

RESOURCE SHEET NUMBER 2 - **Commercial Breeders (Marshall BioResources and Envigo)**

The Animals (Scientific Procedures) Act 1986 revised 2012 (ASPA) and its Code of Practice sets out minimum guidelines, not even best practice for the care, transit, housing and killing of research animals. For example, Establishment standard condition 4 refers only to 'adequate care and accommodation' appropriate to the species.

Both of the commercial breeding companies in the UK have a well-documented history of international animal abuse. A high profile Envigo site in West Virginia, USA was recently closed due to gross welfare violations. The USA permits research animals to have rights to within their welfare regulations, unlike the UK, that explicitly excludes research animals from both the sentience bill and the Animal Welfare Act.

The Animals in Science Regulatory Unit (ASRU) actively supports these companies and permits them to operate beyond the reach and oversight of the public, deeming them to be low-risk. Inspections are minimal, announced, brief and increasingly carried out virtually.

At MBR Acres Limited (Marshall BioResources) in Huntingdon, beagle puppies are bred for the research industry in conditions reflecting an industrial scale puppy factory with over 1,200 dogs on site at any one time. The dogs are left unattended 20 hours a day at weekends and 16 hours a day during the week. Once the staff have left only security remains patrolling the outside areas, they have no access to the sheds where the dogs are kept.

The beagles are housed in soundproofed, windowless industrial sheds, they have no access to the outside world, no natural light, no bedding, not even a bowl of water. This American company also flies in many thousands of beagle puppies from their breeding facilities in New York, to Europe, including to the UK.

The number of staff reduced from 41 in 2017 to 21 in 2022. A basic welfare need is that a veterinary surgeon and care staff should be on site 24/7 yet neither are.

Close laboratory animal commercial breeding facilities - they have global animal welfare indictments. Their priority is profit, certainly not animal care.

Camp Beagle wishes to close down MBR Acres, a huge beagle breeding factory, which supplies about 2,000 puppies a year to toxicology testing laboratories across the UK. The



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priority of this USA commercial Company is profit, not animal welfare.

Marshall's have just had a 5-year licence renewed by the Home Office to bleed out ex-breeding bitches and studs and grade B puppies so their blood and organs can be sold. This is under terminal anesthesia and most commonly via cardiac puncture which is literally bleeding from a beating heart.

Puppies are sold and transported in vans at around 20 weeks old to undergo repeat dose toxicity testing. Customers include Labcorp in Huntingdon and Harrogate, Sequani in Ledbury and Charles River in Tranent, Scotland which is a grueling 6-8 hour journey.

MBR Acres was granted an establishment licence in October 2017. Since then the Animals in Science Regulatory Unit (ASRU), the regulator) has conducted just twelve on-site inspections, only six of which were unannounced.

During a recent court case a protester was found not guilty on all counts. The Judge asked about a MBR Acres employee role and she explained she was an animal technician which meant she cared for the animals. On being asked who was caring for the dogs when the staff left (he mentioned the 36 hour absence at weekends) her answer was no-one.

This company has a well-documented history international animal abuse and yet it is considered by ASRU to be low risk and therefore unannounced visits are inadequate (30 minutes in one case) and infrequent. The only time an inspector noted having seen dogs in outside pens was on arranged visits on 25th April 2018 and 27th November 2020. An inspector's report on 13th November 2019 notes that 'outdoor exercise areas in particular being somewhat neglected.' Transportation, bleeding (be it by donor dogs or terminal anaesthesia) and surgery had not been observed on any visits up to 28th June 21.



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W. Gilman Marshall was born in 1917 near North Rose, a small town in New Jersey. After graduating from Syracuse University in 1939, Marshall returned to North Rose, along with his wife Ina Stevens, intending to make a living at the town's canning factory.

