

December 3, 2018

Elizabeth H. Sibolski, Ph.D.
President
Middle States Commission on Higher Education
3624 Market Street, Second Floor
Philadelphia, PA 19104

Dear Dr. Sibolski:

On behalf of Responsible Policies for Animals (RPA), a 501 (c)(3) tax-exempt educational nonprofit organization, I respectfully submit this letter, the enclosed Middle States Commission on Higher Education (MSCHE) Third-Party Comment Form, written comments applying MSCHE's formal standards, and additional enclosures to challenge the accreditation of the land-grant universities (LGUs) among MSCHE's member institutions, due to their refusal to phase out their "animal science" programs despite knowledge of these programs' far-reaching destructive impacts. I ask that MSCHE investigate whether a college or university's providing training, research, experimentation, lobbying, sales, public relations, and/or promotions for the meat, dairy, fish, egg, animal-feed, and/or any of their allied industries should preclude a college or university's continued accreditation.

I recognize that since I started to prepare this complaint MSCHE has implemented procedures for receiving complaints entirely in an online form. I regret that it is not practical for me to fit this letter and the rest of my complaint within that system. I respectfully request that, due to the far-reaching, life-and-death, substantive nature of this complaint, you will seriously consider this complaint despite the procedural discrepancy.

In this detailed explanatory letter, I provide a coherent and thorough description of and complaint about the problem of our colleges of agriculture at our LGUs teaching and reinforcing false and harmful beliefs in service to destructive profit industries. In the enclosed Comments, I show how particular items covered in this letter relate to MSCHE accreditation standards, providing a factual basis for MSCHE to investigate whether a university's offering "animal science" should be consistent with maintaining its accreditation. Additional enclosures illustrate some of the key assertions in this letter and in my Comments. I am glad to provide abundant additional evidence and sources to you and your staff, acquired over decades, which it would be prohibitive to enclose with this initial complaint.

Background

The following facts are settled among scientists in relevant fields – comparative anatomy, anthropology, nutrition science, ecology, environmental science, medicine, and others – and among animal, environmental, and public-health advocates and other concerned citizens who study such matters, despite persistent and widespread misconceptions to the contrary:

- Human beings are by evolution and nature plant-foraging herbivores. Notions that human beings evolved as “natural killers” and as “hunter-gatherers” are not based on valid science and are debunked by comparative anatomy, anthropology, nutrition science, and other fields.
- The optimal human diet consists only of plant foods; eating from animals is unhealthy for human beings. Generations-long exhortations to eat meat, to cajole children to drink calves’ milk, to obtain “plenty of protein” by eating from animals, and so forth were never based on valid science and are all debunked by science.
- The meat, dairy, fish, and egg industries are major sources of the most lethal infectious and non-communicable diseases in humans and of bacterial resistance to antibiotic drugs.
- Nearly all human food poisoning originates with meat, dairy, fish, or egg industries – even when the immediate source is a fruit or vegetable.
- The meat, dairy, fish, egg, and feed industries waste enormous amounts of energy, topsoil, and fresh water compared with providing only plants for humans to eat. Our species’ future quality of life depends on conserving and not wasting energy, topsoil, and fresh water.
- Raising animals for food accounts for about half of human-generated gases rapidly breaking down Earth’s climate, causing disruption, death, and misery in countless human beings and other animals and threatening civilization and large components of the living world.
- Producing nonhuman-animal feed for the meat, dairy, fish, and egg industries causes massive toxic runoff from feed-crop production, destroying trillions of beings and undermining entire aquatic ecosystems.
- Hundreds of billions of nonhuman animals misguidedly treated as food for human beings suffer horrifically from atrocities associated with mutilations, slaughter, trucking, intensive confinement, separation of children from mothers and other breakup of families, eugenics of breeding, horrible wounding and suffocation from being hauled out of water (fish, octopuses, others), and other causes – all preventable since human beings are herbivores with no biological need of other animals in the diet or in other aspects of human life.

Despite the reality outlined above, “animal science” programs at our land-grant universities (LGUs), established long ago, when authorities and the general public mistakenly believed that eating from animals comported with human nature and was good for human health, continue to provide training, research, experimentation, public relations, sales, marketing, promotions, and lobbying for the meat, dairy, fish, and egg industries. “Animal science” does this on such a massive scale that it is a mainstay of the meat, dairy, fish, and egg industries, sparing the industries enormous costs which they should cover themselves under our economic system.

