



September 2, 2020

Brent Morse, D.V.M.
Director
Division of Compliant Oversight
Office of Laboratory Animal Welfare
National Institutes of Health

Via e-mail: MorseB@mail.nih.gov

Dear Dr. Morse,

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 6.5 million members and supporters to request that the National Institutes of Health (NIH) Office of Laboratory Animal Welfare (OLAW) investigate the use and treatment of animals at the University of Wisconsin-Madison (UW-Madison; Animal Welfare Assurance D16-00239).

A PETA investigator worked at UW-Madison from March 2020 to September 2020. During that time, PETA's investigator documented, including with video recordings¹ and photographs,² numerous instances of apparent noncompliance with the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy) and the *Guide for the Care and Use of Laboratory Animals* (the *Guide*) related to the treatment of monkeys at the Wisconsin National Primate Research Center (WNPRC), located at 1220 Capitol Ct. in Madison, Wisconsin.

The evidence shows that vulnerable monkeys held at WNPRC suffered as a result of neglect, incompetence, and a culture of disregard for their welfare.

1. WNPRC and some of its staff failed to maintain a program of adequate veterinary care. This apparent violation included the facility's failure to use appropriate methods to prevent, control, or effectively treat diseases and injuries.
 - a. Monkeys at WNPRC suffered with recurrent or persistent diarrhea. On a near-daily basis, PETA's investigator observed multiple monkeys who had diarrhea. Some of the older monkeys had suffered with the condition for decades. A young monkey named Daisy was only 14 months old, but suffered from chronic diarrhea. The medical literature indicates that diarrhea can lead to weight loss—and one monkey, named Ellie, suffered from persistent watery diarrhea and was chronically underweight. The literature also specifies that diarrhea can lead to serious metabolic problems, dehydration, and death. The widespread prevalence of

¹Please see [REDACTED].

²Please see [REDACTED].

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recurrent and chronic diarrhea in monkeys at WNPRC has a serious and potentially devastating impact on the animals' physiologies—introducing confounding variables in any experimental data gleaned from them. Thus, WNPRC's failure to effectively control diarrhea in its monkey population presents not only a profound welfare issue, but also a serious scientific concern. Moreover, using these physiologically and psychologically compromised monkeys in experiments—where confidence in the data produced would be gutted—represents a failure on the part of the institution to avoid or minimize “discomfort, distress, and pain” to animals.

- b. Monkeys at WNPRC suffered from traumatic injuries, including lacerations, bite wounds, and injuries necessitating sutures or amputations. In some cases, the monkeys had been caged with incompatible monkeys—and the deep psychological distress stemming from the artificial conditions of the laboratory and the animals' lack of agency resulted in fights from which there was no escape. In other cases, the injuries were self-inflicted and symptomatic of WNPRC's failure to promote the psychological well-being of the monkeys.
 - c. Monkeys at WNPRC suffered with rectal prolapse, a condition that causes distress, and in some cases pain, in which the rectum protrudes out of the body through the anus. According to the medical literature, rectal prolapse in monkeys in laboratories can be associated with diarrhea. The condition is also often associated with stress.
2. WNPRC and some of its staff failed to minimize discomfort, distress, and pain experienced by animals as required by Principle IV of the U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training; and the *Guide*. As part of WNPRC's breeding operation, workers at WNPRC would separate infant monkeys from their mothers—sometimes temporarily, to weigh them, to draw blood, or for other such procedures; and at one year of age, permanently. For such separations, the mother and infant—clinging to each other—would be placed in a metal restraint that closed in on their bodies. The workers would then use physical force, poking and prodding, sometimes with PVC pipes or a “pusher,” a metal pole with a flat surface on one end, to pull the infant in one direction while pushing the mother in the opposite direction, into waiting transport cages. During this traumatizing procedure, at least one monkey sustained injuries. In all cases, the monkeys would screech and cry and defecate.
 3. WNPRC and some of its staff failed to provide safe housing for nonhuman primates. In particular, WNPRC failed to “prevent escape” of monkeys from enclosures in which they were held. A supervisor at WNPRC admitted that monkeys escaped frequently—incidents that jeopardized the safety of monkeys and workers.
 4. WNPRC and some of its staff failed to “enhance animal well-being,” failing to “facilitate the expression of species-typical behaviors” to “promote psychological well-being” of the animals.
 - a. On a near-daily basis, PETA's investigator observed monkeys at WNPRC who exhibited behaviors indicative of psychological distress. They would pace back and forth, walk in circles, shake the cage bars, smack their lips, bite at the cage, and grimace and screech.
 - b. Many monkeys at WNPRC suffered from alopecia. A sign of extreme psychological distress, the monkeys pulled out their own hair or plucked the hair

from cage mates. PETA's investigator observed that nearly all of the monkeys in some rooms at WNPRC had alopecia. In some cases, monkeys' alopecia was so extensive, they were nearly bald. However, workers at WNPRC claimed that nothing could be done for these animals.

- c. While the *Guide* advises that "like all social animals, nonhuman primates should normally have social housing," the guidance also instruct that laboratories must ensure that animals who are caged together are compatible. When physical conflicts arise in nature, the weaker or more submissive party can escape. But in laboratories, where monkeys are held in barren metal boxes, there are no opportunities for escape or even hiding from an aggressor. At WNPRC, the failure to ensure that monkeys who were caged together were compatible resulted in monkeys sustaining painful and traumatic injuries, as described earlier. WNPRC's failure in this regard also meant that the psychological distress caused by imprisonment was compounded by the constant fear experienced by the monkeys—not only of the human experimenters, but also of cage mates. The medical literature is clear, that persistent fear and stress has a profound impact on the constellation of hormones and biological mechanisms that in turn, impact the animal's physiology. Again, these animals would be physiologically and psychologically compromised to such an extent that experimental data gleaned from them would also be compromised and wholly unreliable.
 - d. Federal guidance requires that special attention be given to certain nonhuman primates, including those who show signs of being in psychological distress through behavior or appearance. The *Guide* states that personnel "responsible for animal care and husbandry should receive training in the behavioral biology of the species they work with to appropriately monitor the effects of enrichment as well as identify the development of adverse or abnormal behaviors." However, PETA's investigator observed that WNPRC failed to give adequate consideration to the most vulnerable of the vulnerable population of monkeys at the facility. In one case, a monkey named Cornelius was observed by PETA's investigator as being nearly always hunched over, in a depressed posture, sometimes leaning his cheek against the cage bars. After securing permission from a supervisor, PETA's investigator was able to provide additional items—euphemistically termed "enrichment" for the impoverished environment at WNPRC—for Cornelius, to help engage him. However, the supervisor stated bluntly that in the absence of the efforts made by PETA's investigator, no one else would make such an effort.
5. WNPRC and some of its staff failed to provide appropriate training and instruction to personnel in noncompliance with federal guidance.
 6. WNPRC and some of its staff failed to maintain standards related to cleaning, sanitization, housekeeping and pest control of facilities where nonhuman primates are held, in noncompliance with the *Guide*.

The above failures are detailed in the attached appendix, which is intended to illustrate the pain, loneliness, psychological anguish, and misery suffered by monkeys at WNPRC; and the failure of this institution to do the utter minimum for vulnerable animals imprisoned in its facilities.

PETA's investigator, who is available for an interview upon request, will verify that they captured the referenced video recordings and photographs. I can be reached at 757-803-6447 or AlkaC@peta.org.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Alka Chandna". The signature is written in a cursive style with a prominent initial "A".

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

Wisconsin National Primate Research Center (WNPRC): Apparent Noncompliance with Public Health Service Policy on Humane Care and Use of Laboratory Animals and the Guide for the Care and Use of Laboratory Animals

I. Failure to maintain an adequate veterinary care program

The *Guide* specifies:

Veterinary care is an essential part of an animal care and use program. ... This responsibility extends to monitoring and promoting animal well-being at all times during animal use and during all phases of the animal's life. ... [A] veterinary program that offers a high quality of care and ethical standards must be provided, regardless of the number of animals or species maintained.

The *Guide* elaborates that an “adequate veterinary care program consists of assessment of animal well-being and effective management of ... protocol-associated disease, disability, and other sequelae,” “surgery and perioperative care,” and “pain and distress.” Moreover, the *Guide* specifies:

Disease prevention is an essential component of comprehensive veterinary medical care and biosecurity programs. Effective preventive medicine enhances the research value of animals by maintaining healthy animals and minimizing nonprotocol sources of variation associated with disease and inapparent infection, thus minimizing animal waste and potential effects on well-being.

However, PETA's investigator documented serious deficiencies in multiple aspects of WNPRC's veterinary care program, as detailed below.

A. Failure to use appropriate methods to prevent, control, or effectively treat diarrhea in monkeys

Nearly every day, PETA's investigator observed multiple monkeys who had diarrhea. Although WNPRC administered a probiotic or medications such as paromomycin and tylosin to monkeys suffering with diarrhea, many monkeys had intermittent, recurrent or even chronic diarrhea, in some cases, for years. Shockingly, it appears that ██████████, a supervisor in WNPRC's Colony Management team in the Division of Animal Services, was unaware of why so many monkeys at the facility suffered with diarrhea. On April 6,³ when asked why so many monkeys at WNPRC had diarrhea, ██████████ responded: “That's a good question. I have no idea.” She shared that marmosets at WNPRC had bloody diarrhea; and that if the marmosets became “stressed out or sick,” they would get bloody diarrhea. She speculated that the diarrhea might be caused by irritable bowel syndrome, a chronic gastrointestinal issue, or an allergy.⁴

³All dates herein, unless otherwise noted, are in 2020.

⁴Please see Video 2020-04-06_V1, timecodes 1:45 – 2:48 and 3:02 – 4:58.

