

*In 2011, Kreg Leymaster sent the center director an email citing the deaths of 12 lambs to coyotes in just 4 days, and urging the director to take action. Yet the data shows that lamb deaths to predators reached 25 in 2014, just through June. Did the center director act on Mr. Leymaster's concerns in 2011, and if so, what steps did the director take?*

The concerns were acted upon. USMARC consulted with USDA's Animal and Plant Health Inspection Service's Wildlife Services (APHIS-WS) on how to resolve the coyote issue. In our approach, we sought to reconcile the safety of our animals with our responsibility to respect the balance of nature, which included increasing the number of guardian dogs to protect the sheep. Wildlife is a valued natural resource collectively owned by the people and managed in trust for them by various government agencies.

*And secondly, on the center's review of its experimental protocols, your recent answers appear to have not adequately addressed an important issue that needs to be made very clear. As I discussed with Dr. Chandler, the ARS has a directive IACUCs -- No. 130.4 and dated 2002 -- that says each center must have an IACUC that, among other duties, must approve or reject experimental protocols, and that the committee must keep records of those reviews and decisions. But the U.S. Meat Animal Research Center says its IACUC does neither of these things, and that instead it uses an alternative system of protocol review that is effective for scrutinizing the protocols. Nonetheless, in terms of compliance with this directive, it seems quite clear that in this matter the center is not following the ARS's own rules. Do you agree, and if so, or not, please elaborate.*

We have done our best to explain to you that we understand the ARS Directive and the options it offers for experimental protocol approval or rejection.

Although the IACUC does not hold meetings for that purpose, USMARC does have the IACUC chairperson approve or reject the outlines on behalf of the IACUC, as we have stated in previous answers. In accordance with the U.S. Code (t§2.31), which says:

*“If full Committee review is not requested, at least one member of the IACUC, designated by the chairman and qualified to conduct the review, shall review those activities, and shall have the authority to approve, require modifications in (to secure approval), or request full Committee review of any of those activities.”*

With regard to recording and storing committee decisions, any concern raised during the formal experimental protocol approval process is electronically recorded and stored in accordance with Federal records management policies. The Center Director does not sign off on a project unless the principal investigator (PI) has addressed those concerns. These records are maintained in the electronic database and include the PI's responses to concerns. When an experimental protocol (EP) is approved, but before it is implemented, the EP is put on the Center's Intranet for viewing by USMARC staff.