If not for the enormous financial benefits and the misleading academic “seal of approval” the industries gain from “animal science,” it is unlikely the industries would be able to continue assaulting human health and wellbeing, keeping billions of animals in abject misery for their entire lives, decimating life in Earth’s oceans, and otherwise undermining and destroying life worldwide.

Propagandizing for the meat, dairy, fish, and egg industries is more morally egregious in a university than in the industries themselves. Human beings assume profit industries exaggerate possible benefits of their products, cover up harm from their products, and otherwise misrepresent

reality. Human beings trust universities and their spokespersons to tell the truth and to refrain from misrepresenting reality. For a university, let alone a vast network of agriculture colleges / LGUs in the U.S. and its territories, to institutionalize the teaching of false beliefs promulgated by industries as harmful and destructive as the meat, dairy, fish, and egg industries and to collude with the industries in disseminating such beliefs through K-12 schools and the news industry – as has been the practice for several generations – plainly constitutes educational malfeasance and a gross breach of the public trust.

Due to the ever more urgent need to eliminate the meat, dairy, fish, and egg industries and to begin to repair some of their harm to human beings, other animals, and the living world, since 2003 on behalf of RPA, I have sent hundreds of books, documentary videos, factsheets, articles, and letters to the heads of the “1862” land-grant universities in all 50 states apprising them of the need to phase out “animal science.”

If, as RPA has urged these past fifteen years, our LGUs were to publicly announce the phasing out of “animal science” and the reasons for it, humanity would benefit worldwide. Perhaps, for example, the recent outbreaks of Ebola virus could have been prevented, since Ebola is just one of the more recent infectious diseases “jumping” from nonhuman animals to human beings due to the delusion, perpetuated by “animal science,” that it is healthful and safe to eat from animals. Avian and swine flu continue to afflict our species due to “animal science” and its client industries. The most widespread fatal non-communicable human diseases are linked to eating from animals. In addition to terrible suffering and early death, many human beings endure financial hardship and loss of homes due to such diseases.

Thus, the stonewalling of RPA’s 10,000 Years Is Enough campaign to get our LGUs out of the meat, dairy, fish, and egg industries is easily seen, not only as educational malfeasance but as a long-term assault on humanity and the rest of the living world. It is not possible to simultaneously teach what is true and encourage students to take part in the meat, dairy, fish, egg, or feed industry. There can be no such thing as an academically, intellectually, or ethically legitimate “animal science” program.

Harm from “Animal Science”

“Animal science” programs function as an elaborate and costly public-relations endeavor for the meat, dairy, fish, and egg industries. Using funds from students, parents, the public, and the meat, dairy, fish, egg, feed, agrichemical, and other allied industries, “animal science” programs benefit wholesalers, retailers, transporters, packagers, and warehouses of animal products, as well as breeding, confining, raising, guarding, and killing facilities and their suppliers and workers.

More specifically, “animal science” programs perpetrate two main tactics of public relations on behalf of the meat, dairy, fish, and egg industries: damage control and manufacturing doubt. Damage control involves minimizing harm to a business, industry, or other endeavor from emerging facts or allegations that threaten the enterprise due to likely negative public or “consumer” reaction. Manufacturing doubt involves managing the public mind so that when science exposes realities that threaten a commercial or professional endeavor, the public and “consumers” are confused about what is true.

Damage control and manufacturing doubt run counter to the academic obligations to seek and spread the truth and to debunk beliefs proven false. Practicing public relations rather than truth-telling removes a university from the Enlightenment tradition on which our nation and its institutions are founded, including our LGUs. It can only ill-serve education, students, and the public for any university to protect profits from facts or to falsely generate doubt about what is true. There is no possible way to teach “animal science” without doing exactly those things, since telling the truth about the meat, dairy, fish, and egg industry would prevent any student intellectually and morally qualified for college from enrolling in any “animal science” course or in any way serving or working for the meat, dairy, fish, or egg industry.

