



August 3, 2021

Robert M. Gibbens, D.V.M.
 Director, Western Region
 USDA/APHIS/AC
 2150 Centre Ave.
 Building B, Mailstop 3W11
 Fort Collins, CO 80526-8117

Via e-mail: Robert.M.Gibbens@usda.gov

Dear Dr. Gibbens:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 6.5 million members and supporters worldwide to request swift action from the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) against Texas Biomedical Research Institute (TBRI) for its failure to meet the standard of care for the more than 1,000 *Papio anubis* and *P. hamadryas* baboons maintained in its facilities during the February 2021 winter storm. TBRI reports that it is home to the world's largest baboon colony. I would expect that such a facility would have been able to provide adequate protection for these vulnerable monkeys, but during the storm, 159 animals—an estimated 15% of the colony—suffered from frostbite, leading to the amputation of fingers, toes, and tails.

According to records obtained by PETA through a Freedom of Information Act request, TBRI initially reported this horrific incident to the National Institutes of Health's Office of Laboratory Animal Welfare on March 15, 2021, a month after its occurrence, and submitted the final report on May 17, 2021, in a letter that was also sent to your office.¹ Two months have passed, and USDA-APHIS has yet to issue a citation, despite the obvious failure of TBRI to fulfill the following federal Animal Welfare Act (AWA) 9 CFR § 3.80 (a) (2) (vi) requirement:

Primary enclosures for [nonhuman primates](#) must meet the following minimum requirements: (vi) Provide [shelter](#) and protection from extreme [temperatures](#) and weather conditions that may be uncomfortable or hazardous to the species of [nonhuman primate](#) contained.

Meanwhile, for the baboons imprisoned by TBRI, life has become even harder. Baboons who have lost fingers have a compromised ability to forage, eat, and groom. They are highly tactile primates, and one of the few pleasures for those of them confined at TBRI is exercising their ability to pluck blades of grass, manipulate food items, and engage in grooming. If you've ever watched baboons

¹Report is attached.

PEOPLE FOR
 THE ETHICAL
 TREATMENT
 OF ANIMALS

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grooming each other, you know that their nimble fingers don't just remove flecks of dry skin or the occasional parasite. The act of grooming—that intense focus and touch that takes place between the monkeys—solidifies their position in the troop. While it's true that injuries to digits are not uncommon in nature, the AWA makes it very clear that when these animals are held in captivity, the expectation is that harm through human error must be avoided.

The suffering that these baboons are likely experiencing because of TBRI's negligence cannot be ignored, despite the assertion by institutional official Dr. Joanne Turner that there was no "significant impact" to the maimed baboons. We urge you to fulfill your office's mandate to "[e]nsure the humane treatment of animals covered by the Animal Welfare Act" and take appropriate action against the institute. If it's incapable of providing adequate housing for these baboons during a winter storm, it shouldn't be allowed to keep animals at all.

Thank you for your attention to this urgent matter. I would appreciate the opportunity to discuss it further, and I'll follow up with you in the coming weeks. In the meantime, you can e-mail me at LisaJE@peta.org with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'L. Jones-Engel', with a stylized flourish at the end.

Dr. Lisa Jones-Engel, Ph.D.
Senior Science Advisor, Primate Experimentation
Laboratory Investigations Department