
**To:** Chancellor Kumble Subbaswamy  
**Subject:** Re: follow up

Excellent progress; thanks for sharing.

Sent from my iPhone

On Jul 21, 2020, at 5:29 PM, Chancellor Kumble Subbaswamy  
<[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)> wrote:

Dear [REDACTED],

As you can see below, our Vice Chancellor for Research is getting in touch with the PETA scientists about peer institutions from whom we can learn about more enlightened policies and practices as a first step.

Sincerely,  
Swamy

Kumble R. Subbaswamy  
Chancellor  
374 Whitmore Administration Building  
University of Massachusetts  
Amherst, MA 01003  
phone: (413)545-2211  
FAX: (413)545-2328

**From:** Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>  
**Sent:** Tuesday, July 21, 2020 4:55 PM  
**To:** Amy Clippinger <[amyjc@peta.org](mailto:amyjc@peta.org)>; Katherine Roe <[KatherineR@peta.org](mailto:KatherineR@peta.org)>  
**Cc:** Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>  
**Subject:** Inquiry from UMass Amherst

Dear Drs. Clippinger and Roe,

Chancellor K. R. Subbaswamy shared your contact information with me in my capacity as Vice Chancellor for Research and Engagement at the University of

Massachusetts Amherst.

UMass is committed to promoting research, discovery and innovation at the cutting edge of best practices in the disciplines represented on our campus. We welcome the opportunity to learn from peer R1 doctoral universities on these practices. In particular, we would be grateful to have suggestions for exemplars and potential contacts in the area of non-human primate research from within this group. Our goal is to inform our continuous improvement work in planning, implementation and assessment of our research policies and procedures.

Thank you, in advance, for any information.

Sincerely,

Mike Malone

-----

Michael F. Malone  
Vice Chancellor for Research & Engagement  
University of Massachusetts Amherst  
(413) 545-5270  
Assistant: Christine Burnett, [cburnett@research.umass.edu](mailto:cburnett@research.umass.edu)

**From:** [Kumble Subbaswamy](#)  
**To:** [Mike Malone](#); [Tricia Serio](#)  
**Subject:** Fwd: follow up  
**Date:** Tuesday, July 21, 2020 8:34:14 PM

---

FYI

Sent from my iPhone

Begin forwarded message:

---

**From:** [REDACTED]  
**Sent:** Tuesday, July 21, 2020 8:21 PM  
**To:** Chancellor Kumble Subbaswamy  
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Chancellor  
374 Whitmore Administration Building  
University of Massachusetts  
Amherst, MA 01003  
phone: (413)545-2211  
FAX: (413)545-2328

**From:** Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>  
**Sent:** Tuesday, July 21, 2020 4:55 PM  
**To:** Amy Clippinger <[amyjc@peta.org](mailto:amyjc@peta.org)>; Katherine Roe <[KatherineR@peta.org](mailto:KatherineR@peta.org)>  
**Cc:** Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>  
**Subject:** Inquiry from UMass Amherst

Dear Drs. Clippinger and Roe,

Chancellor K. R. Subbaswamy shared your contact information with me in my capacity as Vice Chancellor for Research and Engagement at the University of Massachusetts Amherst.

UMass is committed to promoting research, discovery and innovation at the cutting edge of best practices in the disciplines represented on our campus. We welcome the opportunity to learn from peer R1 doctoral universities on these practices. In particular, we would be grateful to have suggestions for exemplars and potential contacts in the area of non-human primate research from within this group. Our goal is to inform our continuous improvement work in planning, implementation and assessment of our research policies and procedures.

Thank you, in advance, for any information.