“Animal science” puts careerism and LGU employee interests above human wellbeing and morality, wellbeing and interests of nonhuman animals, health of the living world, and intellectual and academic rigor. Many authoritative books warn of conflicts of interest that arise when colleges or universities serve and promote profit industries: *Science for Sale*, *Science in the Private Interest*, *Campus, Inc.*, *The Leasing of the Ivory Tower*, *University Inc.*, and many others (see “The Case for Ending ‘Animal Science’ Documented,” enclosed). Careerism and conflict of interest are major factors wherever “animal science” programs exist.

With no legitimate intellectual or scientific foundation (hence RPA’s use of scare-quotes with “animal science”), “animal science” can only provide a basis for university teaching, administrative, or staff careers to the extent that participants avoid, deny, censor, stonewall, or suppress relevant knowledge generated in recent decades by nutrition science, medicine, anthropology, ecology, and other fields exposing the meat, dairy, fish, and egg industries as destructive, inhumane, and unjust and lacking any redeeming value.

“Animal science” undermines science and accurate word usage, teaching falsehoods, using euphemisms and doublespeak, and omitting and suppressing knowledge inconsistent with meat, dairy, fish, egg, and feed industry interests. “Animal science” promotes carnist ideology and falsely teaches or reinforces false and harmful beliefs. Some of these beliefs: human beings need protein, calcium, and Omega-3 fatty acids from animals for optimal health; humans are natural omnivores; humans evolved as “hunter-gatherers”; humans are entitled to other animals; breeding, raising, and slaughtering nonhuman animals are not abuse (maltreatment) or injustice and can be done “humanely.”

Agriculture, cultivation of fields, is the industry our land-grant universities were created to support and promote. Breeding, raising, slaughtering, and marketing animals are not agricultural practices and thus are not mentioned along with crops, soil, and water in the 1862 laws establishing our LGUs and the U.S. Department of Agriculture. Through political and verbal sleight of hand, the meat, dairy, fish, and egg industries insinuated themselves into our LGUs’ under deceptive rubric of “animal science” and “animal agriculture.” Zoology is the science of nonhuman animals; “animal science” is a misnomer; “animal agriculture” is an oxymoron and an instance of doublespeak.

“Animal science” subverts agriculture’s task of nourishing human beings by diverting LGU funds, personnel, land, water, and facilities to feeding nonhuman animals and assisting farmers in doing the same. Power, influence, lobbying, and funding from the meat, dairy, fish, egg, and feed industries, state and federal departments of agriculture, and state and national farm bureaus

function to suppress knowledge of harm to human beings, other animals, and the living world from the industries, ensuring that feed for animals raised to addict and malnourish humans supersedes plant foods human beings need for optimal health.

Feed crops occupy an estimated 70 percent of agricultural land. Yet human beings have no need of anything from animals in their diet. As our preeminent nutrition scientist puts it, every nutrient obtained from animals is better obtained from plants. On the nutrition-density scale with kale at 1,000, spinach in the high 600s, and strawberries and melons in the mid-200s, meat is about 30.

Most feed crops are toxically grown, chemical runoff from their production killing countless quadrillions of beings, causing vast “dead zones” in Earth’s oceans, disrupting other aquatic ecosystems, poisoning topsoil, and depleting topsoil more rapidly than agricultural methods that provide optimal food for human beings, all possible to produce in great abundance without toxic chemicals.

Human beings, nonhuman animals, and the living world would fare much better if human beings only ate non-toxically-grown (“organic”) edible fruits, vegetables, legumes, leafy greens, grains, nuts, seeds, tubers, and flowers. “Animal science” obscures and suppresses this knowledge.

“Animal science” undermines informed organized efforts to promote public health, respectful treatment of nonhuman animals, and reversal of our species’ destruction of the natural world.

By promoting poor human nutrition and health, rationalizing continued human ownership, exploitation, defamation, debasement, and abuse of nonhuman animals, squandering and contaminating fresh water and topsoil, destroying forests for grazing, turning land used for grazing to desert, and breaking down Earth’s climate, the meat, dairy, fish, and egg industries – and therefore “animal science” – stymie the practical and moral progress that otherwise could have been made in recent generations and urgently needed now.

