

# my illegal research on humans at Ryerson

on Jan 12 i read about Rye's new labspace at MARS, and thought: is Rye now running animal labs?

i emailed Warren Wakarchuk, Chair of Chem & Biology:

dear Dr. Wakarchuk,

i read this morning about the completion of the new space at MARS, and my first thought was: does this mean Ryerson is now running animal labs? my [acquaintance] works in the East tower for a mouse lab - i know that MARS is an epicentre, and i wonder what 'wet lab' means, in Rye's case.

please forgive what may strike you as an intrusive (cross-faculty) missive, but i'm find it distressing living in a world where humans do so much willful harm to our fellow Earthlings. and when it comes close to home (in this case, to my university) i feel compelled to speak for them. i thought i'd try addressing you, first.

it seems you've thus far outsourced mouse-work to other labs (e.g. UNC and Queen's); but i suspect that will change, now.

i wish there were a way you could do your (from what i can tell) important work without using animals. i had a long conversation with a U of T post-doc student last year (from [my acquaintance's] lab) and while he expressed much regret for what happens to the creatures therein, he took off his glasses, rubbed his eyes and conceded that the mouse model is still the 'gold standard', and the 'sacrifice' would continue for the foreseeable future. but he hopes for better (ethically) models.

the computer models aren't quite there, perhaps. i wonder, then: shouldn't we be waiting till they are? the paradox of our use of non-human animals in research is that it is predicated on their similarity to us (hence the usefulness of the results - even (often) in Psychology!); yet we must suppress that similarity to make it ethically plausible.

[. . . ]i think of [rabbits and rats] as my mammalian brethren - perhaps you'll say i'm overstating their similarity. but in a lonely, mostly lifeless universe, man & mouse seem quite bound, to me.

sincerely,  
paul bali  
dept of Philosophy

i received no reply from Warren, so on Jan 22 i emailed his colleagues (in Bio & Chem) a ten-question survey i composed at Survey Monkey. the survey and its results are **Appendix A**.

dear Chem / Bio faculty and associated researchers:

as part of my ongoing inquiry in animal ethics, i'm surveying Ryerson scientists about their views on & experiences with *in vivo* research.

from what i can gather, Ryerson has so far outsourced in vivo experiment [e.g. [Wakarchuk et al, 2016](#)]. with the new wetlabs at MARS West, the construction of the Daphne Cockwell centre, and the opening of iBEST at St. Mike's, i wonder if Ryerson will now be collaborating more locally, or directly using animals in-house.

the survey can be found here:

<https://www.surveymonkey.com/r/J22VYXV>

it might take ten minutes to complete, and results are anonymous. you're welcome to answer selectively, ignoring questions as you see fit. the ten questions are organized into three topics:

**1. your own attitude to animal 'sacrifice' in Science.** do you think it morally justified? are there any species you're unwilling to experiment on? (some researchers e.g. will 'do' mice & rats but not dogs or cats; will do dogs & cats but not primates, et cet.) did you have any qualms, verbalized or non - ? have you ever discussed the moral dimensions of animal use with colleagues, students, superiors? i'll also ask you to engage in a thought experiment, wherein a cognitively-dominant species breed and sacrifice humans to their super-advanced Science.

2. **your personal experience with animal experiment.** when (if ever) was your first use? your views on the prospect of animal use @ Ryerson. do you anticipate, in your own research, future animal use?

3. **your views on alternate methods** such as Virtual models, *in vitro* techniques. your familiarity with The Oxford Report on *in vivo* research [[Normalizing the Unthinkable](#)]. your familiarity with the Johns Hopkins Center for Alternatives to Animal Testing [[CAAT](#)].

though i'll quantify, your comments (in the provided comment fields) are especially valuable to me.

i'm strongly against *in vivo* research, whatever the gains. i'm also aware of the myriad ways all our lives are predicated on human dominance, of how implicated we're all in the benefits of *in vivo* research. i'm not, in this part of my research, concerned to judge so much as understand.

sincerely,  
paul bali  
Dept of Philosophy

i sent out to 68 Ryerson addresses, of which 11 were bouncebacks - i had to guess at the institutional addresses for some of the researchers - and over the next twelve days six people completed part or all of the survey.

i thank those who took the time to reflect and respond. i've never doubted the decent intentions of most of our researchers, and i was confirmed in some of the responses.

the last comment, to the last question ["you need ethics approval to do this survey with humans"] i thought was a petty snap-back, a joke.

## Phase 2 of my research

Phase 2 of my research, a judgmental phase, began on Feb 3 when an email arrived from Ryerson's [Research Ethics Board](#) - a body i was ignorant of, whose requirements (in line with Federal ones) my survey had violated. my survey, it seems, is research involving human subjects, which needs an Okay from the REB. i could still apply, but

if/when approval for your research is granted, it cannot be granted \*retroactively\*, so any data you've already gathered would need to be destroyed.

our email exchange ends with the REB warning they're passing the case on to Ryerson's lawyers, accusing me of bringing Rye into violation of Federal Law.

the day's full exchange is **Appendix B**.

yes, i'm supposed to get approval. and had i sought it (before ever sending out my survey) the REB would likely have granted it. for me that's not quite the issue, now that an issue's being made.

my view amounts to this: my survey should require no approval process whatsoever, apart from the decision of individuals to participate in it. on the other hand, research that involves e.g. gassing or decapitating the "subjects" should never be approved; and any body, board or college that approves such research is illegitimate.

## **a necessary sacrifice**

in fact Ryerson has had Senate policy in place for animal research since Feb 1 2000, i now know. Senate policy asserts that animals may be used only if "every effort has been made to find a substitute." a typical *in vivo* policy: you can use them if there's no alternative.

note, though: one alternative is simply not using them, and not doing the research.

i know that hairless rats are killed off-campus and brought in for undergrads to dissect. perhaps this meets the Senate requirement in that it's not technically *in vivo* research - though note that most *in vivo* research ends with a dead animal, often dissected. also, Senate policy insists that "animal use"

includes projects carried out in the field or in a facility not owned by Ryerson, or in collaboration with an outside institution(s) or co-researcher(s).

so: how are these hairless rats being bred, fed, housed, killed? and in what sense is their use necessary, without alternative?

these undergrad dissections are "necessary", perhaps, not for increasing human knowledge of rat physiology, but for getting future scientists accustomed to using animals. it's a *ritual* necessity, a "sacrifice" (the standard lab term) that initiates undergrads into our lab-culture.