Sincerely,

Mike Malone

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Michael F. Malone  
Vice Chancellor for Research & Engagement  
University of Massachusetts Amherst  
(413) 545-5270  
Assistant: Christine Burnett, [cburnett@research.umass.edu](mailto:cburnett@research.umass.edu)



**From:** [Chancellor Kumble Subbaswamy](#)  
**To:** [Kumble Subbaswamy](#)  
**Subject:** Fwd: Greetings  
**Date:** Monday, February 1, 2021 3:28:07 PM  
**Attachments:** [Greetings.msg](#)

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As you will see below, the PETA people sent us a long letter (attached) last week, asserting that we are not addressing any of their concerns nor implementing any of their suggested changes. I sent it to Mike Malone for advice about a response. Today, PETA wrote to all of the Trustees, repeating the content of their letter to us and adding that we had not responded. Z forwarded the PETA message to you, President Meehan, and all the PO senior staff

Mike recommends that we not respond to PETA. Shall I, as Mike suggests, tell Z and Sue Kelly that we have discussed PETA's concerns with them at length, and we believe no further response is needed?

Thanks,  
Susan

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**From:** Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>  
**Sent:** Monday, February 1, 2021 3:08:31 PM  
**To:** Chancellor Kumble Subbaswamy <[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)>  
**Subject:** RE: Greetings

I would say that we have listened to their points in previous correspondence and listened to their concerns and believe that no further response is needed.

Mike

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Michael F. Malone  
Vice Chancellor for Research & Engagement  
Professor of Chemical Engineering  
University of Massachusetts Amherst  
(413) 545-5270  
Assistant: Christine Burnett, [cburnett@research.umass.edu](mailto:cburnett@research.umass.edu)

Research & Engagement Help Desk:  
<https://www.umass.edu/research/webform/kuali-help-desk>

COVID-19 Information:  
UMass: <https://www.umass.edu/coronavirus/>  
Research: <https://www.umass.edu/research/covid-19-resources-guidance>  
Daily Checklist: <https://ehs.umass.edu/onsite-personnel-covid-19-checklist>

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**From:** Chancellor Kumble Subbaswamy <[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)>

**Sent:** Monday, February 1, 2021 2:31 PM  
**To:** Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>  
**Subject:** Re: Greetings

The PETA people have now written to all the members of our Board of Trustees, repeating the concerns here and adding that the Chancellor has not responded to their latest message.

Please advise.

Thanks,  
Susan

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**From:** Chancellor Kumble Subbaswamy <[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)>  
**Sent:** Monday, January 25, 2021 4:18 PM  
**To:** Mike Malone <[mmalone@umass.edu](mailto:mmalone@umass.edu)>  
**Subject:** Fw: Greetings

Please advise about who should respond and how.

Thanks,  
Susan

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**From:** Katherine Roe <[KatherineR@peta.org](mailto:KatherineR@peta.org)>  
**Sent:** Monday, January 25, 2021 3:54 PM  
**To:** Chancellor Kumble Subbaswamy <[chancellorswamy@umass.edu](mailto:chancellorswamy@umass.edu)>  
**Subject:** Greetings

Dear Dr. Subbaswamy,

Good afternoon. I hope you are doing well. I am writing on behalf of People for the Ethical Treatment of Animals (PETA) to follow up on our earlier discussions about the use of animals in biomedical research at the University of Massachusetts, Amherst. Please see the attached letter for more details. Thank you.

Sincerely,

Katherine V. Roe Ph.D.

Senior Research Associate  
Laboratory Investigations Department  
People for the Ethical Treatment of Animals  
501 Front Street Norfolk, VA 23510

[KatherineR@peta.org](mailto:KatherineR@peta.org)





PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

January 25, 2021

Kumble R. Subbaswamy, Ph.D.  
Chancellor  
Office of the Chancellor  
University of Massachusetts–Amherst  
374 Whitmore Building  
Amherst, MA 01003

Via e-mail: [chancellor@umass.edu](mailto:chancellor@umass.edu)

Dear Dr. Subbaswamy:

We're writing to share several serious ongoing animal welfare concerns at the University of Massachusetts–Amherst (UMass) and to express our disappointment that our scientists' discussions with you and your research officials—which were brokered by your supporter [REDACTED] [REDACTED]—were abruptly terminated for what appear to be political reasons having nothing to do with science.

