February 16, 2012

Dr. Robert M. Gibbens, Director
USDA/APHIS/AC
2150 Centre Ave.
Building B, Mailstop 3W11
Fort Collins, CO 80526-8117

2 pages via mail and e-mail: Robert.M.Gibbens@usda.gov

Dear Dr. Gibbens,

Thank you in advance for your time. I am writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 3 million members and supporters to request an investigation into possible violations of the Animal Welfare Act (AWA) related to the use of animals in trauma training exercises on February 8, 2011, performed by Assessment and Training Solutions Consulting Corporation [ATSCC] (USDA Cert. No. 52-R-0114) at a San Diego County property owned by Mark Halcon (Covert Canyon LLC) that is located at 19150 High Glen Rd., Alpine, CA 91901.

I. Failure to Adequately Search for and Consider Alternatives to Animal Use

Because alternatives to the use of animals for trauma training exercises are widely available and used without any animals at numerous civilian and military facilities, we believe ATSCC may have failed to adequately seek and consider alternatives to the use of animals, in violation of the AWA.

Non-Animal Models Available and Widely Used for Military Trauma Training

Military medical experts have reported that high-fidelity human patient simulators are suitable for completely replacing the use of animals in civilian and military trauma training exercises.¹,²,³

The U.S. Navy Trauma Training Center and the U.S. Air Force Expeditionary Medical Skills Institute’s Center for Sustainment of Trauma and Readiness Skills have written that they do not use any animals for teaching soldiers and medics how to treat traumatic wounds;⁴,⁵ instead, they use only simulators and cadavers.

The U.S. Army’s own Fort Campbell Rascon School of Combat Medicine does not use animals in its trauma program, stating that “[t]raining on [simulators] is more realistic to providing care for a person than training on animals.”

According to documents obtained from the USDA, Tactical Medics International (USDA Reg. #58-R-0139)—an organization providing the same military training Tier 1 Group offers—“has not used any live or dead tissues or animals in approximately 3 years” in its trauma training exercises. Moreover, Camp Lejeune has verified that Tactical Medics International does not use animals in the company’s Tactical Combat Casualty Care course—a program that ATSCC currently conducts on animals.

**Non-Animal Simulation Superior to Animal Use for Trauma Training**

Recently, a trauma surgeon at Northwestern University’s Feinberg School of Medicine wrote in *The Journal of Trauma: Injury, Infection and Critical Care* that, “From an educational perspective, for both military and civilian training purposes, the use of simulation is documented to be equivalent or superior to animal use for skills development, and the simulation is endorsed by the American College of Surgeons as a suitable replacement for animals in…surgical skills training.”

Comparative studies have found time and again that non-animal models better prepare Advanced Trauma Life Support trainees to treat sick and injured patients than the use of animals. A study published in a 2002 issue of *The American Surgeon* found TraumaMan “to be superior to the animal model” for trauma training. A 2009 study in the *Canadian Journal of Surgery* replicated these results, and concluded that “[t]he TraumaMan model is an effective alternative for learning… surgical skills.”

Based on the information above, it is not possible for ATSCC to show that animal use for its training “is unavoidable for the conduct of scientifically valuable research,” as is required by 9 C.F.R. § 2.31(e)(4).

**II. Conclusion**

We request that the USDA investigate the issues we raised in this letter and, if the allegations are substantiated, cite ATSCC for violations of the AWA, issue an Official Warning, and levy all appropriate penalties permissible by statute.

You may contact me directly by telephone at 757-962-8325 or by e-mail at ShalinG@peta.org with any questions. Thank you in advance for investigating these issues, and I look forward to your response.

Sincerely yours,

Shalin G. Gala
Laboratory Methods Specialist
Laboratory Investigations Department

---


