



August 23, 2022

Betty J. Goldentyer, D.V.M.  
Deputy Administrator  
Animal Care, APHIS, USDA

Dear Dr. Goldentyer:

I'm writing on behalf of People for the Ethical Treatment of Animals U.S.—PETA entities have more than 9 million members and supporters globally—to urge APHIS to conduct an immediate investigation into potential ongoing violations of the federal Animal Welfare Act (AWA) by Hainan Airlines. It appears that this airline is transporting live nonhuman primates in commerce without a valid USDA registration, a clear violation of 9 C.F.R. § 2.25(a) of the AWA that warrants enforcement action.

PETA received a whistleblower report stating that on August 9, Hainan shipped 720 long-tailed macaques (*Macaca fascicularis*), now recognized as an endangered species by the International Union for Conservation of Nature, to Chicago's O'Hare International Airport. We were able to confirm the shipment through Hainan's online tracking system. The monkeys were crammed into 144 wooden crates and flown in the cargo holds of the airline's planes from Phnom Penh, Cambodia, to Beijing (flight HU497, a 4.5-hour trip) and then to Chicago (flight HU724, a 13-hour flight).

From there, it's our understanding, based on documents viewed by whistleblowers, that the monkeys were to be sent to Envigo Global Services Inc. (74-B-0332) in Alice, Texas. As the consignee, Envigo would apparently be responsible for ensuring that the transporter was a legal carrier. However, the company has recently demonstrated that it places a premium on the volume of animals in its facilities, rather than ensuring that the AWA is upheld. The USDA cited its beagle-breeding facility in Virginia with more than 70 violations of the AWA since PETA's 2021 investigation. The agency also cited its monkey facility in Texas in 2019 with a critical violation of the AWA for failing to provide 25 macaques with food for six days. Envigo had to euthanize two of these monkeys because they were so severely starved.

Based on a search of the USDA Animal Care Public Search Tool, Hainan doesn't have a valid carrier registration through the USDA. Moreover, APHIS confirmed to PETA on August 17 that Hainan Airlines Holding Co. Ltd. (91-T-0002) was issued a letter of cancellation on May 3 for failing to renew its USDA registration. Since Hainan was involved in shipping live nonhuman primates three months after this cancellation, that constitutes a clear violation of the AWA.

On multiple occasions over the past three decades, primates **legally** imported into the U.S. as part of the biomedical trade have arrived with infectious agents

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

Washington  
1536 16th St. N.W.  
Washington, DC 20036  
202-483-PETA

Los Angeles  
2154 W. Sunset Blvd.  
Los Angeles, CA 90026  
323-644-PETA

Norfolk  
501 Front St.  
Norfolk, VA 23510  
757-622-PETA

Info@peta.org  
PETA.org

Entities:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

capable of causing a global pandemic.<sup>1,2,3</sup> The federal regulations on the importation of primates<sup>4</sup> lead even a casual reader to understand that the overall risk of importing a monkey with a significant known or unknown infectious disease is high. If Hainan and Envigo have failed to adhere to even the most basic importation requirements, it begs the question of how else they may have skirted the regulations in place to protect the public from the health risks associated with the importation and domestic movement of primates.

We're requesting an immediate and full investigation into Hainan Airlines and its transport of monkeys into the U.S. We're also requesting that you investigate whether Envigo has violated the AWA by consigning this shipment and receiving monkeys. If your investigation confirms noncompliance, PETA urges your agency to escalate its enforcement action against the companies. We've received reports that the airline may be shipping more primates to the U.S. in the immediate future, so time is of the essence.

I look forward to hearing from you regarding this important matter and am available to assist you in your investigation. You can contact me at 307-899-3264 or [AmyM@peta.org](mailto:AmyM@peta.org).

Sincerely,



Amy Meyer  
Manager of Primate Experimentation Campaigns

---

<sup>1</sup>Roberts, JA, Andrews, K. Nonhuman primate quarantine: its evolution and practice. *ILAR Journal*. 2008;49(2):145–156. [doi:10.1093/ilar.49.2.145](https://doi.org/10.1093/ilar.49.2.145)

<sup>2</sup>Jahrling PB, Geisbert TW, Dalgard DW, et al. Preliminary report: isolation of Ebola virus from monkeys imported to USA. *The Lancet*. 1990;335(8688):502–505. [doi:10.1016/0140-6736\(90\)90737-P](https://doi.org/10.1016/0140-6736(90)90737-P)

<sup>3</sup>Centers for Disease Control and Prevention. Epidemiologic notes and reports update: Ebola-related filovirus infection in nonhuman primates and interim guidelines for handling nonhuman primates during transit and quarantine. *MMWR*. 1990;39(2):22–24, 29, and 30. Accessed August 23, 2022. <https://www.cdc.gov/mmwr/preview/mmwrhtml/00001538.htm>

<sup>4</sup>Centers for Disease Control and Prevention. Control of communicable disease; foreign-requirements for importers of nonhuman primates (NHP). *Federal Register*. 42 CFR § 71.53. Accessed August 23, 2022. <https://www.federalregister.gov/documents/2013/02/15/2013-03064/control-of-communicable-disease-foreign-requirements-for-importers-of-nonhuman-primates-nhp>