As you know, UMass has accumulated numerous animal welfare violations over the past few years, many involving nonhuman primates. Several UMass alumni and donors contacted PETA to express their concerns about these violations as well as about the university's continued experimental use of nonhuman primates. In July of 2020, three of PETA's staff scientists met with you, Vice Chancellor for Research and Engagement Dr. Mike Malone, and [REDACTED] to discuss several ways in which UMass could modernize its biomedical research program, reduce its use of animals in experimentation, and improve overall animal welfare at the university. Despite initial interest and enthusiasm from you and the vice chancellor, you have informed us that UMass will not be addressing any of our concerns or implementing any of our suggested changes.

We urge you to reconsider and to recommence our discussions so that we can work together to improve biomedical research and animal welfare at UMass and alleviate the ongoing concerns of alumni and donors. For your convenience, I'm including below a summary of our expertise and the recommendations that we have made.

### **PETA Science Team**

Currently, PETA Science Consortium International e.V. and PETA affiliates worldwide employ 25 scientists with master's or doctoral

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1536 16th St. N.W.  
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202-483-PETA

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323-644-PETA

Norfolk  
501 Front St.  
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757-622-PETA

Berkeley  
2855 Telegraph Ave.  
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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.)

degrees working on regulatory toxicology and basic research. Our scientists' backgrounds and expertise span a diverse array of fields, including primatology, veterinary medicine, neuroscience, mathematics, toxicology, and molecular biology. Collectively, we work with federal regulatory agencies, pharmaceutical companies, universities and colleges, and other biomedical research institutions to reduce or eliminate their use of animals in experimentation, adopt cutting-edge methodologies, and improve the overall impact of their research. You met with Dr. Amy Clippinger, Dr. Lisa Jones-Engel, and me, Dr. Katherine Roe.

Dr. Clippinger is the president of the Science Consortium and director of PETA's Regulatory Testing Department. She received her Ph.D. in cellular and molecular biology and genetics in 2009 from Drexel University College of Medicine and was a postdoctoral fellow in the Department of Cancer Biology at the University of Pennsylvania from 2009 to 2012. In 2012, she joined the Science Consortium, where she collaborates with industry, academia, and government agencies to promote human-relevant, animal-free toxicity testing approaches. In this capacity, she has organized expert working groups, workshops, and webinars and published on topics including inhalation toxicity testing and eye irritation testing. She is on the editorial board of *Applied In Vitro Toxicology* and *Frontiers in In Vitro Toxicology*, is a member of the Society of Toxicology and past president of the Society of Toxicology's *In Vitro* and Alternative Methods Specialty Section, and has 30 peer-reviewed publications.

Dr. Lisa Jones-Engel is PETA's senior science adviser for primate experimentation and has studied the human-primate interface in Africa and Asia and the primate biomedical facilities of the U.S. for 37 years. She was trained at Cornell University, New York University, and the University of New Mexico. She joined the University of Washington's National Primate Research Center in 2002 as a post-doc, and over the next 14 years, she built an international, multidisciplinary, translational research program, which focused on infectious agents that are transmitted at the porous human-macaque interface. As a senior research scientist, she received more than \$4 million in funding from the National Institutes of Health (NIH), the U.S. Department of Defense, the Defense Advanced Research Projects Agency, and conservation agencies. She has published more than 100 peer-reviewed articles spanning the fields of primatology, virology, epidemiology, microbiology, and conservation. She is the associate editor for diseases in *The International Encyclopedia of Primatology*. In December 2020, Springer Nature published her latest edited volume, *Neglected Diseases in Monkeys: From the Monkey-Human Interface to One Health*. In 2014, she was awarded a Fulbright scholarship and served as a faculty member in the University of Washington's Department of Anthropology until 2019. Her work, which straddles the field as well as sanctuary, laboratory, and advocacy communities, gives Dr. Jones-Engel an unparalleled understanding of the way stakeholders think about primates.

