

Report on the Inspection of Palamur Biosciences Private Limited

Submitted on 17th June 2025

Disclaimer

This report has been prepared by the inspection team tasked with conducting a fact-based verification into allegations of cruelty to animals and serious non-compliance with regulatory requirements at Palamur Biosciences Pvt. Ltd. (PBPL). The inspection was undertaken with the objective of assessing the facility's adherence to applicable animal welfare laws, guidelines, and standards.

The observations and findings recorded herein are focused on areas of concern that warrant immediate attention and remedial action. While the report highlights key gaps and deficiencies observed during the inspection, it is not intended to serve as an exhaustive documentation of all operational procedures or standard practices at PBPL.

This report represents the considered findings of the inspection team, based on direct observations, review of documents, information made available by PBPL representatives, and other relevant evidence gathered during the course of the visit. It is submitted to the CCSEA for further examination and appropriate action under the relevant regulatory provisions.

I. Executive Summary

The inspection of Palamur Biosciences Pvt. Ltd. (PBPL) on June 11, 2025 and June 12, 2025, conducted by a multidisciplinary team comprising members from the Committee for the Control and Supervision of Experiments on Animals (CCSEA), the Animal Welfare Board of India (AWBI), the Institutional Animal Ethics Committee (IAEC), and Humane World for Animals India Foundation, was initiated to verify recent allegations of animal welfare violations involving dogs, pigs, and monkeys used in research during the period 2021–2023.

PBPL currently houses a substantial number of animals: approximately 1,169 dogs, along with monkeys, pigs (including minipigs and mixed breeds), sheep, cattle, and an undetermined number of rodents and lagomorphs (rabbits). The overall population of dogs far exceeds CCSEA-approved limits, with multiple species present without adequate disclosure or accurate record-keeping. Critical documentation - including consolidated animal inventories, veterinary treatment records, and breeding logs - was consistently absent, incomplete, or untraceable.

The inspection revealed serious and widespread non-compliance with CCSEA regulations. Key welfare violations included overcrowded and barren kennels, lack of environmental enrichment, feeding practices not aligned with the animals' physiological needs and body weight requirements, untrained and rough handling practices, and an alarming absence of protocols for pain management, sedation, and euthanasia. Veterinary infrastructure was critically inadequate, with poor medical coverage, minimal drug availability, and no functioning isolation or quarantine facilities.

Particularly disturbing were the euthanasia practices observed: beagle dogs were euthanised using thiopentone sodium without prior sedation, and monkeys subjected to invasive surgical procedures involving implantation and daily wound care were physically restrained using gloves, with only analgesics administered post-procedure and dressing, and no sedatives provided. There was no protocol in place to address anxiety, fear, or psychological distress in animals—highlighting a grave neglect of mental welfare, and a veterinary protocol grossly failing to meet even the minimum required standards for the prevention of unnecessary suffering.

Furthermore, deliberate obfuscation was evident in PBPL's failure to provide CCTV footage from critical areas and in the non-disclosure of certain species during the inspection. Inconsistencies between reported study approvals and the actual number of animals on-site strongly suggest potential regulatory breaches.

The inspection team concluded that many of the allegations raised by PETA India's whistleblower—including overcrowding, veterinary neglect, inappropriate handling, and euthanasia violations—were substantiated or could not be conclusively refuted due to the absence of required documentation.

Overall, the findings reflect a systemic and ongoing disregard for regulatory compliance, ethical responsibility, and animal welfare. Immediate regulatory action is warranted, including the removal and rehabilitation of animals in order to prevent further unnecessary pain and suffering, as well as a review of PBPL's registration and breeding licence status.

II. Introduction

1. **Date of Inspection:** 11th and 12th June 2025
2. **Time of Inspection:** On-site from 2:30 PM to 11:30 PM on 11th June; remote inspection from 10:00 AM to 12:00 PM on 12th June
3. **Name of Institution:** Palamur Biosciences Pvt. Ltd.
4. **Type of Institution:** Private
5. **Location:** Karvina, Madigattla Village, Bhoothpur Mandal, Mahabubnagar 509 382, Telangana, India
6. **Purpose of Inspection:**
To verify complaints regarding the alleged abuse and neglect of dogs, pigs, and monkeys used in research and testing at Palamur Biosciences Pvt. Ltd. (*hereinafter referred to as PBPL*), Mahabubnagar, Telangana, during the period 2021–2023. The inspection also aimed to assess the overall conditions and practices related to animal care and use at the facility.
7. **Inspectors:**
 - Dr. Mukesh Kumar Gupta – Member, CCSEA & Director, ICMR-NARFBR, Hyderabad
 - Dr. Manilal Valliyate – Member, AWBI
 - Dr. Vivek Tyagi – Senior Consultant, CCSEA
 - Dr. B.D.P. Kala Kumar – Main Nominee, IAEC
 - Shri A. Madhava Rao – Socially Aware Nominee, IAEC
 - Ms. Alokparna Sengupta – Managing Director, Humane World for Animals India Foundation (formerly known as Humane Society International/India)

III. Animal Use Details

1. Species Used in Experiments:

The facility reportedly uses dogs, pigs (minipigs and mixed breed pigs), sheep, cattle, monkeys, and other species for experimental purposes.

Species-wise Distribution of Animals Housed at the Time of Inspection

It is physically not feasible for the inspection team to individually count the animals or determine their sex and age in the absence of any records provided by the facility. However, this exercise was carried out for the dogs and cattle at the housing facilities that were shown to the inspectors, though the numbers observed may not accurately represent the total number of dogs being housed or used by the facility.

Detail of animals	Species	Number	Sex	Age	Remarks
Monkeys	<i>Macaca mulata</i>	No record	No record	No record	Not counted by inspectors.
Pigs	<i>Sus scrofa domestica</i> and mixed species	No record	No record	No record	Not counted by inspectors.
Dogs	<i>Canis lupus familiaris</i>	No record	No record	No record	1169 numbers based on the headcount conducted by the inspectors at the facilities that were shown.
Cattle	<i>Bos Indicus</i>	No record	No record	No record	12 numbers based on head count.
Sheep	<i>Ovis aries</i>	No record	No record	No record	Not counted by inspectors.
Rodents [Mice, rats, rabbits]	No records shown, and no animals were presented for inspection	-	-	-	No inspection was carried out, as it was not a part of the mandate given to the inspection team by CCSEA.

PBPL failed to provide any documentation detailing the number, age, sex, or species-wise inventory of animals held or used at the facility, despite repeated requests. Although staff acknowledged the existence of an internal Excel spreadsheet containing this information, it was never shared with the inspection team.

Headcount and Observations from the Inspection

Facility	Facility Name	Number of kennels/ cages/ enclosures	No of animals	Remarks
Dogs				Headcount done by inspectors
Breeding Facilities	Module - A	40	85	
	Module - B		200	30 adults + 170 pups
	Module - C		122	36 adults + 86 pups
	Module - D	36	95	
	Maternity (MAT-1)	44	132	Pups 2-4 months
	Maternity (MAT- II)	45	126	Pups above 4 months
	Stock	42	61	Pups above 5 months
Experimentation Facilities	Experiment Room 2		32	
	Experiment Room 3		39	Stock animals accommodated without prior screening
	Experiment Room 6		40	
	Experiment Room 7		62	
	Experiment Room 10		40	
	Experiment Room 11		16	
	Experiment Room 13		46	Stock animals accommodated without Prior screening
	Rehabilitation		73	62 male + 11 female
Total			1169	594 adults + 575 pups
Minipigs			14	9 male + 5 female
Non-Humane Primate			17	13 male + 4 female
Mixed-Breed Pig			13	As informed verbally
Sheep			7	As informed verbally
Cattle			12	Headcount done
Rodents & Others			Unknown	
Grand Total			1232 +	Unknown number of rodents and others.

2. **Non-compliances in Animal Use**

The headcount and placement of dogs housed at PBPL indicate that the facility is exceeding the number approved by CCSEA, in direct violation of regulatory limits, which is 1000 dogs. This overpopulation appears to stem from breeding activities surpassing the number of animals required for ongoing experiments. As a result, two rooms—originally designated for experimentation and located in close proximity to active experimental areas—were repurposed as stock rooms to accommodate the surplus animals. Notably, this was done without screening the dogs for infectious diseases. Veterinarians at the facility stated that the rooms would be fumigated and sterilised before being returned to experimental use; however, even if this is outlined in the organisation's SOPs, reliance on such reactive measures raises concerns regarding the robustness of biosafety protocols.

3. **Number of Animals Currently Under Rehabilitation**

At the time of inspection, 73 dogs—comprising 62 males and 11 females—were reported to be under rehabilitation. This information was provided verbally, with no supporting written documentation shared by the facility. However, a headcount conducted by the inspectors confirmed the reported total.

It was observed that the so-called "rehabilitation area" appeared to be a makeshift arrangement, with a fresh paper label affixed to the door designating it as such. The space itself was evidently an experimental room repurposed as a rehabilitation unit, with no meaningful changes made to accommodate the specific needs of animals undergoing recovery. The environmental conditions, infrastructure, routine practices, and personnel remained consistent with those of a laboratory setting, raising serious concerns about the adequacy, appropriateness and sincerity of the rehabilitation process.

4. **Number of Animals Reused for Experimentation**

The inspection team was informed that animals across all species are reused in multiple experiments, including pharmacokinetic and toxicological studies. In the case of dogs and minipigs, it was claimed that a three-year usage period is followed, with intermittent "washout period" of one month between experimental uses. However, no written policy documents, institutional protocols, or Standard Operating Procedures (SOPs) were provided to substantiate this claim. Practising a one-month "washout period" is a violation of CCSEA guidelines for reuse/rehabilitation of large animals post experimentation (2020), which mandates a minimum of three months as a "washout period".

It was conveyed that pharmacokinetic studies generally involve repeated use of the same animal, whereas toxicological studies are usually conducted only once per animal. The CCSEA guidelines for reuse/rehabilitation of large animals post experimentation (2020) mandate that animals showing liver or kidney impairment, within the three-year period, cannot be reused, and the detailed health status of all such animals shall be maintained in a prescribed format. However, in the absence of accessible records, there was no way to independently verify these practices.

IV. Compliance to CCSEA Mandates

Sl. No.	Particulars	Yes/ No	Remarks
1.	Registration with CPCSEA for experimentation	Yes	
2.	Registration with CPCSEA for breeding animals for experimentation	Yes	
3.	Whether 3R principles followed	No	<p>Reduction in animal use is a principle overseen by the CCSEA during the review and approval of research proposals.</p> <p>However, PBPL failed to demonstrate how many times individual animals were reused—a practice that requires specific approval from the CCSEA. The absence of such consolidated records strongly suggests non-compliance with regulatory requirements.</p> <p>As for the principle of Refinement, there appears to be a complete disregard. Despite conducting procedures that are invasive or likely to cause physical and psychological distress, the clinical examination areas adjacent to the experimentation rooms were found to be unequipped with basic medical kits. Furthermore, the medical inventory lacked essential sedatives, analgesics, and anaesthetics—key components for preventing unnecessary pain and suffering in animals. No consolidated treatment records were maintained to document either pain recognition or pain management.</p>
4.	Housing facilities for animals being bred	No	During the inspection of the dog breeding facilities at PBPL, several serious violations of housing and welfare standards were noted.

