June 22, 2023

Daniel B. Jernigan, M.D., M.P.H. Director National Center for Emerging and Zoonotic Infectious Diseases Centers for Disease Control and Prevention

Dear Dr. Jernigan:

On June 7, in response to PETA's May 4 and May 18 letters asking you to immediately suspend the importation of monkeys from Mauritius because of a reported outbreak of tuberculosis (TB) in the monkey-export facilities on that island, you claimed that the CDC's TB screening protocols for newly imported monkeys were adequate to protect public health. That is demonstrably false. We now know that for months there has been a reportable disease investigation in Michigan directly linked to Mauritius origin, wild-caught macaques who exited your CDC-quarantine safety net and subsequently moved through the U.S. while infected with TB. Officials from the Michigan Department of Health & Human Services confirmed that two laboratory workers had tested positive for TB, and there is concern that these were zoonotic infections. The individuals were referred for treatment.

It's imperative that the CDC immediately do the following:

- End all importation of monkeys from Mauritius
- Order that all monkeys imported from the country in the last six months be retested using a reliable, sophisticated algorithm that can detect animals exposed to and/or infected with TB
- Order all humans who have handled monkeys from Mauritius to be tested
- Issue an advisory to state health departments alerting them to the recent cases of TB in imported monkeys and the potential for zoonotic exposure among people who come into contact with monkeys in facilities that import and/or maintain primates (The <u>CDC issued a similar warning last year</u> when it was discovered that monkeys with melioidosis, a deadly Tier 1 Select Agent, had slipped through the CDC's 31-day quarantine period.)

The CDC's reliance on the outdated, insensitive, and nonspecific tuberculin skin test (TST)¹ screening assay is dangerous and threatens public health, especially when applied to recently imported primates. A 2022 retrospective analysis of Mauritius-origin, imported primates undergoing CDC-mandated quarantine and TB testing concluded the following:

The process of preparing an animal for intercontinental transport, including vaccination may suppress the response to tuberculin, which for example is the case when an animal is measles vaccinated within 28 days of a TST. This would eliminate or PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS

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¹Yee JL, Prongay K, Van Rompay KKA, et al. (2022). <u>Tuberculosis detection in nonhuman</u> primates is enhanced by use of testing algorithms that include an interferon-γ release assay, *Amer. J. Vet. Res.*, 83(1): 15-22.

minimize an animal's response to tuberculin causing a probable false negative reaction and if vaccinated the TST must be delayed until after the 28-day exclusion period. Stress during and after recent shipping is a well-known and documented phenomenon in animals. This stress response may suppress the immune system allowing a recrudesce of latent *Tb*. Reactivation of latent *Tb* may not be diagnosed with the TST until after an animal has cleared CDC quarantine.²

The CDC controls and regulates the flow of primates into the U.S., but the agency's failure to apply best practices including the use of multiple assays to screen imported monkeys for TB has put individuals who have contact with imported monkeys at risk. The agency has apparently taken the position that once primates exit their 31-day CDC-quarantine period, it has no further responsibility to monitor the potential public-health risks. The nation relies on the CDC to protect public health, and the agency's responsibility does not end after 31 days. <u>A recent congressionally mandated audit by the Government Accountability Office</u> concluded last week that the "CDC has not comprehensively identified and characterized risks related to imported wildlife. As a result, CDC's current approach may not be sufficient to prevent outbreaks" [*emphasis added*].

The CDC must take action now and stop shifting the burden of the necessary ongoing disease surveillance of imported primates to the states in which these monkeys will eventually reside.

Thank you for your time and attention to this critical matter. I look forward to your response.

Sincerely,

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²Panarella M, Hursh S (2022) <u>A retrospective analysis of the tuberculin skin test reactions of a single source</u> population of Mauritian *Macaca fascicularis* held in quarantine during 2017. *PLOS One*, *17*(4): e0265942.