Dr. Katherine Roe is a senior research associate with the Laboratory Investigations Department of People for the Ethical Treatment of Animals. She earned her bachelor's degrees in biology and psychology from Syracuse University and her Ph.D. in psychology and cognitive science from the University of California–San Diego. After completing a

post-doctoral fellow at Johns Hopkins University, she went on to become a research fellow at the National Institute of Mental Health for eight years. Over the course of her research career, she studied the neural correlates of language and spatial and memory processing, working with children with early focal brain injury, adults and children with schizophrenia, and individuals with Williams syndrome and related genetic disorders. Dr. Roe has more than 20 years of experience conducting brain and neuroimaging research with humans and is an expert at experimental design and data analysis. She has been published in numerous peer-reviewed journals and presented her findings at numerous national and international industry conferences.

During this meeting, these PETA scientists discussed several initial areas in which UMass could modernize its current research program and reduce its use of animals in experimentation. These suggestions are reviewed below:

### **Initial Recommendations**

#### **Eliminate the Use of Nonhuman Primates**

UMass has already significantly reduced its use of nonhuman primates, which is commendable. However, a limited amount of research is still being conducted at the university that involves marmoset monkeys. The use of marmosets in biomedical research is extremely problematic, as they are extraordinarily [fragile and susceptible to disease in captivity](#). In just a few years, U.S. Department of Agriculture (USDA) inspectors found issues with three of the marmosets at UMass, including the following:

- The university caused the death of a marmoset because of “thermal injuries” after severely burning the animal as he was recovering from a vasectomy (as described [here](#)).
- The university didn’t have a communication mechanism in place to ensure that the attending veterinarian was aware of problems regarding the health, behavior, or well-being of the animals, including a marmoset named Pat who was repeatedly observed to be shaky and moving more slowly than usual.
- A marmoset escaped from an acclimation device, and his tail was injured during recapture by UMass staff.

In addition to the welfare concerns associated with using vulnerable marmoset monkeys in experimentation, there are numerous scientific problems associated with their use that severely limit the impact of the research. For example, the fundamental differences in [gene expression and protein function](#), [immune system functioning](#), [neurodevelopment](#), [neuroanatomy](#), and [reproductive physiology](#) between humans and marmosets limit the applicability that data obtained from these experiments will have to human neurological diseases. Moreover, critical differences between humans and marmosets in age-related changes in hormone production, age-related neurodegeneration, and [tao isoform](#) expression make marmosets a poor model for conditions associated with aging in humans.

Furthermore, artificially induced, oversimplified versions of human conditions in a laboratory setting do not adequately simulate the complex and variable etiology, symptomatology, and treatment responsiveness found in human patients. Marmosets in

laboratories cannot mimic the complex genetic, environmental, or epigenetic factors known to influence human health and disease risk. Coupled with the [lack of available and adequate molecular, genomic, and imaging tools](#) and the impact that [international capture and trade](#) is having on wild populations, continuing to experiment on marmosets is ill advised.

Many cutting-edge research institutes are realizing that the financial costs, ethical considerations, and scientific limitations of research with nonhuman primates make it untenable. For example, the [NIH has acknowledged that the use of chimpanzees in biomedical research was not leading to any meaningful scientific progress](#) and decided to end the use of chimpanzees in research. Similarly, Harvard Medical School recognized that its return on the New England Primate Research Center didn't warrant the costs and [closed the facility down](#). Given the extensive financial costs, limited scientific validity, and serious ethical concerns associated with experimenting on marmosets and other nonhuman primates, PETA strongly recommends that UMass terminate any remaining nonhuman primate research at its campus. PETA scientists are willing to discuss available alternatives or connect any researchers currently using nonhuman primates with other investigators to assist in this transition.

