



July 27, 2022

SENT VIA EMAIL

[REDACTED]
Executive Assistant to the Vice Presidents
Laboratory Investigations Department
People for the Ethical Treatment of Animals (PETA)
501 Front Street
Norfolk, Virginia 23510
[REDACTED]

2nd Letter Subject: Final Response Letter

Dear [REDACTED]:

The Centers for Disease Control and Prevention and Agency for Toxic Substances and Disease Registry (CDC/ATSDR) received your January 28, 2022, Freedom of Information Act (FOIA) request on January 28, 2022, seeking:

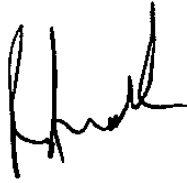
“...one copy of all public records dated from January 1, 2018, to the date this request is processed related to nonhuman primates who died while in CDC-approved quarantine facilities. This includes, but is not limited to, illness/mortality reports, necropsy reports, and quarantine facility inspection reports.”

We located 80 pages of responsive records (76 pages released in full; 4 pages released in part). After a careful review of these pages, some information was withheld from release pursuant to 5 U.S.C. §552 Exemption 6 which protects information in personnel and medical files and similar files when disclosure would constitute a clearly unwarranted invasion of personal privacy. The information that has been withheld under Exemption 6 consists of personal information, such as names. We have determined that the individuals to whom this information pertains have a substantial privacy interest in withholding it.

You may contact our FOIA Public Liaison at 770-488-6277 for any further assistance and to discuss any aspect of your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

If you are not satisfied with the response to this request, you may administratively appeal by writing to the Deputy Agency Chief FOIA Officer, Office of the Assistant Secretary for Public Affairs, U.S. Department of Health and Human Services, via the online portal at <https://requests.publiclink.hhs.gov/app/index.aspx?aspxerrorpath=/App/Index.aspx>. or via e-mail at FOIARequest@psc.hhs.gov or via mail at Hubert H. Humphrey Building, 200 Independence Avenue, Suite 729H, Washington, D.C. 20201. Please mark both your appeal letter and envelope “FOIA Appeal.” Your appeal must be postmarked or electronically transmitted by October 25, 2022.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roger Andoh', written over a white background.

Roger Andoh
CDC/ATSDR FOIA Officer
Office of the Chief Operating Officer
Phone: (770) 488-6399
Fax: (404) 235-1852

Enclosures

#22-00828-FOIA

Nonhuman Primate Importation and Quarantine: United States Fiscal Year 2018

Robert J. Mullan, M.D.

Zoonoses Team

Quarantine and Border Health Services Branch

Division of Global Migration and Quarantine

National Center for Emerging Infectious Diseases

National Center for Emerging Zoonoses and Infectious Diseases

Division of Global Migration and Quarantine



Reviewers:

The meeting is for the general membership of the Animal Transportation Association (international and domestic shippers, brokers, carrier representatives, etc.). This presentation's target audience is attendees of the Research Track/Lab Animal and Zoo Track breakout sessions.

This session will provide a CDC update on trends in NHP transportation in North America, including trends in transportation that are causing CDC concerns (e.g., infractions noted during offloading of NHPs at the port of entry).

42 CFR Part 71.53

Requirements for Importers of Nonhuman Primates: New and Revised Elements

- **Effective April 16, 2013**
- **Consolidates previous guidance**
- **Special permit for African green, rhesus, and cynomolgus species folded into two-year registration**
- **Imports restricted to CDC ports of entry**
- **Zoo-to-zoo and lab-to-lab transfers**

CDC Activities

- **Inspect facilities**
- **Review import plans**
- **Monitor arriving shipments**
- **Assess disease control measures**
- **Conduct periodic site visits**
- **Investigate illness reports**

CDC-Registered Importers of Nonhuman Primates (NHP)

- 14 commercial importers (11)
- 9 zoos (1)*
- 3 national primate research centers
- 3 university (2) **

29 total

* Includes two zoos registered for zoo-to-zoo imports only

** Includes two universities registered for lab-to-lab imports only

NHP Importation Data

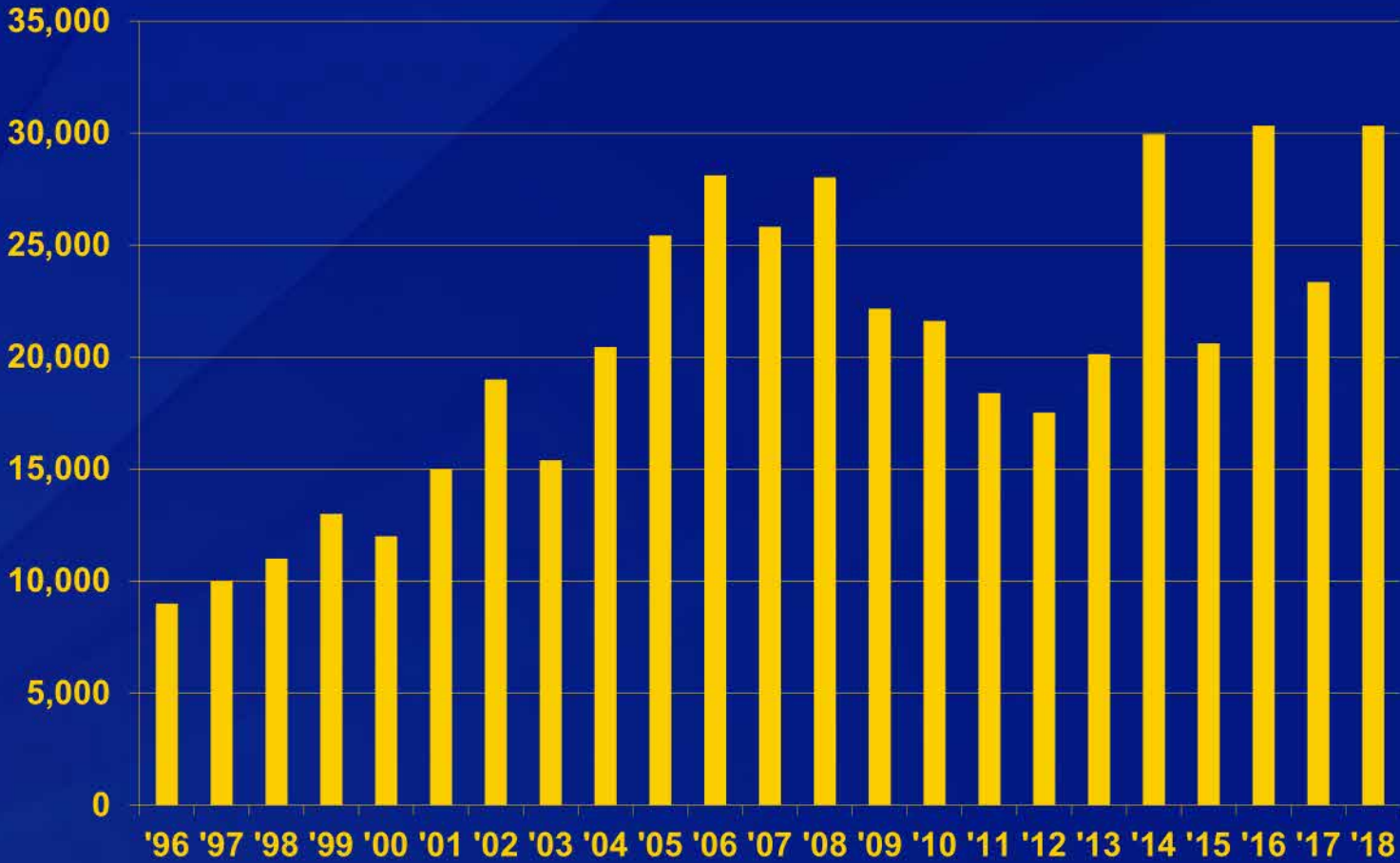
October 1, 2017 to September 30, 2018



Photo Credit: iStockPhoto

NHP Imports, All Species FY 1994–2018

Number of NHPs



Summary Data FY 2018 vs. FY2017

	Number FY18	Percent	Number FY17	% Change ¹
Total animals imported	27,956	—	21,861	+ 27.9%
Total shipments	152	—	125	+ 21.6%
Total animals DOA ²	5	0.0%	2	+ 200.0%
Total died in quarantine	61	0.2%	29	+ 75.9%
Total ill in quarantine	9	0.0%	5	+ 100.0%

¹ From FY 2017

² Dead on arrival

Importation Data by Species, FY2018

Species	Number	Percent	# Ship	% Ship
Cynomolgus	25,700	92.0%	118	77.6%
Rhesus	1,739	6.2%	19	12.5%
African green	208	0.7%	4	2.6%
Marmoset	166	0.6%	2	1.3%
Squirrel	69	0.2%	3	2.0%
Pig-tail macaques	50	0.2%	1	0.7%
Capuchin	8	0.0%	1	0.7%
Various *	16	0.0%	4	0.7%
Totals	27,956	99.9%	152	99.1%

* Includes 6 tamarins, 6 langurs, 3 saki monkeys, and 1 orangutan

Importation Data by Species, FY 2018 vs. FY 2017

Species	Number FY18	Number FY17	% Change
Cynomolgus	25,700	20,110	+ 27.8%
Rhesus	1,739	1,392	+ 25.0%
African green	208	85	+ 144.7%
Marmosets	166	249	- 33.3%
Various	16	25 *	- 36.0%
Total	28,618	21,861	+ 30.9%