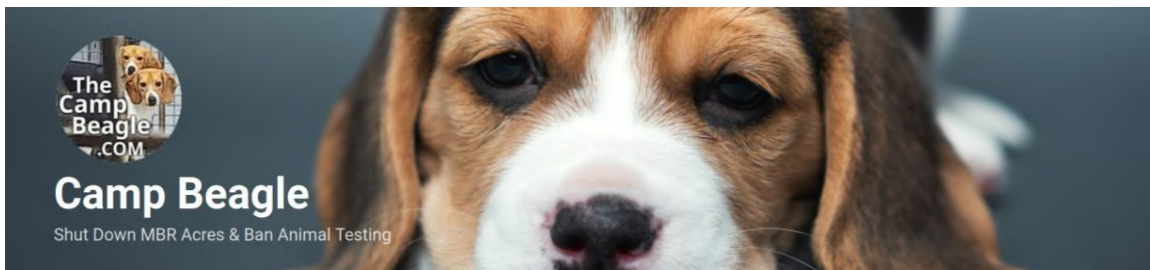
He founded a small ferret business with Ina, having purchased his first ferret in 1938 to hunt rabbits. Soon Marshall began breeding ferrets, selling most to local farmers. Ferrets reproduce quickly, and Marshall soon found himself with more than he could easily sell as rural hunting companions. There was though a strong demand from nearby companies, who were required by federal law to conduct animal tests of their canine distemper treatments and preferred to use ferrets for this purpose.

By selling ferrets to laboratories Marshall started to earn a meaningful supplementary income for his fulltime job. Gradually, the business began to consume all of his time. Gilman Marshall's farm became "Marshall Farms."

To ensure steady profits, Marshall planned a two-part business model: selling ferrets to researchers and breeding a select number of minks for clothing manufacturers. Marshall's focus on the scientific market and his eye for effective advertisement paid off, generating steady growth for his operations.

Marshall took out small notices in publications such as *Science*, trumpeting his ferrets as "The ideal animal for distemper and influenza work." Unlike other breeders, Marshall claimed his ferrets were "reared especially for laboratory use" The farm, a family business run with the help of his nephews and teenage sons, gained a large concrete block structure to house the expanding ferret colony in 1956. By 1960, the family was shipping ferrets across the continental United States and internationally, sending them as far away as Japan. Later in the decade, "Gilman Marshall Ferret Ranch" began to appear in early scientific resource manuals as a "commercial breeder" capable of supplying corporate entities and laboratories. To the present day, Marshall Farms remains one of the largest ferret breeders in the world, and American pet shop ferrets are frequently traceable back to Marshall.

In 1962, the company added a new animal to the mix: starting with just one breeding pair, Gilman Marshall began to breed beagles. He may have feared that ferrets alone would not sustain business, or heard about the potential value of beagles from his customers. First and



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foremost, however, Marshall was responding to the same shifts in toxicology testing standards that propelled beagles into the spotlight more broadly.

Initially reticent about using dogs for research, Marshall concluded it “was justified because you’ve got to test drugs on something and it’s better to use dogs than humans”

In February 1964 advertisements in the livestock section of Syracuse’s *Post-Standard* promised over two hundred “Peppy, slick friendly pups of all ages from champion bloodlines,” By November it was reported that Marshall had signed a deal with the National Cancer Institute to sell 120 beagles for \$9,000 as test subject stock for drug toxicity screening transplant surgery and radiation studies.

Two years later, the National Institutes of Health bought sixty beagles from Marshall at a total cost of \$4,170 for use by scientists such as pathologist Oscar Auerbach, who was investigating the cigarette-cancer linkage. In 1964, Marshall’s company appeared in the National Academy of Sciences’ Institute of Laboratory Animal Resources sourcing guide as “Gilman Marshall Ferret & Beagle Ranch.”

As he had with ferrets, Marshall was quick to see the value of branding his dogs as *scientific* commodities. “These dogs are better than those you would buy for pets or hunting dogs,” he explained to a newspaper interviewer, emphasizing the importance of purebred, pedigree dogs whose entire life history was available to researchers. Marshall was not simply selling beagles *to* laboratories, but rather breeding them *for* laboratory sale.