### **Utilize Recombinant Antibodies**

Currently, there is a great deal of interest within the scientific community in improving the quality of antibodies used in research, diagnostics, and therapeutics. (See [here](#) for a summary of the situation on our website.) We have been working to get recombinant (sequence-defined) antibodies into the hands of researchers and have been collaborating with various companies, academics, and government organizations, including the [National Toxicology Program Interagency Center for the Evaluation of Alternative Toxicological Methods](#). We have ongoing expert working group meetings to address remaining hurdles to facilitate the wider adoption of these antibodies.

In addition, we're currently funding two projects to develop recombinant antitoxins. (See [here](#) for the summary on our website.) Earlier this year, we published a [paper](#) on a recombinant diphtheria antitoxin that we developed with the Technische Universität Braunschweig, the National Institute for Biological Standards and Control in the U.K., the World Health Organization, and Public Health England. This group has been in touch with MassBiologics, which has also developed a diphtheria antitoxin, regarding the potential for collaboration. The other project that we're funding is for a spider antivenin.

PETA offered to schedule an additional call with UMass experts to discuss recombinant antibodies and antitoxins, to discuss whether the university has an in-house antibody core facilities, and to provide any further assistance that UMass researchers might need in this area.

### **Modernize Tick-Borne Disease Research**

UMass is currently [conducting](#) research into tick-borne disease research. Testing related to ticks and ectoparasiticide products is one of PETA's areas of [focus](#). We have been working with researchers from the U.S. Environmental Protection Agency, the USDA,

academia, and companies to advance methods to rear parasites and test the safety and efficacy of parasite control products. There are alternatives to using animals for rearing and testing in various stages of development. For example, alternatives are better established for some tick species while methods for other species and life stages could use further investment for optimization. PETA offered to discuss the tick-borne disease research being conducted at UMass and to help investigators identify any opportunities for adopting non-animal alternatives for their research. One of UMass's federal Animal Welfare Act (AWA) violations involved the use of rabbits for a parasite colony maintenance procedure—thus, this seems like an area in which the university would be eager to engage in discussion.

### **Implement Higher Animal Welfare Standards and Oversight**

As mentioned above, there is a very concerning history of AWA violations at UMass. This becomes even more concerning when you take into consideration that the AWA covers only the most minimal standards of care and doesn't prohibit any experiment on animals, no matter how painful. Moreover, the announced inspections conducted by the USDA occur only once or twice a year and therefore uncover only a fraction of the actual issues. The fact that the USDA has still discovered numerous violations of basic animal care during scheduled visits suggests systemic problems at your animal research facilities. These serious issues need to be addressed.

PETA scientists suggested that you and Dr. Malone take a more active role in monitoring AWA or Public Health Service Act violations occurring at UMass. One of the best ways to improve the conditions of animals being housed at UMass is to ensure that care providers are held accountable for errors and that missteps are immediately and properly documented and corrected. By touring the laboratory facilities and requiring that all animal welfare violations be reported to your office, you can substantially minimize future violations at UMass.

### **Establish a Center for Non-Animal Research Alternatives**

Many high-profile research universities have established research centers focused on developing novel non-animal research tools and methods. These centers receive ample public and private funding and attract cutting-edge researchers, graduate students, and undergraduate students—something we think UMass would like to continue to do.

PETA recommended that UMass consider connecting with scientists at centers that focus on the development and use of alternatives to animal testing, such as the Johns Hopkins University [Center for Alternatives to Animal Testing](#) or the University of Windsor [Canadian Centre for Alternatives to Animal Methods](#).

This is only an initial list of suggestions that UMass might implement that would benefit both science and animals. We had hoped that our meeting with you would be one of several productive discussions that would result in significant improvements to the quality of research conducted at UMass.

Given the history of animal welfare violations at the university, the well-documented limitations of animal experiments, and the concerns of UMass alumni and donors, it is inconceivable that no improvements are needed at UMass. We hope you will accept our invitation to reopen discussions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katherine V. Roe', written in a cursive style.

Katherine V. Roe, Ph.D.  
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