

March 24, 2005

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3 pages via fax (513-627-1587) and U.S. mail

Dear Barbara:

This responds to your March 16 letter stating that there is no value in discussing Iams' "old studies" anymore. Despite Iams' excuses, we stand by the evidence (consisting mainly of protocols of Iams-funded research experiments), which clearly shows that Iams did indeed violate its research policy on multiple occasions, resulting in the needless deaths and injuries of animals. That some of them are "old" does not change the fact that Iams was not truthful with PETA or the general public when engaging in these experiments that violated the company's own policy.

You say that Iams is "focused on the future," so we would appreciate your addressing some troubling issues that are clear and present: 1) Iams' current gingivitis-induction experiment in beagles, 2) the glaring disparity between welfare standards afforded to different species, and 3) the company's outdated protein chick tests. These issues will continue to plague Iams unless you create humane changes.

Iams' 2002-2005 Gingivitis Study

From November 1, 2002, to October 31, 2005, Iams is providing funds to Dr. Roger Johnson of the University of Mississippi Medical Center to conduct an experiment entitled "Effects of Diet on the Initiation of Gingivitis" (protocol number 0801A), ostensibly to test the efficacy of the company's "Dental Defense" diets in resolving canine gingivitis.

If Iams had required that Johnson conduct his study in collaboration with private veterinary clinics whose canine patients with gingivitis were volunteered by their human caretakers, we would have no problem with this experiment.

However, as stated in item number 19 of his "Animal Activity Protocol," Johnson has an experimental stage entitled "Initiation of gingivitis," which involves inducing gingivitis—a painful and bloody stage of periodontal disease—in 21 beagles by cutting and suturing their gums.

This procedure violates item 6 of Iams' 2002 Global Research Policy—a policy initiated nearly 5 months prior to the experiment's initial funding date—which states that Iams will "not contract for, nor conduct, any study involving surgeries to create



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or mimic diseases ... nor will the company use non-surgical methods to induce or simulate diseases that are not acceptable in nutritional or medical research on humans; nor will the company fund any university positions that may be involved in such activities for the study of cat and dog nutrition.”

Iams itself describes gingivitis as a disorder that “can lead to serious health concerns for pets.”¹

Inducing gum disease in dogs is a flagrant violation of Iams’ own research policy.

Furthermore, in your letter dated February 8, 2005, you argue that Johnson’s initial 1999 gingivitis protocol—which states that “animals will be euthanized”—was “an error,” and that in reality, dogs used in this experiment are “still alive today,” as evidenced by your claim that “these same dogs participated in [Johnson’s 2002-2005] follow-up [gingivitis] study.”

While we regard this typo in Johnson’s protocol as suspect, if what you say is true, this would mean that these animals have been cooped up in cramped laboratory cages and subjected to invasive experimentation for more than six years (1999-2005)! And there’s more misery ahead for these dogs, as Johnson states in item 19 of his current “Animal Activity Protocol” that “at the end of the experiments [in October 2005], the animals will be sold and transferred to another research facility.”

There is no way to justify a lifetime of cages and bloody gums for these beagles. To comply with Iams’ research policy, if you wouldn’t volunteer yourself for years of laboratory duress and a plaque-filled, bloodstained mouth, then Iams should not make such a demand of its “four-footed research associates.” Iams has promised lifetime care for the animals it uses, not lifetime caging and endless experimentation. Johnson’s protocol proves that Iams’ “adoption” policy is nothing but lip service.

We ask that you immediately halt Johnson’s experiment, release the beagles to the Mississippi Animal Rescue League—a group that has already told us that it is willing to take these animals off your hands—and pursue collaborative veterinary-clinic studies in lieu of inducing bloody gums in animals.

Iams’ Updated (February 2005) Research Policy

One addition to Iams’ February 2005 research policy is the statement that Iams conducts “studies with chickens and rodents consistent with Procter & Gamble’s policy and practices.” While Iams admits to these experiments, these animals are subject to a different and unfair welfare standard—the Procter & Gamble standard—which allows experimenters to injure and kill chickens and rodents, though dogs and cats are supposedly spared from cruel invasive procedures and death under Iams’ policy.

In Iams’ quest to “[advance] animal welfare in the area of veterinary nutrition,” granting *all* animals the *same* welfare protections and safeguards would be a logical step forward. Now is your chance to take a leadership role. This would usher in a new age in the pet-food industry where mice and chicks, instead of being considered mere “research tools,” are regarded as sentient beings who are as capable of suffering as dogs and cats and as such, deserve equal consideration of interests. We are simply asking you to rephrase Iams’ policy to reflect parity between the humane standards afforded to dogs and cats and those given to other species. **Stipulating that Iams’ studies with chickens and rodents are “consistent with Procter & Gamble’s policy and practices” means that anything can be done to them and that they will most likely be killed at the end of the experiments.**

¹ http://www.iams.com/en_BI/jhtmls/iamsco/news/sw_in_News_page.jhtml?li=en_BI&bc=C&pti=IN&ai=2028

You will find support for our position from one of Iams' own Animal Care Advisory Board members—the Humane Society of the United States, a group that, along with PETA, has publicly called for full inclusion of all birds, mice, and rats in the Animal Welfare Act's definition of "animal," putting them on par with "covered" species such as dogs and cats.

Iams PER Chick Tests

You justify Iams' continued reliance on the outdated and cruel "protein efficiency ratio" (PER) chick test because other companies refuse to share their validation protocols and nonconfidential validation data with you. This is nonsense. These tests have already been blasted by scientific experts and two of Iams' prime competitors (Hill's and Purina) as unnecessary and unethical.

In my letter to you dated November 16, 2004, I enclosed detailed validation information for two non-animal systems (TIM and FIDO) developed by TNO Nutrition and Food Research. We have spoken with officials at TNO who have assured us that they can easily take care of Iams' protein-analysis needs by using TNO's *in-vitro* systems. TNO is willing to work with you to this end, but Iams must show interest.

We spoke with Dr. Len Sauers of Iams regarding another non-animal alternative called IDEA, offered by Novus International. The validation data for IDEA is published on the company's Web site and in the scientific literature.

We have spent much time and effort researching these alternatives and talking with experts who assure us that the non-animal systems are validated and ready for use. Despite the usual resistance from Iams, we are still committed to working with you to help Iams make the transition from the PER chick test to a humane non-animal alternative. We believe—and have been told by your competitors—that any nutritional lab can meet your needs for protein efficiency using test methods that are already validated.

Take the Initiative

Industry leaders take initiative, and if anyone is going to consider Iams "a leader in animal welfare," it's essential that Iams adopt the humane measures highlighted in this letter. May we hear from you please? Thank you.

Sincerely yours,

A handwritten signature in black ink, reading "Shalin D. Gala", is written over a horizontal line. The signature is cursive and includes a large initial "S".

Shalin Gala, Research Associate
Research & Investigations Department

cc: Mary Beth Sweetland