## a semantic suggestion

i advise saying **in vivo** only for research such as Jane Goodall's, whose subjects survive the research - a minimal requirement. we've much to learn from true **in vivo** research: such as rabbit-style kung fu which i've learned from my rabbit friends, and am using right now, typing out this sprightly doc.

we've clearly learned much from the old Cartesian, murderous form of *in vivo*, too. humans have long drawn from the sacrifice: their centres of power are often altars where pure white beings are put to the blade and offered up for gain. these gains are real, by which i mean: Satan or something we may as well call Satan is real and we're deeply indebted to him: a being who keeps pristine accounts & is legal-minded.

so what about all the ways my aging mother has benefitted from animal experiment, all the pills for her migraine? well, who gave her that migraine, first of all. and perhaps if we really want to help our mother we could start by henceforth refraining from stealing, genetically hobbling, and murdering her children.

## a request for info, denied

on Feb 10 i submitted a Freedom of Info [FIPPA] request to Ryerson, seeking overview data on the last five years of in vivo research here. most Canadian Universities submit overview data, voluntarily, to the Canadian Council on Animal Care, so they can say "we've voluntarily submitted overview data to the Canadian Council on Animal Care" - which makes them sound like they care about animals. i asked for

- (i) the number and type of animals used in [Rye] teaching and research;
- (ii) the Purpose of the research [grouped into the CCAC's five categories]; and

(iii) the Invasiveness of the research [again, grouped into the CCAC's categories].

i heard back from Rye's Privacy Officer on March 10. [pls see Appendix C] She denied my request, citing FIPPA exemptions 14(1)(e) and (i), according to which a public institution can withhold public info if they fear such info could "endanger life or physical safety of a person" or "endanger security of a building".

perhaps the Privacy Officer googled me and learned of [my vandalism at U of G in summer of 2015](#). but she cited a June 2016 precedent at Queen's University, who cited the same exemptions for a similar FIPPA request, and whom the Privacy Commissioner favoured in an Appeal.

i wrote back to the Privacy Officer, same day:



**Paul Bali** <pbali@ryerson.ca>

5:02 PM (21 minutes ago) ☆



to [redacted] ▾

hi [redacted]. i appreciate your labours but am of course confused by the decision. is the concern that animal labs will be broken into, researchers harassed or harmed? that's the only sense i can make of this reason. yet i didn't ask for names or locations; just stats, and overview of harm-type. everyone knows that these abuses are occurring at almost every campus and research hospital in the world. a bit of detailing about Ryerson isn't going to make it a special target. moreover, i already know names and places of some of this research, by faculty publications; and i haven't broken into anything or threatened anyone. rather, as a scholar i'm asking for overview stats here, seeking understanding of the system.

there's some irony here. see how protected the Harmers are [the humans inflicting harm on the non-]. Exemptions 14(1)(e) and (i) are invoked to protect them even from our awareness; while they inflict very real harms on others. the strong are protected from even the hint of harm; the weak are harmed with impunity.

p bali  
dept of philosophy  
ryerson university

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her Decision does confirm "that there is one (1) responsive record held by the Office of the Vice President Research and Innovation."

one (1) responsive record,

i like that. perhaps it's

one (1) animal,

daily fed & watered, in a room signed 'Utility' in Kerr Hall South, under the Gym where i'm often lost & turned back on my 'shortcuts' to class.

this **one (1) responsive record**: a pkd Zebra, a McKenna Type One Entity, our own winking Eggy - the Animal seen as best he can, thru a cryptic redaction.

this **one (1) responsive record**: the Tay-Sachs Ram?

The image is a screenshot of a web browser showing a Google search for "Tay-Sachs sheep" and a Washington Post article. The search results show about 52,700 results in 0.58 seconds. The top result is from NCBI: "Tay-Sachs disease in Jacob sheep. - NCBI" with a URL and citation information. The second result is from the Washington Post: "How rare sheep from biblical times may help kids with a deadly ..." with a URL and date. The article snippet mentions that the discovery is due to the persistence of Fred and ... The Washington Post article header is visible at the top, with the title "How rare sheep from biblical times may help kids with a deadly genetic disease" and the author "By Eric Velasco" dated May 23, 2016. A photograph of a ram's head with large, curved horns is shown on the right side of the article preview. A "Most Read" sidebar is visible on the far right, listing five trending stories.

what Wakarchuk oversees, his compact lamb:

Molecular Therapy

# Methods & Clinical Development

Volume 3, 2016, Article 15057



Open Access

Article

## Construction of a hybrid $\beta$ -hexosaminidase subunit capable of forming stable homodimers that hydrolyze GM2 ganglioside *in vivo*

Michael B Tropak<sup>a</sup>, Sayuri Yonekawa<sup>a</sup>, Subha Karumuthil-Melethil<sup>b</sup>, Patrick Thompson<sup>c</sup>, Warren Wakarchuk<sup>d</sup>, Steven J Gray<sup>b</sup>, Jagdeep S Walia<sup>c</sup>, Brian L Mark<sup>e</sup>, Don Mahuran<sup>a, f</sup>

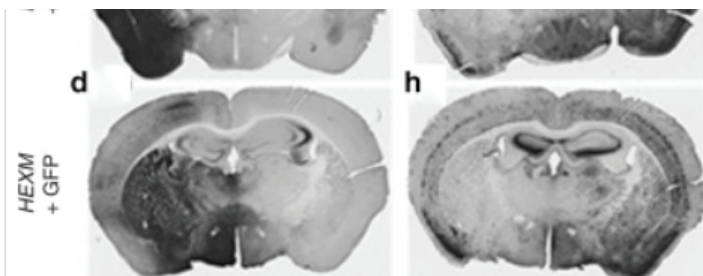


Figure 5.

Reduction in GM2 ganglioside levels following intracranial injection of AAV9-Hex vectors. Four-month-old Tay-Sachs disease knock out mice received a single unilateral intracranial injection (left side) of either AAV9-GFP ( $10^9$  vg) or a 2-vector mixture containing equal amounts ( $10^9$  vg each) of AAV9-GFP and an AAV9-Hex vector, as designated on the left panel. Coronal sections of the brain were analyzed by immunohistochemistry (IHC) for green fluorescent protein (GFP) expression to indicate vector spread (a–d) and for GM2 ganglioside levels to assess the relative activity of Hex (e–h).

Figure options

Reduced GM2 ganglioside accumulation in neonatal SD mice following the intravenous injection of a vector expressing HexM

Neonatal SD (*hexb*<sup>-/-</sup>) mice were injected intravenously with a scAAV9.47 vector containing a synthetic promoter to drive the expression of the *HEXM* gene. Eight-week postinjection the mice were sacrificed and GM2 levels (relative to those of GD1a) and enzyme activity toward MUGS and MUG (relative to total protein) from the mid-brain homogenate were determined. Although the Hex activity in the brains of the mice injected




[mouse, kid, ram, lamb - the Tay-Sachs Org themselves elide. ]



there rooting for them to get better - rooting for them to beat Tay-Sachs disease. You could be that person.