The passage of the 1966 Animal Welfare Act gave the enterprise a further boost by pushing many researchers to invest in purebred research canines like Marshall’s. In 1969, the farm began selling scientific miniature pigs as well. In 1975 it lost a competitive bid to supply 350 beagle puppies to the US Army for chemical weapons tests. The company, now rebranded as “Marshall Research Animals,” sold 6,595 dogs to researchers across the United States in 1976 for an approximate total of \$1million. That figure made Marshall the single largest retailer of scientific beagles in the United States, compared with its four principal competitors: White Eagle Farms in Pennsylvania, Ridgland Farms in Wisconsin, Hazleton Laboratories in Virginia, and Laboratory Research Enterprises in Michigan.



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Collectively, the five companies produced more than 25,000 beagles each year for research in the United States, and nearly seventy-five percent of Marshall beagles went to pharmaceutical companies. The numbers were expected to grow, as the Toxic Substances Control Act of 1976 required new tests of chemicals on live animals and prices were rising to match: the Army paid \$80 each for 400 beagles in 1973, but received bids of up to \$127.50 per dog in 1975.

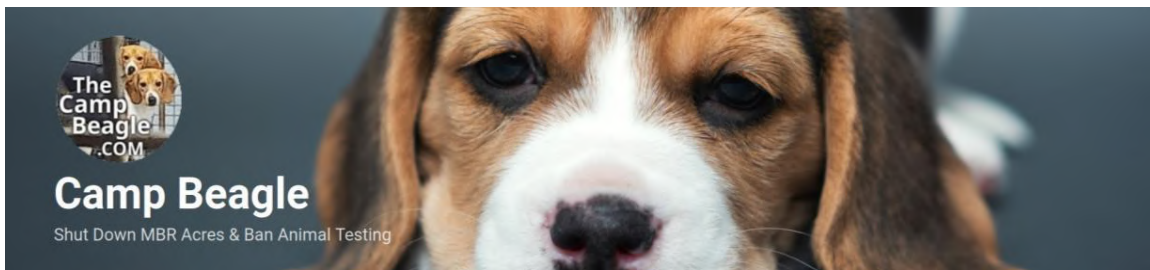
Marshall's advertising grew grander and in 1978, a full-page advertisement in *Laboratory Animal Science* touted beagles and ferrets, but placed the dogs first, a clear sign of their shifting market priority. "When you order a Marshall Beagle," the ad explained, "you order a healthy, friendly dog with a quiet temperament who will readily adapt to the life in your laboratory." The company claimed that its dogs were carefully socialized from birth: "A handled dog is more trusting," explained Gary Marshall (Gilman's son). The company's mass production system also meant, according to the advertisement, a "continuous supply" of dogs to ensure "more meaningful data from your laboratory testing procedures."

A similar ad in 1980, this time featuring only the beagles, recommended those not using Marshall's beagles to ask a researcher who already was: "Our customers are our best salesmen," it claimed, implying the growing dispersal of Marshall dogs.

In 1985, an ad lauded the Marshall beagle as a "suitable and most affordable alternative to mongrels in pharmacological and surgical studies." The company clearly understood its market.

From 1980 until the mid-2000s, dogs were shipped by air from Marshall's extensive New York breeding facilities. In 1990, Gilman Marshall's original small barns had become thirty buildings sprawling across 105 acres and holding 12,801 beagles. Marshall's 1990 ad campaign claimed the company was "Building a Better Beagle," touting a supposedly high-tech computer system that tracked each dog's genetic background.

In 1992, CEO Gary Marshall, was taken to court after a shipment at JFK International Airport, destined for toxicology researchers in Switzerland, was stopped by inspectors over fears that the cages might collapse mid-flight. Marshall avoided paying a \$220,000 fine by agreeing to



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train all of his employees in the safe international shipment of dogs. Switzerland was only one of their many destinations: by 1992, Marshall beagles were shipped to nearly every continent for toxicological and other research purposes.

In 1998, Marshall advertisements announced that the beagles were “A global standard—with the papers to prove it.” In August of the next year, just before the dawn of a new millennium, the “Marshall Beagle” became a trademarked entity and the multinational company became Marshall BioResources. Marshall was no longer a farm but a producer of “resources.” Where previous researchers had worried about national variations in the beagle and even drawn the dogs differently, Marshall now promised universal uniformity, with a single, trustworthy product that would look and function the same way everywhere.