* Includes 19 baboons, 3 orangutans, 2 black lemurs, and 1 brown lemur

Importation Data by Importer, FY 2018

- **1 to 8,887 animals per importer¹ (median = 305)**

¹ Of those importers with shipments in FY2018

Importation Data by Importer, FY 2018

- 1 to 8,887 animals per importer¹ (median = 305)
- 1 to 31 shipments per importer (median = 3)

¹ Of those importers with shipments in FY2018

Importation Data by Importer, FY 2018

- **1 to 8,887 animals per importer¹ (median = 305)**
- **1 to 31 shipments per importer (median = 3)**
- **Died in quarantine 0% to 0.3% (median = 0.0%)²**

¹ Of those importers with shipments in FY2018

² Includes DOA and died in quarantine

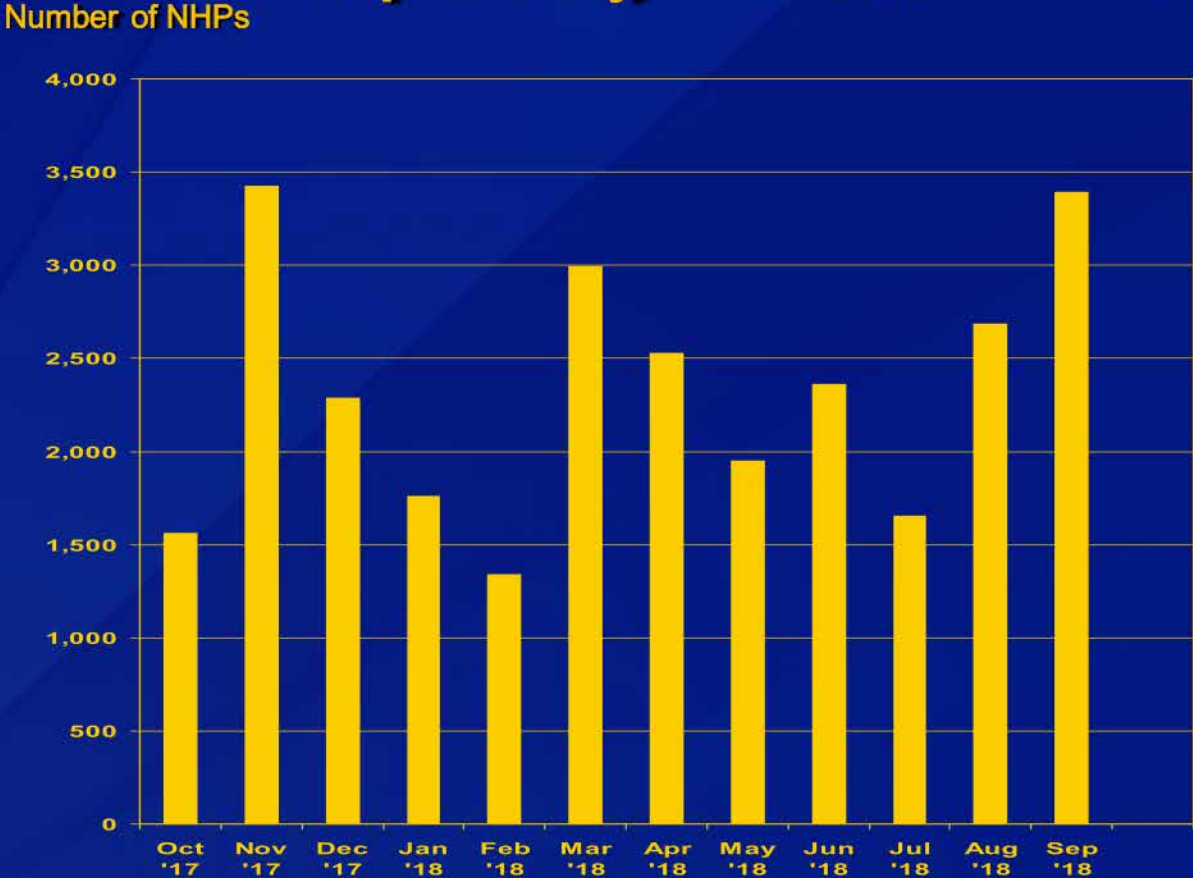
Importation Data by Country of Origin, FY 2018

Country	Number	Percent	# Ship	% Ship
China	19,230	68.8%	86	56.6%
Cambodia	5,851	21.0%	26	17.1%
Mauritius	1,865	6.7%	18	11.8%
Vietnam	480	1.7%	4	2.6%
St. Kitts	208	0.7%	4	2.6%
South Africa	166	0.6%	2	1.3%

Importation Data by Country of Origin (cont.)

Country	Number	Percent	# Ship	% Ship
Guyana	75	0.2%	3	2.0%
Indonesia	50	0.2%	3	2.0%
Canada	3	0.0%	3	2.0%
Singapore	9	0.0%	1	0.7%
UK	6	0.0%	1	0.7%
Germany	1	0.0%	1	0.7%
Total	27,956	99.9%	152	100.1%

Imports by Month, FY 2018



NHP Importations by CDC Quarantine Station, FY 2018

Station	Number	Percent	# Ship	% Ship
Newark	18,212	65.2%	73	48.0%
Chicago	4,927	16.6%	40	26.3%
New York ¹	4,431	15.9%	28	18.4%
Miami	208	0.7%	4	2.6%
Dulles	166	0.6%	3	2.0%
Houston	7	0.0%	2	1.3%
Detroit ²	3	0.0%	1	0.7%
MSP ³	2	0.0%	1	0.7%
Totals	27,956	100.0%	152	100.0%

¹ Includes one land-border crossing of two NHPs

² Includes one land-border crossing of ten NHPs

³ Includes one land-border crossing of three NHPs

Mortality FY 2018

- Overall mortality = 0.2%
 - DOA n = 5 (<<0.1%)
 - Died in CDC quarantine n = 61 (0.2%)
- 0 large-scale mortality event (vs. 0 in FY17)

Mortality FY 2018, Causes of Death

➤ Gastroenteritis	15
➤ Post-anesthesia	7
➤ Failure to thrive	5
➤ Trauma	6
➤ Undetermined	5
➤ Rectal prolapse	4
➤ Pneumonia	3
➤ Bloat	2
➤ Declining condition	1
➤ Gastric rupture	1

Mortality FY 2018, Causes of Death (cont'd)

➤ Nephropathy	1
➤ Metritis	1
➤ Splenitis	1
➤ Pulmonary edema	1

In-Transit Shipments FY2017 vs. FY2018

	No. Shipments JFK	No. Shipments MIA	No. NHPs JFK	No. NHPs MIA
FY2017	5	1	339	100
FY2018	12	6	1,320	610

In-Transit Shipments FY2018, JFK Selected Examples

Country of Origin	Final Destination	Species	No.
Guyana	China	Cebus	75
		Squirrel	97
Guyana	China	Cebus	12
		Squirrel	100
Guyana	China	Cebus	60
		Squirrel	80
		Tamarin	20
Guyana	China	Capuchin	33
		Squirrel	113
Guyana	China	Capuchin	33
		Squirrel	115

In-Transit Shipments FY2018, MIA Selected Examples

Country of Origin	Final Destination	Species	No.
Guyana	Bangladesh	Capuchin	48
		Squirrel	100
Guyana	Thailand	Squirrel	28
Guatemala	Thailand	Capuchin	4
Guyana	China	Capuchin	20
		Squirrel	100
Guyana	China	Squirrel	80
		Tamarin	30

Trends

- **NHP importation increased in 2018**
- **Importers continue to ship primarily medium-sized shipments on commercial flights**
- **Three airlines transport 92.7% of all NHPs**
- **No charter flights in FY2018**

Acknowledgments

(b)(6)

Questions?

For more information please contact Centers for Disease Control and Prevention

1600 Clifton Road NE, Mailstop C-01, Atlanta, GA 30333

Telephone: 1-800-CDC-INFO (232-4636)/TTY: 1-888-232-6348

E-mail: CDCAAnimalImports@cdc.gov

Web: <http://www.cdc.gov/importation/>

The findings and conclusions in this report are those of the authors and do not necessarily represent the official position of the Centers for Disease Control and Prevention.