PETA’s investigator observed the following instances of monkeys with diarrhea. This list is intended to be representative of what our investigator witnessed, but is not an exhaustive accounting of what they observed. Certainly this list only captures a fraction of the pain and discomfort suffered by monkeys at WNPRC because of the facility’s failure to adequately address the prevalence of diarrhea—and the associated issues of weight loss, thin body condition, and rectal prolapse—in monkeys. All of these incidents were recorded in WNPRC’s Electronic Health Records (EHR).

i. Individual monkeys with recurrent or chronic diarrhea:

- a. The monkey with tattoo number rh2519: PETA’s investigator observed that this monkey had diarrhea on April 6; soft feces on April 27, May 4, June 25, and June 30; watery diarrhea on July 2; and soft feces on July 3. This monkey was also observed to have extensive hair loss (please see section on alopecia).
- b. The monkey with tattoo number r16026 (named Pepper by PETA’s investigator): PETA’s investigator observed that this monkey had diarrhea on April 6 (and suffered with diarrhea the previous day as well); and diarrhea or watery diarrhea on April 19, April 22, April 26, May 2, May 3, May 10, May 11, May 17, May 24, June 1, June 6, June 7, June 9, June 14, June 21, June 22, June 28, June 29, July 5, July 8, July 11, July 12, July 13, July 19, July 27, July 29, July 30, August 2, August 3, August 4, August 6, August 9, and August 16.

i. According to EHR:

1. Pepper had chronic diarrhea from April 21, 2017 to June 28, 2017, and this is when fiber was given.
2. According to notations dated May 31, 2018 and February 5, 2019, Pepper was observed as suffering with chronic diarrhea. Based on this information, it would seem that r16026 had suffered with chronic diarrhea for nearly two years.
3. The following notations documented treatments provided to Pepper: azithromycin was given from April 22, 2017 to April 26, 2017, metronidazole was given from June 29, 2017 to July 8, 2017, azithromycin was given from July 21, 2017 to July 25, 2017, a probiotic for diarrhea was given from July 27, 2017 to May 31, 2018, metronidazole was given from August 19, 2017 to August 28, 2017, tylosin was given starting on May 31, 2018, and inulin was given starting on February 5, 2019.

As noted below, Pepper also suffered from weight loss and had to receive supplemental food.

- c. The monkey with tattoo number r13031 (named Ellie by PETA’s investigator): On April 2, while in room B108,⁵ PETA’s investigator observed that this monkey, whom our investigator later named Ellie, was

⁵In the daily parlance of WNPRC’s employees, the rooms in the *annex* basement were referred to as “B108,” “B110,” and so on—and that is how we have referenced the rooms here; technically, these rooms are “AB108,” “AB110,” and so on.

being treated for diarrhea. PETA's investigator observed that Ellie had diarrhea or watery diarrhea on April 14, April 19, April 22, April 26, May 2, May 3, May 10, May 11, May 17, May 24, May 31, June 1, June 6, June 7, June 9, June 14, June 21, June 22, June 28, June 29, July 5, July 19, July 27, July 30, August 2, and August 3. On July 29, Ellie had soft feces. PETA's investigator saw a notation in EHR that Ellie had been battling diarrhea since December 7, 2018. There was always a large amount of watery diarrhea in the cage in which Ellie was confined, along with the monkey with tattoo number r12001 (please see below), who had been battling diarrhea since April 2, 2014.

- i. According to EHR, Ellie was observed to have "diarrhea: acute" on November 7, 2019 that was resolved on November 20, 2019, but the remark column indicated that azithromycin was given to her from November 7, 2019 to November 11, 2019, then again from November 20, 2019 to January 2. During this time, metronidazole was given. Doxycycline was given from January 2 to January 13, supplemental food was given starting on January 2 for weight loss, metronidazole was given from January 14 to January 22, and tylosin was given starting on January 23, with no resolve date. Inulin was given starting on March 30.

As noted below, Ellie also suffered from extensive hair loss and from weight loss, for which she received supplemental food.⁶

- d. The monkey with tattoo number r12001: On April 2, while in room B108, PETA's investigator observed that this monkey was receiving tylosin and inulin fiber bites—and these treatments continued through the months that our investigator observed this monkey. According to EHR, this monkey received azithromycin for acute diarrhea, from April 2, 2014 to April 6, 2014 and again from May 25, 2018 to June 12, 2018, metronidazole was given from June 12, 2018 to June 21, 2018 for recurrent diarrhea, doxycycline was given from July 19, 2018 to August 2, 2018, fiber was started on August 21, 2018, azithromycin was given from May 13, 2019 to May 17, 2019, doxycycline was given from May 21, 2019 to June 18, 2019 for chronic diarrhea, and tylosin was started on July 12, 2019.
- e. The monkey with tattoo number r09059: On April 2, PETA's investigator observed that this monkey, held in room B108 and confined in cage 31, had diarrhea; according to EHR, this monkey had diarrhea the previous day as well. This monkey received chow that was soaked in Ensure to try to address their weight loss. PETA's investigator observed that this monkey had soft feces, diarrhea, or watery diarrhea on April 19, April 26, June 1, and July 5. According to EHR, azithromycin was given to this animal from May 10, 2013 to May 14, 2013, metronidazole was started on May 23, 2013, and doxycycline was given from June 24, 2013 to July 24, 2013. Inulin was given from August 20, 2013 to January 17, 2015, tylosin was given from September 4, 2013 to August 25, 2017, inulin was given from March 25, 2015 to August 25, 2017, metronidazole was given from March 31, 2015 to April 6, 2015 and again from July 15, 2015 to January

⁶Please see Photographs 2020-05-17_1 and 2020-05-17_2.

4, 2017, supplemental food was started on November 3, 2017 due to weight loss, azithromycin was given from April 13, 2018 to April 17, 2018, tylosin was given from April 13, 2018 to October 17, 2018 and started again on December 20, 2018, fiber was started on December 17, 2019 before Giardia, and paromomycin was started on March 18 after Giardia. Metronidazole was given from February 27 to March 18 for “Giardia +.”

- f. The monkey with tattoo number r93050 (named Livingstone, according to a cage tag): PETA’s investigator observed that this monkey, who is caged in room B108, suffered with diarrhea. According to EHR, Livingstone was born on July 11, 1993—and he had been battling diarrhea since April 30, 1999. PETA’s investigator observed that he was usually caged alone, except when he was used for breeding. On June 7, when PETA’s investigator observed Livingstone, he was caged alone.⁷ Numerous times during the months from April to August, PETA’s investigator observed that Livingstone was being treated with tylosin for his chronic diarrhea.
- g. The monkey with tattoo number rh2740: PETA’s investigator observed that this monkey was being treated for diarrhea. According to EHR, azithromycin was given to this animal for acute diarrhea from February 23, 2018 to February 28, 2018 and again from March 8, 2019 to March 12, 2019, metronidazole was given from March 29, 2019 to April 7, 2019, azithromycin was given from July 15, 2019 to July 22, 2019, metronidazole was given from July 22, 2019 to July 31, 2019, and tylosin was started on October 31, 2019.
- h. The monkey with tattoo number r14107: PETA’s investigator observed that this monkey was being treated for diarrhea. According to EHR, this monkey began receiving tylosin for chronic diarrhea on April 9, 2019; and began receiving inulin for the same on August 21, 2017. Azithromycin was given for chronic diarrhea from March 14, 2017 to April 21, 2017. A probiotic was given from April 21, 2017 to June 28, 2017. Fiber was also given from April 21, 2017 to June 28, 2017. Metronidazole was given from June 28, 2017 to July 25, 2017. Azithromycin was given from July 25, 2017 to August 4, 2017. And “TMS” was given from August 4, 2017 to August 21, 2017 for chronic diarrhea.
- i. The infant monkey with tattoo numbers r19019: On May 26, while in room B126, PETA’s investigator observed that the infant monkey with tattoo number r19019 was being caged with an infant with tattoo number r19007, and both were being fed gluten-free chow. The monkey with tattoo number r19019—whom our investigator named Daisy—had watery diarrhea and was being treated for both diarrhea and weight loss. Daisy received her chow soaked in Ensure. According to notations in EHR, she had been given tylosin for acute diarrhea from March 2 to April 24; metronidazole for recurrent diarrhea from March 10 to March 19; and enrofloxacin for chronic diarrhea from April 20 to April 25. She began receiving prednisone on April 27; and fiber bites for chronic diarrhea on March 16. Daisy was born on March 27, 2019, and was just 14 months of

⁷Please see Photograph 2020-06-07_8.

age when PETA's investigator first observed her, but already suffered from chronic diarrhea. Numerous times—including on June 2, June 3, June 10, June 11, June 15, June 17, July 2, July 4, July 8, July 9, July 19, July 21, July 28, August 3, August 9, and August 13—PETA's investigator observed that Daisy had watery diarrhea.

- j. The monkey with tattoo number r02031: On June 15, while in room B110, PETA's investigator observed that this monkey was born on April 4, 2002. She has been afflicted with chronic diarrhea and in June, she was pregnant.⁸
- ii. Notations in EHR document that individual monkeys at WNPRC suffered with diarrhea for extensive periods of time:
 - a. Notations for the monkey with the tattoo number r04034—dated October 21, 2019 and November 15, 2019—specified that this monkey suffered with chronic diarrhea. There was no date under “date resolved.”
 - b. Notations for another monkey with tattoo number r06019—dated March 10, March 18, and March 30—indicated that this monkey suffered from “weight loss,” recurrent diarrhea, and lastly, acute diarrhea.
 - c. Notations for a monkey with tattoo number rh2536—dated July 6, 2018 and October 29, 2018—indicated recurrent diarrhea and “weight loss.”
 - d. The monkeys with tattoo numbers r04147, r04050, r05028, r07028, and r98055 were receiving either a probiotic, tylosin, inulin fiber bite, or some combination of those because of their chronic diarrhea.
 - e. The monkey with tattoo number r04050:
 - first had diarrhea on March 28, 2011 that was resolved on April 4, 2011,
 - then again from May 31, 2013 to June 10, 2013,
 - July 16, 2013 to July 26, 2013,
 - September 21, 2016 to September 25, 2016,
 - November 4, 2016 to November 22, 2016,
 - December 21, 2016 to January 20, 2017,
 - June 27, 2017 to July 14, 2017,
 - June 12, 2018 to July 9, 2018, and
 - October 4, 2019 to October 12, 2019.PETA's investigator observed that this monkey had diarrhea on May 21.
 - f. The monkey with tattoo number r05028—also known as Zak:
 - first had diarrhea on April 18, 2004⁹ that was resolved on October 11, 2007,
 - March 3, 2008 to April 8, 2008,
 - May 30, 2008 to December 26, 2008,
 - September 27, 2010 to November 4, 2010,
 - February 23, 2011 to March 15, 2011,
 - June 2, 2012 to June 11, 2012,
 - August 16, 2012 to August 29, 2012,

⁸Please see Photographs 2020-06-15_16 and 2020-06-15_17.

⁹According to EHR, Zak was born on June 22, 2005—so it appears that there is an error in EHR, either in his birthdate or the date when he was first noted to have diarrhea.

