



June 8, 2023

Robert M. Gibbens, D.V.M.
Director, Animal Welfare Operations
Animal Care
Animal and Plant Health Inspection Service
U.S. Department of Agriculture

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

Dear Dr. Gibbens:

I'm writing on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 9 million members and supporters globally—to respectfully request swift action from the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) against Oregon Health & Science University (OHSU; USDA Certificate No. 92-R-0001) for its failure to meet the standard of care for animals held in its facilities, including at the affiliated Oregon National Primate Research Center (ONPRC).

On June 7, 2023, OHSU posted [a statement](#) on its website, describing the death of an infant rhesus macaque. On May 4, 2023, OHSU employees were attempting to conduct a “routine capture” of a female rhesus macaque and her infant from their enclosure. According to the university’s statement, “the female monkey aggressively charged the doorway, allowing the vertical slide door to fall.” In the clamor that ensued, the infant monkey fell into the path of the steel guillotine door of the enclosure, which had dislodged and crushed the infant. Experimenters examined and then euthanized the baby.

The university’s “root cause analysis” of the incident concluded that the problem stemmed from the “physical characteristics of the transfer box and the door”—and not human error. Even so, the analysis acknowledged that the “capture technique has been used for more than 10 years without incident.” The analysis also found fault with the mother macaque, indicating that she had behaved in “an unanticipated manner.” T

We believe the treatment of monkeys at OHSU, as indicated in the incident described above, fails to comply with the Animal Welfare Act (AWA) and Animal Welfare Regulations (AWRs).

1. Section 2.38(f)(1) of the AWRs states, “Handling of all animals shall be done as expeditiously and carefully as possible in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort.” However, the infant macaque sustained traumatic injuries so extensive that he or she had to be euthanized. Additionally, the mother monkey suffered—and is suffering—extreme distress and long-lasting emotional trauma as a result of the manner in which the “routine capture” was handled.

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.)

2. Section 2.32(c)(1) of the AWRs states, “Training and instruction of personnel must include guidance in ... [h]umane methods of animal maintenance and experimentation, including: (i) The basic needs of each species of animal; [and] (ii) Proper handling and care for the various species of animals used by the facility.” However, OHSU’s statement that the mother macaque behaved in “an unanticipated manner” suggests that the facility is unaware that mother monkeys will vociferously defend their infants. This protective instinct would be especially strong if the female macaque in this incident had previously had infants stolen from her—as is likely the case. The institution’s ignorance on this fundamental point of primates’ maternal nature calls into question whether it is qualified to train and instruct personnel on humane methods of animal maintenance and experimentation.
3. Section 2.33(b) of the AWRs states: “Each research facility shall establish and maintain programs of adequate veterinary care that include: (1) The availability of appropriate facilities, personnel, equipment, and services to comply with the provisions of this subchapter; [and] (3) The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries.” However, in their handling of the “routine capture” of the female rhesus macaque and her infant, OHSU employees failed to prevent catastrophic injuries to the infant. Moreover, the university’s “root cause analysis” seems to find fault with the equipment used—in spite of the fact that the school had used that very equipment and technique for 10 years without incident. OHSU’s failure to recognize the potential problems associated with its capture method constitutes a failure to ensure the availability of appropriate equipment to comply with the provisions of the AWRs.

The horrific incident described in OHSU’s June 7, 2023 statement follows a [pattern of chronic and egregious violations](#) in the university’s laboratories. Among other recent violations of federal animal welfare laws and regulations at OHSU, monkeys have been burned when left unattended on heating pads, been scalded to death in a cage washer, and died while trapped behind a cage.

This cannot continue and we ask that you bring the full scope of your authority to bear in addressing the catastrophic failures in OHSU’s laboratories.

Thank you for your attention to this urgent matter. If you have any questions, please contact me at (757) 803-6447 or AlkaC@peta.org. Thank you for your time and consideration.

Sincerely,



Alka Chandna, Ph.D.
Vice President
Laboratory Investigations Cases