

**Bonobo Conservation Initiative · Center for Biological Diversity  
Endangered Species Coalition · International Fund for Animal Welfare  
Natural Resources Defense Council · Public Employees for Environmental  
Responsibility**

March 18, 2021

David Applegate, Ph.D., Exercising authority of the Director  
U.S. Geological Survey (USGS) United  
States Department of the Interior 1849  
C. St.  
Washington DC 20240<sup>1</sup>

Federal Express

Re: animal care accreditation for USGS wildlife health laboratories

Dear Dr. Applegate,

The undersigned conservation, animal welfare, and public health organizations write to urge you to obtain independent animal care accreditation for the three major USGS wildlife disease laboratories, the National Wildlife Health Center (NWHC) in Madison, Wisconsin; Leetown Science Center (LSC) in Kearneysville, West Virginia; and the Western Fisheries Research Center (WFRC) in Seattle, Washington. Due to the exemption for Federal labs in the Animal Welfare Act these facilities are not subject to external oversight. Unfortunately, USGS's self-regulating status has allowed animal care deficiencies and even reported biosafety breaches to be minimized or glossed over.<sup>2</sup>

The NWHC, the principal wildlife disease laboratory, states its mission is "...to provide national leadership to safeguard wildlife and ecosystem health through dynamic partnerships and exceptional science." Moreover, the NWHC provides vital information to Federal agency decision-makers on emerging diseases of wildlife, domestic animals, and humans. These have included, of course, the current SARS-CoV-2 pathogen as well as other serious zoonotics such as avian influenza, West Nile virus, and monkeypox.

The undersigned groups are supporting vastly stronger pandemic response and prevention policies that will include likely additional funding and responsibilities especially for the NWHC lab. In doing so, we are very mindful to not also enable additional foreseeable animal care and welfare or biosafety lapses. Indeed, meeting animal care standards is an important part of scientific integrity.

The Departmental Management Manual ("DM") governs the Department of Interior on "Integrity of Scientific and Scholarly Activities" (305 DM 3). In relevant part, the Manual provides:

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<sup>1</sup> Also emailed to: [applegate@usgs.gov](mailto:applegate@usgs.gov).

<sup>2</sup> See Public Employees for Environmental Responsibility (PEER) press releases, <https://www.peer.org/federal-animal-disease-lab-awash-in-deficiencies/> and <https://www.peer.org/federal-lab-biosafety-whistleblower-targeted/>.

*The Department will not tolerate loss of integrity in the performance of scientific activities or in the use of scientific products in decision making. (§ 3.4B)*

The loss of scientific integrity is defined in the Manual:

*Loss of Scientific Integrity. Occurs when there is a significant departure from the accepted standards, professional values, and practices of the relevant scientific community... Loss of scientific integrity negatively affects the quality or reliability of scientific information. (§ 3.5 B)*

The accepted standards in the scientific community for live animal laboratories include independent verification of meeting care and welfare needs and biosafety standards. In fact, numerous Federal agencies have voluntarily ensured the integrity of their programs by arranging for inspection and accreditation by the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC)<sup>3</sup> and/or the American Biological Safety Association (ABSA).<sup>4</sup> These include:<sup>5</sup>

1. The Centers for Disease Control (Atlanta and Ft. Collins)
2. Department of Defense (Uniformed Services University of the Health Sciences)
3. Department of Energy (Lawrence Livermore and Oak Ridge)
4. Department of Agriculture
5. Environmental Protection Agency
6. Food and Drug Administration
7. National Aeronautics and Space Administration (Ames, Kennedy, Johnson Centers)
8. National Institute of Health
9. Veterans Affairs

As virtually all other Federal agencies that handle animals obtain accreditation, the lack of it for the Department of the Interior and USGS – the nation’s premiere wildlife health science practitioner – is a glaring deviation. Independent accreditation likely also could reduce the risk of future accidental releases of zoonotic pathogens from the wildlife labs, which represents a major concern to the public and decisionmakers in view of the current pandemic.

Finally, we are alarmed by recent reporting on alleged retaliation against a long-serving WFRC researcher who revealed pathogen releases in the form of wastewater leaks from the lab in which she worked into the nearby wetlands.<sup>6</sup> Those releases, reported to result from shoddy or poorly-maintained experiment equipment, may have reached Lake Washington, which is heavily used for swimming and other recreation by the surrounding Seattle residents as well as providing habitat to

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<sup>3</sup> AAALAC webpage, [www.aaalac.org/accreditation-program/what-is-aaalac-accreditation/](http://www.aaalac.org/accreditation-program/what-is-aaalac-accreditation/).

<sup>4</sup> ABSA webpage, <https://absa.org/lab-accred>.

<sup>5</sup> The listed agencies and many other Federal labs and centers are in the AAALAC searchable directory of accredited labs at: [www.aaalac.org/accreditation-program/directory/directory-of-accredited-organizations-search-result/#E](http://www.aaalac.org/accreditation-program/directory/directory-of-accredited-organizations-search-result/#E). More than 1,000 institutions in 49 countries have AAALAC accreditation.

<sup>6</sup> E&E News, [www.eenews.net/stories/1063725073](http://www.eenews.net/stories/1063725073); Vice News, [www.vice.com/en/article/bvg5xm/whistleblower-biosafety-government-lab-pathogen-leak-washington](http://www.vice.com/en/article/bvg5xm/whistleblower-biosafety-government-lab-pathogen-leak-washington).

fish, amphibians, and a wide range of other aquatic fauna. We urge you to investigate this situation and take prompt remedial steps.

To cure this glaring lack of external oversight at the NWHC, LSC, and WFRC, the USGS should commit to acquire AAALAC and/or ABSA accreditation for all its programs in those labs that use live animals in research, especially those that work with high risk pathogens. This also will serve to improve the overall integrity and reliability of scientific information produced by those labs, in keeping with Interior's Departmental Manual. We respectfully request a response within 30 days.<sup>7</sup>

Sincerely,

**Bonobo Conservation Initiative  
Center for Biological Diversity  
Endangered Species Coalition  
International Fund for Animal Welfare  
Natural Resources Defense Council  
Public Employees for Environmental Responsibility**

CC: Deb Haaland, Secretary of the Interior

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<sup>7</sup> Lead contact: Peter T. Jenkins, Senior Counsel, Public Employees for Environmental Responsibility, 962 Wayne Ave., Suite 610, Silver Spring, MD 20910 tel: 202.265.4189; email: [pjenkins@peer.org](mailto:pjenkins@peer.org) .