- November 28, 2012 to January 24, 2013,
 - February 28, 2013 to March 18, 2013,
 - July 22, 2013 to August 2, 2013, and
 - August 16, 2013 to September 9, 2013.
- g. The monkey with tattoo number r07028 first had diarrhea on February 18, 2009 that was resolved on June 11, 2010, and for which this animal received “inulin/fiber therapy.” It indicated that this animal had diarrhea and “campylobacter sp” from February 1, 2010 to March 12, 2010. EHR indicated that this animal also had diarrhea from:
- May 4, 2011 to May 17, 2011,
 - August 12, 2011 to September 7, 2011,
 - April 18, 2012 to May 5, 2012,
 - July 30, 2012 to August 1, 2012,
 - February 11, 2013 to February 22, 2013,
 - April 9, 2013 to April 18, 2013,
 - August 7, 2013 to August 16, 2013,
 - December 9, 2013 to December 26, 2013,
 - June 24, 2014 to July 18, 2014,
 - November 21, 2014 to December 3, 2014,
 - February 3, 2015 to February 9, 2015,
 - June 8, 2015 to June 22, 2015,
 - September 11, 2015 to September 18, 2015,
 - November 20, 2015 to November 30, 2015,
 - December 23, 2015 to December 29, 2015,
 - January 27, 2016 to February 9, 2016,
 - April 13, 2016 to April 22, 2016,
 - May 6, 2016 to May 16, 2016,
 - June 27, 2016 to September 8, 2016, and
 - September 30, 2016 to October 18, 2016.

PETA’s investigator observed that this monkey had diarrhea on June 18.

- h. The monkey with tattoo number r98055—also known as Noah—first had diarrhea on May 2, 2000 and it was not marked as “resolved” until August 23, 2014. The remark read “diarrhea-chronic intermittent.” A remark dated March 8, 2004 to June 23, 2004 read “persistent diarrhea.” A remark dated August 9, 2004 to August 23, 2004 read “diarrhea.” EHR also indicated that this animal had diarrhea from:
- May 30, 2006 to June 14, 2006,
 - May 17, 2007 to June 6, 2007,
 - November 4, 2008 to November 10, 2008,
 - January 20, 2009 to February 4, 2009,
 - April 15, 2009 to May 7, 2009,
 - October 29, 2009 to November 10, 2009,
 - March 17, 2010 to March 21, 2010,
 - May 14, 2010 to May 25, 2010,
 - July 22, 2010 to August 19, 2010,

- October 14, 2010 to October 27, 2010,
- April 16, 2011 to April 25, 2011,
- December 13, 2011 to December 22, 2011,
- February 24, 2012 to February 28, 2012,
- July 30, 2012 to August 8, 2012,
- September 5, 2012 to October 3, 2012,
- October 3, 2012 to November 27, 2012,
- January 23, 2013 to February 11, 2013,
- May 1, 2013 to May 24, 2013,
- June 21, 2013 to July 5, 2013,
- December 13, 2013 to December 23, 2013,
- April 4, 2016 to April 27, 2016, and
- June 23, 2016 to July 6, 2016.

PETA's investigator observed that Noah had diarrhea or watery diarrhea multiple times, including on July 22, July 26, August 2, and August 23.

- i. In room B119, PETA's investigator observed a monkey with tattoo number r10036 who was being treated for diarrhea. According to the problem list, this animal was given inulin for diarrhea on February 28, 2012 but the observed and resolved dates were February 7, 2012 and September 5, 2012. Inulin was given to this animal again from January 9, 2013 to August 21, 2017. Azithromycin was given to this animal from February 26, 2013 to March 4, 2013, then again from January 7, 2014 to February 10, 2014. The animal was given inulin for chronic diarrhea from August 30, 2017 to January 12, 2018, then again on April 26, 2018, with no resolved date.
- j. While in room B112, PETA's investigator observed four monkeys with tattoo numbers r17104, r18008, r17105 and r18042 who were being treated for diarrhea. According to the problem list on EHR, the animal with tattoo number r18042 received a fiber bite because of chronic diarrhea. The date for this observation was November 26, 2018, with no resolved date. The animal with tattoo number r17105 received a fiber bite because of chronic diarrhea that had an observation date of September 11, 2018, with no resolved date. The animal with tattoo number r18008 received a fiber bite because of "diarrhea: intermittent." The observation date was September 11, 2018, with no resolved date. The animal with tattoo number r17104 was given a fiber bite for "diarrhea: acute." The observation date was July 17, 2018, with no resolved date.
- k. In room B119, PETA's investigator observed a monkey with tattoo number r02096 who was being treated for diarrhea. According to the problem list, the animal started receiving inulin fiber bites because of chronic diarrhea on March 28, 2014. This animal:
 - first had diarrhea from March 4, 2005 to March 16, 2005,
 - then again from June 9, 2005 to June 22, 2005,
 - April 3, 2006 to May 26, 2006,
 - September 19, 2006 to September 28, 2006,
 - August 1, 2007 to August 7, 2007,

- December 5, 2007 to January 17, 2008,
- March 3, 2008 to March 24, 2008,
- September 25, 2008 to November 28, 2008,
- August 11, 2009 to August 17, 2009,
- June 17, 2010 to June 22, 2010,
- July 17, 2010 to September 2, 2010,
- September 20, 2010 to October 18, 2010,
- December 1, 2010 to December 14, 2010,
- January 26, 2011 to February 7, 2011,
- March 22, 2011 to April 7, 2011,
- July 7, 2011 to August 7, 2011,
- August 8, 2011 to August 18, 2011,
- September 15, 2011 to November 1, 2011,
- February 15, 2012 to February 20, 2012,
- March 2, 2013 to March 11, 2013,
- May 15, 2013 to May 20, 2013,
- July 15, 2013 to July 23, 2013,
- October 14, 2013 to October 28, 2013,
- December 18, 2013 to July 14, 2014,
- February 12, 2015 to April 9, 2016,
- July 18, 2017 to November 28, 2017, and
- January 16, 2018 to June 28, 2019.

It began again on August 2, 2019, with no resolved date. PETA's investigator observed that this monkey had watery diarrhea on April 29, June 11, and July 13.

- l. In room B119, PETA's investigator observed two monkeys, with tattoo numbers r04046 and r12069, who were being treated for diarrhea. According to EHR, the animal with tattoo number r04046 first received azithromycin for diarrhea from March 12, 2018 to March 19, 2018, then from June 12, 2018 to August 24, 2018. This animal received metronidazole from June 12, 2018 to June 21, 2018 and doxycycline from July 26, 2018 to August 12, 2018. He or she then received tylosin for chronic diarrhea from October 17, 2018 to August 30, 2019, then again beginning on October 24, 2019, with no resolved date.
- m. The monkey with tattoo number r04159 first received azithromycin for diarrhea from April 24, 2019 to May 28, 2019, then started to receive tylosin for recurrent diarrhea on June 7, 2019, with no resolved date.
- n. The monkey with tattoo number r16083 began receiving fiber for chronic diarrhea on September 25, 2018; the animal with tattoo number r17019 began receiving inulin for intermittent diarrhea on March 28, 2019; the animal with tattoo number r17017 was given fiber for recurrent diarrhea starting on August 31, 2018; the monkey with tattoo number r17011 began receiving inulin for intermittent diarrhea on March 28, 2019; and the monkey with tattoo number r16109 began receiving fiber for chronic diarrhea on December 13, 2018 and tylosin on January 28. PETA's

- investigator observed that this monkey had watery diarrhea on May 13, June 18, June 23, June 24, July 1, July 12, and July 22.
- iii. The monkey with tattoo number r03077 was first observed to have diarrhea on October 29, 2009. This was resolved on November 10, 2009; but the monkey became afflicted again from December 11, 2009 to February 4, 2010. This monkey received azithromycin for acute diarrhea from October 19, 2017 to October 31, 2017 and from February 1, 2018 to February 5, 2018. Metronidazole was given for recurrent diarrhea from April 25, 2018 to June 6, 2018, then doxycycline for chronic diarrhea from June 6, 2018 to July 3, 2018, then tylosin from July 3, 2018 to July 15, 2019. Then tylosin was started again on September 6, 2019, supplemental food was started on September 6, 2019 for thin body condition, and fiber was started on April 9. PETA's investigator named this monkey Annie and observed that she had watery diarrhea on April 30, May 6, May 14, May 17, May 26, May 31, June 7, June 14, June 21, June 22, June 23, June 28, June 30, July 1, July 2, July 3, July 4, July 5, July 6, July 11, July 12, July 14, July 16, July 26, August 2, and August 16.
 - iv. On March 18, while in room B144, PETA's investigator observed that a female monkey had diarrhea. A member of the training staff named [REDACTED] noted that according to EHR, this animal had also been observed the previous day to have diarrhea.
 - v. On March 19, while in room B161, PETA's investigator observed that one monkey had diarrhea while another had feces stuck on his/her anus. [REDACTED] confirmed that one of these monkeys had been noted in EHR as having had diarrhea the previous day.
 - vi. On March 20, while in room B108, PETA's investigator observed that three monkeys had diarrhea. Later, a monkey was observed to have vomited and had a large amount of watery diarrhea. Upon the instruction of training coordinator [REDACTED], PETA's investigator added this observation into EHR.
 - vii. On March 23, while in room B110, PETA's investigator observed that two monkeys had diarrhea. According to EHR, these animals had previously had diarrhea. Later that day, PETA's investigator observed that two other monkeys in this same room had diarrhea.
 - viii. On March 24, while in room B108, PETA's investigator observed a monkey who had diarrhea. According to EHR, this animal had diarrhea the previous day as well. Later in the day, PETA's investigator observed a second monkey in this room who had diarrhea.
 - ix. On March 25, while in room B110, PETA's investigator observed two monkeys who had diarrhea. According to EHR, these animals had diarrhea the previous day as well. Later that day, PETA's investigator observed that another monkey in this same room had diarrhea.
 - x. On March 26, while in room B110, PETA's investigator observed diarrhea in a cage confining two monkeys. This was the same cage where monkeys had been observed the previous morning to have diarrhea. Later in the day, again in room B110, PETA's investigator observed that a different monkey had diarrhea.
 - xi. On March 27, while in rooms B140 and B142, PETA's investigator observed that a monkey in each room had diarrhea; both of these monkeys were caged with another animal and it was difficult to discern which monkey was afflicted.