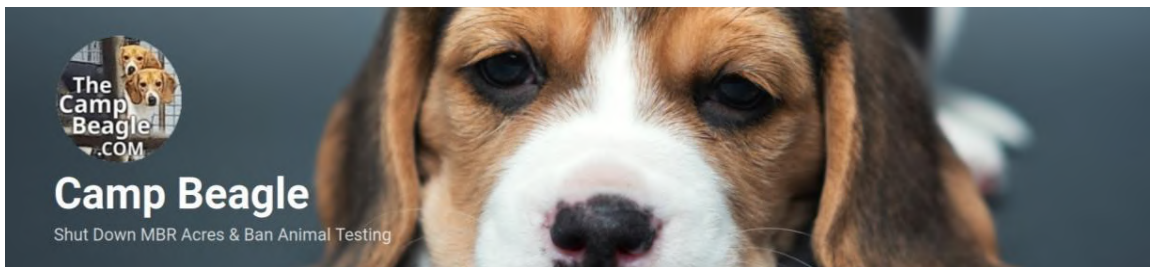
Under family control since its founding, Marshalls is smaller than well-known animal suppliers such as Charles River Laboratories, but in 2015 it shared around forty-five percent of the scientific beagle market with multinational contract research organisation Covance.

Marshall has carefully avoided media attention, resulting in a quiet yet significant international expansion over the previous three decades. Its first international facility opened in 1994 in Lyon, France operating under the seemingly ironic corporate name “Utopia.” Marshall’s Lyon facility was followed, around 2002, by the acquisition of a breeder in northern Italy known as Green Hill and a joint venture in China, Beijing Marshall Biotechnology.

Marshall started operating a facility in Tsukuba, Japan and purchased a British competitor, B&K Universal Ltd., to access its facilities and expertise in England. Marshalls and B&K opened a controversial beagle and ferret breeding facility in Grimston, near Hull, in northeast England in 2013.

The movement to expand into new countries was likely a response to tightening legal restrictions on air transportation of mammals destined for laboratory research, restrictions that had when first affecting air shipments of primates from India, originally helped Marshall expand its market.

The controversy at JFK was only one instance of multiple decades of friction, including a 2007 decision by Air Canada to stop Marshall’s shipments that culminated in bans from



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most major airlines in 2012. The last two decades, in fact, have been a fractious one for the international market in laboratory beagles, with Marshall often behind the headlines.

Beijing Marshall Biotechnology Co., a relatively silent partner, came to the fore in 2012 when an illicit shipment of beagles destined for Indian contract researcher Advinus was caught on arrival in Chennai by activists. Marshall had obviated Cathay Pacific's policy against transporting lab mammals by listing them on flight logs as "pets."

In 2016, Marshall opted to sell off its "Green Hill" breeding facility in northern Italy, one of the larger dog suppliers for drug research in Europe. Findings there were: Over four years, MBR had killed over 6,000 dogs, deliberately inducing heart attacks in several of them. MBR's European Director was sentenced to 18 months in prison for animal cruelty, alongside two of her colleagues. The conduct of public health department veterinarians inspecting the farm was obviously negligent. The practice of giving prior warning of health department inspections to Green Hill was deeply embedded and said inspections were carried out inadequately. The Public Prosecutor defined the inspections as "superficial". There was a lack of exercise areas for the dogs. Dogs were left unattended 6pm to 7am which was deemed to cause unnecessary suffering.

In 2015 during a US Department of Agriculture (USDA) inspection, MBR's New Jersey facility was cited for violating animal welfare regulations. Dogs were found to be living in their own faeces.

In 2016 due to unhygienic conditions, dog pens at MBR in NJ were infested with flies, and the USDA cited them again. They have received over 20 citations since 2004, with dogs found in freezers, and puppies killed in front of one another.

Marshall's American facility held an estimated 22,000 beagles in June 2018. Current estimates are 23,000 beagles.

Envigo (part of Inotiv since November 2021)

A 2021 People for the Ethical Treatment of Animals (PETA) undercover investigation found 5,000 beagle dogs and puppies intensively confined to small, barren kennels and cages 24/7 at a massive breeding factory in Cumberland, Virginia. The mothers were forced to breed



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twice a year for up to seven years, and the facility produced around 500 puppies each month to sell for experimentation.