Nonhuman Primate Importation and Quarantine: United States Fiscal Year 2019

Robert J. Mullan, M.D.
Zoonoses Team

Association of Primate Veterinarians
Annual Workshop
Denver, Colorado
October 11, 2019

42 CFR Part 71.53

Requirements for Importers of Nonhuman Primates: New and Revised Elements

- **Effective April 16, 2013**
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- **Imports restricted to CDC ports of entry**
- **Zoo-to-zoo and lab-to-lab transfers**
- **In-transit shipments**

CDC NHP Activities

- **Inspect facilities**
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- **Conduct periodic site visits**
- **Investigate illness reports**

CDC-Registered Importers of Nonhuman Primates (NHP)

- 14 commercial importers
- 7 zoos*
- 2 national primate research centers
- 2 university**

25 total

* Includes two zoos registered for zoo-to-zoo imports only

** Includes two universities registered for lab-to-lab imports only

NHP Importation Data

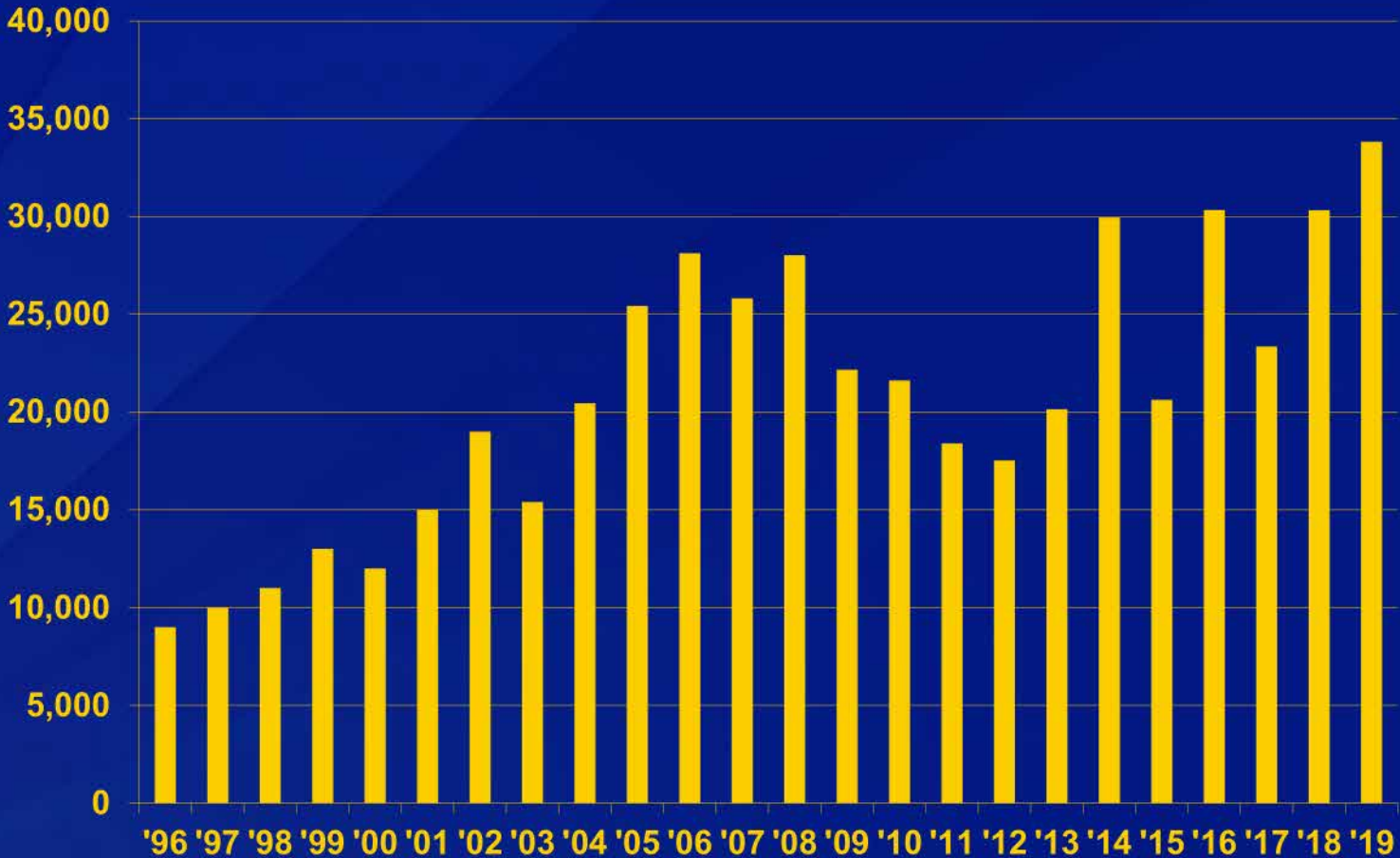
October 1, 2018 to September 30, 2019



Photo Credit: iStockphoto

NHP Imports, All Species FY 1994–2019

Number of NHPs



NHP Summary Data FY 2019 vs. FY2018

	Number FY19	Percent	Number FY18	% Change ¹
Total animals imported	33,818	—	30,317	+ 11.5%
Total shipments	162	—	152	+ 6.6%
Total animals DOA ²	6	0.0%	5	+ 20.0%
Total died in quarantine	71	0.2%	61	+ 16.4%
Total ill in quarantine	15	0.0%	9	+ 66.7%

¹ From FY 2018

² Dead on arrival

NHP Importation Data by Species, FY2019

Species	Number	Percent	# Ship	% Ship
Cynomolgus	32,439	95.2%	142	87.7%
Rhesus	844	2.5%	8	4.5%
African green	282	0.8%	5	3.0%
Marmoset	195	0.6%	3	1.9%
Squirrel	30	0.1%	1	0.6%
Capuchin	15	0.0%	1	0.6%
Various *	13	0.0%	4	2.5%
Totals	33,818	99.2%	164	100.8%

* Includes 7 saki, 1 colobus, 4 gelada, and 1 orangutan

NHP Importation Data by Species, FY 2019 vs. FY 2018

Species	Number FY19	Number FY18	% Change
Cynomolgus	32,439	25,700	+ 26.2%
Rhesus	844	1,739	- 51.4%
African green	282	208	+ 35.6%
Marmosets	195	166	+ 17.5%
Various	13	16 *	- 23.0%
Total	33,818	30,317	+ 11.5%

* Includes 7 saki, 1 colobus, 4 gelada, and 1 orangutan

NHP Importation Data by Importer, FY 2019

- **1 to 9,107 animals per importer¹ (median = 370)**

¹ Of those importers with shipments in FY2019

NHP Importation Data by Importer, FY 2018

- **1 to 9,107 animals per importer¹ (median = 370)**
- **1 to 37 shipments per importer (median = 3)**

¹ Of those importers with shipments in FY2019

NHP Importation Data by Importer, FY 2018

- **1 to 9,107 animals per importer¹ (median = 370)**
- **1 to 37 shipments per importer (median = 3)**
- **Died in quarantine 0% to 0.8% (median = 0.0%)²**

¹ Of those importers with shipments in FY2019

² Includes DOA and died in quarantine

NHP Importation Data by Country of Origin, FY 2019

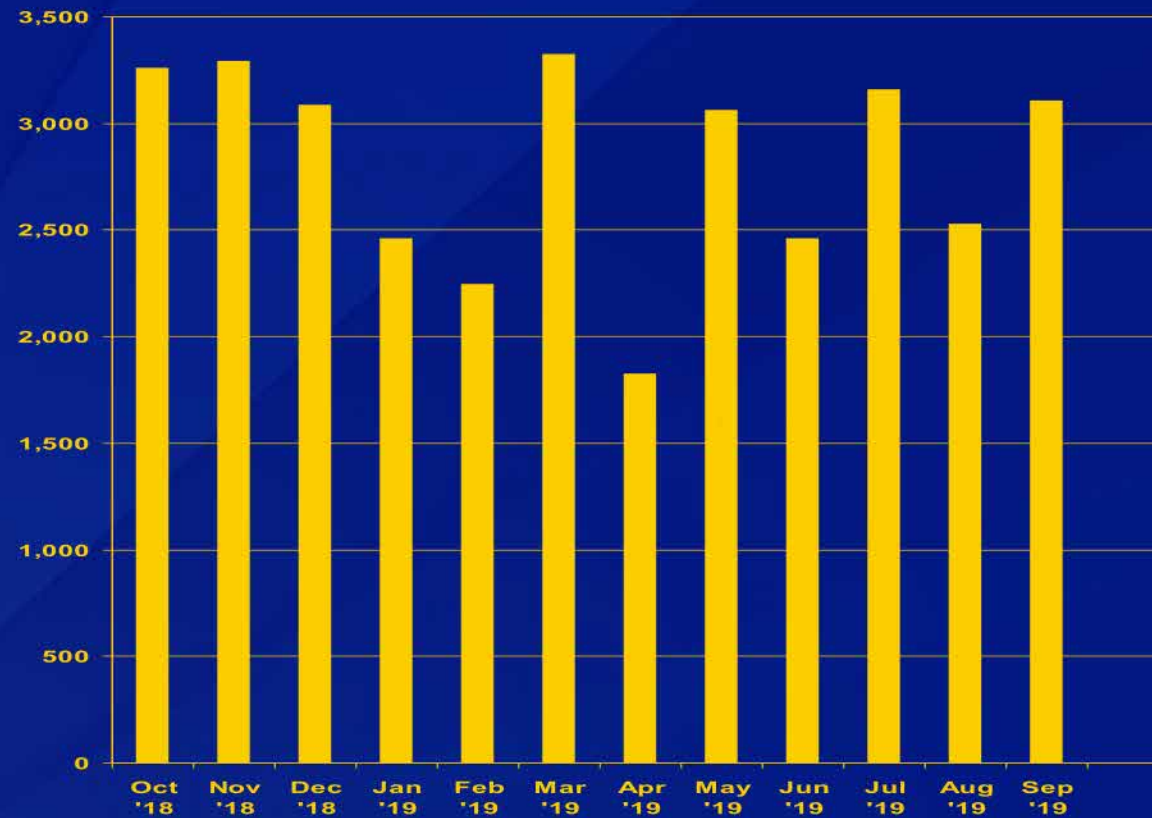
Country	Number	Percent	# Ship	% Ship
China	20,270	59.9%	79	48.8%
Cambodia	8,571	25.3%	28	17.3%
Mauritius	3,540	10.5%	35	21.6%
Vietnam	840	2.5%	6	3.7%
St. Kitts	328	1.0%	6	3.7%
South Africa	160	0.5%	2	1.2%

NHP Importation Data by Country of Origin (cont.)