In failing to truthfully assess such severe, far-reaching, painful, and catastrophic impacts of large, longstanding “animal science” programs and in dismissing these impacts when urged repeatedly to address them by eliminating “animal science” according to their authority and responsibility, our LGUs disserve students, entire LGU communities, and the public, placing themselves outside of the Enlightenment tradition that is the basis of our nation and its educational institutions.

Publication Illustrates the “Animal Science” Problem

A highly revealing and distressing example of “animal science” as a force for careerism, conflict of interest, profit-industry bias, suppression knowledge, abandonment of the Enlightenment, and functioning as public relations in opposition to the education endeavor is the 140-page 1997 compilation of fourteen “discussion papers” titled *Animal Welfare Issues Compendium*. You and your staff may locate the *Compendium* by entering the title in an Internet search engine.

Facilitated by two employees of the U.S. Department of Agriculture, an arm of government closely allied with the meat, dairy, fish, egg, feed, agrichemical, and other allied industries at the expense of nutritious plant foods that human beings need for optimal health, the *Compendium*’s twenty-seven authors include twenty-one from LGU “animal science” and veterinary programs (these are closely associated with “animal science” programs), one from a “swine center” in Canada, one

from the U.S.D.A., and none from among the thousands of authorities from outside of industry and government on animal welfare, human nutrition and health, bioethics, ecology, or other matters closely related to the papers that make up the *Compendium*.

The *Compendium's* primary purpose is to rationalize the continued existence of the meat, dairy, fish, egg, and veterinary industries and of LGU "animal science" programs, defending them against substantive, evidence-based, ethical arguments publicly raised in the two preceding decades, since popularization of an "animal rights movement," increasing adoption of a "vegan lifestyle" as a matter of personal conscience, and heightened awareness of atrocities perpetrated on nonhuman animals by industries that exploit them, including but not limited to the meat, dairy, fish, and egg industries.

Particularly striking about the *Compendium* for purposes of this submission to you regarding the problem of accrediting institutions with "animal science" programs and associated schools of veterinary medicine is the publication's lack of academic and intellectual rigor – a clear signal that it is propaganda for its authors' careers, their LGU programs, and the profit industries they serve. While the long list of source citations presents a veneer of scholarship, basic flaws include the failure to question use of the word "welfare" in the popular phrase "animal welfare" used in the *Compendium's* title. By the time of publication in 1996, many authors and advocates had long since recognized that the true aim of "animal welfare" practices is not genuine wellbeing, a high quality of life consistent with animals' evolved nature, or a fulfilling life for all nonhuman animals as the phrase implies but minimizing awareness of the abuse (maltreatment) inherent in our species' endeavor, since prehistoric times, of altering animals' genes through selective breeding to make the animals more useful to a range of human interests and to prevent them from harming human beings who unjustly foreclose their autonomy and dominate their lives.

Additional fundamental flaws in the *Compendium* include quoting "animal rights" philosophers and advocates out of context to make their arguments appear easier to refute than they actually are; excluding arguments against the existence of meat, dairy, fish, and egg industries that are difficult or impossible to refute; presuming the legitimacy of meat, dairy, fish, and egg industries without providing legitimate empirical arguments in support of their legitimacy; and more. It is beyond conspicuous that, with thousands of scholars in relevant fields available to them at the LGUs and government agencies that employ or interact with them, the *Compendium's* authors and compilers could not possibly have based the publication's "discussion papers" on open and above-board *calls for papers* such as scholars typically issue for anthologies, conferences, and other collective academic endeavors.

Don't Make Victims of Perpetrators

RPA in no way seeks to punish or deprive of a livelihood any LGU personnel involved in "animal science." Animal-abuse culture and industries are lawful thus far, and civilization indoctrinates and conditions all of us from birth to accept them and even perceive them as normal and natural though they are not. It is RPA's position that our LGUs and our state and federal education agencies should assist in finding new employment any personnel displaced by the phasing out of "animal science." The U.S. Department of Labor indicates that people who teach "animal science" are qualified to teach subjects in life sciences that do not directly involve the meat, dairy, fish, egg, or feed industry.

Persons capable of teaching “animal science” should be well enough versed in basic biology and some of its branches to be able to teach some field of science in college or secondary school. Having served agribusiness industries, they should be able to find employment in them.