If we could find the brave sheep a mommy or a daddy - they would try that much harder to get better. We all love to have our mommy and daddy at our side when we are feeling yucky. Can you help a sheep feel better?

 Check back January 1, 2012!!!



A sheep parent gets two t-shirts and a stress reliever sheep emblazoned with our logo and named after a Tay-Sachs child. Your shirts will proudly announce **your support for the Cure Tay-Sachs Foundation**

You need to take very good care of your sheep – they are very important to us. Your generosity and big heart might be the difference that allows us to find the cure!

*Note: Please select the Shirt #1 size and color and click the corresponding Add to Cart button. Next, select Shirt #2 size and color and click the corresponding Add to Cart button. And finally, select the Mouse Name and click the third Add to Cart button.*

**To GO ON SALE January 1, 2012!! We will try and restock.**

Shirt #1:	<input type="text" value="Youth XS (2-4)"/>	<input type="text" value="Green; Short-Sleeves"/>	<input type="button" value="ADD TO CART"/>
Shirt #2:	<input type="text" value="Youth XS (2-4)"/>	<input type="text" value="Green; Short-Sleeves"/>	<input type="button" value="ADD TO CART"/>
Choose a Mouse Name:	<input type="text" value="Dakota"/>	<input type="button" value="ADD TO CART"/>	

when Temple fell in 70 A.D. the sacrifice was ended. [ a temple of Baal; where children were bled. ] or Temple's remade in the Research U & Hospital friends: in U of T, a rising Rye, we've Sick Kids, MARS, and the old Mount Sinai.

or Temple's remade, in mosques at Eid.<sup>1</sup>

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<sup>1</sup> i'm not anti-semite, i'm anti-King and his quisling scribes. am anti the men with the knives. i'm one-third jewish, my mother is Jewish and i side with Isaiah, with Yahweh and Yeshua who spoke against the Sacrifice. i side with Asherah, the tree.

## here, my Appeal

in lieu of a wearying, and likely-losing, Provincial Appeal i'll end, for now, by printing what i would've said, by writing under their heads:

FIPPA requests are often re contentious issues, for info that could show the Providing Institution in a bad light - info that could make a college enemies. we need FIPPA precisely because of this. if a college can invoke the 14(1) exceptions to withhold info it worries could turn some of us against it, then the Act is undermined. almost any 'damaging info' could, conceivably, inspire vandalism, violence against the institution. swastikas are now and then scrawled on a carrel, on a toilet stall wall. can a college then invoke 14(1) to bury info on relations with Israel, on diversity stats of student/faculty? anti-abortionists might hound Departments who harbour liberal feminists, whose scholars, a FIPPA request reveals, are funded by women's clinics; eco-activists might smash the transom of a President's office shown to funnel Endowment into conflict minerals -

- might.

for exceptions 14(1)(e) and (i) to apply, the petitioned institution should point to, if not demonstrate, a credible threat, local and specific.

am i, paul bali, the threat to Rye? i did spraypaint ABATTOIR on a wall at U-Guelph in summer of 2015., am guilty of Criminal Mischief. yet Rye's decision cites the Queen's U precedent. did Queen's, too, have a local threat, deny e.g. Will Kymlicka? Professor Kymlicka [condemns the Left for abandoning animals](#) yet doesn't so far as i know vandalize. nor do i, anymore. i offer just my tiny survey and summing doc. am shamed by my Judge into a scholar's style, am older & cautious.

we already know in vivo happens at Rye. the info sought would be of no use in planning an ALF invasion. the data could be damning - should twist good hearts into revulsion & rage. but the FIPPA exception doesn't quite say: 'we'll not release stuff that makes people mad.'

i'll update this doc to version 3, if any development . . .



**Appendix A: survey on *in vivo* @ Ryerson**

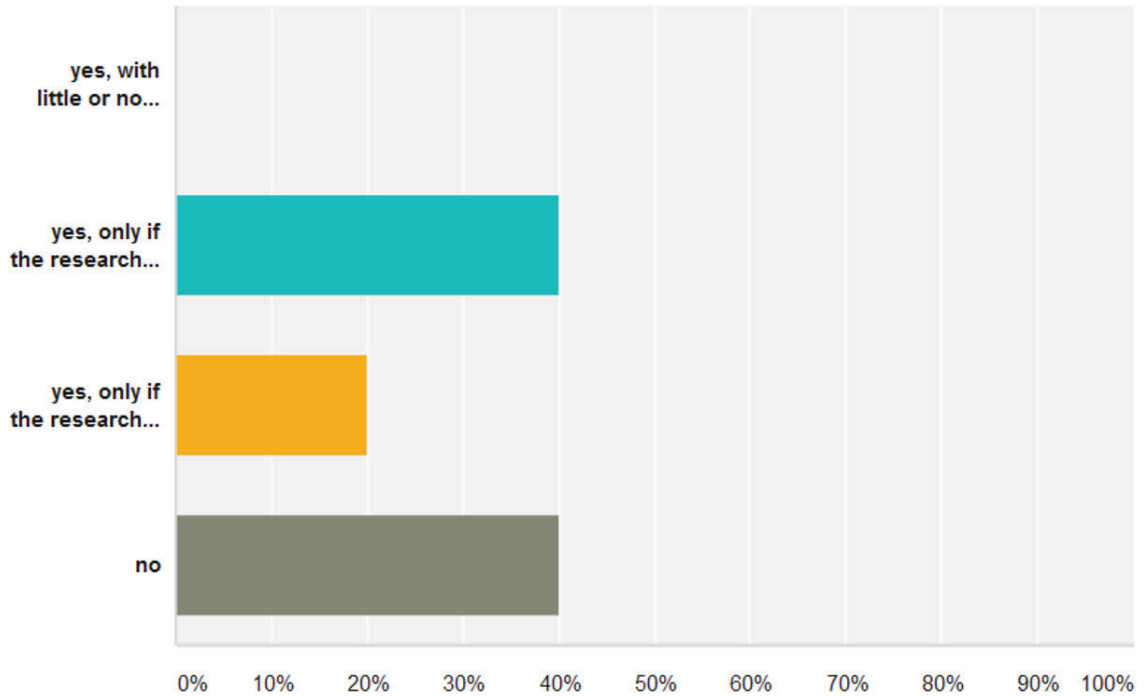
Q1

Customize

Export

## do you think humans have a right to experiment in vivo on non-humans?

Answered: 5 Skipped: 1



Answer Choices	Responses
yes, with little or no exception	0.00% 0
yes, only if the research has potential to enhance our understanding of life	40.00% 2
yes, only if the research has potential to alleviate suffering, e.g. to cure disease	20.00% 1
no	40.00% 2
<b>Total</b>	<b>5</b>