- xii. On March 30, while in rooms B161, PETA's investigator observed that two monkeys in this room had diarrhea. According to EHR, these animals had diarrhea the previous day as well. The same day, while in room B163, PETA's investigator observed diarrhea in two cages; as there were multiple monkeys in each cage and it was difficult to discern which monkey was afflicted, these incidents were entered as cage observations. Later in the day, PETA's investigator observed that in room B161, one of the monkeys who had diarrhea earlier in the day continued to suffer with diarrhea.
- xiii. On March 31, while in room B161, PETA's investigator observed that the two monkeys who were noted to have diarrhea the previous day continued to suffer with diarrhea. Later in the day, PETA's investigator observed that one of the monkeys in room B161 who had diarrhea earlier in the day continued to suffer with diarrhea.
- xiv. On April 2, while in room B108, PETA's investigator observed that two monkeys had diarrhea. One was in cage seven (either r13031 or r12001); a cage observation from the previous day also indicated that one of the monkeys in this cage had diarrhea. The other was in cage 31 (monkey r09059); according to EHR, this monkey had diarrhea the previous day as well.
- xv. On April 3, while in rooms B140 and B142, PETA's investigator observed diarrhea in one cage in each room. Each cage confined two monkeys, so the diarrhea was noted as a cage observation for both cases. According to EHR, these cages had been noted for diarrhea the previous day as well. Later in the day, while in these rooms, PETA's investigator observed that the same monkeys who had diarrhea earlier in the day still had diarrhea.
- xvi. On April 6, while in room B110, PETA's investigator observed that two monkeys had diarrhea. One of these animals was caged with another monkey, so this was entered into EHR as a cage observation—and according to EHR, a monkey in this cage had suffered with diarrhea the previous day as well.
- xvii. On April 8 and again on April 9, while in room B110, PETA's investigator observed that a monkey, caged with another animal, had diarrhea. According to EHR, this same cage had been flagged the previous day as confining a monkey with diarrhea. A monkey with tattoo number rh2551, afflicted with chronic diarrhea—according to EHR—was given an inulin fiber bite and a probiotic.
- xviii. On April 9, PETA's investigator observed a monkey with tattoo number rh2551 who suffered with chronic diarrhea and monkeys with tattoo numbers r16004 and r16029 who suffered with recurrent diarrhea, according to EHR. Later in the day, while in room B110, PETA's investigator observed that a monkey with tattoo number r10012 had diarrhea, while a monkey in cage 5 had soft feces.
- xix. On April 10, while in room B119, PETA's investigator observed that a monkey in cage 7 had diarrhea; as it was not clear which animal had diarrhea, this was entered as a cage observation in EHR. Later in the day, while in room B119, PETA's investigator observed that a monkey in cage 33 had diarrhea. Since it was not clear which animal in this cage had diarrhea, this was entered as a cage observation.
- xx. On April 13, while in room B110, PETA's investigator observed a monkey who had diarrhea. As this animal was housed with another monkey, the issue was entered as a cage observation. PETA's investigator also observed that in this

- room, an animal with tattoo number r03168 had soft feces; according to EHR, this monkey had also been observed to have soft feces the previous day.
- xxi. On April 14, while in room B108, PETA’s investigator observed two monkeys who had diarrhea and one monkey who had soft feces. These animals were each housed in a cage with another monkey. Since it was not possible to identify which animal had diarrhea or soft feces, these incidents were entered as cage observations in EHR, where PETA’s investigator observed notations indicating that an animal in these cages had diarrhea the previous day and that one animal had soft feces.
 - xxii. On April 16, PETA’s investigator observed that two monkeys in room B110 had diarrhea. As these animals were caged with others, it was not possible to identify which monkey had diarrhea. According to EHR, an animal in each of these cages had diarrhea the previous day.
 - xxiii. On April 17, while in room B119, PETA’s investigator observed diarrhea in two cages. As these monkeys were caged with others, these incidents were entered as cage observations. Later in the day, while in room B112, our investigator observed that the monkeys with tattoo numbers r17105, r18008, r17104, and r18042—noted earlier to have diarrhea—were receiving inulin fiber bites for this condition. PETA’s investigator observed that according to EHR, the animal with tattoo number r17105 started to receive inulin on September 11, 2018 for chronic diarrhea; the animal with tattoo number r18008 started to receive inulin on September 11, 2018 for intermittent diarrhea; the animal with tattoo number r17104 started to receive inulin on July 17, 2018 for acute diarrhea; and the animal with tattoo number r18042 started to receive inulin on November 26, 2018 for chronic diarrhea.
 - xxiv. On May 10, while in room B120, PETA’s investigator observed that the monkey with tattoo number r16003 was being treated for diarrhea. According to EHR, this animal started receiving inulin for “diarrhea: Acute” on August 4, 2016; azithromycin from July 27, 2019 to July 31, 2019 for “diarrhea: Acute”; and metronidazole for “diarrhea: Chronic” from March 28 to April 6. She was started on tylosin on April 15. The same day, in the same room, PETA’s investigator observed that the monkey with tattoo number r16078 was also being treated for diarrhea; this animal started to receive fiber for chronic diarrhea on December 13, 2018.
 - xxv. On July 3, while in room B163, PETA’s investigator observed that the monkey with tattoo number r06005 had soft feces; the monkey with tattoo number r03041 had watery diarrhea; and the monkey with tattoo number rhbd72 had diarrhea.
 - xxvi. On July 4, July 6, July 26, August 2, and August 16, while in room B165, PETA’s investigator observed that the monkey with tattoo number r05017 had diarrhea.
 - xxvii. On July 20, while in room B163, PETA’s investigator observed that the monkey with tattoo number r06005 had soft feces, while the monkey with tattoo number r03041 had watery diarrhea.

B. Failure to ensure that animals maintain a healthy weight

PETA’s investigator observed the following instances of monkeys who required food supplementation, in most cases because they were losing weight. For some of these

monkeys, their weight loss and inability to thrive may have been connected with recurrent or chronic diarrhea. And for some of these monkeys, years of food supplementation failed to resolve their poor bodily condition. This is just a sampling of what PETA's investigator observed at WNPRC.

- i. The monkey with tattoo number r97005: On April 9, while in room B110, PETA's investigator observed that this monkey was being given chow soaked in water. According to EHR, this was an attempt to address the weight loss that had been observed on July 20, 2016, but for which there was no date of resolution. On multiple instances during April, May, June, and July, when PETA's investigator was in room B110, they observed that this monkey was scheduled to receive supplemental food and also was given chow soaked in either water or juice. This monkey was born on February 23, 1997; and three of his canine teeth had been extracted. He was usually caged alone, except when he was used for breeding.¹⁰
- ii. The monkey with tattoo number r97075: On April 13, while in room B110, PETA's investigator observed that this monkey had started receiving supplemental food due to a "thin body condition." The monkey's body condition appeared to score 2 on the scale described in [this 2012 paper](#). This monkey was born on September 2, 1997; and was usually caged alone, except when used for breeding.¹¹
- iii. The monkey with tattoo number rh2532: This female monkey, named Maya, is caged in room B163, and was previously caged in room B110 and B118. According to EHR, Maya is 14.8 years of age and is being, or had been, used in a study titled, "impact of SIV infection on congenital ZIKA syndrome." The anti-HIV drug raltegravir is mixed in with her food. She is missing most of her hair (please see the section on alopecia) and started receiving supplemental food because of "thin body condition," but is still used for breeding. On numerous occasions from April through August, PETA's investigator observed that this monkey was receiving supplemental food.
- iv. The monkeys with tattoo numbers r16060 and r16109: On April 17, while in room B118, PETA's investigator observed that two monkeys—one with the tattoo number r16060 and the other with the tattoo number r16109—had a body condition that appeared to score 2 on the chart referenced earlier. These monkeys were receiving supplemental food, but in spite of this, one monkey's ribs were somewhat prominent.
- v. The monkey with tattoo number rh2819 (Sainte): According to EHR, on July 22, Sainte was identified as scoring 2 on the chart referenced earlier—and began receiving supplemental food. A notation dated August 12 described Sainte as having a thin body condition.
- vi. Notations in WNPRC's EHR document that some monkeys had been receiving food supplementation for years: PETA's investigator also observed such supplementation over the period from April through August.

¹⁰Please see Photographs 2020-06-15_01 and 2020-06-15_02.

¹¹Please see Photographs 2020-06-15_06 and 2020-06-15_08.

- a. According to EHR, the monkey with tattoo number rh2735 began receiving supplemental food because of a thin body condition, which was first observed on February 21.
 - b. According to EHR, the monkey with tattoo number rh2804 began receiving supplemental food, because of weight loss, on September 23, 2019. She appeared to score 2 on the scale referenced earlier, and was also given chow soaked in Ensure.
 - c. According to EHR, the animal with tattoo number rh2786 began receiving supplemental food on October 11, 2018 because of weight loss. This animal's body condition appeared to score 2 on the scale referenced earlier.
 - d. According to EHR, the monkey with tattoo number r04144 began receiving supplemental food on January 8, 2012 because of weight loss. In June, this monkey was observed to have watery diarrhea.
- vii. Additional monkeys: In addition, PETA's investigator observed that the monkeys with the following tattoo numbers received supplemental food at WNPRC because of their thin body condition or weight loss. Several of these monkeys also suffered with intermittent, recurrent, or chronic diarrhea.
- a. rh2536
 - b. rh2571
 - c. rh2736
 - d. rh2741
 - e. rh2751
 - f. rh2758
 - g. rh2760
 - h. rh2798
 - i. rh2806
 - j. rh2808
 - k. rh2936
 - l. rh2937
 - m. rh2938
 - n. rh2939
 - o. rh2941
 - p. rh2963
 - q. rh2968
 - r. r02027
 - s. r02096
 - t. r03077 (Annie)
 - u. r04034
 - v. r04144
 - w. r06019
 - x. r07031
 - y. r09059
 - z. r12019
 - aa. r12027
 - bb. r12028
 - cc. r13031 (Ellie)

dd. r14107
ee. r14112
ff. r15087
gg. r16026 (Pepper)
hh. r16078

C. *Failure to use appropriate methods to prevent injuries in monkeys*

As evidenced by the incidents described below, WNPRC failed to implement elementary measures to prevent monkeys from sustaining injuries. When monkeys became injured, it did not appear that much effort was taken to try to determine the cause of the injury to prevent such incidents from reoccurring. In some cases, employees knowingly left monkeys in circumstances where they were vulnerable to injury. Some of the injuries described below may have occurred as a result of incompatible monkeys being caged together; and such actions would also be a noncompliance of the section of the *Guide* that advises that “[s]ocial animals should be housed in stable pairs or groups of compatible individuals.” In many cases, there was no discussion on how to prevent future such incidents—leaving the animals vulnerable to further injury. The observations described below are just a sampling of the incidents that PETA’s investigator witnessed and not an exhaustive accounting.

