



November 21, 2022

James Mulligan
Area Director
Occupational Safety and Health Administration
Boston South Area Office—Braintree

Via e-mail: braintree-osha@dol.gov

Dear Mr. Mulligan:

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 request that your office investigate possible violations of occupational safety and health standards, 29 C.F.R. § 1910 *et seq.* at Harvard Medical School (HMS), located at 220 Longwood Ave., Boston, MA 02115.

PETA has obtained documentation regarding a series of maternal and sensory deprivation experiments on infant rhesus macaques at an HMS laboratory. The experiments in question, conducted by principal investigator (PI) Margaret Livingstone, involve removing infant monkeys from their mothers at birth and subjecting them to various sensory deprivation procedures. In some experiments, newborn monkeys' eyes are sutured closed for their entire first year of life. For multiple experiments, their heads are immobilized using helmets, chin straps, and bite bars,¹ and in some experiments, the monkeys are killed and dissected.

According to a [federal report](#), the HMS Animal Care and Use Committee states that on April 24, 2020, a veterinarian observed the PI not wearing personal protective equipment while experimenting on a nonhuman primate in a chair restraint. In addition to violating approved protocol, the 40-year Harvard employee failed to adequately protect herself, her entire laboratory, other staff, and the animals. Monkeys may harbor viruses and other infectious agents that may be transmissible to humans, and it's impossible to ensure that they are free of all infectious agents. For example, many monkeys in laboratories are infected with herpes B. In monkeys, herpes B is fairly benign, and infected monkeys usually have no or only mild symptoms. However, when transmitted to humans through a bite or other means, the herpes B virus “has a propensity to invade the central nervous system and has a fatality rate of greater than 70% if not treated properly.”² State veterinary and other records show that monkeys transported to and used in laboratories in the U.S. have also been found with campylobacter, Chagas disease, cholera, coccidioidomycosis (Valley fever), cryptosporidium, hepatitis, MRSA, Listeria, salmonella, simian immunodeficiency virus, tuberculosis, and West Nile virus.

¹Arcaro MJ, Livingstone MS. Retinotopic organization of scene areas in macaque inferior temporal cortex. *J Neurosci.* 2017;37(31):7373-7389.

²Elmore D, Eberle R. Monkey B virus (Cercopithecine herpesvirus 1). *Comp. Med.* 2018;58(1):11-21.

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.)

This is not the first time this laboratory has endangered staff and animals. In December 2017, [staff in Livingstone's laboratory failed to secure a latch on a cage and a monkey escaped](#). That monkey engaged in a violent fight with another one, and the second animal sustained severe injuries that required a finger amputation.

We believe the circumstances detailed in the federal report to be violations of occupational safety and health standards. PETA respectfully asks that your agency investigate the conditions described above. If you have any questions, please contact me at 541-848-7465 or AndreaK@peta.org. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrea Kuchy', with a long horizontal stroke extending to the right.

Andréa Kuchy, Ph.D.
Research Associate
Laboratory Investigations Department
People for the Ethical Treatment of Animals