Conclusion, Recommendations, Offers of Assistance

By any rational educational standard and by the Enlightenment tradition in which U.S. universities and civilization are rooted, the persistence of “animal science” despite a large body of evidence delivered to LGU presidents, chancellors, trustees, deans, instructors, and newspapers indicating “animal science” is an educational travesty constitutes the most serious kind of malfeasance. It seems clear to me that MSCHE’s standards as outlined in its standards document Characteristics of Excellence in Higher Education, Requirements of Affiliation and Standards for Accreditation (<http://www.msche.org/publications/CHX-2011-WEB.pdf>) disqualify for accreditation any institution of higher learning that teaches “animal science”; that refuses to eliminate such programs when provided with far more than sufficient reason to; and that either ignores informed requests to do so, or rationalizes animal science using insidious and anti-intellectual public-relations techniques.

If, today, our colleges of agriculture at our land-grant universities (LGUs) were to propose programs providing training, research, experimentation, public relations, sales, marketing, promotions, and lobbying for the meat, dairy, fish, egg, and animal-feed industries, the proposal would have little chance of success. But LGU administrators, as well as our LGU trustees and the governors of all 50 states (*ex officio* LGU trustees) have these past 15 years stonewalled RPA’s repeated, documented, urgent requests that they phase out “animal science” at their institutions. “Animal science” unfortunately became established at our LGUs before the public became aware of destructive impacts, the horrific suffering of animals used by the industries, the innate equality of all animals, or the experience, needs, or mental, familial, and social lives of nonhuman animals.

While our informing institutions generally – colleges, universities, news, K-12 schools, advocacy organizations, civic and religious groups – all persistently fail to educate about these matters, our LGUs are the main “bottleneck” of knowledge and engine of ignorance, maintaining confusion rather than assimilating and disseminating new information and knowledge throughout the culture and the polity.

Millions of people constitute LGU communities: students and their family members, faculty and theirs, alumni, and staff. According to the National Association of Public Universities, high proportions of LGU graduates go on to influence all of civilization’s institutions, industries, professions, and endeavors. It should alarm all literate and morally and politically engaged persons that institutions among our species’ most powerful and influential are misinforming the human world on life-and-death matters such as animal abuse, human health, nutrition and disease, causes of climate breakdown, and sources of water, air, and soil contamination.

So if our LGUs would rigorously disqualify debunked industry-serving beliefs about food from curricula and include only up-to-date knowledge, our most harmful, destructive, dangerous, inhumane, and unjust industries would lose massive financial and public-relations support from “animal science”; would be compelled to pay their own bills, and would lose the completely undeserved credibility currently afforded them by LGU collusion.

Elizabeth H. Sibolski, Ph.D.
December 3, 2018
Page Eight

In addition to the enclosed MSCHE Third-Party Comment Form and Comments regarding accreditation standards, I am enclosing sample letters RPA sent to all 50 states' "1862" LGUs and the governors of all 50 states, and RPA's white paper "The Case for Ending 'Animal Science' Documented." These items constitute a small representative selection of materials relevant to the need to eliminate "animal science" and RPA's part in the endeavor to eliminate it. RPA has in its possession a great many more relevant documents and publications. Should you and your staff decide to investigate this crucial matter as I am requesting, I am glad to meet with you and to make available any and all relevant items that you might desire which I am able to provide. You are welcome to visit RPA's office in Glenside, Pennsylvania, to review correspondence, literature, and other relevant materials.

As the enclosed comments and documentation reinforce, in continuing to teach and promote "animal science" - "poultry science," "dairy science," "aquaculture" (fish farming), and the rest, despite their undeniable harm to education, human beings, nonhuman animals, and the rest of the living world, I am sure you will agree that our LGUs require investigation as they very likely fall far short of MSCHE standards.

Thank you for allowing RPA the opportunity to comment. I am glad to discuss these comments with you, to answer any questions you might have, and to assist you in any exploration of this matter that MSCHE might undertake in relation to RPA's request that MSCHE make phasing out "animal science" a requirement for continued accreditation.

Sincerely,

David Cantor
Executive Director

Enclosures: Middle States Commission on Higher Education Third-Party Comment Form; RPA white paper "The Case for Ending 'Animal Science' Documented"; sample letter from RPA to all 50 states' LGU presidents or chancellors about the need to phase out "animal science": November 12, 2015; sample letter to all 50 states' governors about the need to phase out "animal science": November 14, 2015; letter from Penn State University to RPA rationalizing "animal science" without empirically refuting RPA's argument against it: September 23, 2008.

