



### Inspection Report

Bethyl Laboratories Inc.  
P. O. Box 850  
Montgomery, TX 77356

Customer ID: **1414**  
Certificate: **74-R-0044**  
Site: 001  
BETHYL LABORATORIES, INC.

Type: FOCUSED INSPECTION  
Date: 13-APR-2017

#### 2.31(e)(5)

##### INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE (IACUC).

Approved protocol #220161106-EM does not contain adequate information to determine if a complete description of euthanasia methods has been included. Current industry standards and guidelines require that a complete animal euthanasia process include confirmation of death prior to disposal of the body. The facility protocol and related standard operating procedures contain little relevant criteria for confirmation of death following euthanasia. Discussion with facility personnel indicate criteria may not be uniformly standardized at the facility.

Prior to protocol approval the IACUC must determine that an activity involving animals contains a complete description of euthanasia methods, processes and animal use. Correct by: May 1, 2017

#### 2.32(c)(4)

##### PERSONNEL QUALIFICATIONS.

The facility does not have a formal training program in place that instructs personnel of reporting method options whereby any deficiencies in animal care and treatment or protocol deviations can be communicated to the IACUC. Any alleged deficiencies must be brought to the attention of the IACUC and eventually reach the IACUC Chair so that the IACUC can fulfill the required function of reviewing and investigating animal welfare concerns as described under 2.31(c)(4).

Current institutional policies and communication pathways that can be followed by employees to bring animal welfare concerns to the IACUC should be reviewed, modified as needed and implemented. Training and guidance in these procedures should be provided for all facility employees. Correct by: May 19, 2017.

Prepared By:

**MARY MOORE**  
MOORE MARY, D V M

Digitally signed by MARY MOORE  
DN: c=US, o=U.S. Government, ou=Department of  
Agriculture, cn=MARY MOORE,  
0.9.2342.19200300.100.1.1=12001000185528  
Date: 2017.04.19 20:24:50 -0500

Date:  
19-APR-2017

Title: VETERINARY MEDICAL OFFICER 1044

Received By:

*Stacy Carlson*  
SENT VIA EMAIL

Date:  
19-APR-2017

Title: ATTENDING VETERINARIAN



### Inspection Report

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This inspection included review of IACUC related documents, functions, protocols, facility standard operating procedures and programs.

The inspection and exit interview were conducted with the AV, IACUC Chair and other IACUC members.

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**MARY MOORE**

Digitally signed by MARY MOORE  
DN: cn=US, o=U.S. Government, ou=Department of Agriculture, cn=MARY MOORE,  
0.9.2342.1.9200350.100.1.1=12001000185528  
Date: 2017.04.19 20:25:47 -0500

**Prepared By:**

MOORE MARY, D V M      USDA, APHIS, Animal Care

**Date:**  
19-APR-2017

**Title:** VETERINARY MEDICAL OFFICER 1044

**Received By:**

*Stacy Bloum*  
SENT VIA EMAIL

**Date:**  
19-APR-2017

**Title:** ATTENDING VETERINARIAN