		<p>None of the dogs in the breeding modules were provided with any form of bedding and were left to lie directly on slippery tiled floors—an inappropriate and uncomfortable surface that fails to meet even the most basic animal welfare requirements.</p> <p>No environmental enrichment was provided, except few plastic bones—there were no toys, stimulation objects, or opportunities for social interaction. According to staff, the dogs were only let out of their cages during cleaning, indicating a highly restrictive and unstimulating environment with extremely limited chances for exercise or socialisation.</p> <p>The constant noise from continuous barking created an environment with dangerously high noise levels, indicative of widespread stress and discomfort among the animals. Alarming, the facility manager was unable to provide the exact number of dogs housed in the breeding section, and no records were available for verification.</p> <p>The kennels in the dog breeding section were generally dirty, soiled with faeces, and poorly maintained. The overall environment of the dog breeding units was uninviting and clearly neglected, reflecting a troubling disregard for the basic care, hygiene, and welfare needs of the animals.</p> <p>Hygrometers installed in the breeding areas showed excessively high relative humidity levels, ranging from 80% to 97%, which can pose serious health risks to the animals.</p> <p>The designated socialisation area for dogs measured approximately 550 square metres, was barren,</p>
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			<p>and had a hard concrete surface. Given that the facility houses over 1,000 dogs, each individual may have to wait weeks or even months for a single opportunity to access this limited space—rendering it functionally ineffective in promoting socialisation or improving welfare.</p> <p>In summary, the breeding modules for dogs at PBPL were found to be uncomfortable, poorly enriched, inadequately managed, and not aligned with the minimum standards of care expected for breeding animals.</p>
5.	Housing facilities for animals being experimented upon	No	<p>During the inspection of the experimental housing areas at PBPL, several serious concerns were identified regarding housing conditions, animal allocation, and the absence of species-appropriate enrichment. PBPL housed a range of animals—including dogs, monkeys, minipigs, pigs, and sheep—but all were confined exclusively to cages, with no access to open or enriched environments even when they were housed for more than three months, sometimes exceeding nine months. While some dogs and monkeys were housed in same-sex pairs, these arrangements are insufficient to support the natural social behaviours characteristic of these species.</p> <p>Critically, there were no dedicated outdoor enclosures or exercise facilities for non-human primates. This deprived the monkeys of any opportunity for natural movement, physical exercise, or cognitive stimulation. The lack of outdoor access and meaningful enrichment across species poses a significant risk to both the psychological welfare and behavioural health of the animals in PBPL's care.</p>

		<p>Environmental enrichment across all animal housing areas was grossly inadequate. In the experimental rooms for dogs, a few plastic bones were loosely scattered in the corridors. These rigid and repetitive items lacked the novelty or functionality to effectively engage the animals. No other enrichment tools or activities were present. Similarly, only a few minipigs were provided with enrichment in the form of cut PVC pipe sections—simple items that failed to sustain their interest or encourage exploratory behaviour. In the monkey enclosures, circular rings were suspended as the only form of enrichment. However, these minimal features were clearly insufficient to meet the cognitive and physical needs of the primates, particularly given their confinement to small cages, either alone or in same-sex pairs.</p> <p>Dogs: The dog housing units in the experimental section were equipped with artificial lighting and temperature-controlled environments; however, there was a complete absence of meaningful environmental enrichment. Plastic bones were haphazardly placed in the corridors but offered no meaningful engagement or stimulation for the animals. Several dogs from the breeding stock were found housed in two experimental facilities due to insufficient space in the designated breeding area—highlighting poor planning and inadequate resource management. Critically, these animals had not been screened for disease conditions prior to relocation, despite such screening being a mandatory prerequisite before introducing animals into experimental zones. This oversight raises serious concerns regarding contamination risks and compromised sterilisation</p>
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		<p>standards. Additionally, some dogs were reportedly transferred for experimental procedures without visible tags or identifiers, making it impossible to trace individual histories or monitor their use—constituting a serious violation of standard compliance protocols.</p> <p>Minipigs: The housing for minipigs featured polymer flooring with rectangular drainage openings, which are unsuitable for 24 X 7 housing of cloven-footed animals to stand or lie down comfortably. No meaningful environmental enrichment was provided. Although it was unclear whether these pigs were actively being used for experimental procedures, facility staff informed the inspection team that they had been imported from Denmark. A few minipigs were offered minimal enrichment in the form of cut PVC pipe sections, including L-shaped bends. However, these were significantly undersized relative to the pigs' body dimensions, and the design posed a clear risk of choking or injury, as the openings were small enough that animals could potentially attempt to insert their heads. This highlights a lack of considered design and a failure to meet even the most basic behavioural and welfare needs of the animals.</p> <p>Pigs (White Yorkshire Mixed Breeds): These animals were not initially disclosed to the inspection team, despite repeated inquiries. Their presence came to light only incidentally during a meeting, when scientists—while discussing ongoing cardiology-related studies such as pacemaker development—unintentionally acknowledged their use. The pigs were housed in enclosures similar in design to those used for dogs, albeit larger</p>
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		<p>in size. They were kept in isolated conditions on polymer flooring with drainage openings, which is inappropriate for 24 X 7 housing of cloven hooves and overall physiology. Furthermore, the absence of species-specific environmental enrichment highlighted a broader disregard for basic welfare standards.</p> <p>Sheep: Contrary to the facility's initial claim that no sheep were present, seven sheep were discovered by the inspection team in the experimental section during a visit to the mixed-breed pigs. This unreported presence reflects a serious disregard for regulatory compliance and a failure to meet the basic norms prescribed by CCSEA. Each sheep was individually caged without any form of environmental enrichment. The complete absence of social interaction or sensory stimulation raised significant concerns about their welfare. They were kept on polymer flooring with drainage openings, which is inappropriate for 24 X 7 housing of cloven hooves and overall physiology.</p> <p>Monkeys: The enclosures housing the monkeys offered little room for natural movement or social interaction. There were no dedicated outdoor enclosures or exercise facilities. The narrow metal platforms inside the cage made it difficult for the animals to sit or lie down comfortably, raising serious concerns about their physical comfort and overall welfare. The only form of enrichment observed was a single coloured ring suspended in each enclosure—an effort that proved grossly inadequate, failing to provide any meaningful cognitive stimulation or physical engagement.</p>
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			<p>Cattle</p> <p>Twelve cows were housed in a makeshift cattle shed with minimal infrastructure and inadequate protection from the elements. Continuous rainfall had led to water accumulation in parts of the shed, creating damp and unsanitary conditions.</p>
6.	Housing facilities for animals being rehabilitated	No	<p>Dogs:</p> <p>The rehabilitation facility for dogs was found to be a small, corner room located on the first floor of the building. It was observed that the so-called "rehabilitation area" appeared to be a makeshift arrangement, with a fresh paper label affixed to the door designating it as such. The room was evidently an experimental space that had been repurposed, with no meaningful changes made to support the functional and welfare needs of animals in recovery.</p> <p>The environment was entirely artificial, with no access to natural light and fully temperature-controlled conditions. The flooring consisted of hard perforated polymer flooring with integrated drainage, which may cause discomfort, offering no physical comfort for the animals to stand, sit, or lie down for long periods. Critically, there was no provision for socialisation, environmental enrichment, or access to outdoor spaces—elements essential for the physical and psychological recovery of rehabilitating animals. The facility, as observed, fell significantly short of providing a conducive, humane, and restorative environment—undermining the very essence of what true rehabilitation should represent.</p>
7.	Identification of animals	Yes	<p>Dogs at the breeding centre were reported to be microchipped and tagged with neck chains; pigs and</p>

			sheep were reported to be tagged with RFID devices, while monkeys were reported to be microchipped.
8.	General condition of animals observed	No	<p>Dogs in poor body condition, including several exhibiting cherry eye, were observed at the breeding modules. However, due to the absence of consolidated medical records or documentation, there was no evidence of any treatment history or supportive interventions provided for these animals.</p> <p>General body condition of minipigs appeared poor. However, due to absence of medical records on-site, the health status of minipigs could not be ascertained.</p> <p>The body condition score of the cows was generally poor, with most animals appearing underweight and below the average standard.</p>
9.	Trained staff/handlers	No	<p>A serious welfare concern was observed when an animal handler lifted a heavy dog by the scruff and used a wiper to move the animal—an act carried out openly in front of the inspection team. The casual manner in which this was done suggests that such rough handling is a routine and accepted practice at PBPL. These actions are inappropriate and raise grave concerns about staff training, supervision, and basic regard for animal welfare. While a few dogs appeared fearful, most seemed relatively at ease around humans, indicating inconsistent and largely unmonitored handling practices across the facility.</p>
10.	Restraint	No	<p>All dogs at the facility were housed in individual cages with no visible form of physical restraint within the enclosures. However, they were not provided with any outdoor access or designated free time. While facility staff claimed</p>

			<p>that animals were let out during cleaning, a review of CCTV footage did not show dogs being allowed out for play or exercise, raising doubts about the accuracy of these claims.</p> <p>During cleaning, nursing mothers and puppies were reportedly transferred to crates, some of which were found to be damaged—posing both hygiene and injury risks to the animals. Of particular concern was the procedure followed during euthanasia. The veterinarian responsible openly stated that sedatives were not used prior to administering thiopentone sodium to dogs. Instead, the dogs were manually restrained before injection. This approach fails to account for the fear, anxiety, and distress experienced by the animals during the procedure and demonstrates a serious violation of accepted veterinary protocols and ethical standards set by CCSEA for euthanasia.</p>
11.	Record	No	There is a glaring absence of a proper record-keeping system to ensure the health and welfare of animals in the custody of PBPL.
	a. Permits (breeding, use and reuse)	Yes	PBCL shared the approval orders.
	b. Procurement records	No	PBPL failed to furnish any documentation or records to substantiate otherwise.
	c. Breeding record	No	PBPL failed to furnish any documentation or records to substantiate otherwise.
	d. Health records (for each animal)	No	The available documentation at PBPL consists of loose paper sheets—standard forms filled out seemingly to meet the requirements of the contracting client. These documents capture isolated cases or incidents and are submitted to the record room immediately after data entry.