Comments by David Cantor
Founder & Director
Responsible Policies for Animals
to
Middle States Commission on Higher Education
Regarding Whether University “Animal Science” Programs
Violate Accreditation Standards

Introduction. Responsible Policies for Animals (RPA), a 501(c)(3) educational nonprofit organization headquartered in Glenside, Pennsylvania, urges the Middle States Commission on Higher Education (MSCHE) to investigate whether elimination of “animal science” from university curricula should be a requirement for continued accreditation of institutions governed by MSCHE. These Comments supplement the accompanying December 2018 letter to MSCHE President Elizabeth H. Sibolski, Ph.D., and MSCHE Third-Party Comment form from RPA founder & director David Cantor concerning this matter. The letter to which readers of these Comments are referred is the above-mentioned letter. The MSCHE Standards quoted in these Comments are the MSCHE Accreditation Standards, 2011 revision, <http://www.msche.org/publications/CHX-2011-WEB.pdf>.

Each page number below is the source of the quotation from the MSCHE Accreditation Standards that follows the page number.

Page 2: “An accredited institution is expected to possess or demonstrate the following attributes or activities: clearly defined mission and goals that ... relate to external as well as internal contexts and constituencies.”

Comment. The missions and goals of LGUs do not address destructive impacts of “animal science” on human beings, nonhuman animals, and the living world. “Animal science” hampers efforts by universities, governments, nonprofit organizations, including RPA, and their personnel to prevent and treat human disease and food poisoning; slow, mitigate, and halt climate breakdown; conserve and prevent contamination of fresh water, oceans, and topsoil; reduce animal abuse defined as all that humans do to and with other animals and their natural home (it is all maltreatment); prevent catastrophic financial losses to human beings from health and ecological effects of the meat, dairy, fish, egg, and feed industries; and otherwise reduce suffering and diminish its causes.

“Animal science” harms students by misleading them to believe, falsely, that the meat, dairy, fish, and egg industries are legitimate and that human beings benefit from their products; that there can be humane and just ways of operating such industries; and that profiting from animal abuse is an ethically sound basis for a career. Thus, by perpetuating their “animal science” programs, our LGUs afflict students with *moral injury*, the painful experience of innately moral and conscientious human beings told by authorities that something they are doing is good when it is in actuality harmful and has no redeeming value.

By teaching carnist ideology and its pseudoscientific underpinnings rather than the actual science relevant to raising and using animals for food, “animal science” prepares students to mislead other human beings in the larger world in ways that perpetuate the false and harmful beliefs promulgated by “animal science” and its branches such as “dairy science,” “poultry science,” “aquaculture,” and others. Harmful impacts of this process are accurately seen as immeasurable and ever-increasing as personnel of institutions beyond the academy such as news, K-12 schools,

civic and youth groups and others are not equipped to challenge and correct such elaborate misconceptions perpetuated by an enormous network of highly respected universities.

Page 21: “Academic and intellectual freedom gives one the right and obligation as a scholar to examine data and to question assumptions. It also obliges instructors to present all information objectively because it asserts the student’s right to know all pertinent facts and information. A particular point of view may be advanced, based upon complete access to the facts or opinions that underlie the argument, as long as the right to further inquiry and consideration remains unabridged.”

Comment. “Animal science” prevents our LGUs from meeting this standard. LGUs make at most token and dismissive efforts to enable students to question the assumptions behind “animal science” and the meat, dairy, fish, egg, and feed industries it serves, promotes, and colludes with, or to examine the detrimental effects of “animal science” on human health and wellbeing, those of other animals, on air, water, topsoil, ecosystems, or Earth’s biosphere.

The article at ...

<https://hpjmh.com/2012/03/29/academic-unfreedom-at-cornell-t-colin-campbell/>

... is titled “Academic ‘Unfreedom’ at Cornell.” It recounts one very well-known example in which teaching by the world’s preeminent nutrition scientist, T. Colin Campbell, Ph.D., was impeded by Cornell (the only Ivy League LGU) personnel serving the interests of the meat and dairy industries through the university’s “animal science” program, because Dr. Campbell’s decades-long research, called “the Grand Prix of epidemiological research” by *The New York Times* and increasingly influential in health-care professions concludes that human beings experience optimal health only by eating plants only and that every nutrient obtained from animal products is better obtained from plants.