The PETA US investigator found more than 360 dead puppies in the course of the investigation. Some had been crushed by their mothers in the cramped cages that they were forced to live in, others died of pneumonia or hepatitis, and some had been left to rot alongside their surviving siblings.

During the course of the investigation, the facility was owned and operated by Envigo.

https://www.youtube.com/watch?v=HW3_fJU1Ly8

In May 2022, a federal court in Virginia granted the Justice Department a temporary restraining order, an emergency procedure used to halt ongoing misconduct threatening irreparable harm, against this facility. The court concluded that such extraordinary relief was necessary because of the serious and repeated Animal Welfare Act violations documented by USDA investigators over a 10-month period.

The order followed execution of a federal search warrant at the facility, during which law enforcement officers seized a total of 446 dogs and puppies, including 145 on the first day, needing immediate care to “alleviate life-threatening illnesses or injuries,” and identified many others requiring medical attention. To argue for the restraining order, the DOJ included a necropsy report, completed two days before the raid began, that exemplified the extent of the catastrophic neglect, abuse, and suffering. A puppy’s cause of death was “unknown” because they had been “eaten and only has a head left.”

Workers and a supervisor routinely left dogs in their cages as they sprayed them with high-pressure hoses, leaving the soaked puppies to shiver on the hard plastic floors and their food to grow moldy and become infested with maggots. Puppies also fell through holes in the cages and ended up in drains, soaked with water, faeces, and other waste.

Workers with no veterinary credential’s stuck needles into puppies’ heads, apparently to drain hematomas, without any pain relief, causing the puppies to scream. They also cut prolapsed tissue off puppies’ eyes with scissors, among other medical procedures.



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Workers were instructed to use clamps to remove newborn puppies' dewclaws, where bone meets nail, without any pain relief.

Workers were also tasked with pressing needled clamps into puppies' ears, as their mothers looked on, and then rub paint into the resulting holes to tattoo them. Dozens of puppies were tattooed three times, first with the wrong information, the second time with "X"s over the mistakes, and then again with the intended tattoo.

The court noted that US Department of Agriculture (USDA) inspectors had documented more than 60 violations, with over half being the most serious type. These violations encompassed failings in fundamental animal welfare requirements such as veterinary care, staffing, housing, sanitation, recordkeeping and feeding. Inspectors found, in a 10-month period, that "many [dogs] were not given anaesthesia before they were euthanized by intracardiac injection. Beagles with even minor injuries or easily treated medical conditions were euthanized rather than given veterinary care. Nursing female beagles were denied food. The food that the beagles did receive was observed to contain live insects, worms, maggots, beetles, flies, ants, mould, and faeces." Inspections noted that Envigo had failed to determine the cause of death for over 300 puppies, including 173 so decomposed it was impossible to determine the cause of death.

In July 2022 Envigo was permanently barred from "any activity requiring a federal Animal Welfare Act licence" at the company's Cumberland beagle-breeding factory and laboratory, including breeding and raising dogs for sale and experimenting on animals. The remaining dogs were made available for adoption.

In March 2023, Dr. Betty Goldentyer, a top official of the USDA that failed the Envigo beagles stepped down. This sudden announcement came after she and at least one other top Animal Care official were brought before a federal grand jury to answer questions about their failure to take action against Envigo, even though veterinary inspectors repeatedly documented the systemic mistreatment of beagles over a period of 10 months.

Envigo also operate breeding facilities in the UK. On 29th April 2022, 96 Beagles were flown from the Envigo Cumberland breeding facility via Denmark to Envigo in Belton Leicestershire. These and other shipments are believed to have been to move stock around prior to the facility closure. The 96 dogs were likely later sold to laboratories. Toxicity



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shipments tend to be in batches of 32. As far as we know Envigo, Belton do not sell live dogs to laboratories however they do sell blood and body parts. It is likely a non-competition clause was agreed when Marshalls bought the Wyton site from Envigo (that had taken over Harlan In 2015).