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06/01/2010 02:16 PM

To "foia.officer@aphis.usda.gov" <foia.officer@aphis.usda.gov>
cc
bcc
Subject Request for results of complaint E10-022

To Whom It May Concern:

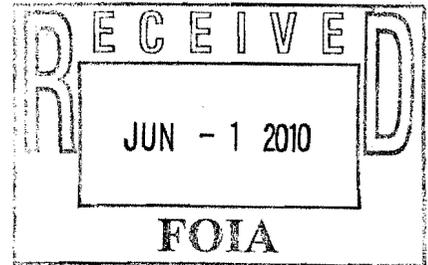
On behalf of Dr. John Pippin of the Physicians Committee for Responsible Medicine (PCRM), I am requesting the results of his APHIS complaint (attached) regarding the use of live pigs in Advanced Trauma Life Support (ATLS) courses at Baystate Medical Center in Springfield, MA. **The complaint issue number is E10-022.**

Please confirm receipt of this request and provide an estimated time for delivery of the results of the inspection.

Thank you.

Sincerely,

NOAH GITTELL
PHYSICIANS COMMITTEE FOR RESPONSIBLE MEDICINE
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JUN 29 2010



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October 27, 2009

Via Priority 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 Animals for Advanced Trauma Life Support Courses at Baystate Medical Center

Dear Ms. Goldentyer:

I am writing on behalf of the Physicians Committee for Responsible Medicine (PCRM) and our membership of 7,000 physicians and more than 100,000 other medical professionals, scientists, educators, and laypersons.

PCRM requests that the Animal and Plant Health Inspection Service (APHIS) investigate the unlawful use of live animals in Advanced Trauma Life Support (ATLS) courses at Baystate Medical Center in Springfield, MA.

We believe that this animal use is a violation of the Animal Welfare Act because there are equivalent alternative nonanimal technologies available. Human cadavers and the TraumaMan System from Simulab have 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. The Subcommittee on ATLS also recently approved the use of another manikin model—Synman from the Swiss company Synbone—for these courses.

Not only have these nonanimal alternatives been approved by ACS for ATLS courses, but they have been proven more effective in teaching the procedures that make up the surgical skills portion of the ATLS course. **According to a study published in the November 2002 edition of the *Journal of the American College of Surgeons*, study participants misplaced 30.2 percent of cricothyroidotomies (tracheotomies) when performing the procedure on live animals compared to only 3.6 percent when using human cadavers (McCarthy). In addition, a study published in the July 2002 edition of *The American Surgeon* concluded that "students found [the TraumaMan System] to be superior to the animal model in teaching surgical airways . . . and the management of pneumothorax" (Block).**

A November 2008 *Journal of Trauma* article also found the following: "Unlike animal models, Trauma Man has replaceable 'skins' that allow for specific procedures to be repeated frequently. In recent years, Trauma Man has become widely used in ATLS" (Cherry and Ali).

Lastly, an ongoing 2007-2009 survey by PCRMC has so far received 201 responses from facilities in Canada and the United States offering ATLS courses. **The survey has found that 191 of those facilities (95 percent) use nonanimal models for instruction and the vast majority of those 191 facilities exclusively use the TraumaMan System (attached).**

Under the Animal Welfare Act, Baystate Medical Center 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 minimization of animal pain and distress via the consideration of nonanimal 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 the TraumaMan System, Synman, and human cadavers are educationally equivalent to live animals for ATLS training and the overwhelming use of nonanimal models at 90 percent of the U.S. and Canadian facilities that offer the course, **there can be no valid justification for not using these other methods in place of live animals.**

The educational purposes for which live pigs are used at Baystate undoubtedly cause more than momentary or slight pain or distress. Although the 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.

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

Sincerely,

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