Some years ago, I met a recent Ph.D. graduate in nutrition science from Penn State University who had not heard of Dr. Campbell’s work during his years of graduate studies, though Dr. Campbell had authored or co-authored more than 300 peer-reviewed scientific articles and had published his landmark book *The China Study: The Most Comprehensive Study of Nutrition Ever Conducted*. Penn State has long been a major university serving the meat industry. A letter from Penn State to RPA states that “animal science” classes are among the institution’s “most popular.”

Whether through intimidation, censorship, self-censorship, ignorance, or other factors, it is reasonable to believe a great deal of knowledge about the destructive nature of the meat, dairy, fish, eggs, and feed industries is suppressed at universities that provide “animal science” programs. I would think this is an area well worth MSCHE’s investigating.

Page 22: “An accredited institution is expected to possess or demonstrate the following attributes or activities: ... sound ethical practices and respect for individuals through its teaching, scholarship/research, service, and administrative practice, including the avoidance of conflict of interest or the appearance of such conflict in all its activities and among all its constituents.”

Comment. A university with an “animal science” program cannot possibly meet this standard. In stonewalling rather than showing they can refute RPA’s systematic and well-informed fifteen-year

effort to persuade our “1862” LGUs in all 50 states to phase out “animal science,” the LGUs tacitly acknowledge the unethical nature of the entire “animal science” endeavor and that “animal science” persists due to interests other than educational benefit. More than one LGU has written to RPA that they consider “animal science” justified because the classes are “popular” or because meat remains a popular “food” among human beings.

The programs continue to operate by inertia, powered by careerism and conflict of interest, not because they meet basic ethical standards. Not only do universities with “animal science” programs unethically perpetrate animal abuse simply by perpetuating and rationalizing our species’ tyranny over other animals; “animal science” has long been a driving force behind the most atrocious factory-farming methods that long ago drove many “old school” animal farmers out of the meat, dairy, and egg industries because they found the “new” methods designed by “animal science” personnel so extraordinarily inhumane.

As outlined in the letter accompanying this portion of RPA’s submission regarding the “animal science” problem, conflict of interest is rampant in, and a mainstay of, “animal science.”

Page 23: “An accredited institution is expected to possess or demonstrate the following attributes or activities: ... honesty and truthfulness in public-relations announcements, advertisements, and recruiting and admissions materials and practices.”

Comment. All substantive LGU literature, Internet postings, syllabi, and other materials designed to promote or rationalize any aspect of “animal science” violate this standard, containing deceitful and untruthful language and statements. Our not quoting examples bespeaks the ubiquity, not paucity, of such materials: Singling out any item could give a false impression that “animal science” materials exist that are honest and truthful when we do not know of any or of any way that an “animal science” program could tell the truth about itself and expect to continue to operate.

The most basic and frequent language throughout “animal science” communications – “animal agriculture,” “animal welfare,” “environmentally sound,” and the like – is inherently dishonest. There is no such thing as animal agriculture as agriculture is cultivation of fields; nonhuman animals are not mentioned along with crops, seeds, soil, and water in the 1862 Acts of Congress establishing the purviews of our colleges of agriculture at our LGUs and the U.S. Department of Agriculture. Animals raised for food experience no welfare – no wellbeing, absence of physical or emotional misery, or a chance at a fulfilling life). From its inception in prehistoric times, human beings’ use of animals for food has constituted ecological disruption and led over time to all other ecological destruction (sometimes called the Biocaust) by our species. Even before agriculture began, our species had driven extinct about half of Earth’s large-mammal species, primarily through hunting.

Among the many replies RPA has received to its many letters to LGU presidents, chancellors, and trustees and the states’ governors (*ex officio* LGU trustees) urging the phasing out of “animal science” (all accompanied by detailed supporting evidence of the need to eliminate these programs), none has been honest or truthful. All have used evasion, deceptive rhetoric and public-relations techniques, merely thanked RPA for its correspondence without saying anything of substance. There simply is no valid factual basis for “animal science” programs, so they are maintained strictly through dishonesty and untruthfulness.