- i. The monkey with tattoo number r04054:
 - a. On April 16, while in room B110, PETA’s investigator observed that a monkey with tattoo number r04054 had an open wound, approximately 5 inches long, on her back.¹² According to EHR, this monkey was observed with “cutaneous swelling and eschar formation on mid-upper dorsum” on April 13. [REDACTED], a laboratory technical support supervisor at WNPRC, explained that this monkey had an abscess that had been drained the previous day. It was not clear what caused the abscess in the first place.
 - b. On August 3, PETA’s investigator observed that this monkey was receiving pain medication for trauma to her tail. According to notations in EHR, the monkey suffered wounds and multiple lacerations on her tail on or about July 30. These required suturing, and the animal was being monitored.
- ii. The infant monkey with tattoo number r19045:
 - a. On April 17, while in room B119, PETA’s investigator observed that an infant monkey with tattoo number r19045 had a wound on the top of his left hand. This wound measured approximately 1 centimeter and it appeared that the skin was lifted open.¹³
 - b. On April 21, PETA’s investigator observed that this infant still had the same wound.¹⁴ According to the clinical remarks on EHR, under “subjective/objective,” it indicated, “reported for wound on left hand, 5mm abrasion on dorsal left hand over metacarpal 4 near metacarpophalangeal joint. Mild erythema and minimal swelling present

¹²Please see Video 2020-04-16_V1, 5:29 – 5:56.

¹³Please see Video 2020-04-17_V10, 0:02 – 0:25.

¹⁴Please see Video 2020-04-21_V5, 0:00 – 0:25.

around wound. No discharge from wound. Using left hand normally.” Under “assessment,” it indicated, “minor trauma, will heal without intervention. Wound may be from dam, adult partner or incidental cause.” Under “plan,” it indicated “no action indicated” and the status read “completed.” There was no indication that this animal received pain relief, topical ointment, or any other treatment for this wound.

- c. On June 17, PETA’s investigator observed that this monkey had a scratch on his face and on his head. He also had peeling skin in between his nostrils.¹⁵

iii. The monkey with tattoo number r10036:

- a. On April 17, while in room B119, PETA’s investigator observed that the monkey with tattoo number r10036 had an open wound on her lower back. This wound was not actively bleeding, but had a diameter of 1 inch. It was white and it appeared as if the top layer of the skin was gone.¹⁶ ██████████ ██████████ opined that this wound did not appear to be new; however, the wound had not been entered into EHR. ██████████ said that in February, “lots of wounds” had been reported for the monkey with tattoo number r10036.¹⁷ ██████████ also said that this monkey had “multiple wounds,” but the one on the lower back was “more open.”¹⁷
- b. On April 21, PETA’s investigator observed that this monkey still had the wound on her lower back, but instead of being white, the wound had turned brownish red. Notations on this injury in EHR read, “reported for wound on lower back. 2cm by 5 mm wound granulating wound on lower dorsum. Several small abrasions on cranial right thigh and right upper dorsum ... minor trauma from partner wounds will heal without intervention.” Under “plan,” it read “no action indicated” and under status it read “completed.” There was no indication that this animal received pain relief, topical ointment or any other treatment for this wound. PETA’s investigator also observed a small scab on the monkey’s right upper leg.¹⁸
- c. On April 29, PETA’s investigator observed that this monkey had an open wound on her right thigh that was actively bleeding.¹⁹ A notation in EHR, dated April 27, reported “an open cut on right thigh on 4/26, observed a scratch ~ 1 cm on the lateral thigh”—but also concluded that there was no need for intervention. PETA’s investigator called and spoke to ██████████ ██████████, a veterinarian at WNPRC regarding this monkey.

iv. Anesthetized monkey left unattended:

- a. On April 21, while in room B119, PETA’s investigator observed a worker who appeared to have anesthetized a monkey and removed the monkey from the cage. Approximately 10 minutes later, the worker placed the monkey back in the cage. The monkey had not recovered from anesthesia as yet, and was lying—unattended—on the metal floor of the cage on their

¹⁵Please see Photographs 2020-06-17_1, 2020-06-17_2 and 2020-06-17_3.

¹⁶Please see Video 2020-04-17_V11, 0:06 – 0:12.

¹⁷Please see Video 2020-04-17_V11, 2:19 – 10:01.

¹⁸Please see Video 2020-04-21_V3, 0:01 – 0:09.

¹⁹Please see Video 2020-04-29_V2, 4:54 – 5:00.

side, slowly moving their arms and legs.²⁰ Leaving an anesthetized animal unattended jeopardizes the safety of the animal and does not accord with current established veterinary medical procedures for post-procedural care.

v. The monkey with tattoo number r16029:

- a. On April 27, while in room B110, PETA's investigator observed that the monkey with tattoo number r16029 had several scabs and an open wound, approximately 2 centimeters in diameter on his left thigh. Later in the day, this monkey was seen scratching at this wound. There were also several scabs on his tail.²¹ According to a notation for this monkey in EHR, dated April 20:

Evaluated for reported trauma and worsening wounds to dorsum. Sedated to fully evaluate and clean wounds. There is generalized trauma varying ages present on the head, dorsum, tail and all four [limbs]. The majority of these are scabbed and healing. There are several newer puncture wounds. Dorsum: single wound on right lateral dorsum and 2 on left lateral dorsum, all ~1cm~ these do not appear to communicate. The caudal most wound on the left lateral dorsum surrounded by bruising and moderate erythema. Left rump/hip: three smaller wounds <0.5cm that communicate. There are also newer, but superficial, wounds mid-tail and to the top of the head.

PETA's investigator also observed a scab on top of the monkey's head. The report stated that the wounds were most likely caused by a "dominant cage mate." While the pair was separated when the trauma was reported, had WNPRC observed earlier that the two monkeys were incompatible, monkey r16029 would have been spared the pain and distress of the assault.

- b. On May 4, PETA's investigator noticed that this monkey's wounds were still healing.²² There were several new notations in EHR for this monkey. A notation dated April 27 indicated that most of the wounds on the monkey's body had closed, although the wounds on the lower right dorsum were open. This monkey was reported for diarrhea on April 29, and was observed to be "picking at scab on left hip." Also: "Wound on left hip is open about 2 cm in diameter ... 6 reports of diarrhea in the past week ... Persistent diarrhea."

vi. The monkey with tattoo number rh2514:

- a. On April 29, while in room B119, PETA's investigator noticed that an observation in EHR from the previous day indicated that the monkey with tattoo number rh2514 was now singly housed "due to injury" and "wet cuts on R ear and tail." The clinical remarks for this animal, under subjective/objective, indicated that on April 27, she was "reported for an inch surface scratch on left leg. Observed a scratch ~1 inch in length lateral aspect of left leg. Slight erythema, no swelling or discharge. Animal appeared BARH [bright, alert, responsive, hydrated], took treats

²⁰Please see Video 2020-04-21_V1, 0:06 – 1:05.

²¹Please see Video 2020-04-27_V1, 0:02 – 0:26.

²²Please see Photographs 2020-05-04_07, 2020-05-04_08, 2020-05-04_09 and 2020-05-04_10.

readily.” Under assessment, it indicated, “confirmed minor trauma, adult cage mates appear amicable. Wound will heal without intervention.” Under plan, it indicated, “NAI.” On April 28, under subjective/objective, it indicated, “reported for wet cuts on right ear and tail, observed wounds on the head, dorsum, both lateral thighs, distal tail and arms. All wounds are becoming scabbed and dry-trauma possibly happened overnight. Animal appeared BARH, took treats readily.” Under assessment, it indicated, “confirmed trauma likely from cagemate, pair separated.” While the pair was separated when the trauma was reported, had WNPRC observed earlier that the two monkeys were incompatible, monkey rh2514 would have been spared the pain and distress of the assault.

vii. The monkey with tattoo number r12050:

- a. On April 29, while in room B119, PETA’s investigator noticed that the monkey with tattoo number r12050 had an open wound on his inner left thigh. According to a notation in EHR from the previous day, this monkey had sustained a 4 centimeters-long laceration to the leg left. The monkey was sedated for an examination. The assessment read: “Suspect SIB [self-injurious behavior] due to cage wash.” Later in the day, PETA’s investigator observed this monkey scratching and picking at the open wound on the inside of his left thigh.²³ The monkey also moved his head down, as if he was going to bite at the wound. Although the laceration was sutured, there was no discussion how to prevent future incidents of self-injury with this monkey.

viii. The monkey with tattoo number rh2517:

- a. On May 19, while in room B144, PETA’s investigator observed that the monkey with tattoo number rh2517 had an open wound that was approximately 1 inch in diameter at the top of her head. Our investigator reported this wound on EHR. However, on May 24, they noticed that there were no clinical remarks on EHR that indicated this wound was looked at by veterinary staff. The monkey was caged just with her infant, and the wound appeared the same condition on May 24 as it had five days earlier.²⁴
- b. On May 26, PETA’s investigator checked EHR for any update on the status of this monkey and noticed the following clinical remarks dated May 22: “Animal reported for scab or wound on top of head. Observed ~7 mm open dry scab on the back of head.” And on May 26: “Observed a dime-sized superficial wound on top of head. Edges toward right side of wound were slightly raised.” It appears that the veterinary staff did not check on this monkey until three days after our investigator reported the wound.

ix. The infant monkey with tattoo number r19112 (named Cocoa by PETA’s investigator):

- a. On June 14, while in room B144, PETA’s investigator observed that this infant had sustained injuries on her face and the top of her head.²⁵ Cocoa

²³Please see Video 2020-04-29_V2, 2:10 – 4:15.

²⁴Please see Photographs 2020-05-24_15 and 2020-05-24_17.

²⁵Please see Photographs 2020-06-14_2, 2020-06-14_3 and 2020-06-14_7. Please also see Video 2020-06-14_V2.

was receiving ketoprofen injections for the injuries, so our investigator requested the assistance of an animal research technician named [REDACTED] with the injection.

b. PETA's investigator learned from [REDACTED] that Cocoa's mother and her adult cage mate had gotten into a fight and the cage mate got ahold of the infant and injured her.

c. According to notations in EHR, on June 12:

[Cocoa had been] sedated for wound repair following trauma from adult partner. 1cm lacerating through skin with some muscle tearing on top of head dorsal to right brow. 2 lacerations on top of head with small band of tissue between them; laceration was 4 cm long when tissue was trimmed. Two puncture wounds near right temple. 3 mm wide by 1 cm long flap of skin on upper eyelid extending near lateral canthus towards medial canthus. Moderate bruising and swelling on left cheek with 1 cm area of darker bruising. Bruising, swelling, and moderate erythema on brows. 1 cm [abrasion] on right hip. No neurologic signs noted before sedation.