			<p>Critically, they fail to provide any comprehensive overview of essential information such as the total number of animals used, the frequency of their use in experiments, clinical conditions identified, or the preventive and therapeutic care administered—whether at the breeding facility or the experimentation centre. This fragmented and superficial record-keeping reflects a seriously negligent approach to both regulatory compliance and animal welfare standards. Moreover, veterinary records were not available on-site, significantly hampering the ability to conduct thorough inspections or continuous assessments of animal health and well-being. Without access to these records, it is impossible to monitor medical histories, vaccination status, or previous treatments—elements that are vital to ensuring timely and appropriate veterinary care. The absence of a structured, accessible veterinary documentation system undermines the facility's responsibility to safeguard the animals in its custody.</p>
	e. Sale & transfer records	No	PBPL failed to furnish any documentation or records to substantiate otherwise.
	f. Surveillance records	No	PBPL failed to furnish any documentation or records to substantiate otherwise
	g. Rehabilitation cost records (if any; please state if no cost is undertaken)	No	PBPL failed to furnish any documentation or records to substantiate otherwise. However, this may be verified through the CCSEA, as such reports are mandatorily required to be submitted to them.
12.	Quarantine protocols	No	There is a complete absence of dedicated quarantine facilities across all animal housing units at PBPL, including those for monkeys, dogs, sheep, minipigs,

			<p>and mixed-breed pigs. No separate rooms or designated areas have been established for quarantining new arrivals or isolating potentially sick animals, posing a significant risk to animal health, biosecurity, and disease containment.</p> <p>Primates (<i>Macaca mulatta</i>) are sourced from CCSEA-approved vendors and are wild-caught. PBPL informed that the current screening protocol for monkeys does not include Kyasanur Forest Disease (KFD)—a zoonotic infection known to be prevalent among monkeys in India. Considering that the monkeys are wild-caught, and in view of the potential biosecurity implications and associated health risks for researchers and staff, including KFD in the screening process would be a prudent and proactive measure.</p> <p>Across all facilities, it was reported that individual cages within shared housing rooms are being used as makeshift quarantine and isolation spaces. This practice falls far short of accepted quarantine protocols and fails to provide the critical separation needed to prevent cross-contamination. The absence of proper quarantine infrastructure in a facility housing over 1,500 animals reflects a serious disregard for both animal and human health and welfare. This concern is further exacerbated by the lack of on-site veterinary records, making it impossible to verify health screenings, disease surveillance, or any measures taken to address zoonotic risks.</p>
13.	Welfare, care & veterinary access	No	<p>The overall approach to animal welfare and veterinary care at PBPL reflects a deeply troubling lack of commitment to the health and well-being of the animals in its custody. The organisation</p>

		<p>appears to function primarily as a client-facing entity, with minimal regard for fundamental animal welfare principles, including the prevention of unnecessary pain, suffering, and distress.</p> <p>An anxiety, fear, and distress management protocol is not in place. The experiment conducted on two monkeys—involving an incision near the scapula and insertion of a medicinal repository—is a painful and invasive procedure requiring ongoing wound management. Despite this, the treatment protocol includes only the use of analgesics post procedure completion, while the animals are physically restrained by staff using protective gloves, without the administration of sedatives. This represents a serious lapse in addressing the psychological well-being of animals used in experimentation. Similarly, as reported by the facility's veterinarians, dogs euthanised at the conclusion of research studies are not sedated prior to the administration of thiopentone sodium. Taken together, these practices point to a poorly designed veterinary protocol that fails to adequately safeguard animal welfare during both research procedures and routine veterinary interventions.</p> <p>A critical gap lies in the absence of a functional system for recording preventive healthcare and treatment interventions. No accessible, structured on-site veterinary documentation was available, and existing loose case sheets are reportedly stored in a separate building—severely limiting timely medical assessments and ongoing veterinary oversight. This lack of accessible records undermines the ability to monitor animal health, track vaccination and treatment</p>
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		<p>histories, or assess compliance with humane care and regulatory norms.</p> <p>The medical inventory maintained by PBPL is grossly inadequate for a facility housing over 1,500 animals across various species. The central store contained only limited quantities of basic medications such as dewormers, multivitamins, and mineral supplements. Critically, there was no stock of essential medications such as sedatives, analgesics, or anaesthetics, raising grave concerns about the facility's ability to manage anxiety, fear, distress, pain, perform safe medical procedures, or carry out ethical clinical care. While the experimentation room includes a clinical veterinarian and an examination table, there were no emergency or pain-management medicines available at the site for immediate intervention. This further reinforces the perception that PBPL's role is largely confined to conducting studies that culminate in euthanasia, necropsy, and histopathological examination, rather than ensuring ongoing health and welfare.</p> <p>Environmental conditions within the facility were also suboptimal. The breeding facility recorded elevated humidity across all areas remained around 86%. Moreover, there was a complete absence of essential infrastructure—no dedicated quarantine areas, no isolation wards for sick animals, and no grooming or exercise facilities. This was consistent across all large animal species, including monkeys, dogs, sheep, minipigs, and pigs, and represents a systemic failure to uphold even the minimum standards of animal welfare.</p> <p>Of the four veterinarians reportedly assigned to 13</p>
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			<p>experimental facilities, only two were present at the time of inspection—raising serious concerns about the adequacy of veterinary coverage and timely access to care. In the absence of regular veterinary supervision, dedicated treatment spaces, and structured welfare protocols, animals remain at significant risk of untreated medical issues and unnecessary suffering.</p> <p>In conclusion, the conditions observed at PBPL point to substantial deficiencies in veterinary access, preventive healthcare, and critical welfare infrastructure. These shortcomings compromise both the physical well-being and dignity of the animals and present serious ethical and regulatory concerns that warrant urgent attention.</p>
14.	All experiments conducted/being conducted are approved?	Inconclusive	PBPL failed to furnish any documentation or records to substantiate otherwise.
15.	Segregated housing for rehabilitated vs experimental animals?	Yes	<p>Although the rehabilitation facility is separate from the experimental units, the housing conditions in both are virtually identical—enclosed, temperature-controlled rooms where animals are confined to cages without any form of environmental enrichment. Consequently, the quality of life in the so-called rehabilitation setting is indistinguishable from that of the experimental facility and falls significantly short of the fundamental principles and intended goals of true rehabilitation.</p>
16.	Adequate shelter (space, ventilation, hygiene)?	No	<p>As outlined in the section on housing conditions for animals bred and used in experiments, while the space provided is generally inadequate, the breeding facilities also lacked proper ventilation and were marked by poor hygiene standards. In contrast, the experimental facility</p>

			showed marginal improvements in air-conditioning and cleanliness; however, fundamental welfare concerns persisted across both settings.
17.	Clean water and species-appropriate food available?	No	Water was provided via a drip pipe system. All species were offered packaged dry commercial feed: dogs received 300 grams once daily; minipigs were provided 500 grams per day; and monkeys were fed 150 grams of pellets along with fruits and a bun each day. In the case of dogs—specifically adult Beagles—the fixed ration of 300 grams of dry commercial pellets per day is likely insufficient to meet their daily caloric and nutritional requirements. Moreover, a single daily feeding is not aligned with standard welfare practices for laboratory-housed dogs, particularly Beagles, which benefit from multiple feedings and enrichment. Thus, the current feeding regime may contribute to nutritional imbalance and does not reflect best practices in animal nutrition and welfare management.
18.	Veterinary care accessible at all times?	Inadequate	Veterinary care at PBPL is available only between 9:00 a.m. and 5:30 p.m., with no veterinarian coverage during night hours. Although technicians are reportedly present on campus overnight, they are not stationed on the animal floors. Critically, both the breeding and experimentation centres lack essential veterinary medicines, including those necessary for emergency care, pain relief, or disease prevention. In the absence of these fundamental medical supplies, veterinarians are effectively unable to provide any meaningful treatment or alleviate unnecessary pain and suffering. As a result, there is no 24x7 functional veterinary system in place to safeguard the health and

			welfare of the large number of animals currently housed at PBPL.
19.	Daily monitoring and health logs maintained?	No	The veterinary logs, maintained as loose case sheets, lack essential clinical details—such as observed clinical signs, diagnostic assessments, and medications administered. This incomplete and inconsistent documentation renders the recording system ineffective, offering no tangible benefit to the animals' health, treatment, or ongoing care.
20.	Animals being reused are healthy and with approved?	No	PBPL failed to furnish any documentation or records to substantiate otherwise. A detailed micro-audit is necessary to determine the frequency of reuse of individual animals and to assess whether such practices are in compliance with the specific permissions granted by the CCSEA.
21.	Was CCTV footage made available and accessible during the inspection, and were there any notable findings or issues observed?	No	<p>CCTV footage was not made available to the CCSEA inspection team despite multiple formal and verbal requests on the day of the visit, as well as prior intimation through an official CCSEA letter. The team was later informed that the designated custodian of the CCTV system was unavailable, and therefore, recordings could not be accessed during the inspection—even though senior management was present and expressed helplessness in resolving the issue.</p> <p>Management subsequently assured the team that online access to the CCTV footage would be facilitated the following morning, once the operator was on duty at 9 a.m. During a Microsoft Teams meeting held the next day, the dashboard monitor displaying live CCTV camera feeds was shared with the inspectors. However, despite repeated and specific requests, the team was not shown any recordings from the corridors</p>

			<p>of the dog breeding stock areas. Staff claimed that no cameras were installed in those particular locations, leaving a critical gap in visual documentation.</p> <p>Similarly, when the team requested footage from the rehabilitation area, animal entry, and the dirty corridors of the experimental housing zones, they were again informed that no CCTV cameras had been installed in those areas either. Notably, only one camera was found to be recording the presence of AWBI inspectors near the corridor of the rehabilitation centre—despite the fact that the inspection team was present there from 2:30 p.m. until late at night.</p> <p>The inspection team is of the opinion that this lack of access to key CCTV footage, combined with the absence of camera coverage in critical areas, indicates a deliberate attempt to withhold or tamper with evidence related to potential animal welfare violations. For a facility housing thousands of animals, CCTV should be a primary tool for monitoring and preventing cruelty. In this case, the system appeared to be non-functional—or at least non-operational—for the CCSEA inspectors, raising serious concerns about transparency and accountability at PBPL.</p>
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V. Non-Compliances Related to the Prevention of Unnecessary Pain and Suffering in Animals

Contrary to the mandates set forth by CCSEA regulations and guidelines, a case study based on data from the software application used at PBPL's experimentation facility revealed serious lapses in animal welfare. In one instance, a dog exhibiting mild to moderate tremors was not withdrawn from the experiment. The symptoms reportedly progressed to severity and became severe by the tenth day. The animal was then marked as "removed" and "killed-moribund" on the twelfth day.

The terminology used in the software—"removal" and "killing-moribund"—is ambiguous and fails to clarify whether any action was taken to alleviate the animal's suffering during this period. As per regulatory guidelines, an animal exhibiting significant neurological symptoms

such as tremors, indicative of high drug toxicity, should be promptly removed from the study and provided with appropriate medical intervention. In this case, both the researcher and the clinical veterinarian failed to take timely action.

