



Stop Animal Exploitation Now!

S.A.E.N.
"a force for change"

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Dr. Elizabeth Goldentyer
USDA/APHIS/AC
920 Main Campus Drive, Suite 2000
Raleigh, NC 27606

12/6/12

Dr. Goldentyer,

I am writing to you today to file an Official Complaint against Clemson University. In the Column E Explanation of their 2011 Animal use report (attached) they state:

“Three raccoons were non-target captures during a field study.

One raccoon chewed front digits when trapped and was euthanized. The animal was euthanized because foraging activity would be adversely effected with this injury.

Two raccoons chewed rear digits and were released.”

Clemson should be cited for improper handling of animals, under Section 2.38 (f)(1) Miscellaneous which states “Handling of all animals shall be done as expeditiously and carefully as possible in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort.”

Additionally, staff that are involved in a field study involving trapping should know how often to check traps to avoid injuries to the animals. Therefore we believe that this incident also demonstrates inadequately trained personnel:

Section 2.32 (a) Personnel Qualifications, which states “It shall be the responsibility of the research facility to ensure that al scientists research technicians, animal technicians, and other personnel involved in animal care, treatment, and use are qualified to perform their duties. This responsibility shall be fulfilled in part through the provision of training and instruction to those personnel.”

Since these animals were left alone long enough that they caused self-injury, sufficient to warrant euthanasia for a raccoon, this clearly demonstrates inadequate observation of the animals violating Sec. 2.33 Attending veterinarian and adequate veterinary care.

(a) Each research facility shall have an attending veterinarian who shall provide adequate veterinary care

(2) Each research facility shall assure that the attending veterinarian has appropriate authority to ensure the provision of adequate veterinary care and to oversee the adequacy of other aspects of animal care and use;

(b) Each research facility shall establish and maintain programs of adequate veterinary care that include:

(3) Daily observation of all animals to assess their health and well-being; Provided, however, That daily observation of animals may be accomplished by someone other than the attending veterinarian; and Provided, further, That a mechanism of direct and frequent communication is required so that timely and accurate information on problems of animal health, behavior, and well-being is conveyed to the attending veterinarian;

I know that your office considers major violations of the Animal Welfare Act to be very serious in nature, especially when these violations take the lives of animals. The treatment of animals at this facility illustrates attitudes of carelessness and negligence that must be punished so that meaningful changes can be made. Therefore, I also insist that you take the most severe action allowable under the Animal Welfare Act and immediately begin the process of issuing a fine against Clemson University at the completion of your investigation.

I look forward to hearing from you in the near future about the fate of this facility.

Sincerely,

A handwritten signature in black ink that reads "Michael A. Budkie, A.H.T." with a stylized flourish at the end.

Michael A. Budkie, A.H.T.,
Executive Director, SAEN

Attachments: Clemson 2011 Report