The wounds were sutured, medications were prescribed to address pain and inflammation, and Cocoa was "separated from adult and infant partners," although she was kept paired with her mother. According to notations in EHR, Cocoa's "prolonged recovery may have been related to hypothermia since dam was not holding infant." The notes also indicated that her mother's behavior toward Cocoa alternated between grooming and threatening. However, PETA's investigator saw Cocoa's mother holding her and did not see the behaviors that were noted on EHR. Later on June 14, our investigator witnessed Cocoa's mother picking at her wounds; and also saw that Cocoa had discharge on the inner corner of her right eye.

d. On June 28, PETA's investigator observed that the wound on Cocoa's head still did not appear to be closed.²⁶

e. By August 13, it appears that the wound on Cocoa's head had scabbed. However, her mother appeared to be missing part of her left ear.²⁷

x. PETA's investigator also observed that the following monkeys had sustained injuries:

a. On April 30, PETA's investigator observed that the monkey with tattoo number r16069 was being treated with an antibiotic for a puncture wound to the groin area. This monkey was caged with another monkey.

b. On May 2, while in room B161, PETA's investigator observed that the monkey with tattoo number r08060 had two small scratches on her face; and on May 12, our investigator observed that the same monkey had a small scab on the right side of her head.

c. On May 2, while in room B161, PETA's investigator observed that the monkey with tattoo number rh2800 had a small scab below his or her nose.

²⁶Please see Video 2020-06-28_V3, 0:00 – 0:20.

²⁷Please see Video 2020-08-13_V2, 0:00 – 0:21.

- d. On May 4, while in room B110, PETA's investigator observed that the monkey with tattoo number rh2519 had dried blood below her nose.
- e. On May 5, while in room B118, PETA's investigator observed that the monkey with tattoo number r16094 had a small scratch on the left side of his nose.
- f. On May 5, while in room B118, PETA's investigator observed that the monkey with tattoo number 17006 had a small scratch next to his right eye; and on May 13, our investigator observed that the same monkey had a large scratch on his chest that was approximately 3 inches long.
- g. On May 5, while in room B118, PETA's investigator observed that the monkeys with tattoo numbers r18075 and r18091 each had a small scab next to their right eye; and on May 13, the monkey with tattoo number r18075 had a scab next to his right eye, while the monkey with tattoo number r18091 had a scab on his left elbow. In the same room, on May 5, PETA's investigator observed that the monkey with tattoo number r18076 had a small scratch below his left eye; on May 20, this monkey had a scab on his head.
- h. On May 7, while in room B113, PETA's investigator observed that the monkey with tattoo number r19017 had two small scratches in between his/her eyes.
- i. On May 11, while in room B113, PETA's investigator observed that the monkey with tattoo number r18097 had a scratch below his right eye; and in room B120, the monkey with tattoo number r16095 had a small scratch on his nose. Also, in room B113, the monkey with tattoo number r19038 had a scratch next to and above her right eye, a scratch next to her left eye, two small scratches on her left ear and one small scratch on her inner right thigh. On June 7, PETA's investigator observed that this monkey had some redness around her right eye.
- j. On May 13, while in room B118, PETA's investigator observed that the monkey with tattoo number r17016 had a scab next to his left eye; the monkey with tattoo number r17012 had a small scratch on his nose; the monkey with tattoo number r18098 had a small scab on his inner left arm; and the monkey with tattoo number r18075 had a scab next to his right eye.
- k. On May 14, while in room B111, PETA's investigator observed that the monkey with tattoo number rh2972 had a scratch above her right eye. In room B144, the monkey with tattoo number r12075 had a scratch above her right eye.
- l. On May 17, while in room B113, PETA's investigator observed that the monkey with tattoo number r19037 had a scratch above her left eye, while the monkey with tattoo number r19020 had a scratch on each cheek.
- m. On May 17, [REDACTED] informed PETA's investigator that an infant monkey in room B119, cage 7 and with tattoo number r20002 would be receiving an injection the following day. According to EHR, this monkey was reported on May 11 "for an open cut on left arm, observed a laceration ~2 inches mid forearm. Majority of laceration hidden by dam's arm." Also: "Confirmed trauma, suspect accidental injury from enclosure

or adult animal in group.” An update that was provided on May 13 stated: “Laceration remains open ... possible infection starting.” And on May 14: “Sedated to examine wound on left forearm. Wound is 4 cm long and extends from lateral left forearm to cranial left forearm near elbow. Wound is through skin only with a 1 cm flap along the length of the distal margin of wound ... Wound may be from adult partner, from arm being caught and then released in the enclosure, or less likely from dam.” The wound was sutured.

- n. On May 18, PETA’s investigator observed that in room B110, the monkey with tattoo number r97075 had a scab above his right eye; while in room B140, the monkey with tattoo number r20023 had a small scratch above his right eye.
- o. On May 19, while in room B144, PETA’s investigator observed that the monkey with tattoo number r03122 had a scratch above her left eye.
- p. On May 20, while in room B118, PETA’s investigator observed that the monkey with tattoo number r18086 had a scratch next to his left eye; the monkey with tattoo number r18076 had a scab on his head; the monkey with tattoo number r17078 had red marks on his left eyelid; and the monkey with tattoo number r18098 had a scab above both eyes.
- q. On May 24, while in room B144, PETA’s investigator observed that the monkey with tattoo number r11009 had a red mark on her right cheek.
- r. On May 31, while in room B113, PETA’s investigator observed that the monkey with tattoo number r19003 had a small scratch on her nose; while the monkey with tattoo number r19037 had a scratch below her left eye.
- s. On June 1, in room B120, animal technician [REDACTED] and [REDACTED] from the behavior team were attempting to put monkeys into a transport box. [REDACTED] pointed to one of the monkeys in the room and said that he was “the worst to get out.” This monkey had a tattoo number that ended in 95. [REDACTED] said that because the monkey had been used in many blood draws and other “bad” procedures, the monkey was “freaked” out and had started “beating the s**t” out of his cage mates. Although [REDACTED] was aware of this issue, she hadn’t taken preventative action to protect the other monkeys who were caged with this one.²⁸
- t. On June 2, a mother monkey and her infant were placed in the cage restraint device so that workers could feed the baby. Video footage of this episode documents blood or scratches on the mother’s face.²⁹
- u. On June 7, while in room B113, PETA’s investigator observed that the monkey with tattoo r19038 had some redness around her right eye.
- v. On June 7, while in room B144, PETA’s investigator observed that the infant monkey with tattoo number r19088 had an approximately 2 centimeter-long scratch above his right eye.
- w. On June 8, while in room B142, PETA’s investigator observed that the monkey with tattoo number r09048 had an approximately 1 inch open wound on her chest.

²⁸Please see Video 2020-06-01_V2, 9:01 – 10:00.

²⁹Please see Video 2020-06-02_V1, 7:54 – 7:58.

- x. On June 11, while in room B119, PETA’s investigator observed that the monkey with tattoo number rh2750 had dried blood on her face.³⁰ At our investigator’s request, a veterinary technician examined the monkey and said it appeared that she cut her brow. In the same room, PETA’s investigator observed that the monkey with tattoo number rh2533 was being given meloxicam for a “partial closure of open wound on R lateral rump/proximal thigh,” according to the problem list on EHR. The monkey with tattoo number r14087 was scheduled to be given metronidazole for a wound on his left leg, according to EHR; this wound had been sutured up. On August 23, PETA’s investigator observed that this monkey (tattoo number r14087) had a wound on his back that was open and wet. According to EHR, a notation dated August 10 indicated that a 3-inch laceration was observed on this monkey’s right lateral side: “Per veterinarian, sedated for assessment and wound repair. Previous sutures near right elbow were opened with granulation tissue already formed on wound. Left elbow wound to heal by second intention.” The wounds were determined to have been from the monkey’s cagemate.³¹ On August 25, the wound on this monkey’s back still appeared wet.³²
- y. On June 18, while in room B118, PETA’s investigator observed that the monkey with tattoo number r18084 had a small scratch on his nose and a scab above his right eye. Also, our investigator noticed that the monkey with tattoo number rhbm64 had blood on his hands, and he had smeared blood on the bottom of the cage and the solid part of the cage well. He was also licking a finger on this hand and appeared to be favoring this hand.³³ On June 23, PETA’s investigator observed that this monkey was using his left hand normally. According to a June 18 entry in EHR for this monkey, “reported for trauma on left hand. 5 mm wound on medial left hand over p2. Dried blood also present on medial d3 left hand but no wounds visible. No swelling around wound. Animal mildly favoring left hand.”
- z. On June 21, while in room B108, PETA’s investigator observed that the monkey with tattoo number rh2936 was being treated with meloxicam and cephalixin. According to EHR, on June 18, this monkey was “reported for trauma from breeding male. 1.5 cm laceration through skin and muscle on caudolateral left upper arm.” The wounds were sutured. This monkey was also receiving supplemental food, presumably to address weight loss.
- aa. On June 21, while in room B144, PETA’s investigator observed that the monkey with tattoo number r09074 had a scratch on her forehead, approximately 1 inch in length. On June 28, our investigator observed that this monkey still had the scratch on her forehead and there was also redness around the scratch.³⁴

³⁰Please see Photographs 2020-06-11_1 and 2020-06-11_2.

³¹Please see Video 2020-08-23_V2.

³²Please see Video 2020-08-25_V2.

³³Please see Videos 2020-06-18_V1 and 2020-06-18_V2.

³⁴Please see Video 2020-06-28_V4, 0:00 – 0:19.