Moreover, the software did not provide any detailed account of the animal's clinical parameters, additional symptoms, or medications administered. Although the clinical veterinarian claimed that such records were maintained on loose sheets using a fixed format, she was unable to produce the relevant documentation even after an extensive search. This raises serious concerns about the absence of evidence-based health monitoring or treatment interventions at PBPL.

The lack of a minimum stock inventory of drugs, instruments, and surgical supplies at the examination areas of each experimentation room further compounds the situation, underscoring the extent of cruelty to animals, compromise of animal welfare, and potential regulatory violations at the facility.

There is no protocol to address anxiety, fear, and distress in animals at the facility. In a recent invasive experiment on two monkeys involving surgical implantation and daily wound care, only analgesics were used post procedure, with physical restraint applied without sedatives—indicating serious neglect of psychological welfare. Similarly, dogs euthanised at the end of research studies were not sedated prior to the administration of thiopentone sodium. These practices highlight critical flaws in the veterinary protocol, failing to meet even the basic standards for preventing unnecessary pain and suffering.

Moreover, the use of nomenclature such as “removal” and “killed” in official records reflects a troubling level of insensitivity by the establishment and its personnel toward animals as sentient beings. This choice of language stands in stark contrast to the terminology mandated by CCSEA regulations, which explicitly call for the use of the term “euthanasia”—denoting a “good death” that is humane, compassionate, and ethically conducted. The terminology employed at PBPL not only lacks clarity but also suggests a disregard for the ethical principles embedded in the regulatory framework.

VI. Euthanasia

It was reported that euthanasia is a routine and significant procedure at PBPL, primarily overseen by the pathology department. According to both records and the veterinarian in charge, approximately 30–40 dogs are euthanized each month. These procedures are followed by gross pathological and histopathological examinations, the findings of which are appended to the respective research data.

However, several deeply concerning observations emerged during the inspection. The attending veterinarian confirmed that no sedatives are administered prior to euthanasia to mitigate fear, anxiety, or distress. Instead, thiopentone is injected slowly while an assistant physically restrains the animal—an approach the veterinarian himself acknowledged he would not use if the procedure were a routine surgery such as spaying or castration, or if the breed were less docile, such as a Bulldog, Doberman, or Rottweiler. This underscores a troubling reliance on the naturally gentle and submissive temperament of Beagle dogs, which makes them easier to handle and restrain, even under distressing conditions, without adequate measures to reduce suffering.

Alarming, despite the high frequency of euthanasia, only 20 vials of thiopentone were available at the pathology department, with no stock visible in the central store. This raises serious concerns about whether euthanasia procedures are being conducted consistently with proper dosing and humane practices.

The sheer number of euthanasia cases also suggests that a significant proportion of the animal population is being killed as part of experimental protocols. This may further explain why only 73 dogs were found in the rehabilitation section—a number that appears disproportionately low relative to the reported usage and turnover.

VII. NGO Involvement in Rehabilitation:

Dogs are currently rehabilitated within PBPL's own facility. No records were made available to the inspection team indicating that animals had been transferred to AWBI-recognised animal welfare organisations. Additionally, there was no documentation provided regarding any Memoranda of Understanding (MoUs) or financial support extended to such organisations for the long-term care of the animals.

VIII. Lack of Transparency in Animal Use and Research Practices

During the inspection, the presence of mixed-breed pigs and sheep was repeatedly denied by the facility staff, despite direct and repeated queries from the inspection team. This immediate lack of disclosure raised serious concerns about transparency and the intent to obscure critical information.

Further compounding these concerns, the presence of mixed-breed pigs was inadvertently confirmed when a researcher referenced their use in cardiological studies, including pacemaker development. This was followed by the inspection team observing a separate room housing sheep—despite earlier denials. When committee members proceeded to assess these areas, staff at both the breeding and experimental facilities refused to switch on the lights. They cited adherence to Standard Operating Procedures (SOPs) governing lighting schedules. However, this explanation was inadequate in the context of a formal regulatory inspection and effectively obstructed visibility, thereby preventing a thorough evaluation of the animals' housing conditions.

In addition, a clear inconsistency was observed between the number of CCSEA-approved research protocols—reported to be 87 over the past three months—and the actual number of dogs, minipigs and monkeys present at the facility. This discrepancy suggests possible non-compliance with approved study limits or underreporting of animal populations.

Crucially, the mandatory three-month washout period—required to ensure complete elimination of substances from animals' systems before reuse—was reportedly not being followed, particularly for minipigs. No documentary evidence was produced during the inspection to verify compliance with this requirement. This lapse not only violates standard ethical and scientific guidelines but also compromises the validity of subsequent research and the welfare of the animals involved.

Overall, the number of animals observed during the inspection did not align with the facility's declared housing capacity or the volume of CCSEA-approved experimental protocols. The presence of surplus, unscreened stock animals in experimentation rooms points to serious gaps in documentation and oversight. These findings underscore the urgent need for a detailed review and reconciliation of animal usage records to ensure compliance with regulatory requirements and to uphold fundamental animal welfare standards.

IX. CCSEA Inspection Team's Observations in Relation to Specific Allegations Raised by PETA-India's Alleged Whistle-blower

Animal Species	Complaint Category	Specific Allegations by PETA	CCSEA Inspection Team's Observation
Confirmation of Location of Reported Incidents	General	Allegations of cruelty to animals and violations of animal protection laws occurring on the premises of PBPL.	The visuals presented in PETA-India's investigation video were found to match the premises of PBPL. The PBPL management acknowledged that certain footage—such as holding a dog by the scruff—was taken from a training video and claimed it is not representative of routine practice. However, they disputed some visuals, asserting that these either originated from another facility or had been manipulated.
Beagles (Dogs)	Overcrowding & Housing	Approximately 1,500 dogs housed in a space designed for 800, forcing 3-4 dogs into cages meant for two. Breeding facility reportedly concealed from various auditors.	<p>At the time of inspection, 2-3 dogs per kennel were noted in each of the breeding stock modules; the whelping mothers were housed with their puppies.</p> <p>An overall high housing density of dogs was observed in the breeding modules, and excess breeding stocks were found to be housed in dog experimental areas. The facility's manager was unable to determine the accurate number of total dogs present, indicating potential overcrowding possibilities.</p> <p>Furthermore, CCTV footage from the corridors of the dog breeding stock areas was not made available, with staff asserting that no cameras were installed in those specific areas, which</p>

			could impede verification of housing conditions.
	Breeding Practices	Dogs bred twice a year, often exceeding the company's stated policy of a maximum of five breeding cycles. Dogs as old as 13 years allegedly used for breeding, causing immense physical strain and increasing risk of difficult labor.	Consolidated breeding records and veterinary care of dogs were not available on-site within the dog breeding area. The overall high housing density of dogs in the breeding modules and the facility manager's inability to determine the correct number of dogs present suggest practices that could lead to overbreeding and exceed capacity.
	Lack of Care & Handling	Overcrowding led to frustration, food aggression, and frequent fights, causing serious injuries (especially to ears). Company allegedly failed to provide basic care, including proper wound cleaning and pain management. Workers observed handling dogs roughly, kicking them, and carelessly closing cage doors on their legs. Dogs picked up by the scruff of the neck or skin on their backs.	At the time of inspection, no seriously injured animals were observed. However, the inspection team noted an overall high housing density of dogs in breeding modules, accompanied by extreme decibel levels of barking. A few dog kennels in the breeding stock area were observed to house animals in poor body condition, some showing signs of cherry eye, with dirty conditions and an overall uninviting environment. The veterinary records for the animals were not present on-site, which significantly hindered inspectors ability to monitor medical history or verify proper wound care and pain management. No CCTV is installed at an angle that would allow visualization or recording of individual dogs.
	Medical Neglect & Suffering	Dogs developed abscesses, ulcers, and signs of severe pain following subcutaneous injections of	The complete absence of on-site veterinary records for the animals precluded the inspection team from

		test compounds. Injection sites became inflamed or developed open wounds, with infections potentially spreading. In some studies, dogs became very ill, with one reportedly vomiting excessive quantities of blood before dying. Some suffered ulcers in mouth and intestine from oral dosing.	verifying specific claims of abscesses, ulcers, severe pain, or other medical conditions and their treatment. However, the team observed a few dirty kennels and very high relative humidity levels (80-97%) in nearly all rooms, which can create an environment conducive to health problems and infections. Furthermore, the recording of adverse reactions in study-based software were poorly recorded or, apparently, not recorded.
	Euthanasia Protocol Violations	"Humane endpoints" existed only on paper; management instructed veterinarians to delay euthanasia for suffering animals until sponsor permission was granted. Dogs allegedly killed using thiopentone without prior sedation.	The euthanasia is performed by the veterinary pathologist using approved drugs. However, in the case of dogs, sedation or tranquilization prior to euthanasia is not practiced.
Minipigs	Unlicensed Breeding & Euthanasia	Company purchased Göttingen minipigs but lacked a license to breed them. Accidental pregnancy led to euthanasia of 8-10 piglets via intracardiac injection without prior sedation.	Minipigs were present at the facility. A noticeable inconsistency was observed between the number of CCSEA-approved research protocols and the actual population of minipigs housed, which raises questions regarding breeding. The absence of on-site veterinary records further prevented verification of euthanasia for piglets, if any.
	Lack of Enrichment	Despite a written policy requiring playtime and social enrichment for pigs, the Company routinely failed to provide either. Enrichment only provided when external visitors were present.	A notable deficiency in environmental enrichment was observed for minipigs, with only a few provided with cut sections of PVC pipes, which failed to engage them and left them visibly uninspired and bored.

			Provision for playtime outside cages is not available.
	Improper Housing	Representatives from the Danish supplier observed pigs' feet getting injured due to improper flooring.	All animals, including minipigs, were confined exclusively in cages with fibber-reinforced polymer flooring. However, the absence of on-site veterinary records for the animals precluded the inspection team from verifying specific claims of pigs' feet getting injured and their treatment.
Monkeys (Rhesus Macaques)	Illegal Capture & Transport	Company allegedly captured 14 rhesus macaques from the forest in Rajasthan, exceeding government permission for 12. Monkeys (approx. 1.5 years old) were sedated and placed in plastic bags, up to five per bag, for transport.	Monkeys were present at the facility and were procured from a CCSEA-registered vendor.
	Zoonotic Disease Risk & Concealment	Two monkeys tested positive for monkeypox in Rajasthan. All monkeys transported together to Telangana facility. The two positive monkeys were killed upon arrival, but others were kept alive despite transport with infected animals. Subsequent re-testing occurred only one week after arrival, despite potentially longer incubation period, as company needed monkeys for client-sponsored test. Company allegedly kept the monkeypox matter quiet, killing infected monkeys without broader disclosure, despite public health risks.	There was a total absence of dedicated quarantine rooms and isolation rooms for sick animals, which critically compromises biosecurity and disease management. The absence of on-site veterinary records further prevented verification of health screenings, disease status, or any actions taken regarding zoonotic diseases.