Country	Number	Percent	# Ship	% Ship
Guyana	52	0.2%	1	0.6%
Germany	39	0.1%	2	1.2%
Canada	17	0.1%	2	1.2%
Argentina	1	0.0%	1	0.7%
Total	33,818	100.1%	162	100.0%

NHP Imports by Month, FY 2019

Number of NHPs



NHP Importations by CDC Quarantine Station, FY 2019

Station	Number	Percent	# Ship	% Ship
Newark	21,665	64.1%	82	50.6%
New York ¹	7,042	20.8%	27	16.7%
Chicago	4,075	12.1%	40	24.7%
Dulles	655	1.9%	5	3.1%
Miami	380	1.1%	7	4.3%
Houston	1	0.0%	1	0.6%
Totals	27,956	100.0%	162	100.0%

¹ Includes one land-border crossing of one NHP

NHP Mortality FY 2019

- Overall mortality = 0.2%
 - DOA n = 6 (<<0.1%)
 - Died in CDC quarantine n = 71 (0.2%)
- 0 large-scale mortality event (vs. 0 in FY18)

NHP Mortality FY 2019, Causes of Death

➤ Euthanized ¹	38
➤ Enteritis/diarrhea	14
➤ Post-anesthesia	9
➤ Unknown/indeterminate	4
➤ Pneumonia	3
➤ Arrived moribund	2

¹ Enteritis non-responsive to therapy (11), herpes B positive (8), moribund upon arrival (5), shipping stress (3), foreign body (2), tuberculin skin test positive (2), congenital stenotic prepuce (1), dehydration (1), endometrial hyperplasia (1), failure to thrive (1), rectal prolapse (1), renal abscess (1), and trauma (1).

NHP Mortality FY 2019, Causes of Death (cont'd)

➤ Dehydration	2
➤ Gastric bloat	2
➤ Septicemia	2
➤ Colonic torsion	1
➤ Heat stroke	1
➤ Peritonitis	1
➤ Trauma	1
➤ <u>Uroabdomen</u>	<u>1</u>
Total	43

NHP In-Transit Shipments

- Pre-arrival notification
- In-transit shipments must be housed and cared for in a manner consistent with requirements for NHPs intended for import into the United States

NHP In-Transit Shipments FY2017– FY2019

	No. Shipments JFK	No. Shipments MIA	No. NHPs JFK	No. NHPs MIA
FY2017	5	1	339	100
FY2018	12	6	1,320	610
FY2019	4	20	176	1,637

NHP In-Transit Shipments FY2019, JFK Selected Examples

Country of Origin	Final Destination	Species	No.
Guyana	China	Capuchin	36
		Squirrel	80
Surinam	China	Capuchin	10
		Squirrel	30
Guyana	China	Squirrel	10
Guyana	China	Spider	10

NHP In-Transit Shipments FY2019, MIA Selected Examples

Country of Origin	Final Destination	Species	No.
Guyana	China	Capuchin	77
		Squirrel	100
Guyana	Thailand	Tamarin	30
Guatemala	China	Spider	10
Guyana	China	Saki	40
		Spider	20
Guyana	China	Squirrel	100
		Capuchin	55
		Marmoset	10

NHP Importation Trends

- **NHP importation increased in 2019 by 11.5%**

NHP Importation Trends

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- **Importers continue to ship primarily medium-sized shipments on commercial flights**

NHP Importation Trends

- **NHP importation increased in 2019 by 11.5%**
- **Importers continue to ship primarily medium-sized shipments on commercial flights**
- **Three airlines transport 98.2% of all NHPs¹**

¹ Excludes in-transit shipments

NHP Importation Trends

- **NHP importation increased in 2019 by 11.5%**
- **Importers continue to ship primarily medium-sized shipments on commercial flights**
- **Three airlines transport 98.2% of all NHPs**
- **No charter flights in FY2019**

¹ Excludes in-transit shipments

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Nonhuman Primate Importation and Quarantine United States, Fiscal Years 2019-2021

Association of Primate Veterinarians Annual Workshop
Kansas City, MO October 15, 2021

(b)(6)

Veterinary Medical Officer, Quarantine and Border Health Services Branch
National Center for Emerging Zoonoses and Infectious Diseases
Division of Global Migration and Quarantine

42 CFR § 71.53 - Requirements for Importers of Nonhuman Primates (NHP)

- Prevent transmission of zoonotic disease
- Current regulation effective 2013
- Restricts importation—only for science, education, or exhibition
- Comprehensive requirements for registered importers

CDC NHP Import Program



Review

- Registration applications
- Standard operating procedures
- Importer records
- Illness/mortality reports

- Assist in outbreak investigations



Site visits

- Inspect quarantine facilities
- Audit shipments
- Verify NHP only distributed for permitted purposes



Monitor

- NHP shipment arrivals
- Offloading
- Personal protective equipment
- Disinfection

Current CDC-Registered NHP Importers (Oct. 2021)

- 16 Commercial Importers
- 4 Zoos
- 3 National Primate Research Centers
- 1 University
- 1 Animal Act

