



Science Advancement & Outreach
A DIVISION OF PETA

1536 16th St. N.W., Washington, DC 20036

December 8, 2025

Council of Councils
Division of Program Coordination, Planning, and Strategic Initiatives
National Institutes of Health

Dear Council of Councils members:

I'm writing on behalf of Science Advancement and Outreach, the biomedical research policy division of People for the Ethical Treatment of Animals, to request that the Council of Councils advise the NIH Director and the Division of Program Coordination, Planning, and Strategic Initiatives to take additional actions related to the agency's [April 29th policy directive](#) to prioritize human-based research technologies and reduce the use of animals in NIH-funded research.

Request #1: Expedite the formal establishment of ORIVA.

While there have been commendable steps—such as disallowing animal-only funding opportunities and launching the Standardized Organoid Modeling Center—many key commitments outlined in the policy directive remain unmet.

More than seven months after the announcement, the Office of Research Innovation, Validation, and Application (ORIVA) has yet to be established. This delay is preventing the critical coordination needed to align agency activities with the directive. The absence of ORIVA is evident in the agency's continued funding of unnecessary experiments on animals.

Request #2: Direct OPA to:

- **Convene an impartial working group to systematically review NIH-supported research areas, identifying opportunities to replace animal use with approaches that offer greater scientific or economic benefit, and identifying projects where the harm to animals exceeds realized outcomes.**
- **Develop and publicly report metrics to track NIH's progress in prioritizing human-based research and reducing animal use.**

While the April 29th announcement was a promising start, the plan lacks clear, actionable steps. The agency must first identify areas in which animal use can be phased out, specifically where:

- a) Non-animal, human-based methods can be used instead,
- b) Animal models have a poor record of human translation, or
- c) The harm to animals outweighs the realized or expected scientific benefit.

These analyses fall squarely within the scope of the Office of Portfolio Analysis (OPA) and would enable leadership to better manage research portfolios and optimize public investment in science.

In addition, the agency has not released any metrics by which “[progress toward reduction of funding for animal studies and an increase in funding for human-based approaches](#)” can be assessed. Without transparent benchmarks, public confidence in this widely supported goal will continue to erode.

Request #3: Direct ORIP to cease renewal of P51 grants to the seven NPRCs.

The urgency for immediate action is underscored by the Office of Research Infrastructure Programs (ORIP) funding of the seven National Primate Research Centers (NPRCs). Decades of public investment in the NPRCs have failed to significantly improve the health and well-being of humans, while causing severe and unnecessary harm to monkeys. The NPRCs are consistently cited for animal welfare violations, suffer from chronic leadership failures, and pose a significant public health risk as potential sources of zoonotic disease outbreaks. Instead of renewing public funding for the NPRCs, ORIP must provide a pathway to transition them into hubs for human-based research.

Thank you for your attention to this matter.

Our scientists are available to meet with the Council to discuss these requests and more.

Sincerely,



Emily R. Trunnell, Ph.D.

Director

EmilyT@peta.org