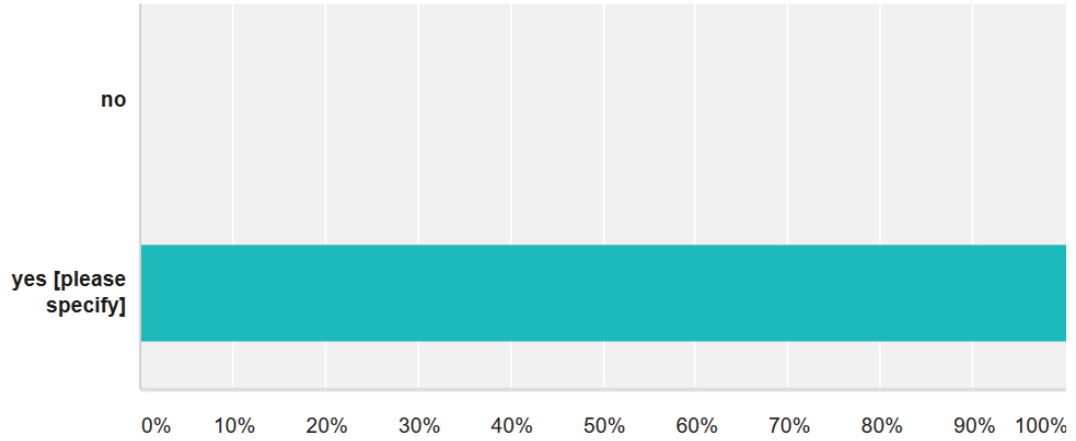
Showing 1 response

Work on animals has shown us the function of many of our genes since do not know the true function of a gene until its function is destroyed. Work on animals has given us information on the effects of drugs used to treat many different diseases.

1/23/2017 9:04 AM [View respondent's answers](#)

### are there any species you're unwilling to experiment on?

Answered: 4 Skipped: 2



Answer Choices	Responses
no	0.00% 0
yes [please specify] <b>Responses</b>	100.00% 4
Total	4

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Showing 4 responses

All, unless they are willing humans.

1/24/2017 12:19 PM [View respondent's answers](#)

I personally am not happy about experimenting on pet species or primates so I understand that it needs to be done. However, I realize that much of the information we have on diabetes came from work on dogs. Our current understanding of cancer also involved work on dogs. Our understanding of much of the organization and function of the nervous system came out of work on primates. Rats and mice are not suitable for some of these experiments as their responses do not sufficiently resemble those of humans.

1/23/2017 9:04 AM [View respondent's answers](#)

other

1/23/2017 9:03 AM [View respondent's answers](#)

Mice and rats are okay but not if they are genetically modified to inherit diseases such as alzheimers, parkinson, cancer etc. Not willing to work on cats, dogs and primates. However, perhaps research should be focused on other model organisms carrying genetically modified disease such as C. elegans and Drosophila melanogaster (fruit fly). Perhaps pharmacokinetic research involving computer modelling drug effect on human physiology should be more heavily invested on. Perhaps, effect of viral infections could be tested on the model organism Danio rerio (zebrafish). In addition, perhaps focus should be on identifying model organisms with genetic and proteomic architecture similar to humans where these model organisms are not higher levels eukaryotes such as primates etc. Just some ideas.

1/22/2017 2:03 PM [View respondent's answers](#)

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Total

4



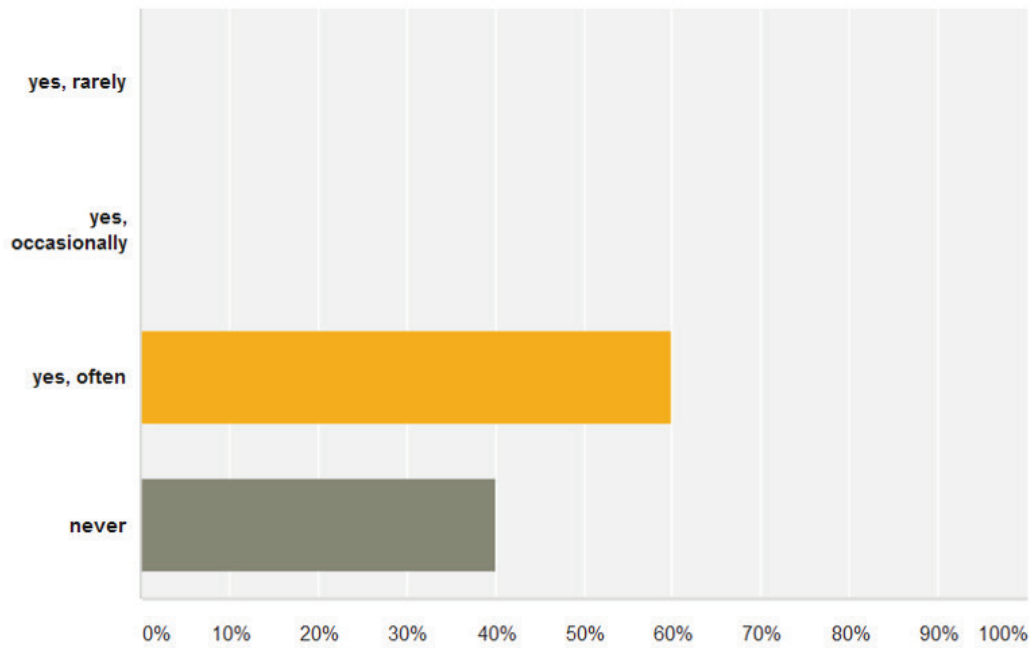
Q3

Customize

Export ▾

## have you ever discussed the moral dimensions of in vivo experiment with colleagues, students, superiors?

Answered: 5 Skipped: 1



Answer Choices	Responses
▼ yes, rarely	0.00% 0
▼ yes, occasionally	0.00% 0
▼ yes, often	60.00% 3
▼ never	40.00% 2
Total	5