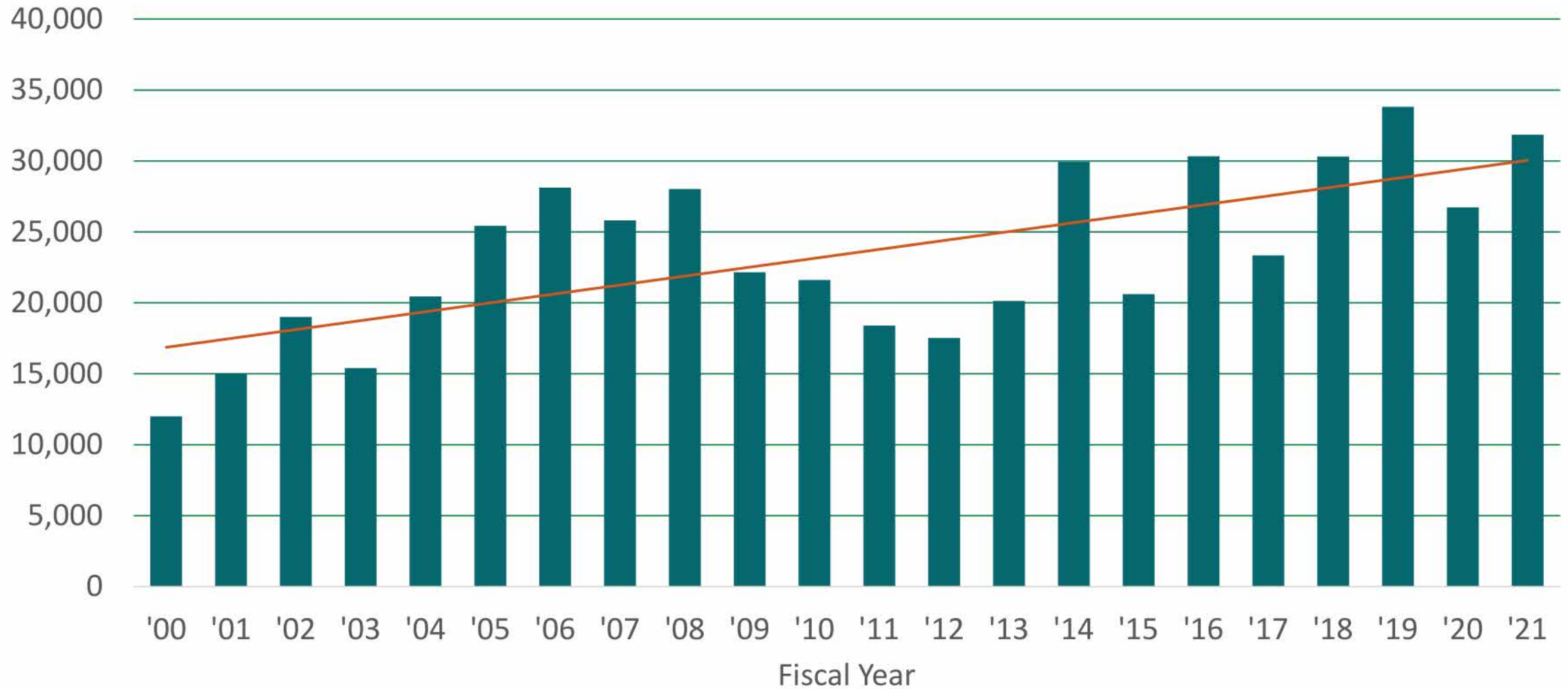
25 Total

NHP Importation Data – Fiscal Years 2019-2021

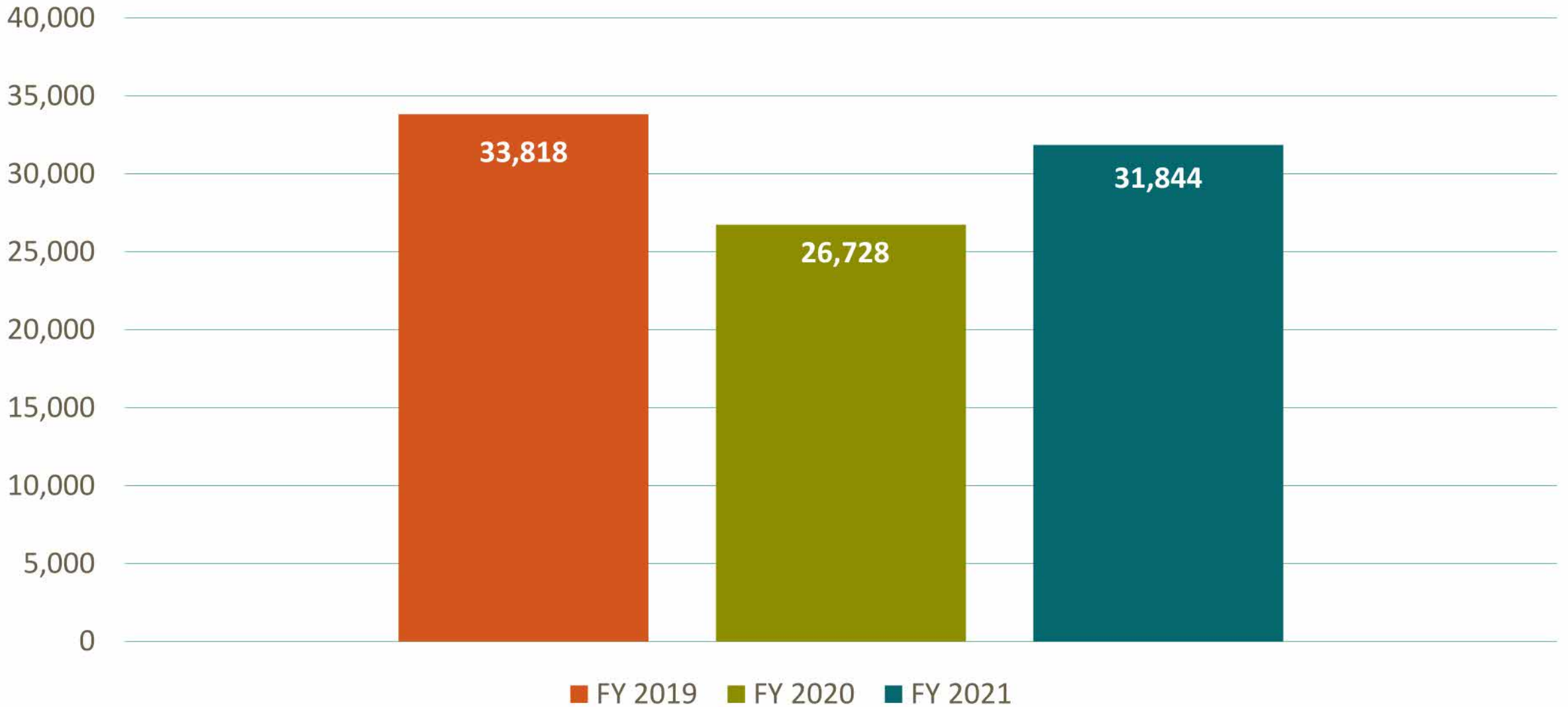
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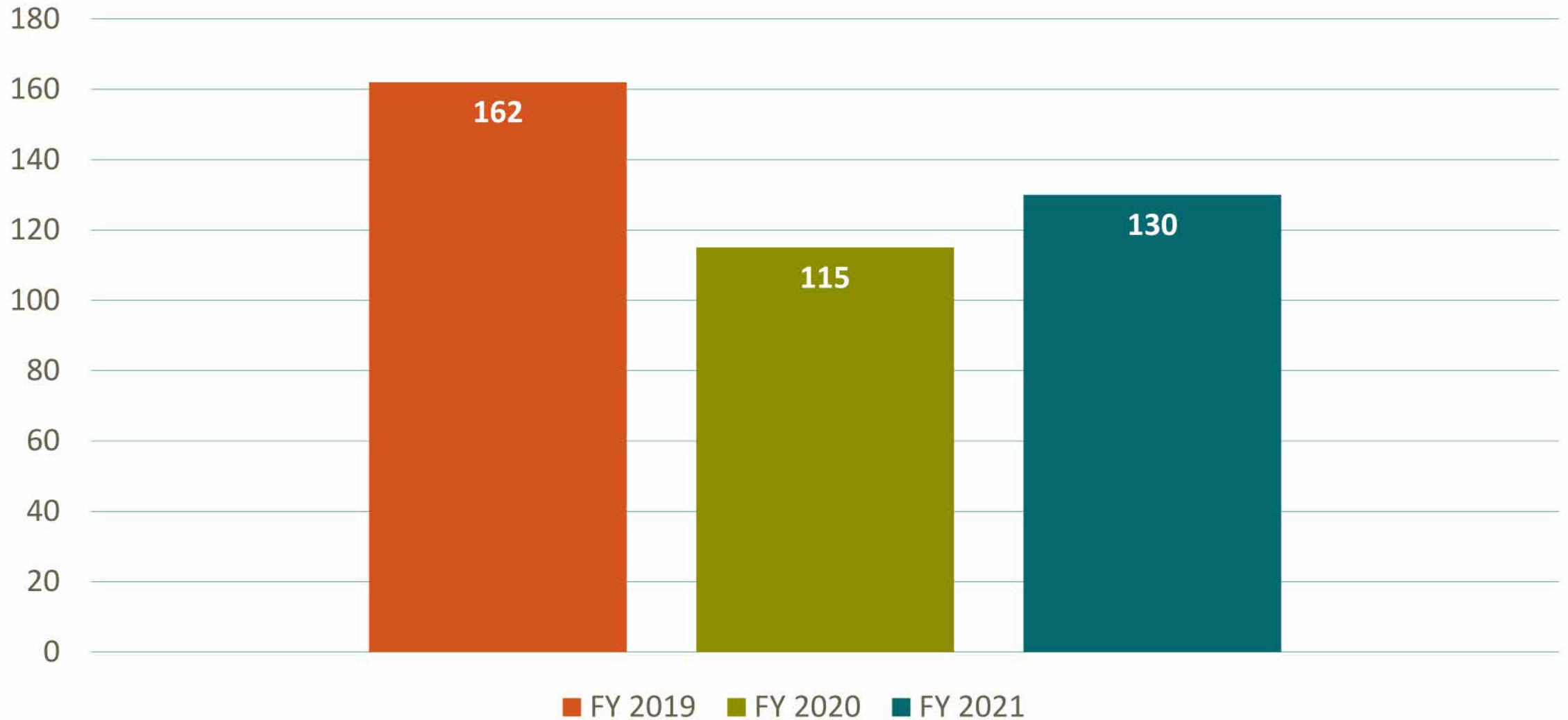
Number of NHP Imported (All Species) FY 2000-2021



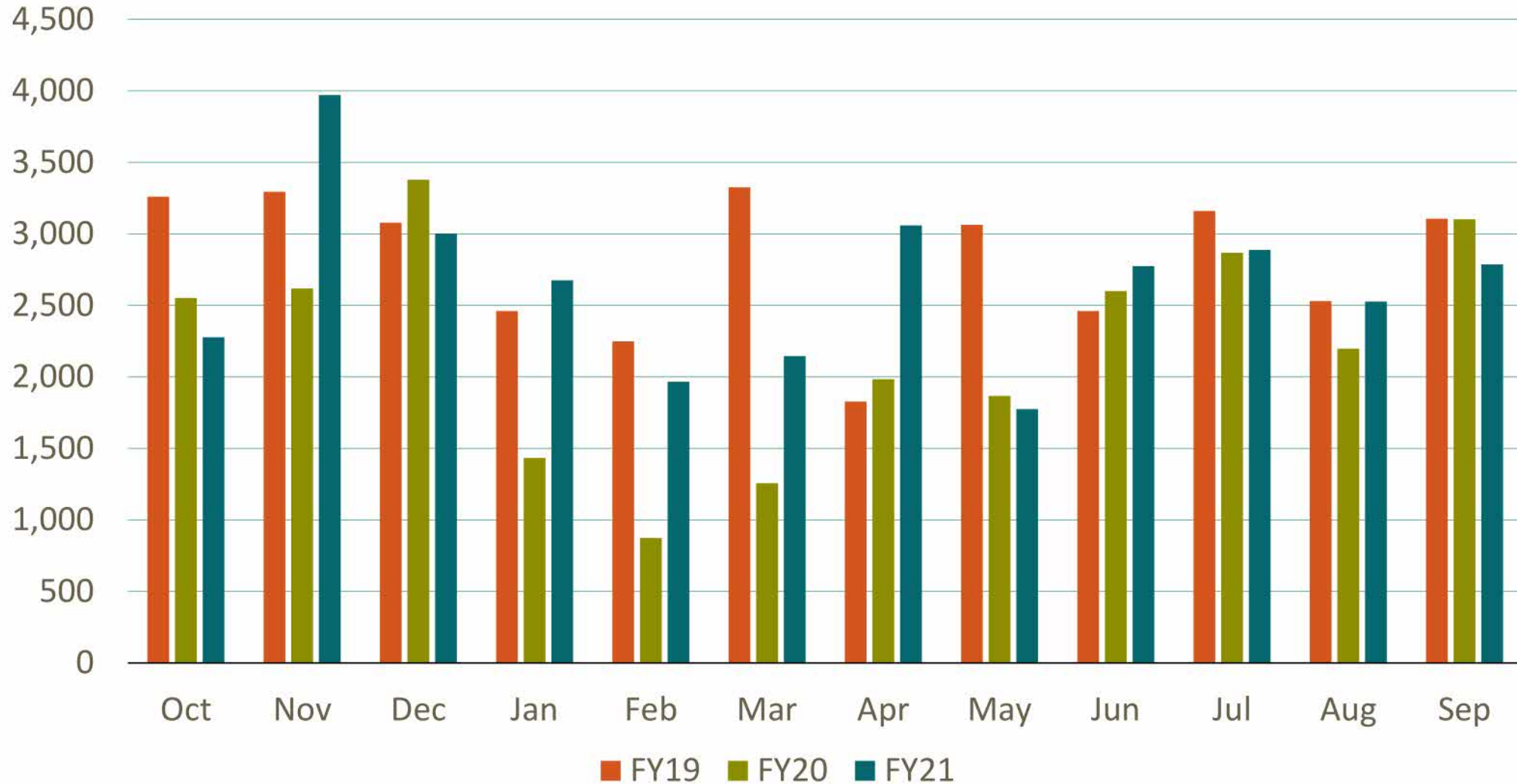
Total NHP Imported Per Fiscal Year 2019-2021