- bb. On June 23, while in room B118, PETA's investigator observed that the monkey with tattoo number r17017 had a scratch on the right side of his lower back.
- cc. On June 24, while in room B118, PETA's investigator observed that the monkey with tattoo number r17078 had a small scratch on his nose, a small scratch in between his brows, a small scratch on his head, and a small scratch on his right eyelid; the monkey with tattoo number r18086 had a scratch below his right eye; and the monkey with tattoo number r18098 had a scratch on his left cheek pocket, a scab on the back of his neck and some redness on the back of his head.
- dd. On June 25, while in room B110, PETA's investigator observed that in a cage confining the monkeys with tattoo numbers r11091 and r13039, the monkey with tattoo number r11091 had a small amount of dried blood on her left cheek and two small scratches on her face. According to the previous day's observations, this monkey had "abrasion/scrapes left side of face, cut on bottom right foot." According to EHR, the wounds appeared to be "trauma sustained from partner." The monkeys had been separated, but were caged back together on June 25. The animal with tattoo number r13039 had a small amount of dried blood on her face and an approximately 1 inch scratch on her chin. The previous day's observations for this animal indicated, "cuts on chin, puncture behind L ear, bruised bite marks on dorsum and right forearm/shoulder." PETA's investigator was unable to see the bruises and punctures on this animal because she was holding her infant in a corner. On July 9, PETA's investigator observed that the monkeys with tattoo numbers r11091 and r16088 were both receiving meloxicam. Notations in EHR for the monkey with tattoo number r11091 indicated that on July 6, the monkey was "reported for trauma on foot, observed traumatic amputation of d3 left foot at proximal interphalangeal joint." PETA's investigator observed that this animal was missing half of her third toe on her left foot. She was still caged with her partner (the monkey with tattoo number r13039)—with whom she had a fight on June 24, resulting in wounds to both animals. On July 23, PETA's investigator observed that the monkey with tattoo number r11091 was caged alone. According to EHR, on July 5, the monkey with tattoo number r16088 was "reported for wounds on tail ... observed abraded skin on the distal 1-2cm of tail." Mild bleeding was noted, and the assessment was made: "Multiple skin wounds likely sustained from partner." And on July 9: "recheck of distal tail amputation."
- ee. The monkey with tattoo number r13031 (Ellie):
 - i. On June 28, while in room B108, PETA's investigator noticed in EHR that a notation had been added for the monkey with tattoo number r13031 (Ellie). On June 23, a worker had entered that Ellie's left ear had been bitten and the tip was missing: "Notified from animal care staff about trauma to left pinnae, observed slight bleeding from pinnae margin. Wound on pinnae margin ~1 inch in length ... Minor trauma from partner." A notation from June 26

- indicated that Ellie had scratches on her face and arms; and on June 27, there was a report that she had small scratches on her face, back, and ears. PETA’s investigator observed that all of these scratches were now scabbed—but Ellie had not been separated from her partner.³⁵
- ii. On June 29, PETA’s investigator observed that Ellie’s ears and the top of one shoulder were bleeding; and there was blood all over the cage. There were also puncture wounds on Ellie’s right arm. The monkey with tattoo number r12001, Ellie’s partner, had blood on her chin and left hand.³⁶ PETA’s investigator separated the animals and alerted one of the veterinarians.
- ff. On July 11, while in room B113, PETA’s investigator observed that both eyes of the monkey with tattoo number r19052 appeared swollen and red. This monkey was also shaking her head and rubbing her eyes, which appeared to be slightly closing.³⁷ During the afternoon checks, PETA’s investigator observed that this monkey’s eyes appeared less red, but she was still rubbing her eyes and shaking her head. On July 12, PETA’s investigator observed that this monkey’s eyes appeared to be better, with just a small amount of pink around the eyes. Also, the monkey was not rubbing her eyes or shaking her head. It was not determined what caused the seeming pain and discomfort to the monkey’s eyes.
 - gg. On July 12, while in room B118, PETA’s investigator observed that the monkey with tattoo number r17016 had a scratch on his left eyelid; and the monkey with tattoo number r17078 had a small scratch on his nose.
 - hh. On July 13, while in room B119, PETA’s investigator observed that the monkey with tattoo number r19106 had scratches on top of his head.³⁸
 - ii. On July 15, while in room B120, PETA’s investigator observed that:
 - i. The animal with tattoo number r17029 was receiving meloxicam. According to EHR, on July 5, this monkey was “reported for trauma to LHD3” [left hand, digit 3] where there was a “small laceration ... multiple wounds on digits.” On July 6: “Recheck of d3 left hand amputation site.” On July 13: “Recheck of LHD3 amputation site.”
 - ii. The monkey with tattoo number r16095 had a red mark next to his right eye.
 - iii. The monkey with tattoo number 17078 had a scratch in between his eyes.
 - iv. The monkey with tattoo number r17085 had a wound on top of his head. This wound was dry and measured approximately 1 cm. On EHR, notes for this monkey indicated that he had been subjected to “craniotomy, former cranial pedestal.”³⁹

³⁵Please see Video 2020-06-28_V1, 0:00 – 0:56.

³⁶Please see Videos 2020-06-29_V2, 0:00 – 0:26 and 2020-06-29_V3, 0:00 – 0:40.

³⁷Please see Video 2020-07-11_V1, 0:00 – 0:47.

³⁸Please see Video 2020-07-13_V1, 0:00 – 0:13.

³⁹Please see Video 2020-07-15_V1, 0:00 – 0:45.

- jj. On July 19, while in room B144, PETA’s investigator observed that the monkeys with tattoo numbers r04118 and r04067 were in a cage together with their infants; however, the monkey with tattoo number r04067 had small scratches all over face and an approximately 1 inch scratch on her chin that had dried blood on it. On July 26, PETA’s investigator observed that these two monkeys were still caged together. While the scratches on the victim’s face had healed, the scratch on her chin was still there and it was scabbed.
- kk. On July 20, while in room B113, PETA’s investigator observed that the monkey with tattoo number r18097 had a small scratch on his nose. In room B161, the monkey with tattoo number rh2800 had a small scab below her nose and the monkey with tattoo number r15002 had a small scab next to her right eye.
- ll. On July 27, while in room B113, PETA’s investigator observed that the monkey with tattoo number r19016 had two small scabbed scratches on his forehead.

D. Failure to prevent rectal prolapse in monkeys

Monkeys at WNPRC suffered with rectal prolapse, a condition that causes distress, and in some cases pain, in which the rectum protrudes out of the body through the anus. According to the medical literature, rectal prolapse in monkeys in laboratories can be associated with diarrhea. The condition is also often associated with stress. PETA’s investigator either witnessed or learned from EHR that the following monkeys suffered a rectal prolapse:

- i. According to EHR, the monkey with tattoo number r17078 began receiving fiber for a history of rectal prolapse on June 13, 2018. PETA’s investigator observed that this monkey was being given inulin fiber bites—used as a probiotic supplement and antidiarrheal support—in April, May, June, and July.
- ii. On June 3, while in room B113, PETA’s investigator observed that the monkey with tattoo number r19012 had blood around his hindquarters. This was reported to ██████████ who stated that the monkey might have a rectal prolapse. On June 6, PETA’s investigator checked the clinical remarks in EHR and observed that on June 3, there was a comment: “Rectal prolapse no longer present, moderate amount of blood on perineum area ... Suspect self-reduced rectal prolapse.” The plan for this monkey read, “NAI” (no additional intervention).

E. Other

- i. On April 27, PETA’s investigator observed that the monkey with tattoo number r09036 received fish oil for dermatitis; this treatment began on August 27, 2015. The monkey with tattoo number r12016 also received fish oil for dermatitis; this treatment began on July 19, 2019.
- ii. On June 2, ██████████ said that the previous year, WNPRC’s veterinary staff had failed to tell the laboratory technicians that a mother monkey wasn’t producing enough milk for her infant and consequently, the laboratory would need to provide the infant with supplemental food. The failure of veterinary staff to communicate to laboratory technicians and of laboratory technicians to realize

- that the infant was not thriving resulted in the death of the infant. ██████ seemed to recollect that the mother and her infant were in room 163, cage 19.⁴⁰
- iii. On June 6, while in room B113, PETA’s investigator observed that the monkey with tattoo number 19011 was being given liquid omega 3 to treat dermatitis.

II. Failure to minimize discomfort, distress, and pain experienced by animals

Principle IV of the U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training emphasizes the “imperative” to avoid or minimize “discomfort, distress, and pain” to animals. The *Guide* endorses the principle of “avoidance or minimization of discomfort, distress, and pain” and bolsters the application of this principle through the establishment of an effective animal care and use program.

Moreover, the *Guide* defines “humane care” as “those actions taken to ensure that laboratory animals are treated according to high ethical and scientific standards” and advises the “creation of a laboratory environment in which humane care and respect for animals are valued and encouraged.”

However, PETA’s investigator observed or became aware of multiple incidents at WNPRC that suggested that workers failed to handle animals as carefully or humanely as possible.

- a. On April 8, an animal research technician named ██████ told PETA’s investigator that while she was moving monkeys between rooms B110 and B108, a monkey who “did not know how to be transported right” ran into the transport box and hit his face on the box, sustaining a scratch near his eye. The technician said that this monkey—identified with tattoo number r16004—began rubbing his eye and then there was “a lot of blood”. PETA’s investigator later observed that the scratch on the monkey’s brow measured approximately 1 centimeter.⁴¹
- b. Weighing animals: Workers at WNPRC weighed mother monkeys and their infants using a cage restraint with metal bars to hold the animals in place. The workers would then poke, prod, and shout at the monkeys to pull the infant in one direction while pushing the mother in the opposite direction, into waiting transport boxes. Sometimes, the workers used PVC pipes or a “pusher,” a metal pole with a flat surface on one end to prod the monkeys. During this traumatizing procedure, the monkeys would screech and cry and defecate.
 - i. On May 6, PETA’s investigator observed WNPRC’s process for weighing mother monkeys and their infants; the distressed monkeys’ fear would cause them to defecate during the process.⁴² While workers weighed a mother and her infant, another mother-infant pair was waiting in a transport box, listening to the terrifying sounds of the mother and infant being weighed.⁴³ One worker told a monkey: “You’re gonna get shit all over your tail,” and the other workers laughed.⁴⁴ While another mother-infant pair were held in the metal restraint

⁴⁰Please see Video 2020-06-02_V1, 4:39 – 5:13.

⁴¹Please see Video 2020-04-08_V1.

⁴²Please see Videos 2020-05-06_V1, 7:15 – 9:11 and 2020-05-06_V3, 2:41 – 4:04.

⁴³Please see Video 2020-05-06_V1, 9:15 – 10:01.

