



December 27, 2022

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

Via e-mail: Betty.J.Goldentyer@usda.gov

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 the U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service to initiate proceedings to revoke the Class B dealer license issued to Envigo Global Services Inc. (Envigo, 74-B-0332). This request follows a just-posted critical violation of the Animal Welfare Act and the associated Animal Welfare Regulations (AWRs) in which Envigo left a monkey in a transport cage for three days, leading to the death of the monkey—presumably due to thirst, starvation, or exposure.

History of Neglect and Recklessness

On November 29, the USDA issued a critical violation of section 2.131(b)(1) of the AWRs after a macaque monkey, identified only as “B 16549,” died at Envigo's Alice, Texas monkey factory farm after being forgotten in a transport cage for 3 days.

Earlier this year, the USDA posted a late report that cited Envigo's same facility with a critical violation of section 3.80(a)(2)(ii). The June 8, 2021 inspection report cited an incident from January 2020, in which a monkey died in their cage after being trapped between the squeeze panel and the front of the cage. That monkey likely asphyxiated to death.

In June 2019, the USDA cited Envigo with yet another critical violation of section 3.82(b) after staff failed to provide food to 25 monkeys for six days. Two of the monkeys became so severely impacted that they had to be euthanized.

Role in Alleged Monkey-laundering and -smuggling ring

This request is all the more urgent because the incident occurred just days after the U.S. Department of Justice's (DOJ) indictments of Cambodian government officials and nationals as well as the owner and staff of Vanny Bio Research (Cambodia) Corporation Ltd. (VBRC), a breeding farm that exports monkeys for use in laboratories in the U.S. and elsewhere. The DOJ alleges that the accused falsely labeled and sold wild-caught long-tailed macaques as captive-bred—felony violations of both the Lacey Act and the Endangered Species Act.

The International Union for Conservation of Nature (IUCN) recently announced that the conservation status of long-tailed macaques has changed from “vulnerable” to “endangered,” and it projected that the species' wild populations will experience an additional decline of 50% over the next three generations of monkeys if current threats are not mitigated. According to the IUCN,

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experimenters' demand for these once-plentiful species is a major factor in their dramatic population crash.

Inotiv, which owns the Envigo facility, admitted in a U.S. Securities and Exchange Commission filing on November 16 that VBRC is its principal supplier of long-tailed macaques. We urge the USDA to work with U.S. Fish and Wildlife Service to investigate whether the macaque who died in this transport cage was in one of the alleged illegal monkey shipments.

Request: Revoke Envigo's License

Envigo has demonstrated over and over that it is incapable of abiding by the minimal Requirements set by the Animal Welfare Act, and now it appears it may be involved in illegal monkey smuggling. We urge the USDA to revoke the company's dealer license and to facilitate the transfer of all remaining monkeys to reputable sanctuaries.

I appreciate your attention to this important matter, and I look forward to your response.

Sincerely,

A handwritten signature in black ink that reads "Kathy Guillermo". The signature is written in a cursive, flowing style.

Kathy Guillermo
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