NHP Shipments Per Fiscal Year 2019-2021



Number of NHP Imported Per Month FY 2019 - 2021



Number of NHP Imported by Species

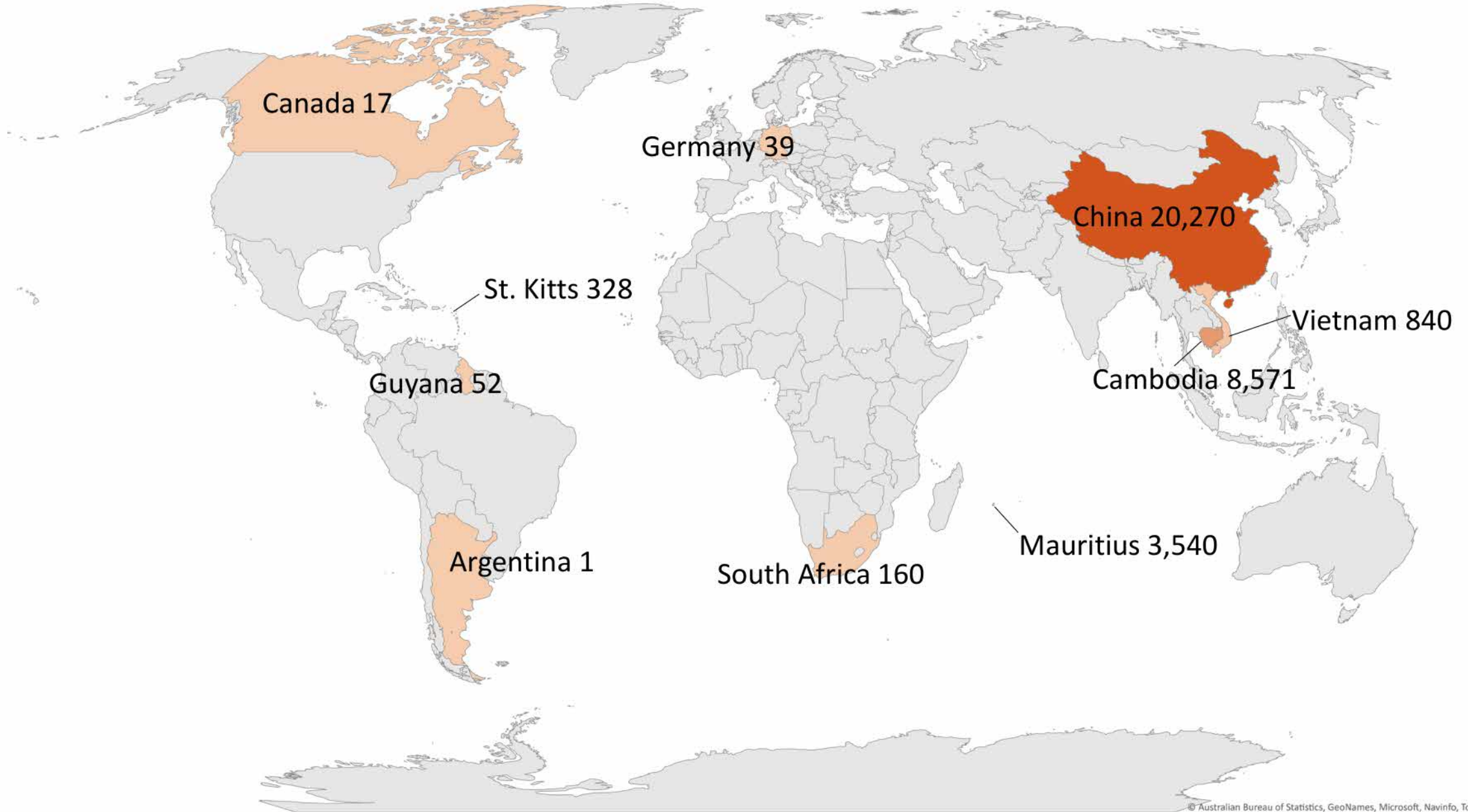
Species	FY 2019	FY 2020	FY 2021
Cynomolgus	32,439	24,879	30,649
Rhesus	844	763	80
African Green	282	720	711
Marmoset	195	326	284
Squirrel	30	34	68
Capuchin	15	0	40
Various*	13	6	12
Totals	33,818	26,728	31,844

*FY19: 7 Saki, 1 Colobus, 4 Gelada, and 1 Orangutan

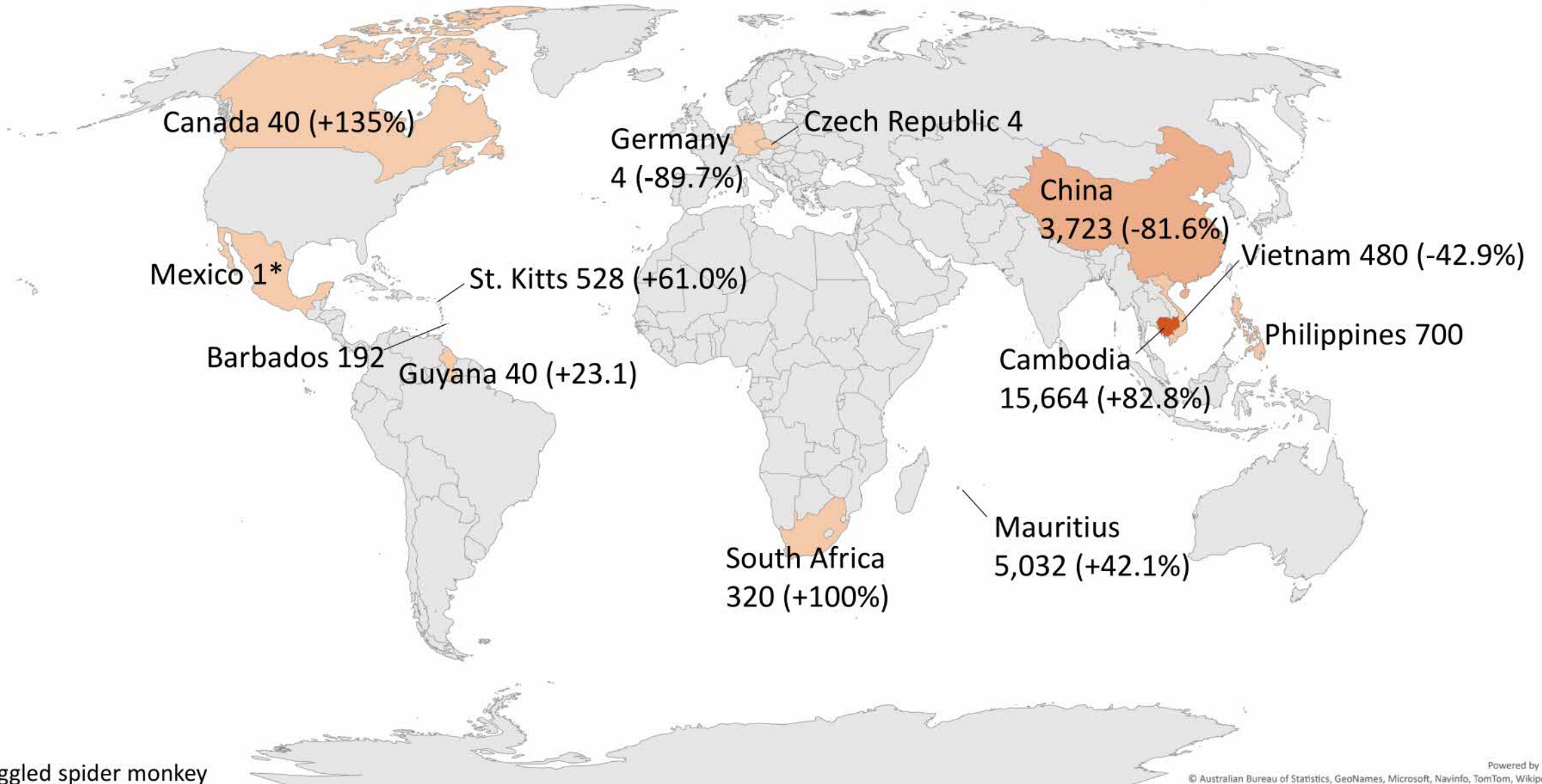
*FY20: 2 Colobus, 1 De Brazza's, 2 Siamang, and 1 spider monkey (smuggled)

*FY21: 12 spider monkeys (2 smuggled)