X. Discussion

The comprehensive inspection of PBPL highlights systemic failures at multiple levels of its operations to uphold animal ethics and welfare as per CCSEA guidelines. PBPL's approach to animal research demonstrates an operational model that prioritizes experimental output over welfare, compliance, and ethical responsibility. Despite its extensive use of dogs, non-human primates, pigs, and other species, PBPL has failed to implement even the most basic standards of care mandated by CCSEA.

Housing conditions were consistently found to be overcrowded, barren, and inadequate, leading to significant welfare concerns such as elevated stress, noise, poor body condition, and heightened risk of infectious diseases. Essential aspects such as environmental enrichment, social interaction, and proper bedding were either entirely absent or grossly insufficient across all species. The breeding facilities were particularly concerning, with overproduction of animals resulting in unauthorized repurposing of experimental spaces as stock rooms, unscreened animal transfers, and potential biosecurity risks.

Veterinary care infrastructure was deeply inadequate. The facility maintained minimal medical supplies, lacked essential analgesics, sedatives, and anaesthetics, and failed to maintain proper treatment records. Notably, no protocol was in place to manage anxiety, fear, or distress—an essential component of humane animal care. Painful and invasive procedures, such as those performed on monkeys involving surgical implantation, were conducted using only analgesics post procedure, with animals physically restrained without sedatives. Similarly, dogs euthanised at the conclusion of research were not sedated before the administration of thiopentone sodium. These practices reflect glaring omissions in veterinary planning and a disregard for psychological well-being.

The animal record-keeping system at PBPL is virtually non-functional, with key regulatory documentation either missing or grossly insufficient. Without breeding records, reuse data, health histories, or procedural logs, PBPL operates in opaque conditions that obstruct regulatory oversight. The deliberate non-cooperation during inspection — notably the failure to provide CCTV footage from critical areas — raises serious questions about transparency and intent.

The inspection also uncovered troubling deviations from approved euthanasia protocols. Animals were euthanised without sedation, relying solely on physical restraint—a practice incompatible with ethical norms of humane care. The high euthanasia rate suggests an unsustainable use pattern where large numbers of animals are systematically killed after experimental use, with limited rehabilitation or rehoming efforts.

XI. Conclusion

The operational deficiencies observed at PBPL are not isolated incidents but indicative of entrenched structural, procedural, and ethical failures. The scale and severity of non-compliances documented during the inspection raise significant concerns regarding the facility's adherence to established standards of animal welfare and regulatory accountability.

The situation demands urgent attention—particularly with respect to the removal and rehabilitation of animals to prevent further pain, distress, or suffering. The findings also call for a critical review of the facility's registration and breeding licence in view of the serious and repeated deviations from prescribed norms. A detailed micro-audit of PBPL's Institutional Animal Ethics Committee (IAEC) is imperative, including a comprehensive reconciliation of records relating to breeding, procurement, experimentation, reuse, rehabilitation, transfer, euthanasia, and disposal. Such scrutiny is essential to evaluate compliance with approved protocols and to verify the accuracy and integrity of reported data.

XII. Photographic Evidences

Health Condition:

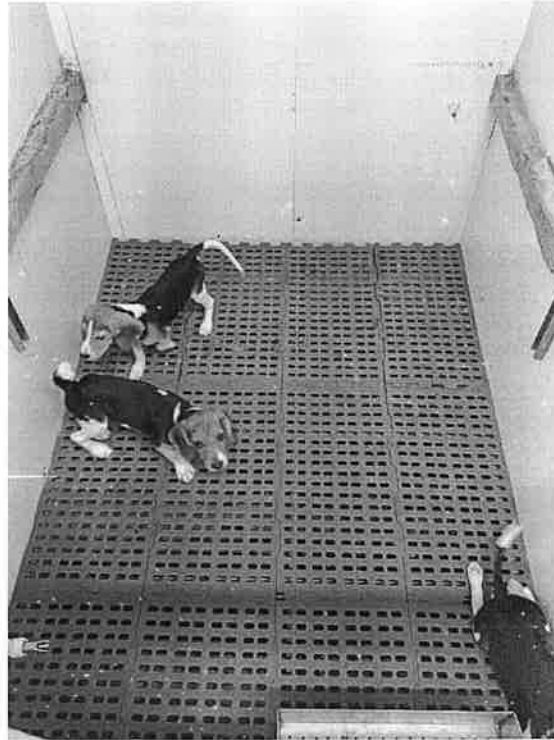


Photo 1: Dogs with poor body condition



Photo 2: Dog on left with poor body condition



Photo 3: Cherry eye condition observed in some dogs



Photo 4: Cherry eye condition observed in some dogs

Housing Conditions:



Photo 5: No bedding and no enrichment



Photo 6: No bedding and no enrichment

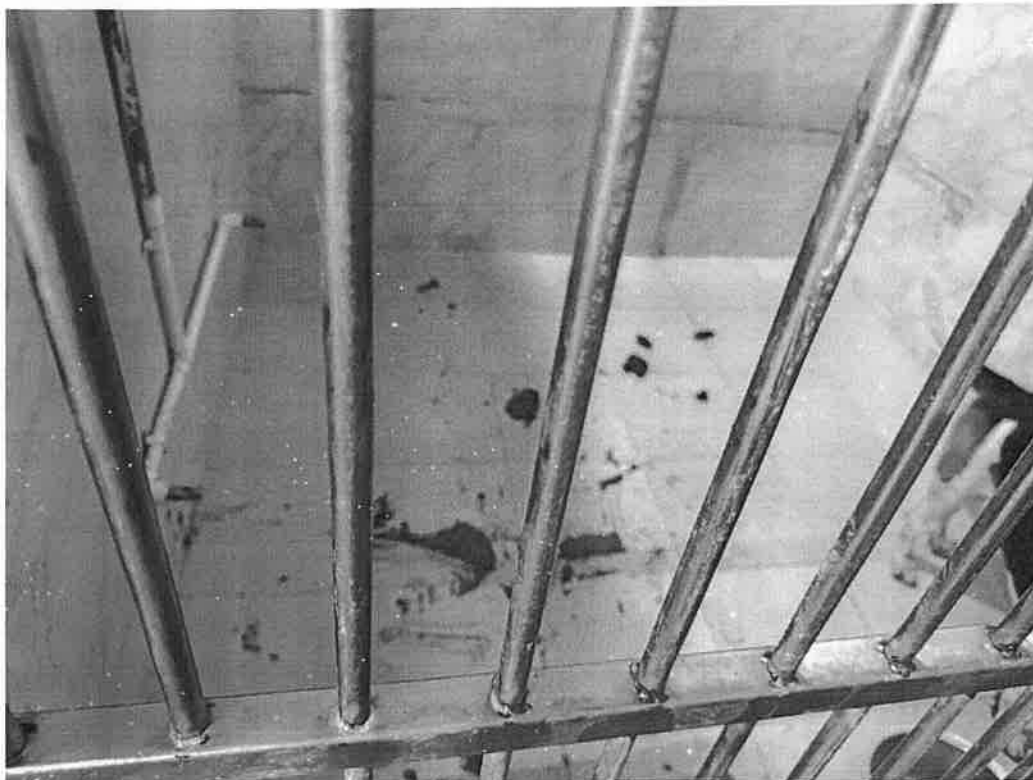


Photo 7: Floor soiled with faeces and in an unclean condition



Photo 8: Floor soiled with faeces and in an unclean condition



Photo 9: Stained and poorly maintained flooring



Photo 10: Stained and poorly maintained flooring



Photo 11: Polymer flooring with drainage channels, making it uncomfortable for animals to stand or lie down



Photo 12: Polymer flooring with drainage channels, making it uncomfortable for animals to stand or lie down



Photo 13: Poorly enriched living conditions with a slippery floor



Photo 14: Poorly enriched living conditions with a slippery floor



Photo 15: Polymer flooring with drains, uncomfortable for animals to stand or lie down



Photo 16: Polymer flooring with drains, uncomfortable for animals to stand or lie down



Photo 17: Enclosed space lacking natural light and enrichment



Photo 18: Enclosed space lacking natural light and enrichment



Photo 19: Restricted movement and lack of socialisation causing significant distress



Photo 20: Poorly designed enrichment tools with limited or no utility

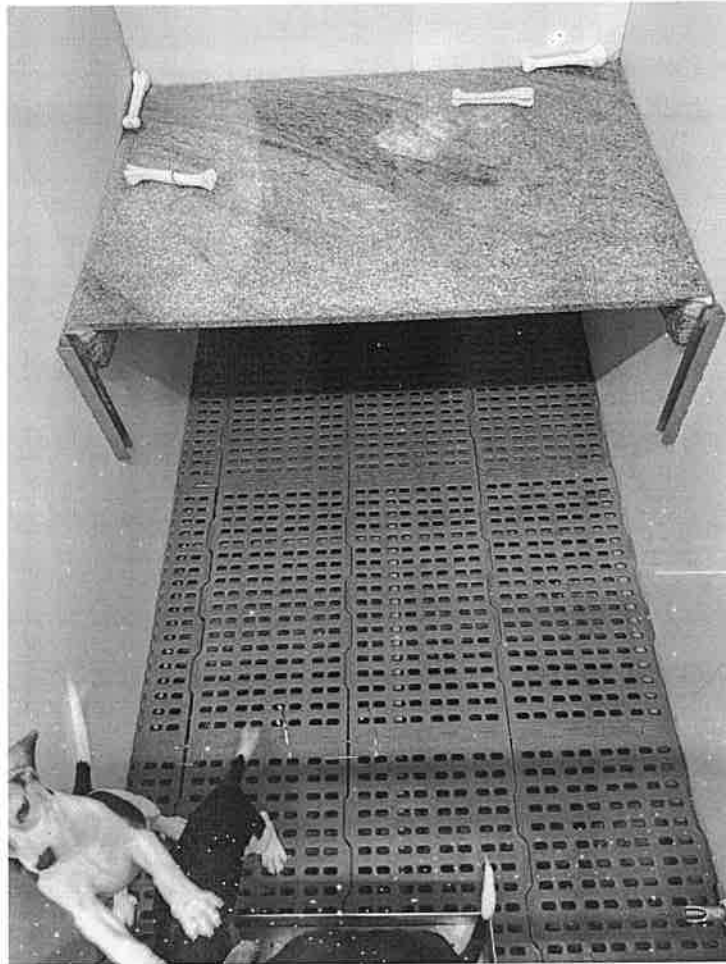


Photo 21: Bland, non-nutritive synthetic feeding enrichment lacking flavour and value



Photo 22: Bland, non-nutritive synthetic feeding enrichment lacking flavour and value