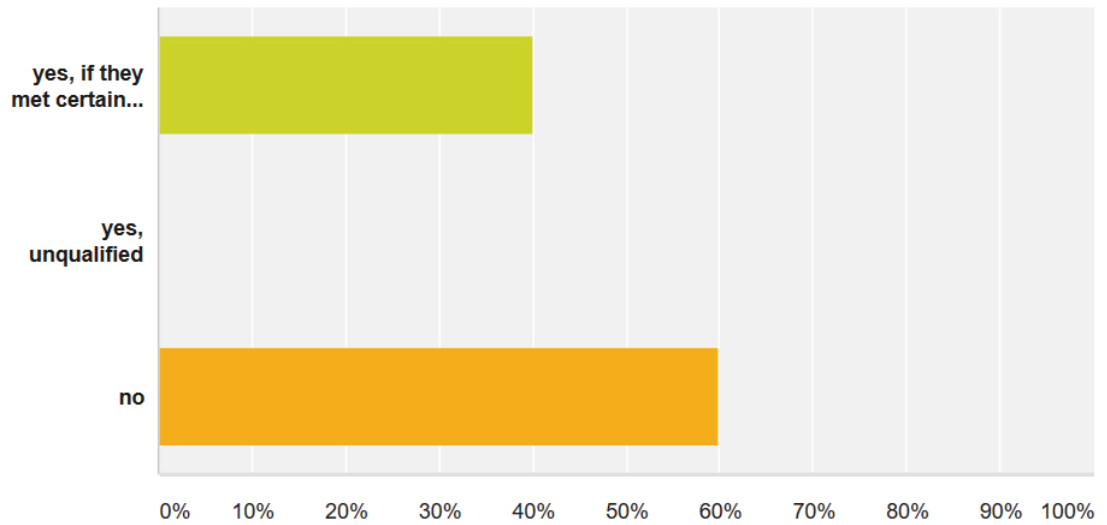
Showing 1 response

Most scientists are well aware of the ethical aspects of work with animals and try to minimize suffering. I spoke with a well known scientist within the last week on our discomfort working with animals and discussing the fact that there is no way around the issue. However, if we do not talk about the necessity of the work, the general public is left with the idea that scientists are unnecessarily cruel to animals.

1/23/2017 9:04 AM [View respondent's answers](#)

## would a cognitively superior species have a right to perform in vivo research on us?

Answered: 5 Skipped: 1



Answer Choices	Responses
▼ yes, if they met certain ethical standards of experiment design [e.g. pain minimization]	40.00% 2
▼ yes, unqualified	0.00% 0
▼ no	60.00% 3
Total	5

Showing 1 response

Is the person who thought up this question aware of a cognitively superior species? Please let us all know.

1/23/2017 9:04 AM [View respondent's answers](#)

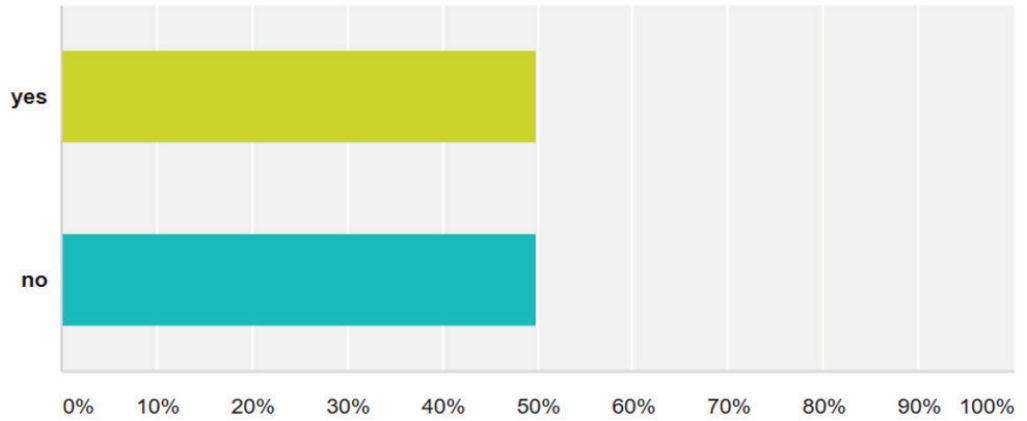
Q5

Customize

Export

### do you anticipate, in your own future research at Ryerson, performing or commissioning in vivo experiment?

Answered: 4 Skipped: 2



Answer Choices	Responses
▼ yes	50.00% 2
▼ no	50.00% 2
Total	4

Comments (0)

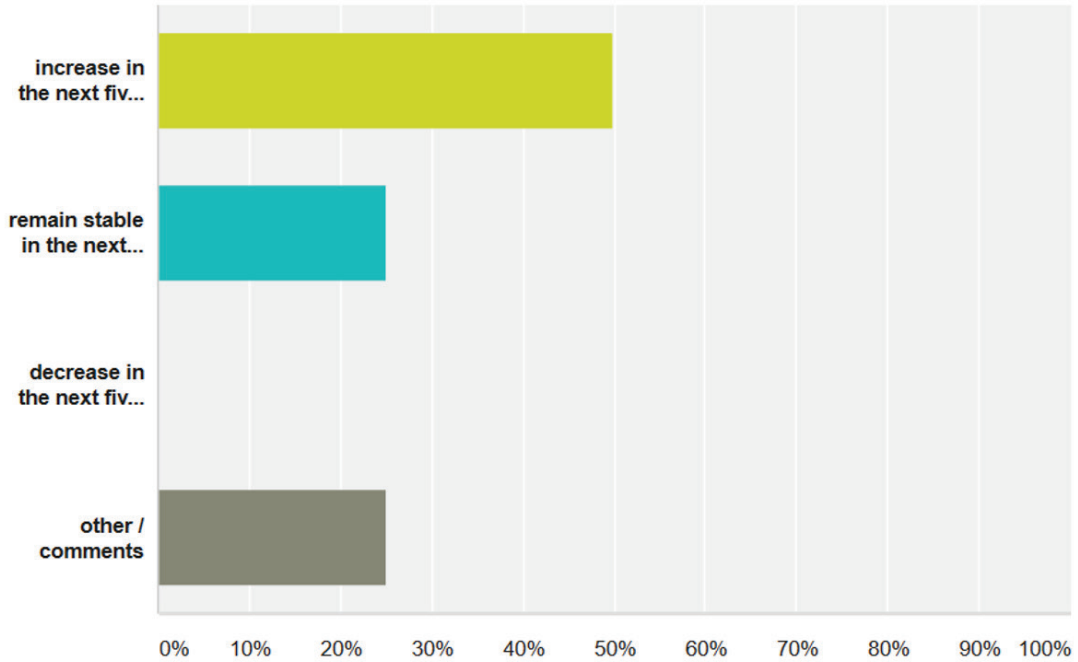
Q6

Customize

Export ▾

### in vivo research at Ryerson will

Answered: 4 Skipped: 2



Answer Choices	Responses
<ul style="list-style-type: none"> <li>increase in the next five years</li> </ul>	50.00% 2
<ul style="list-style-type: none"> <li>remain stable in the next five years</li> </ul>	25.00% 1
<ul style="list-style-type: none"> <li>decrease in the next five years</li> </ul>	0.00% 0
<ul style="list-style-type: none"> <li>other / comments <a href="#">Responses</a></li> </ul>	25.00% 1

