

September 9, 2026

Council of Councils
Division of Program Coordination, Planning, and Strategic Initiatives (DPCPSI)
National Institutes of Health (NIH)

Via email c/o Robin I. Kawazoe, Executive Secretary, kawazoer@mail.nih.gov

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, with several requests for the Council of Councils' consideration.

We commend NIH for establishing the Office of Research Innovation, Validation, and Application (ORIVA). We hope the office provides essential leadership for expanding and integrating human-based research methods across NIH. Its launch, however, must mark the beginning of a shift in NIH's research portfolio, rather than only an expansion of human-based science alongside continued funding of experiments on animals.

NIH has already recognized the need for both sides of this transition. In April 2025, the agency committed to "publicly report on research spending annually to measure progress toward reduction of funding for animal studies and an increase in funding for human-based approaches." Yet NIH has not publicly described the metrics, baseline, or timetable it will use to fulfill this commitment.

We ask the Council to recommend the following actions to the NIH Director and other leadership.

Request #1: Require NIH to publish its first annual report on funding for animal and human-based research and commit to an annual date by which future reports will be released.

NIH's reporting must provide enough information to determine whether the agency's investments are changing the composition of its research portfolio. At a minimum, the report should:

- Establish a baseline for NIH funding of projects involving animals and projects using non-animal, human-based approaches;
- Report annual funding totals for both categories, including institute- and center-level data;
- Identify spending on animal experimentation infrastructure, breeding programs, research resources, training, and the development of new animal models;
- Describe how NIH classifies projects that use both animal and non-animal methods;
- Report changes from the preceding year in both dollars and percentages; and
- Identify research areas in which funding for experiments on animals has been either reduced or increased.

NIH expressly pledged to measure a reduction in funding for animal experiments as well as an increase in funding for human-based approaches. Both measures are necessary to determine whether the agency is redirecting resources or simply adding new programs while maintaining the status quo.

Request #2: Direct NIH institutes and centers to identify and stop funding categories of experiments on animals that lack sufficient human relevance, translational value, or scientific benefit.

Investing in non-animal methods is necessary, but investment alone will not end experiments on animals. NIH continues to support animal-based infrastructure, breeding programs, training, model development, and research projects that maintain the use of animals. These investments create institutional and financial incentives for animal experimentation to continue even when human-based tools are available.

NIH should require each institute and center to review its portfolio and identify areas in which funding for experiments on animals can be ended, particularly where:

1. The research question can be investigated directly using human cells, tissues, data, participants, or computational approaches, or can be reframed to fit the use of these tools;
2. Systematic reviews and historical data demonstrate poor translation of animal experiments to humans; and/or
3. The harm imposed on animals is not justified by realistic and evidence-based expectations of benefit.

These reviews should result in shifts to funding priorities, and—if warranted—grant cancellations, not only recommendations for further method development. NIH should establish deadlines for discontinuing identified categories of animal use and redirect the associated funding toward human-based research and the practical transition of laboratories away from animal experimentation.

This approach would complement ORIVA's work. ORIVA can expand access to human-based methods, while it works with other offices within DPCPSI to review portfolios and funding policies to ensure that outdated, duplicative, or poorly translating animal experiments do not continue by default.

Request #3: Direct the Office of Research Infrastructure Programs to stop awarding research grants for the use of monkeys and other animals at the National Primate Research Centers (NPRCs) and transition these centers to hubs for non-animal methods.

The National Primate Research Centers are among the clearest examples of animal-based infrastructure whose continued federal support conflicts with NIH's stated direction. These centers maintain breeding colonies, facilities, personnel, and research programs built around the continued use of monkeys.

We urge NIH to announce that existing research grants will not be renewed and/or will be renegotiated to transition the investigators to the use of non-animal methods. The NPRCs (and newly renamed NBRCs) should become hubs for animal-free, human-based research, under the provision that they also prohibit the expansion of monkey breeding and experimentation and provide for the placement of monkeys in reputable sanctuaries.

Continuing to fund the primate experiments at the NPRCs/NBRCs would preserve one of NIH's most entrenched animal experimentation systems. Ending or renegotiating animal research grants would demonstrate that the agency's commitments apply not only to new initiatives but also to longstanding programs whose continued funding shapes the direction of biomedical research in a way that is misaligned with the priorities of the administration, the agency, and the public.

NIH has taken an important step by establishing ORIVA and issuing new funding opportunities and programs for non-animal, human-based methods. The next step is to ensure that its investments in human-based research are accompanied by deliberate, measurable reductions in animal use and funding.

Thank you for your attention to these requests. Our scientists are available to meet with the Council and NIH leadership to discuss their implementation.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Trunnell". The signature is fluid and cursive, with the first letter "E" being large and prominent.

Emily R. Trunnell, Ph.D.
Director
EmilyT@peta.org
ScienceAdvancement.org