Photo 23: Enclosed space lacking natural light and enrichment



Photo 24: Enclosed space lacking natural light and enrichment



Photo 25: Cramped dog breeding rooms offering minimal privacy

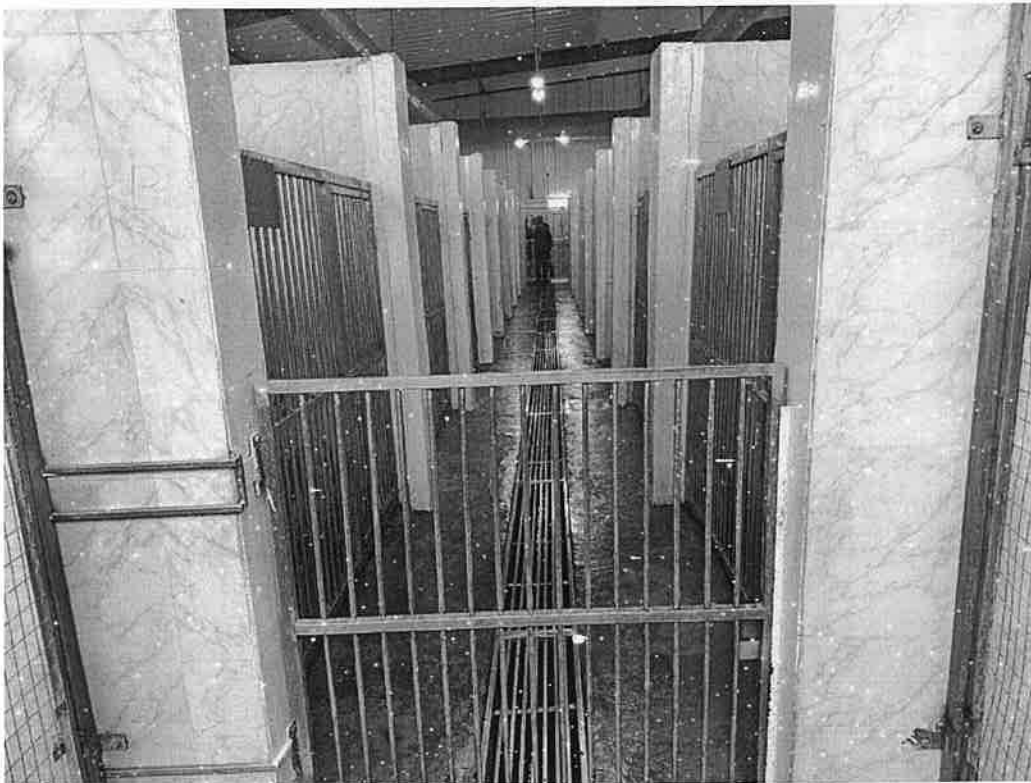


Photo 26: Kennels designed for human cleaning convenience, with flooring and drainage prioritised accordingly



Photo 27: Minipigs housed on uncomfortable flooring with no enrichment



Photo 28: Minipigs housed on uncomfortable flooring with poorly designed enrichment



Photo 29: Monkey enclosures with limited space for movement and interaction



Photo 30: Monkey enclosures with very limited enrichment



Photo 31: Monkey enclosures with very limited enrichment



Photo 32: Narrow metal platforms restricting animals' comfort while resting

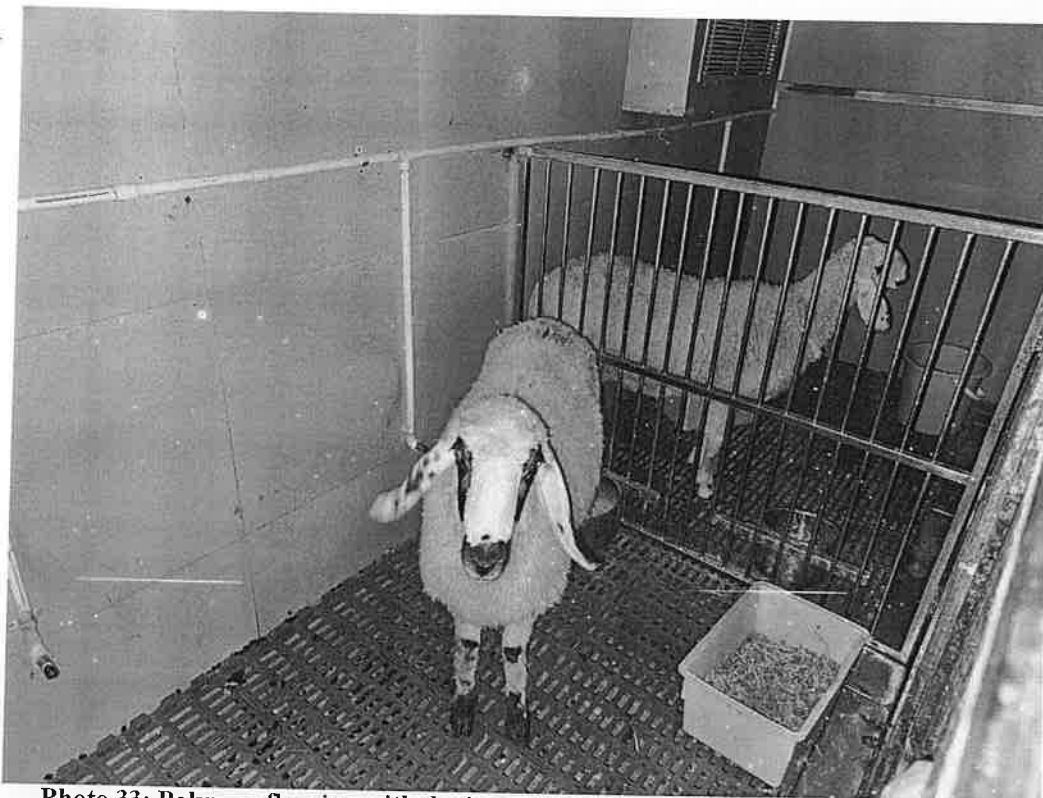


Photo 33: Polymer flooring with drainage openings, difficult for sheep to stand on



Photo 34: Restricted space and lack of socialisation opportunities

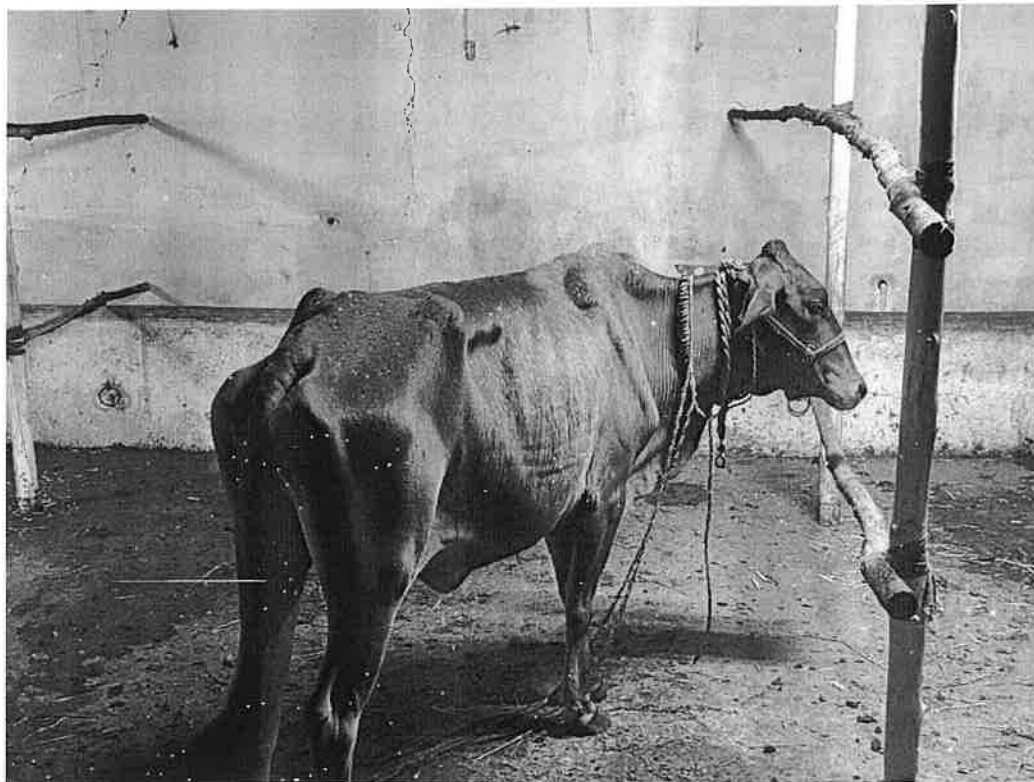


Photo 35: Cows in poor body condition used for experimentation

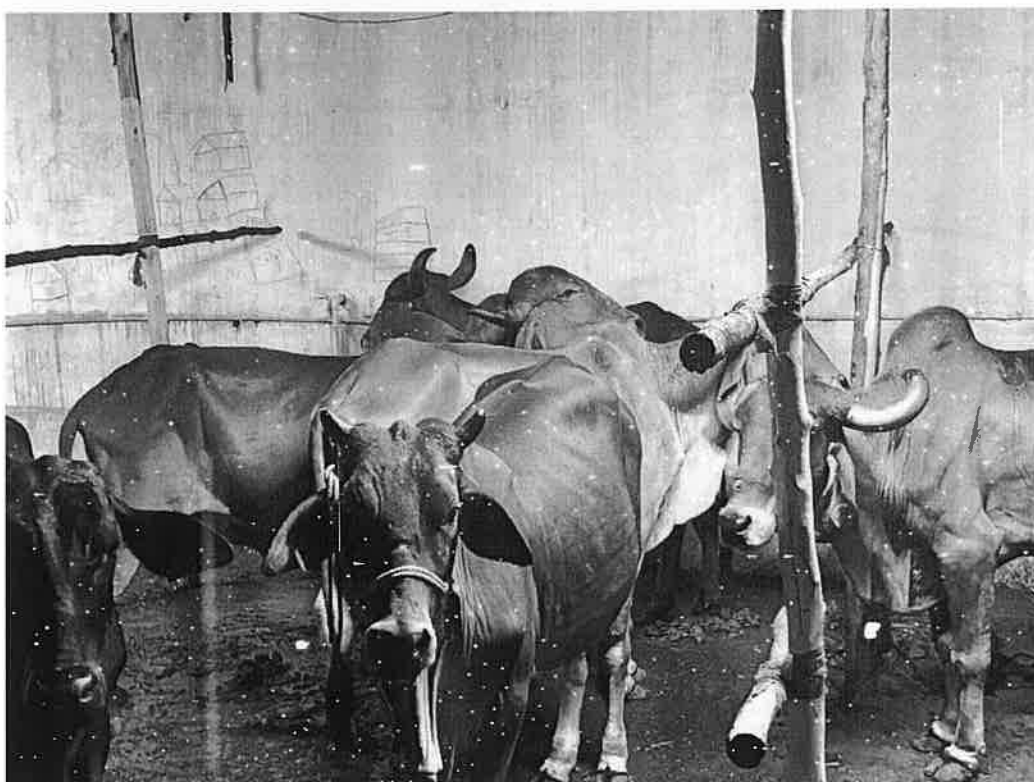


Photo 36: Cows in a makeshift shed with inadequate protection and unsanitary conditions

