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To Whom It May Concern:

My name is Shannon Keith. I am an animal rights attorney and president and founder of the non-profit international rescue and advocacy charity, Beagle Freedom Project.

We have recently become aware of the testing taking place or about to take place at the Vicotecnia laboratory facility in Madrid, Spain in conjunction with the University of Barcelona.

In the past week, I have reached out to the University of Barcelona, Vicotecnia and others in an effort to quietly resolve this unfortunate issue.

As I stated in the attached letters (See letters emailed to Vivotecnia and University of Barcelona), BFP is ready to take these 38 beagles into our care immediately. We have a facility and homes at the ready.

Unfortunately, neither Vivotecnia nor the University of Barcelona have cared to respond.

Sadly, these abhorrent tests come on the heels of an undercover investigation by Cruelty Free International that spanned from 2019-2020 at Vivotecnia documenting sickeningly cruel behavior inflicted upon the animals that not only violates the directive but violates all animal welfare laws at the very least and any sense of morality.

The disturbing footage is here: https://youtu.be/joH_DR8heJI

Employees can be seen violently shaving beagles' heads and angrily taking a thick black pen to their heads in order to draw a number on them, as seen in the photo. The degrading sick nature of this behavior is not only unnecessary but cruel and violates any minimum of animal welfare standard.

Then, we see an individual shoving a tube down a beagle's throat in an attempt to administer oral gavage. It is clear this person has no regard for the beagle's pain, feelings or care, nor does this person have any experience or expertise in performing this procedure in any ethical and scientific manner.

The dogs are shown being picked up by the scruff of the neck and thrown into boxes or cages.

Legislation in Spain requires that all personnel working with animals for scientific purposes must have "adequate prior training."

When the footage was released, there was quite obviously anger within the community. It appeared legal and criminal action would be taken.

"We were dismayed to see the images," the head of the government's directorate-general for animal protection, Sergio Garcia Torres, told AFP....

"After verifying the facts, the research activities at the centre were immediately, temporarily suspended, and a ban was put in place on carrying out any new projects involving animals," the regional government said in a statement.

"What we see in the video reveals unacceptable animal welfare standards and a violation of many requirements laid down in the EU directive 2010/63/EU – the most stringent legislation in the world for the protection of animals used in science," said a European commission spokesperson.

"The commission expects the Spanish authorities to investigate the matter in full and clarify how this situation was allowed to happen," the spokesperson added.

Veterinarian Joan Antoni Fernández Blanco, who works with the Barcelona Biomedical Research Park, said of the allegations, "It's not justifiable to allow a live animal to suffer and not take any kind of measure."

Once an animal's physiology is altered due to stress, any testing data collected on that animal is essentially unreliable – ultimately it is in the best interest of the researchers to ensure the highest standard of animal welfare or risk "using a lot of animals for nothing", he said.

This is a critical statement and it is made by an individual who is not involved in this matter and who is a veterinarian specializing in animal research science.

The conditions upon which Vicotecnia perpetrate upon these animals render any testing completely useless.

Despite the violations of law and public outrage, Vicotecnia was never closed and was allowed to continue operations.

The Madrid Ministry of Agriculture, Livestock and Food had decided that animal tests at the facility could resume despite ongoing legal action by Cruelty Free International and a number of Spanish organisations.

On November 25, 2021, Spain passed a novel law giving animals sentience, thereby essentially stating that animals are no longer considered "objects" by the law. Animal "sentience" refers to the ability of animals to feel and experience emotions such as joy, pleasure, pain, fear and any other feelings humans feel.

This law is critical because it recognizes that animals used in experimental research and testing feel the pain inflicted upon them. As if we did not already know that, at least now it is codified in law.

Furthermore, the EU directive 2010/63/EU encompasses the Three R's in legislation. This means that Spain should be adhering to:

1. Replacing animals with non-animal methods as much as possible,

2. Reducing the use and number of animals as much as possible, and most poignantly for purposes of this letter,

3. Refining experimentation methods in order to cause the least amount of suffering possible.

Not only does the footage portray that "refining" has been completely ignored, but it reveals blatant animal cruelty and severe abuse. The individuals responsible for the abuse portrayed should have been and should be imprisoned for animal cruelty. If that is not enough, years of studies have shown that killers begin by maiming, mutilating and killing animals, then move on to human beings. What is shown is not science, not even close. These individuals should not be walking free amongst others in society and the laboratory should be closed.

The Penal Code (2015) provides that the mistreatment of any animals with the exception of noncaptive wild animals, is punishable by up to two years imprisonment. *Why has this not happened*?

Why has Vivotecnia been allowed to continue their practices? Why has nobody been convicted of animal crimes and why, after all of this evidence, public pressure and the obvious new animal welfare regulations, has the government not forced the release of these beagles to Beagle Freedom Project and closed this facility?

I implore you to do the right thing, for the animals, for science and for society. We stand at the ready to hear from you. While you might have taken a huge step in the right direction with the animal sentience law, you have taken 10 steps back with the cruelty you are allowing now in direct contradiction to this law.

It is a sad state of affairs when the United States must get involved but we have our resources and celebrities at the ready to embarrass and shame you and your country for crimes against animals and humanity.

I look forward to hearing from you within 24 hours from this email. You may reach me at:

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Yours In Freedom,

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Shannon Keith, Esq. President & Founder, Beagle Freedom Project

Beagle Freedom Project is a non-profit 501(c)(3) international charity with supporters across the globe. BFP has rescued, adopted and rehabilitated over 3,000 animals from research, testing and experimentation in 12 countries and 39 states. BFP is the foremost organization most qualified in understanding the very special needs of these animals and is able more than any other organization to place these animals in the proper homes and care for them for life. BFP also works to legislate and advocate for change for a better world for animals and humans alike, for better science and an ultimate end to animal testing.