Importations by Country of Origin FY 2019 - Number of NHP

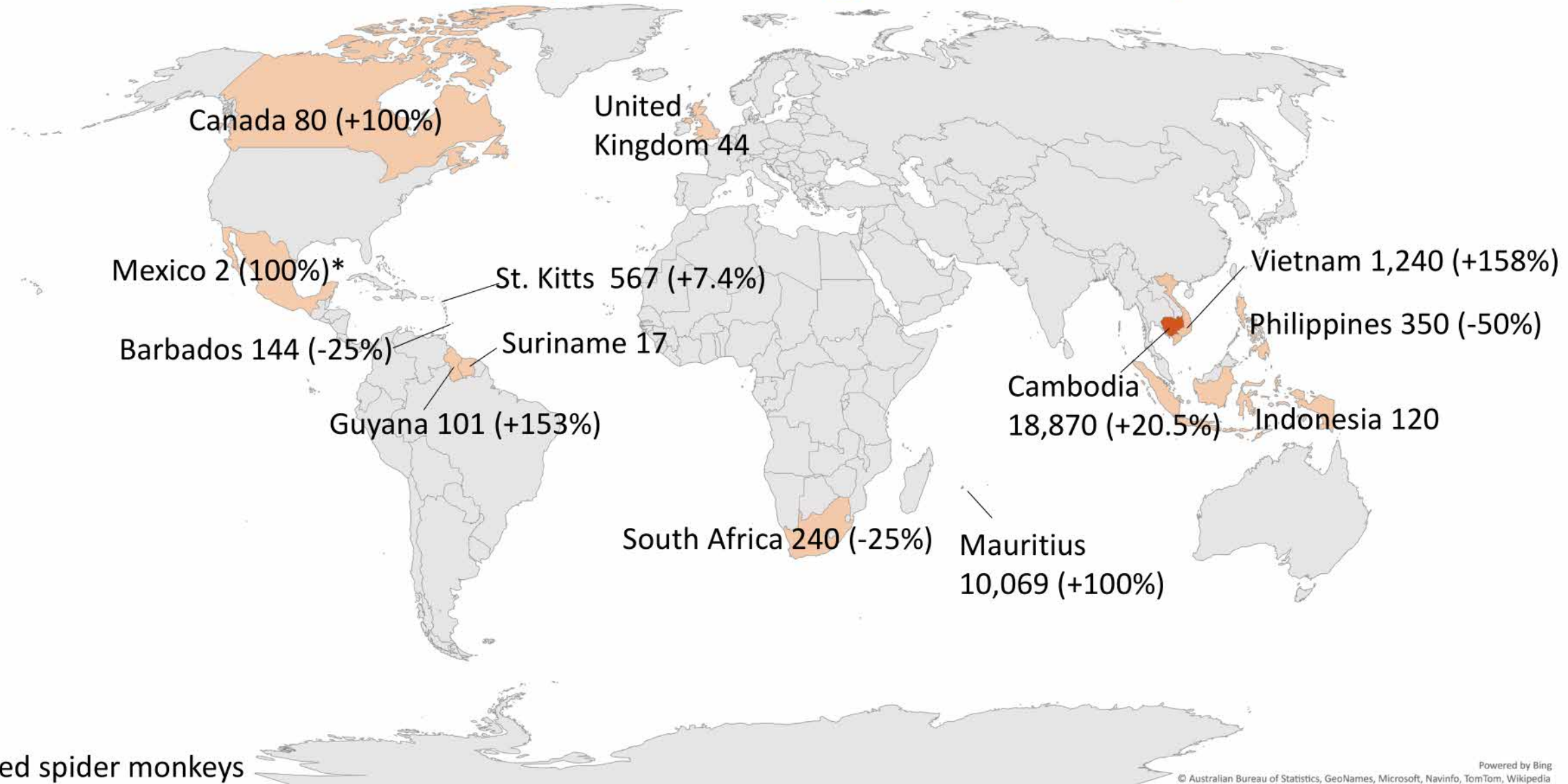


Importations by Country of Origin FY 2020 Number of NHP (Percent Change from FY 2019)



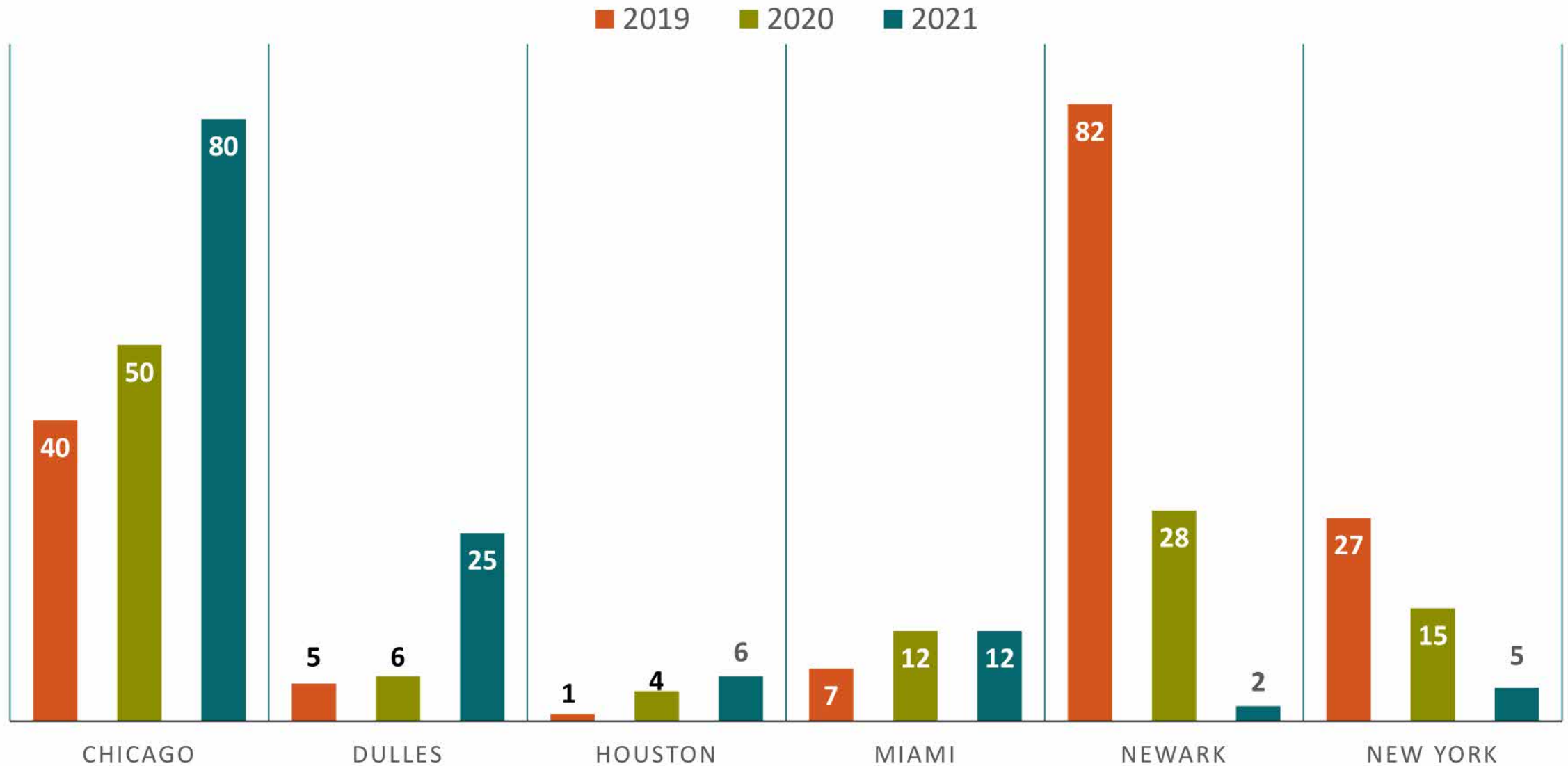
*Smuggled spider monkey

Importations by Country of Origin FY 2021 Number NHP (Percent Change from FY 2020)



*Smuggled spider monkeys

Number of NHP Shipments by Port of Entry, FY 2019-2021



NHP Morbidity and Mortality

	FY 2019	FY 2020	FY 2021
Overall Mortality	77 (0.20%)	79 (0.30%)	136 (0.43%)
Dead on Arrival (DOA)	6 (0.02%)	4 (0.01%)	11 (0.03%)
Died in Quarantine	71 (0.20%)	75 (0.30%)	125 (0.40%)
Illness reported to CDC (recovered during quarantine period)*	15 (0.04%)	0	119 (0.37%)

*Includes NHP illness that may be of public health concern such as clinical signs consistent with filovirus infection, confirmed *Shigella* and *Campylobacter* infection, and malaria.