Medical Inventory:

Photo 37: Medical inventory lacks essentials medicines like sedatives and analgesics



Photo 38: Inadequate medical inventory with only general medicines



Photo 39: Inadequate medical inventory with only general medicines



Photo 40: Inadequate surgical inventory with only general items

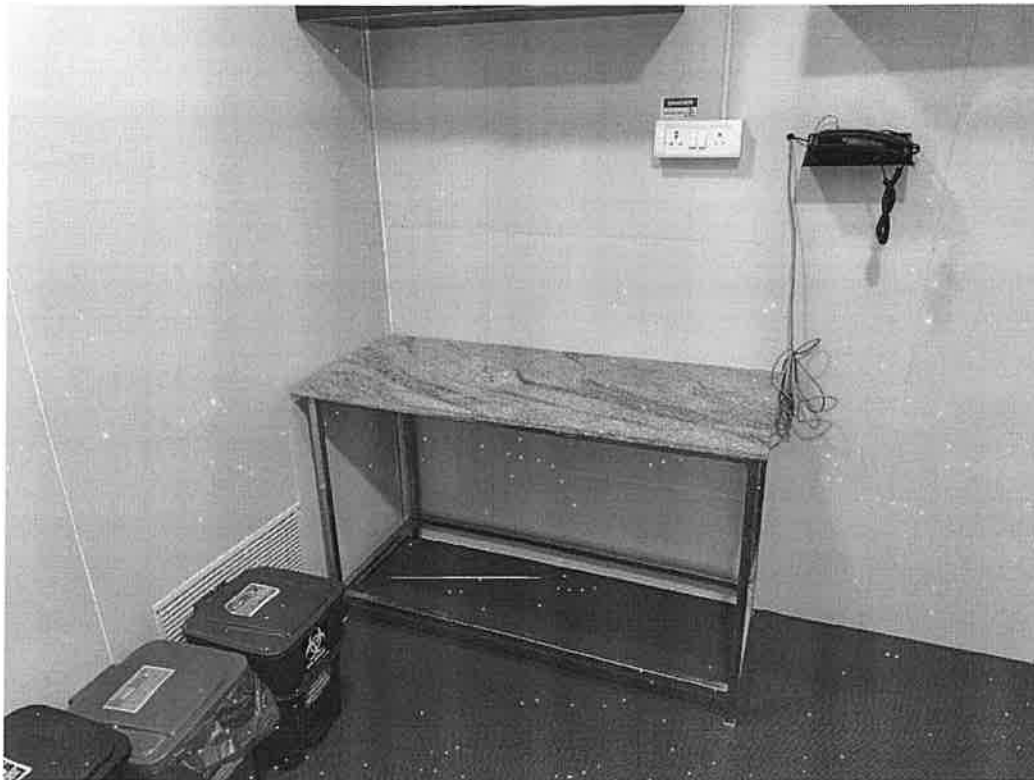


Photo 41: Clinical examination room without medicine stock or diagnostic tools



Photo 42: Clinical examination room without medicine stock or diagnostic tools

Veterinary Documentation:

[illegible]

Photo 43: Veterinary logs maintained as loose sheets lack essential clinical details

ORIGINAL

INDIVIDUAL ANIMAL HEALTH RECORD

Form No.	FNHP/BS/ABH/327
Version No	01
Effective Date	17.09.2014
Replaces No.	00
	Page 2 of 6

Palamur bio

FORMAT

S.No.	Type of Deworming	Deworming schedule Age at Deworming	Deworming date	Sign and Date
1	Pyrantel embonate 14.4 mg/kg + Fenbendazole 15 mg/kg - 1 ml/kg P.O	1 st days		
2	Pyrantel embonate 14.4 mg/kg + Fenbendazole 15 mg/kg - 1 ml/kg P.O	28 days		
3	Pyrantel embonate 14.4 mg/kg + Fenbendazole 15 mg/kg - 1 ml/kg P.O	42 days		
4	Pyrantel embonate 14.4 mg/kg + Fenbendazole 15 mg/kg - 1 ml/kg P.O	56 days		
5	Pyrantel embonate 14.4 mg/kg + Fenbendazole 15 mg/kg - 1 ml/kg P.O	90 days		
6	Pyrantel embonate 14.4 mg/kg + Fenbendazole 15 mg/kg - 1 ml/kg P.O	120 days		
7	Pyrantel embonate 14.4 mg/kg + Fenbendazole 15 mg/kg - 1 ml/kg P.O	150 days		
8	Pyrantel embonate 14.4 mg/kg + Fenbendazole 15 mg/kg - 1 ml/kg P.O	180 days		
9	Pradiquantel 30 mg + Pyrantel Pamoate 144 mg up to 10 kg - 1 tablet, Dogs (200-250 kg - 2 tablets).	6 th month		
10	Pradiquantel 30 mg + Pyrantel Pamoate 144 mg up to 10 kg - 1 tablet, Dogs (200-250 kg - 2 tablets).	10 th month		
11	Pradiquantel 30 mg + Pyrantel Pamoate 144 mg up to 10 kg - 1 tablet, Dogs (200-250 kg - 2 tablets).	12 th month		
12	Pradiquantel 30 mg + Pyrantel Pamoate 144 mg up to 10 kg - 1 tablet, Dogs (200-250 kg - 2 tablets).	14 th month		

Note: After 10 years, all the adult animals will be dewormed with adult dewormer once in every 2-month interval

Reviewed by QAU

Approved by TFM

Name	Dr. S. Sudhakararaman	Reviewed by	Mr. V.D. Giththarao
Signature	<i>S. Sudhakararaman</i>	Approved by	<i>V.D. Giththarao</i>
Date	18.09.2014		19.09.2014

CONTINUOUS RECORDING

COPY NO

846

SIGN WITH CARE

(in varieties)

Photo 44: Veterinary logs maintained as loose sheets lack essential clinical details

ORIGINAL
Palampur bio
FORMAT

INDIVIDUAL ANIMAL HEALTH RECORD

Title	Form No.	Version No.	Revision No.	Effective Date	Page 3 of 6
	FRM/PBS/ABH/027	01	00	19-04-2014	

S.No.	Health Incident	Date	General Health Note Treatment Given	Remarks	Sign and Date
01	External Examination	19-04-2014	19-04-2014		
02	Right Ovary Cyst	19-04-2014			
03	Internal and External Examination	19-04-2014	19-04-2014		
04	Heart Palpated	19-04-2014			
05	Animal Shown for mating	19-04-2014			
06	After mating	19-04-2014			
07	Animal Shown for mating	19-04-2014			

Name	Author	Reviewed by QAU	Approved by IFM
Dr. S. Subramaniam	Dr. S. Subramaniam	Mr. V.D. Girdhar Rao	Dr. T. Kumar
Signature	Signature	Signature	Signature
Date	Date	Date	Date

m. verikarshi

Photo 45: Veterinary logs maintained as loose sheets lack essential clinical details

ORIGINAL
Palampur bio
FORMAT

NOTE TO STUDY

Title	Form No.	Version No.	Revision No.	Effective Date	Page 1 of 1
	FRM/PBS/GER/004	01	01	17-11-2020	

Study Number / Study Phase Number: 3889 / 3586

09/04/15, Animal Number: D00101

During Routine physical Examination, round way noticed on dorsal surface of left ear.

Treatment

1) Liquid povidone iodine for cleaning.

2) Powder Povidone Iodine applied topically.

1) Liquid povidone iodine for cleaning.

2) Low povidone iodine applied topically.

17-11-2020

Reference SOP: SOP/PBS/GER/002

Name	Author	Reviewed by QAU	Approved by IFM
Mr. V.D. Girdhar Rao	Mr. V.D. Girdhar Rao	Dr. P. Rajan Srinivas Rao	Dr. S. Subramaniam
Signature	Signature	Signature	Signature
Date	Date	Date	Date

REVALIDATED ON 11-10-2020

REVALIDATED ON 17-11-2020

CONTROLLED DOCUMENT

COPY 3/3

DO NOT WRITE OR SIGNATURE

REVALIDATED ON

REVALIDATED ON

ET389

Photo 46: Veterinary logs maintained as loose sheets lack essential clinical details

Review/Amend Data

Subject: D620101 Period: 10/04/2025

Parameter: ROUTINE

ILD009

1. Current Set 2. Observation Entry 3. Tick Sheet & Type 4. Review / Amend

Record Type: **CURRENT**

Result DateTime: 10/04/2025 08:12:00

Record DateTime: 30/05/2025 15:12:03

Logged On User: Hyndavi

Session: 340

Timeslot: Any Timeslot

Record Number: 2 Of 1 Week: 1

Enter RETROSPECTIVE OBSERVATION FIRST

Symptom	Site	Severity	Modifiers	P/T
Wound	Left Ea			

Reason For Change

Non-Reportable Comment

Reportable Comment

Multi-Step Amend

Row 1 of 3 Record 1 of 1

Photo 47: Poor documentation of clinical data, treatment protocols, actions taken, and outcomes

Rehabilitation:

Photo 48: Rehabilitation appears to be a makeshift arrangement, indicated by a paper label affixed to the door



Photo 49: Room and cage design indicate conversion from an experimentation room



Photo 50: Rehabilitation cages lack any form of enrichment



Photo 51: 73 dogs—62 males and 11 females—reported to be under rehabilitation



Photo 52: Only 20+ thiopentone vials stocked for 30–40 monthly euthanasia cases

Name: Thiopentone Sodium Injection Manufacturer Name: Sandoz India Pvt. Ltd. Batch/Lot: 10117 Pack Size: 30mg/10			Total Quantity: 100 Expiry Date: Sep 2014 Other Details: —			Receiver Sign & Date: Storage Conditions: Room Temperature Location: Pharmacy 2014				
Date	Study No.	Opening Stock	Quantity (Vial)		Solution Prepared (ml)	Solution Used (ml)	Reconstitution Detail	Remarks	Sign & Date	
			Issued	Balance					Performed	Verified
08-04-15	25243	34	01	33	5	31	Empty vial was discarded with full instructions for injection to allow final concentration of 10mg/ml	Reconstituted 10ml water, discarded	<i>[Signature]</i> 08-04-15	<i>[Signature]</i> 08-04-15
09-04-15	25244	33	02	31	10	9.5	Empty vial was discarded with full instructions for injection to allow final concentration of 10mg/ml	Reconstituted 10ml water, discarded	<i>[Signature]</i> 09-04-15	<i>[Signature]</i> 09-04-15
08-04-15	25245	31	01	30	5	14	Empty vial was discarded with full instructions for injection to allow final concentration of 10mg/ml	Reconstituted 10ml water, discarded	<i>[Signature]</i> 08-04-15	<i>[Signature]</i> 08-04-15
10-04-15	AD-02101	30	05	25	25	241	Empty vial was discarded with full instructions for injection to allow final concentration of 10mg/ml	Reconstituted 241ml water, discarded	<i>[Signature]</i> 10-04-15	<i>[Signature]</i> 10-04-15
11-04-15	AD-02101	25	05	20	25	21.9	Empty vial was discarded with full instructions for injection to allow final concentration of 10mg/ml	Reconstituted 21.9ml water, discarded	<i>[Signature]</i> 11-04-15	<i>[Signature]</i> 11-04-15