Page 23: "In addition to the evidence inherent within or necessary to document the fundamental elements above, the following, although not required, may facilitate the institution's own analysis relative to this accreditation standard: analysis of the application of institutional policies governing conflict of interest."

Comment: Accreditation requires such an analysis, and LGUs and others clearly ignore their inherent conflict of interest between promoting "animal science," which serves profit interests at the expense of student and public interests, and promoting student and public interests, which requires eliminating "animal science" programs. In fifteen years of writing to our LGUs about the "animal science" problem, RPA has only seen LGUs resist and avoid their obligation to analyze any institutional policies governing conflict of interest that might exist; we have seen evidence of their carrying out such analysis. This lack of conflict-of-interest analysis gives every appearance of violating this important MSCHE standard.

Page 26: "The fundamental question asked in the accreditation process is, 'Is the institution fulfilling its mission and achieving its goals?' This is precisely the question that assessment is designed to answer, making assessment essential to the accreditation process. Assessment processes help to ensure the following: Institutional and program-level goals are clear to the public, students, faculty, and staff."

Comment. Clearly, LGUs do not make clear their goals regarding support of the animal-abuse industries by promoting "animal science." First, as mentioned above, "animal science" is not a science; second, it supports only the animal abuse industries, and not the taxpaying public as a whole. LGUs and others engage in public relations campaigns to obfuscate this basic truth.

For example, while Penn State promotes "animal science" in its "Careers" section (<http://animalscience.psu.edu/majors/animal-science/careers>) various jobs in the meat, dairy, fish, and egg industries, nowhere does it mention or explain the deep ties Penn State has with the industries themselves, on that or any related website.

This lack of transparency plainly and clearly violates this dimension of MSCHE accreditation.

Page 47: "Institutions should identify and provide a recognizable core of general education that expresses the educational philosophy of the institution for each undergraduate degree program or cluster of degree programs; incorporates essential knowledge, cognitive abilities, and an understanding of values and ethics; enhances students' intellectual growth; and draws students into new areas of intellectual experience, expanding their cultural and global awareness and sensitivity, and preparing them to make enlightened judgments outside as well as within their academic specialty." And **Page 48:** "An accredited institution offering undergraduate degrees and some graduate institutions are expected to possess or demonstrate the following attributes or activities: ... consistent with institutional mission, a program of general education that incorporates study of values, ethics, and diverse perspectives"

Comment. The study of "animal science" reinforces values, ethics, and perspectives deceitfully engineered by the meat, dairy, fish, egg, and feed industries through consumerist public-relations campaigns and the news industry, not our species' innate values, ethics, and perspectives as plant-foraging herbivorous apes originating on the African savanna without weapons, clothing, or other technological innovations that produced meat, dairy, fish, and egg industries. The preeminent

biologist E.O. Wilson describes our innate *biophilia* as “the connections that human beings subconsciously seek with the rest of life.” Our LGUs’ “animal science” programs, like the industries they serve, undermine the natural human connection to the rest of the living world, in ways outlined above and in the enclosed letter.

Rather than inculcate diverse perspectives, “animal science” and its various branches and related courses reinforce long-established ideologies and delusions that predate nutrition science, modern genetics, anthropology, zoology, ethology, and other fields that not only indicate harm to humans, other animals and the living world from the meat, dairy, fish, and egg industries but debunk notions of human supremacy, human entitlement to other animals, inequality among beings, and others false beliefs nurtured for thousands of years as rationalizations for the Animal-Abuse Revolution, animal-abuse culture, and component endeavors, which include but are not limited to the meat, dairy, fish, and egg industries.

All of these practices abuse and undermine the intellect rather than expand it; dedicate the mind to rationalization rather than reason or ethics; and mock the concept of diversity by emphasizing thoroughly debunked views as if they were empirically valid. There are diverse views within the realm of current science regarding optimal plant-based diets; ways of producing food that reduce climate-breakdown gases, waste of energy, fresh water, and topsoil, contamination of water, topsoil, and ecosystems, and animal abuse. They cannot be presented within academic programs that presume the legitimacy of raising animals to feed human beings or to serve other human purposes.