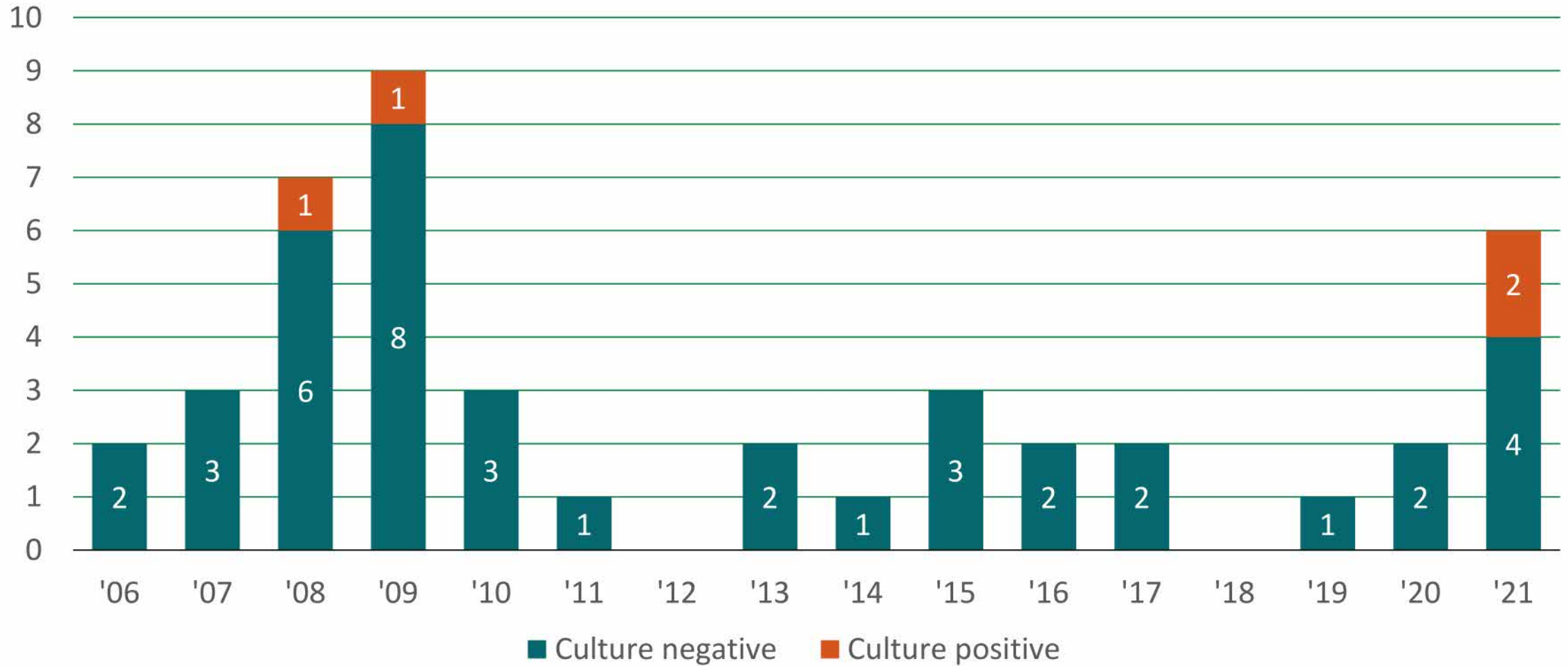
Mortality Data - Causes of Death	FY 2020	FY 2021
Humane euthanasia	14	85
Gastrointestinal disease*	34	15
Sepsis	13	14
Trauma	1	4
Wasting marmoset syndrome	0	4
Pneumonia	6	1
Unknown/indeterminate	4	10
Pyelonephritis/emaciation	0	1
Anesthetic complication	3	1
Hypothermia/hypoglycemia	2	0
Shipping stress	1	0
Cardiomyopathy	1	0
Pending	0	1
Total	79	136

*FY20: Includes gastritis, enteritis, colitis, bloat, *Yersinia pseudotuberculosis*, campylobacteriosis, shigellosis.

*FY21: Includes enterocolitis, hemorrhagic gastroenteritis, erosive colitis with serositis, yersiniosis (*Yersinia pseudotuberculosis*, *Yersinia enterocolitica*), campylobacteriosis, shigellosis.

Mortality Data - Reasons for Euthanasia	FY 2020	FY 2021
Gastrointestinal disease +/- sepsis	4	34
Hypothermia/dehydration	0	4
Tuberculosis suspect	3	24
Bone fracture/other trauma	2	2
Severe rectal prolapse	1	3
Pneumonia	1	0
Melioidosis	0	1
Sepsis	0	1
Simian retrovirus (SRV) positive	2	13
Herpes B virus (HBV) seropositive	0	2
Sciatic nerve injury	1	1
Total	14	85

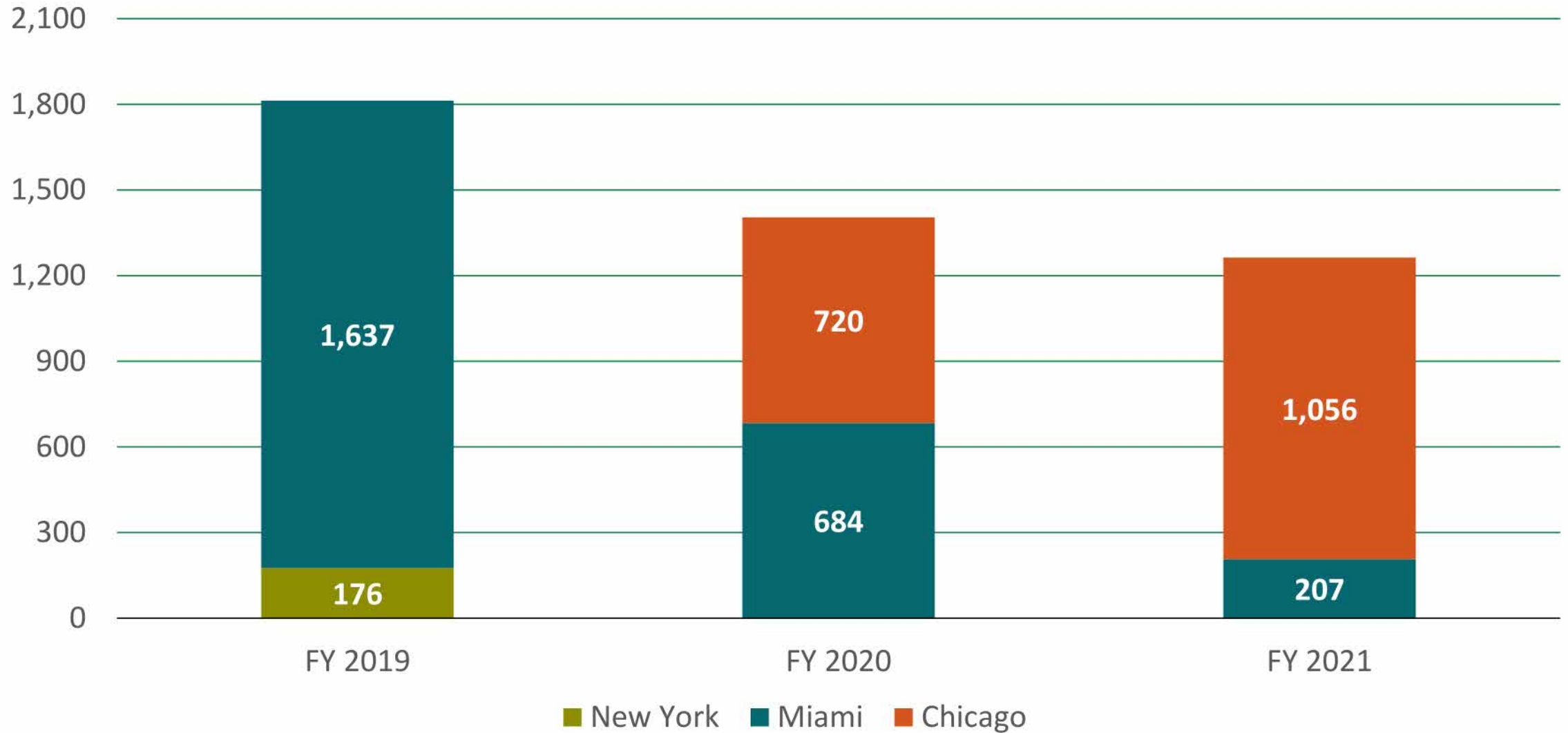
TB-Related Extended Quarantine TST Positive Shipments Per Year, FY 06-21



NHP In-Transit Shipments

- NHP moving between foreign countries stop in the US
- Pre-arrival notification to CDC
- Standard operating procedures
- Housing/husbandry requirements same as imported NHP

Number of In Transit NHP Per Year by Port of Entry, FY19-FY21



NHP In-Transit Shipments

Selected Examples, FY20 and FY21

Country of Origin	Final Destination	Species	Number of NHP
Guyana	United Kingdom	Bearded saki	4
		Howler	2
Cambodia	Canada	Cynomolgus	360
		Capuchin	14
		Squirrel	30
		Spider	8
Suriname	United Arab Emirates	Red-handed tamarin	40
Guatemala	China	Spider	10

Trends and Changes

- Number of NHP imported decreased 21% in FY20 and increased 19% in FY21.
- NHP imports from China decreased 83% in FY20 and 100% in FY21.
- NHP imports from Cambodia increased 120% from FY19 to FY21.
- Three airlines transported approximately 80% of NHP in FY20 and FY21*.
- Although still less than 1%, morbidity and mortality increased in FY21.
- Shipments with TB-positive NHP increased in FY21.

*Excludes in-transit shipments

Acknowledgments

(b)(6)

For more information about NHP importation, please contact
CDC Division of Global Migration and Quarantine
Quarantine and Border Health Services Branch
Zoonoses Team
Telephone 1-800-CDC-INFO (232-4636)/TTY: 1-888-232-6348
Email: NHPImporters@cdc.gov
Web: <http://www.cdc.gov/importation/>

For more information, contact CDC
1-800-CDC-INFO (232-4636)
TTY: 1-888-232-6348 www.cdc.gov

The findings and conclusions in this report are those of the authors and do not necessarily represent the official position of the Centers for Disease Control and Prevention.