Photo 53: Only 20+ thiopentone vials stocked for 30–40 monthly euthanasia cases

Socialisation Area:

Photo 54: Barren, concrete 550 sq. m. socialisation area for 1,000 dogs

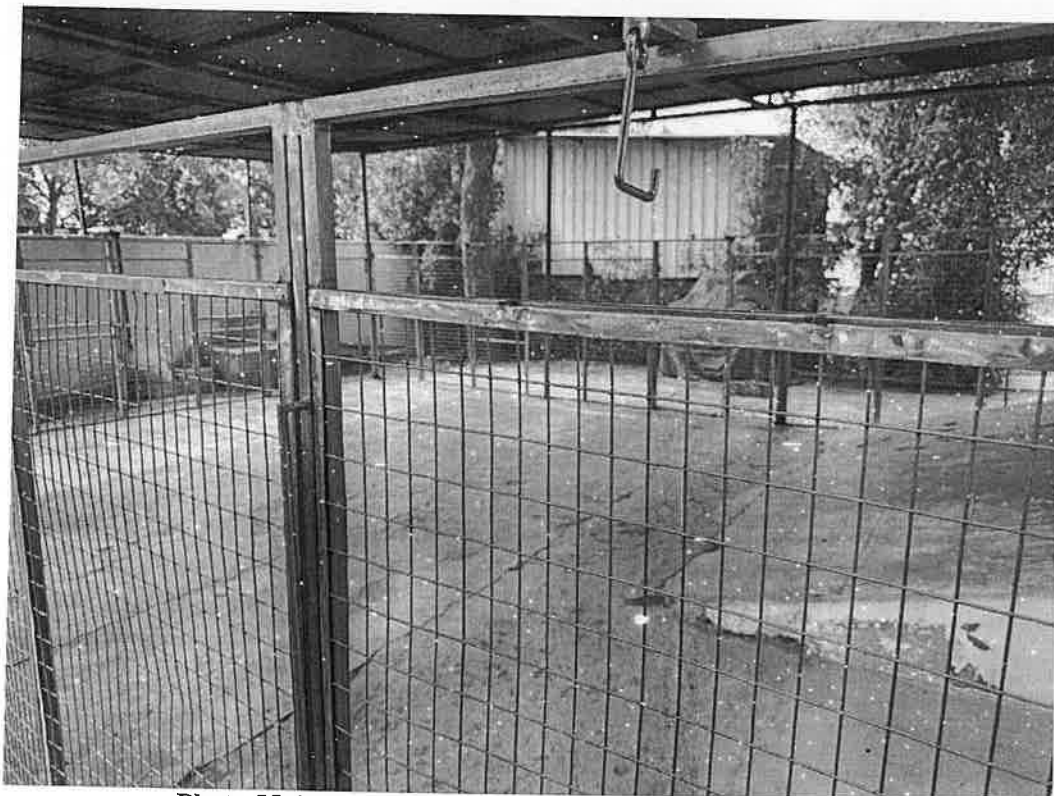


Photo 55: No enrichment provided in the socialisation area

Nutrition:



Photo 56: Animals fed commercial food with limited quantity and frequency



Photo 57: Animals fed commercial food with limited quantity and frequency

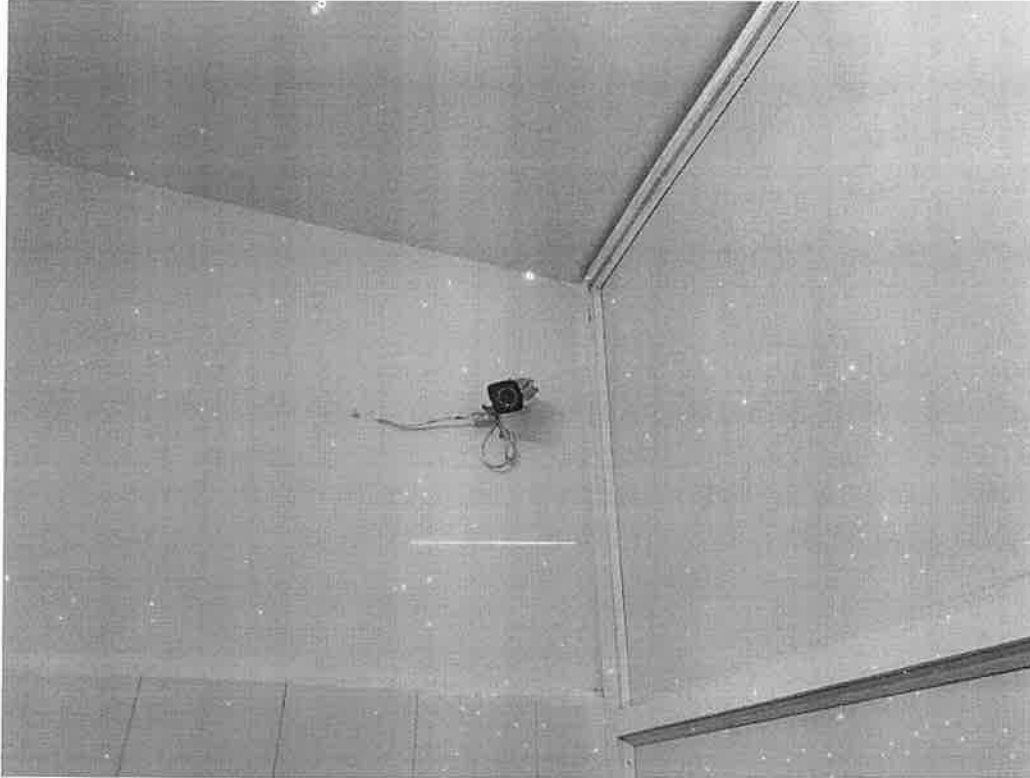
CCTV

Photo 58: CCTV cameras absent or non-functional at critical locations

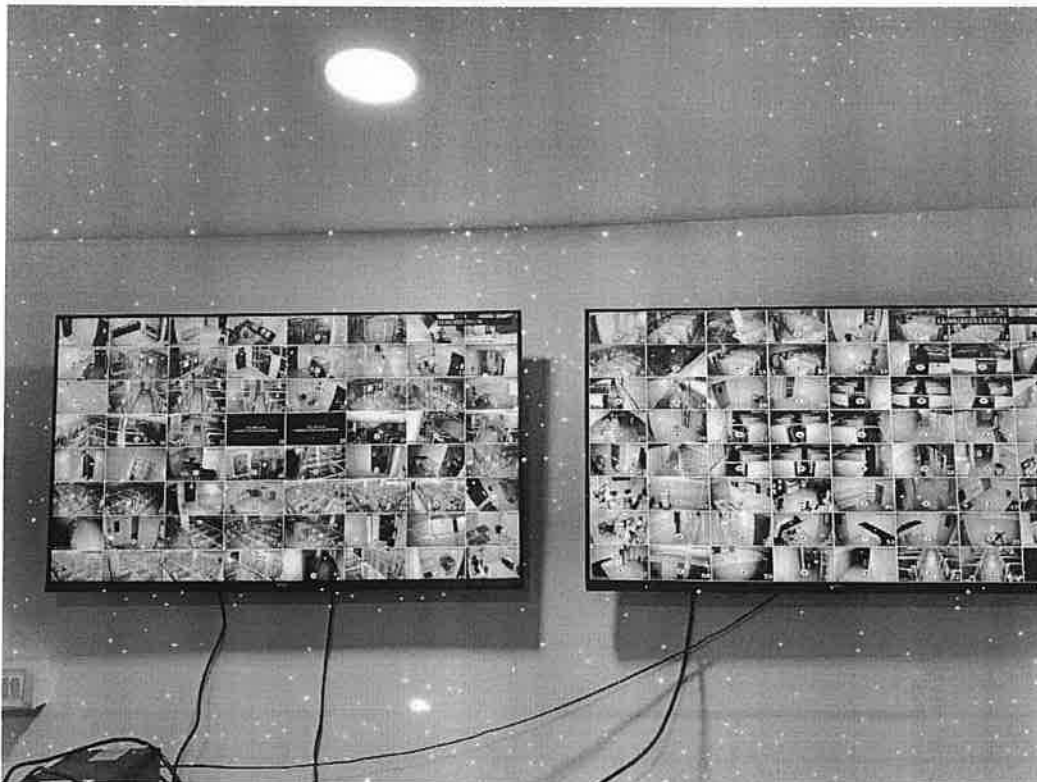
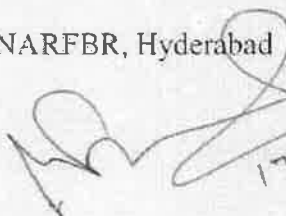


Photo 59: Unavailable CCTV footage from critical areas raises transparency concerns

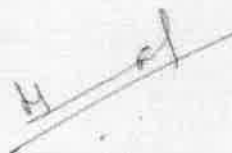
Inspection Team Signatures and Verification

We, the undersigned members of the inspection team, hereby affirm that the findings, observations, and conclusions presented in this report are accurate to the best of our knowledge, based on the on-site inspection conducted at Palamur Biosciences Pvt. Ltd, on 11 June 2025, and the information made available by PBPL representatives. This report is respectfully submitted to the Committee for the Control and Supervision of Experiments on Animals (CCSEA) for its consideration and appropriate action in accordance with the applicable rules and regulations.

1. Dr. Mukesh Kumar Gupta
Member, CCSEA & Director, ICMR-NARFBR, Hyderabad

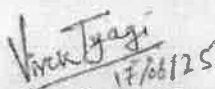

17/06/2025

2. Dr. Manilal Valliyate
Member, AWBI

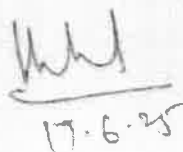


17.06.2025

3. Dr. Vivek Tyagi
Senior Consultant, CCSEA


17/06/25

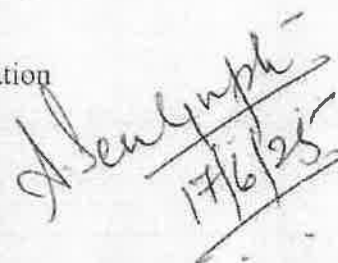
4. Dr. B.D.P. Kala Kumar
Main Nominee, IAEC


17.6.25

5. Shri A. Madhava Rao
Socially Aware Nominee, IAEC


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6. Ms. Alokparna Sengupta
Managing Director, Humane World for Animals India Foundation


17/6/25