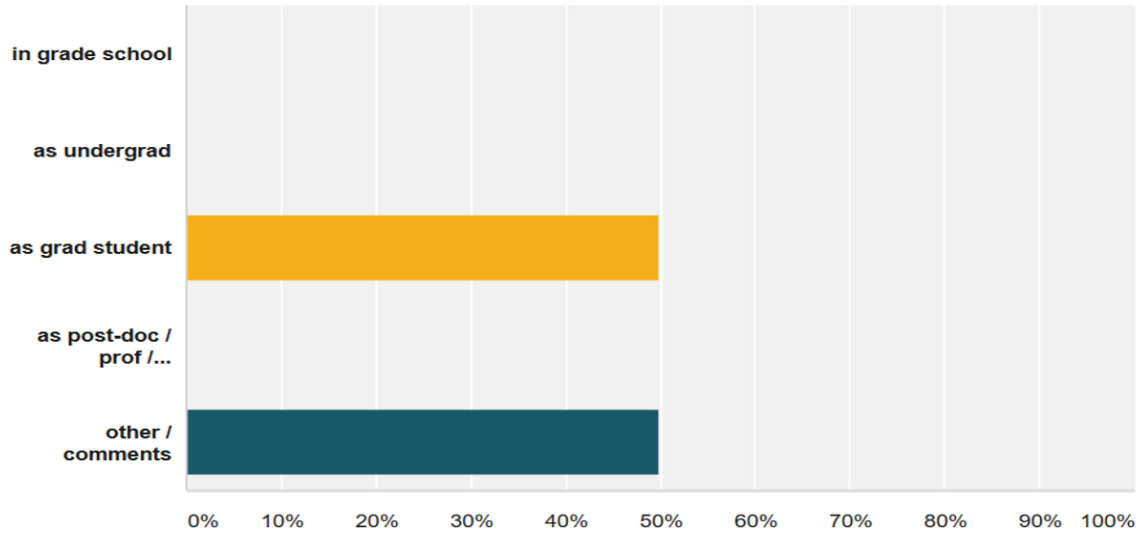
Showing 1 response

Depends on market demand, disease spread (epidemic/pandemic) and urgency for cure, identification of non in-vivo modelling and research as alternative to in-vivo research, identification of validity and reproducibility of in-vivo research to general human benefit (since responses to cures can have different effect on different humans based on genetic makeup, might lack efficacy and long term effects might be more detrimental compared to short-term benefit etc.)

1/22/2017 2:10 PM [View respondent's answers](#)

## when was your first in vivo experiment?

Answered: 4 Skipped: 2



Answer Choices	Responses
in grade school	0.00% 0
as undergrad	0.00% 0
as grad student	50.00% 2
as post-doc / prof / professional researcher	0.00% 0
other / comments <a href="#">Responses</a>	50.00% 2

Showing 2 responses

na

1/24/2017 12:20 PM [View respondent's answers](#)

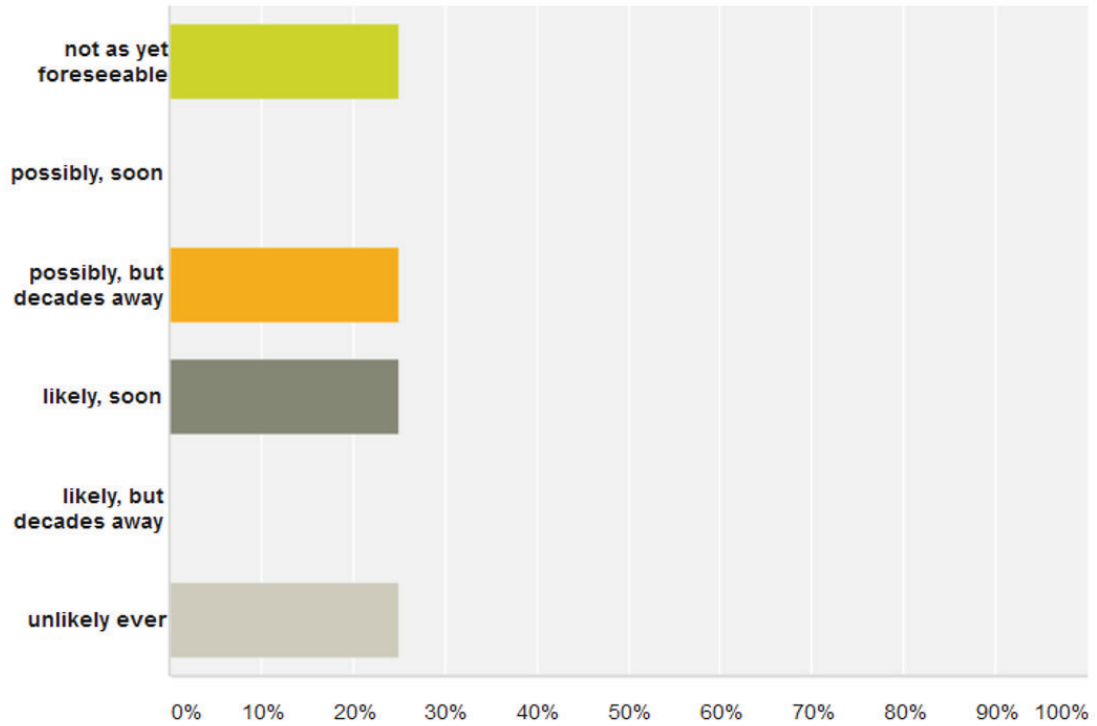
Didn't do one so far.

1/22/2017 2:10 PM [View respondent's answers](#)

Q8 Customize Export

### do you anticipate that virtual, in vitro, or other alternatives will make most or all in vivo research unnecessary?

Answered: 4 Skipped: 2



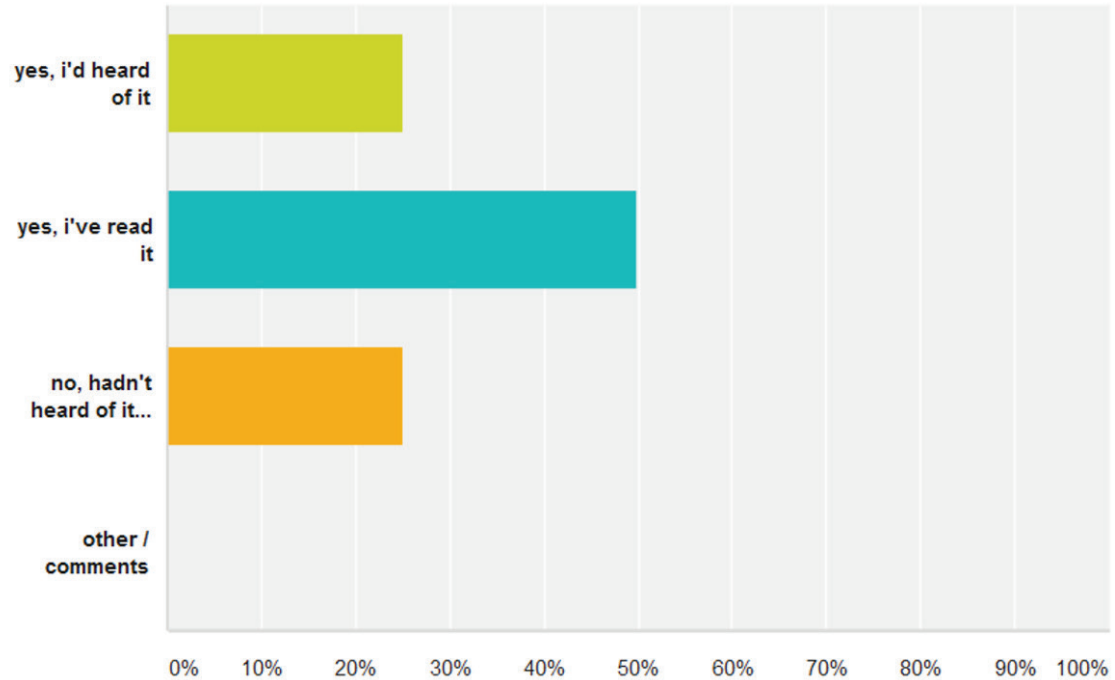
Answer Choices	Responses
not as yet foreseeable	25.00% 1
possibly, soon	0.00% 0
possibly, but decades away	25.00% 1
likely, soon	25.00% 1
likely, but decades away	0.00% 0
unlikely ever	25.00% 1

Total Respondents: 4

This is simply not possible since we cannot possibly predict the effect of drugs without using animals with REAL organs like livers and kidneys. It is much better to realize that a drug damages mouse livers than realize it after several million humans have been taking a medication.

## are you familiar with The Oxford Report on in vivo research ['Normalizing the Unthinkable', 2015]?

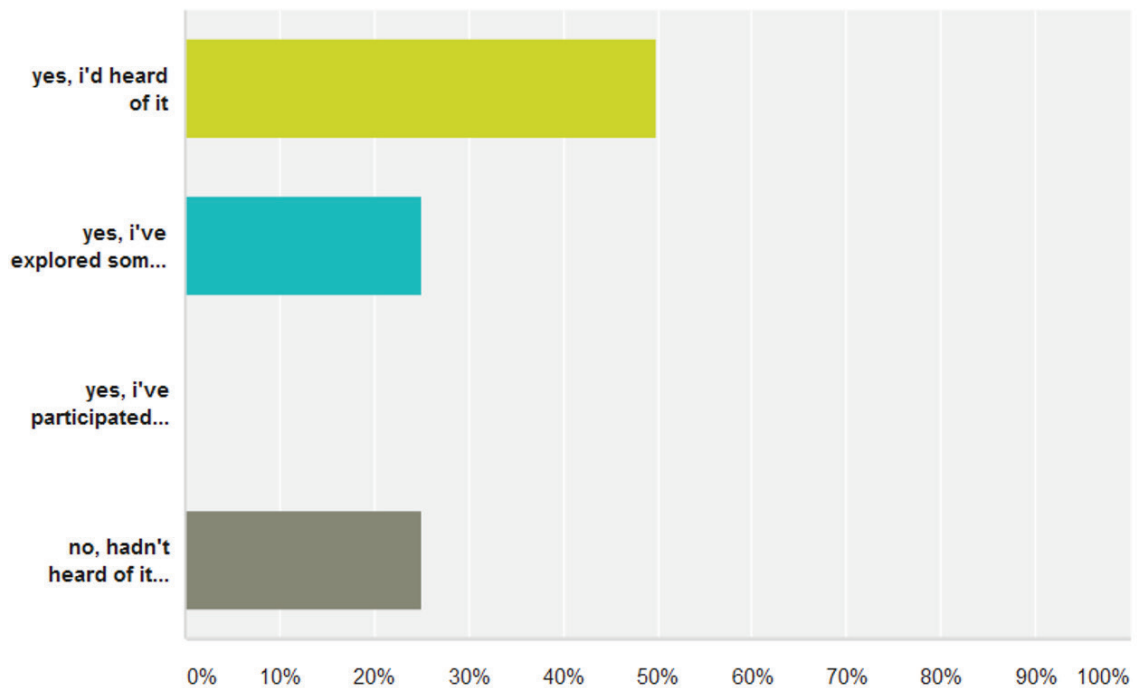
Answered: 4 Skipped: 2



Answer Choices	Responses
yes, i'd heard of it	25.00% 1
yes, i've read it	50.00% 2
no, hadn't heard of it till now	25.00% 1
other / comments	0.00% 0
<b>Responses</b>	
Total	4

## are you familiar with the Johns Hopkins Center for Alternatives to Animal Testing [CAAT]?

Answered: 4 Skipped: 2



Answer Choices	Responses
yes, i'd heard of it	50.00% 2
yes, i've explored some of its programs / courses	25.00% 1
yes, i've participated in some of its programs / courses	0.00% 0
no, hadn't heard of it till now	25.00% 1

Total Respondents: 4

[Comments \(1\)](#)

you need ethics approval to do this survey with humans

1/22/2017 4:35 PM [View respondent's answers](#)



## **Appendix B: exchange with Ryerson Research Ethics Board.**

[some blurring of personal info]

research survey on in vivo research

Inbox x



Feb 3 (3 days ago) ☆



to pbali ▾

Hey, Paul. Long time no see. (In case you can't place the name, I [redacted]).

I'm currently [redacted] (along with [redacted], cc'd here). It's come to our attention that you're conducting a survey among Ryerson researchers. Under federal guidelines, such research needs prior REB approval.

You can get information about the REB approval process here: <http://www.ryerson.ca/research/resources/ethics/>

I'm happy to help if I can. However, you should note that if/when approval for your research is granted, it cannot be granted \*retroactively\*, so any data you've already gathered would need to be destroyed.

Let me know if you have any questions.

Best,



Paul Bali <pbali@ryerson.ca>

Feb 3 (3 days ago) ☆



to [redacted] ▾

hi [redacted], remember you well! hope you're doing well.

i understand you're doing your job here, but i can't hold back. here's my honest, unvarnished reaction:

i dispute that i need anyone's approval to send out a short survey to my colleagues. unlike the animals they're using and killing, they have *complete* autonomy in participating or not in that survey. i'll certainly use the data [what little came in] as i see fit in my research.

i hope you give some more thought, [redacted], to exactly what it is you're approving [or St. Mike's is] when you greenlight research at Rye under the so-called "Animal Ethics" heading.

regards,  
paul



[Redacted]

Feb 3 (3 days ago) ☆



🔒 to Paul ▾

Paul:

Just to clarify: I don't have any role vis-a-vis animal research at all -- the REB deals exclusively with \*human\* research subjects. (That's not a denial of the importance of ethics in animal research -- it's merely a different portfolio). So I'm not involved in approving animal research at all.

Under federal regulations -- the Tri-Council Policy Statement -- all research conducted by researchers at Canadian universities & hospitals have to be approved. There's little room for dispute here in terms of that.

Let me know if I can explain further.

Regards,

[Redacted]



**Paul Bali** <pbali@ryerson.ca>

Feb 3 (3 days ago) ☆



to [Redacted] ▾

i'm just going by the link you sent me - the REB homepage. there, it seems the REB at least coordinates with St. Mike's to oversee animal use at Ryerson. i appreciate that you nor any REB member personally adjudicate animal proposals; but the REB legitimates the process by overseeing & coordinating with St. Mike's.

and the outsourcing to St. Mike's is provisionl, re the long-term, no? as Rye grows and aspires more to Research U status i imagine it will desire an in-house approval process.

given the REB connection to animal use [and i really don't mean this as a personal affront, [Redacted], just being straight with you] i consider it and all such bodies illegitimate. i refuse to ask for it to approve my modest online survey when, with the other hand, it okays just the worst things that can be done to sentient beings.

regards,  
paul



to Paul ▾

Feb 3 (3 days ago) ☆



Paul:

I see. I think you may have misunderstood the REB's connection to animal research. The only connection is that our administrator tells researchers who contact her how to get in touch with St Mike's.

Ryerson may some day have an in-house review process for animal research -- I honestly have no idea -- but whatever that process might be, it will not involve the REB.

At any rate, since you're putting us in violation of federal law, unfortunately I now need to turn it over to the university's lawyers.

Regards,



**Paul Bali** <pbali@ryerson.ca>

Feb 3 (3 days ago) ☆



to ▾

that the REB has no intention of further integrating itself with the Animal Use approval process is itself objectionable, then. it seems to presume that profoundly different standards must apply in the human case. to this i object.

, whatever the REB's own precise role or insulation from the animal approval process, i refuse to submit my harmless research for an approval process to a University that allows precisely the kind of research my own research seeks to delegitimize. if i were to submit, i'd performatively undermine my own research project, and [since you're asking me to destroy whatever results i've thus far acquired] i'd in fact undermine my research.

and to be clear, i've put you in violation by what, not stating that i've destroyed my results? wiped them [the six responses] from my memory? my results can't be unlearned.

...

## **Appendix C: Response from Ryerson Privacy Officer**

**Sent by email**

March 10, 2017

**Attention:** Rajinder (Paul) Singh BaliToronto ON  
pbali@ryerson.ca

Dear Rajinder (Paul) Singh Bali:

**Re: Ryerson University ("Ryerson") FIPPA Request 2017-005 – Decision Letter**

We refer to your request which we received on February 10, 2017, and was made pursuant to the Freedom of Information and Protection of Privacy Act ("FIPPA") for access to the following records:

"the University's overview statistics on in-vivo [live-use] Animal Research. Specifically: the University likely submits an annual report to the Canadian Council on Animal Care, stating:

- (i) the number and type of animals used in its teaching and research;
- (ii) the Purpose of the research [grouped into the CCAC's five categories]; and
- (iii) the Invasiveness of the research [again, grouped into the CCAC's categories].

I would like five years of Ryerson's CCAC data: 2011 thru 2015. If Ryerson has, but will not provide me with, the reports they submitted to the CCAC, then I'd like the data [summarized above in (i) thru (iii) that those reports contain.

If Ryerson does not submit to the CCAC, then relevant/similar data can be acquired from the Department of Chemistry and Biology, or by liaising with Ryerson's Research Ethics Board. The REB connects Ryerson researchers with the St. Michael's Animal Care Committee, who greenlight any Ryerson animal use. The St. Michael's ACC reports annually to Ryerson Senate, and conducts an Annual Animal Inventory/Facility Review."

## **I. Decision**

A review of Ryerson's records indicates that there is one (1) responsive record held by the Office of the Vice President Research and Innovation.

We have decided that the record is excluded from FIPPA pursuant to section 65(8.1) (research records) supported by by the exemption 14(1)(e) (endanger life or physical safety of a person) and 14(1)(i) (endanger security of a building). An exclusion means that FIPPA's access-to-information provisions do not apply.

We make reference to the Information and Privacy Commissioner Order No. PO-3626, Queen's University dated June 29, 2016 where the Commissioner upheld the University's decision to apply sections 65(8.1)(research records), 14(1)(e) (endanger life or physical safety of a person), and 14(1)(i) (endanger security of a building).

## **II. Fees**

Section 57 of FIPPA requires Ryerson to charge a fee for access. All charges are regulated pursuant to FIPPA and you may review these charges by visiting the Office of the General Counsel's website at <http://www.ryerson.ca/about/generalcounsel/infoprivacy> where there is a summary of permitted charges as well as a direct link to Regulation 460. There are no additional fees associated with processing this request.

## **III. Appeal**

If you disagree with any aspect of this decision, please discuss the matter directly with the undersigned. Afterward, you may appeal this decision to the Information and Privacy Commissioner. The Commissioner can be reached at:

Information and Privacy Commissioner/Ontario  
2 Bloor Street East  
Suite 1400  
Toronto, Ontario  
M4W 1A8

If you decide to appeal a decision to the Information and Privacy Commissioner, please provide the Commissioner's office with:

1. the request number assigned to the request;
2. a copy of this decision letter; and,

3. a copy of the original request you sent to this institution.

Appeals to the Commissioner must also be accompanied by the appropriate fee. Fees vary according to the nature of the request being appealed as follows:

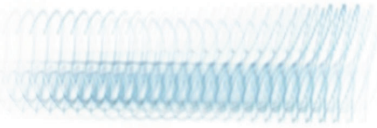
1. \$25, if the person appealing has made a request for access to a general record under subsection 24(1) FIPPA;
2. \$10, if the person appealing has made a request for access to personal information under subsection 48(1) FIPPA; and,
3. \$10, if the person appealing has made a request for correction of personal information under subsection 47(2) FIPPA.

If you would like to discuss any aspect of your request (Ryerson FIPPA file 2017-005), please contact the undersigned at your convenience.

Yours truly,

**RYERSON UNIVERSITY**

Per:



Director, Compliance and Policy Management, and Privacy Officer

T: 416-979-5000 ext. 4676

E: 

cc:  General Counsel and Secretary of the Board of Governors