⁴⁴Please see Video 2020-05-06_V4, 3:15 – 3:28 and 3:37 – 5:06.

device, the mother passed liquid diarrhea.⁴⁵ With this pair, as the workers attempted to separate the infant from the mother, they used a PVC pipe to prod them.⁴⁶

- c. On May 7, while transporting dirty cages to the cage wash room, ██████████ emphasized the importance of checking to ensure that no animals are left in the cage. She said that years previous, an animal had been left in a cage that had been put into the cage wash. ██████████ said that she had gone behind the barrier and could hear the monkey screaming.
- d. On May 14, ██████████ from WNPRC’s training team gave a “Primate Health” training for two employees.
 - i. ██████████ cautioned that when handling marmosets, workers should be “really careful with their limbs because their bones are small, very small, and unfortunately we have had somebody break a marmoset leg before because they were being a little bit too firm or rough with it.”⁴⁷
 - ii. ██████████ warned that marmosets could easily escape from enclosures, stating: “I’ve actually caught animals ... in mid-air as they’re leaping ... And it’s happened in this very room ... It’s happened inside an animal housing room. But you have to be careful, ’cause if you’re not wearing a leather glove, they will cut you.”⁴⁸
 - iii. ██████████ advised that workers should be careful not to allow the neck tags used with marmosets to become too tight, noting that she had seen “necks growing around those ID tags.”⁴⁹
 - iv. While explaining the use of the tabletop cage restraint (the same device used to separate infants from mothers to weigh them), ██████████ said that about three weeks prior, WNPRC’s attending veterinarian Saverio “Buddy” Capuano was using the pusher (the metal pole with a flat surface at one end) to get a monkey into the cage restraint, but the monkey got loose.⁵⁰ Although ██████████ did not explain how the monkey was captured, the process very likely resulted in more fear and distress for the animal, while also potentially jeopardizing the safety of workers.
- e. On June 11, ██████████ mentioned that she always put monkeys in a tabletop restraint to administer subcutaneous injections. ██████████ acknowledged that other workers use the squeeze backs of cages to perform such injections (by drawing monkeys to the front of the cage), but she said that she thought the tabletop restraint device was “much safer.” This evaluation seems to ignore the significant stress experienced by monkeys in the tabletop restraint.
- f. Tuberculosis (TB) Testing and Tattooing: Workers at WNPRC performed TB testing on sedated monkeys and also tattooed infants who were old enough to be tattooed. Mothers and their infants were transported to the procedure room and then subjected to TB testing and/or tattooing. However, younger infants who were not getting tattooed were not sedated and were left on their mothers who were unconscious. WNPRC’s failure to consider that the infants would be traumatized by seeing their mothers appearing to be dead resulted in greater behavioral stress for the monkeys.

⁴⁵Please see Video 2020-05-06_V5, 0:00 – 1:03.

⁴⁶Please see Video 2020-05-06_V5, 1:15 – 2:00.

⁴⁷Please see Video 2020-05-14_V2, 2:17 – 2:35.

⁴⁸Please see Video 2020-05-14_V2, 4:17 – 4:35.

⁴⁹Please see Video 2020-05-14_V3, 7:31 – 8:21.

⁵⁰Please see Video 2020-05-14_V4, 2:02 – 2:55.

- i. On June 30, PETA’s investigator observed two alert infant monkeys on opposite sides of the testing room, climbing on their sedated mothers and crying.⁵¹
- ii. On July 1, TB testing continued and monkeys were transported to the testing room. There were two infants who were not sedated that day, but were left on their sedated mothers when they were brought to the testing room. PETA’s investigator observed a mother and infant pair who both struggled to free themselves from the table top restraint device. Only after the infant bit one of the technicians was the infant sedated. ██████████ recounted that years previous, an infant had escaped from a cage while a worker had been trying to transport the mother and infant.
- iii. On July 2, TB testing continued. ██████████ brought a transport box containing a mother and her infant the hallway and onto a cart. ██████████ thought the monkeys were unconscious when she went to remove them from the transport box, but one of the monkeys walked out. The monkey hopped under the cart and then ran under cages that were in the hall. The monkey was loose in the hall for about two minutes.⁵²
- iv. On July 2, while ██████████ was tattooing a sedated infant, she acknowledged that infant was beginning to wake up, saying: “She’s already waking up.” But ██████████ continued tattooing the infant, who was moving his or her limbs and shaking.⁵³
- v. During TB testing on July 2, an awake infant cried and crawled over his sedated mother.⁵⁴
- g. On July 14, an animal research technician named ██████████ was taking an infant and her mother to a testing room to be weighed. PETA’s investigator heard ██████████ scream and then saw the infant running on the floor. It seemed that the infant had jumped off the scale. ██████████ was able to catch the infant.
- h. On July 21, animal research technician ██████████ informed PETA’s investigator that two animals had gotten loose in room B120. Several workers in the room were trying to capture these monkeys with nets. The monkeys were loose for at least 30 minutes before they were returned to cages.
- i. On July 23, the monkeys in room B140 were being TB tested. As PETA’s investigator was carrying animals to the testing room and back to cages, they saw a monkey run down the hallway. An animal research technician named ██████████ later explained that he had poked the monkey when she was in the transport box and she didn’t move so he thought she was unconscious. He said that when he opened the door, she ran out with her infant. The mother—whose tattoo number, workers said, ended in “2538”—hid behind cages in the hall.

III. Failure to provide safe housing for nonhuman primates

Principle VII of the U.S. Government Principles for the Utilization and Care of Vertebrate

⁵¹Please see Video 2020-06-30_V05, 6:42 – 7:28. Please also see Video 2020-07-01_V03, 4:34 – 4:44.

⁵²Please see Video 2020-07-02_V1, 1:08 – 2:37.

⁵³Please see Video 2020-07-02_V5, 0:50 – 1:59.

⁵⁴Please see Video 2020-07-02_V6, 6:04 – 6:17.

Animals Used in Testing, Research, and Training states: “The living conditions of animals should be appropriate for their species and contribute to their health and comfort.” The *Guide* expands on this point:

The primary enclosure should provide a secure environment that does not permit animal escape and should be made of durable, nontoxic materials that resist corrosion, withstand the rigors of cleaning and regular handling, and are not detrimental to the health and research use of the animals. The enclosure should be designed and manufactured to prevent accidental entrapment of animals or their appendages and should be free of sharp edges or projections that could cause injury to the animals or personnel.

However, PETA’s investigator observed or became aware of incidents that suggested that WNPRC failed to comply with these regulations.

- a. On April 20, ██████████ demonstrated the use of transport boxes to remove animals from a cage. ██████████ said to always use the right cage divider because she has seen workers use the wrong divider and not latch the door that holds the divider. She said workers will remove one animal and leave the door open and the animals can escape. She said this happens “very, very, often”—noting that the monkeys are “super smart.”⁵⁵
- b. On April 21, ██████████ informed PETA’s investigator that one of the cages in room B161 was damaged, as a metal part on the back of the cage was bent outward. The damaged part could hurt the monkeys held in this cage. ██████████ said that since the cages were scheduled to go to cage wash the following day, the monkeys would be left in the damaged cage overnight.⁵⁶

IV. Failure to promote psychological well-being of nonhuman primates

The *Guide* is explicit in its guidance on behavioral and social management of animals in laboratories:

Animals maintained in a laboratory environment are generally restricted in their activities compared to free-ranging animals. Forced activity for reasons other than attempts to meet therapeutic or approved protocol objectives should be avoided. High levels of repetitive, unvarying behavior (stereotypies, compulsive behaviors) may reflect disruptions of normal behavioral control mechanisms due to housing conditions or management practices.

The *Guide* also advises:

Appropriate housing strategies for a particular species should be developed and implemented by the animal care management, in consultation with the animal user and veterinarian, and reviewed by the IACUC. Housing should provide for the animals’ health and well-being while being consistent with the intended objectives of animal use ... The primary aim of environmental enrichment is to enhance animal well-being by providing animals with sensory and motor stimulation, through structures and resources

⁵⁵Please see Video 2020-04-20_V3, 3:05 – 3:34.

⁵⁶Please see Video 2020-04-21_V4, 0:27.

that facilitate the expression of species-typical behaviors and promote psychological well-being through physical exercise, manipulative activities, and cognitive challenges according to species-specific characteristics ... Examples of enrichment include structural additions such as perches and visual barriers for nonhuman primates ... as well as manipulable resources such as novel objects and foraging devices for nonhuman primates [and] manipulable toys for nonhuman primates ... Well-conceived enrichment provides animals with choices and a degree of control over their environment, which allows them to better cope with environmental stressors ... For example, visual barriers allow nonhuman primates to avoid social conflict.

However, PETA's investigator observed or became aware of incidents that suggested that WNPFC failed to ensure the psychological well-being of nonhuman primates.

A. Stereotypic movement and other behaviors indicative of psychological distress

On a near-daily basis, PETA's investigator observed monkeys who exhibited behaviors indicative of psychological distress. They paced back and forth, shook the cage bars, grimaced and screeched.

- i. On March 24, while in room B108, PETA's investigator observed monkeys pacing back and forth, shaking cage cars and doing cartwheel movements.
- ii. On March 28, while in room B112, PETA's investigator observed monkeys clinging to each other, screeching, and rocking back and forth.⁵⁷
- iii. On April 10, while in room B112, PETA's investigator observed that most of the monkeys in this room were holding onto each other. Our investigator saw one pair of monkeys rock back and forth. Three monkeys clung together, screeched and grimaced; then they tumbled through the divider at once into the other side of the cage.
- iv. On April 16, PETA's investigator observed a monkey walking in circles in a cage.⁵⁸ Our investigator also observed several monkeys circling and pacing in cages.⁵⁹
- v. On April 17, PETA's investigator observed a monkey bobbing back and forth in the cage.⁶⁰
- vi. On May 2, while in room B108, PETA's investigator observed that a male monkey was missing patches of hair and was also rocking from side to side.⁶¹ On May 24, this monkey was observed to have the tattoo number rh2819. PETA's investigator gave him the name Sainte and again observed him rocking from side to side.⁶² A tag that had been placed on the cage in which Sainte was confined about three weeks prior, indicated that he should receive extra foraging items. In addition to engaging in stereotypic behavior and having some hair loss, Sainte also suffered with frequent bouts of diarrhea, watery diarrhea or soft feces.

⁵⁷Please see Video 2020-03-28_V1, 0:39 – 0:45, 0:50 – 0:56 and 1:01 – 1:11.

⁵⁸Please see Video 2020-04-16_V1, 0:30 – 0:40.

⁵⁹Please see Video 2020-04-16_V3, 0:04 – 0:15.

⁶⁰Please see Video 2020-04-17_V02, 8:30 – 8:35.

⁶¹Please see Video 2020-05-02_V2, 0:15 – 0:22.

⁶²Please see Video 2020-05-24_V1, 0:00 – 0:13.

PETA's investigator noticed that Sainte was always rocking from side to side. Sainte would rock from side to side when our investigator entered the room, when they left the room, and even when they were at the end of the row of cages where he wasn't able to see them.⁶³ On June 1, PETA's investigator asked ██████████ ██████████, a member of WNPRC's behavior team, whether there was something that could be done for Sainte. ██████████ said she would look at Sainte, but was also dismissive, saying that in the "broad spectrum," rocking is not the "most concerning behavior," but if there was something "obvious that's triggering it," that has "a quick fix," then they "might as well."⁶⁴ PETA's investigator observed Sainte rocking from side to side on May 31, June 1, June 6, June 7, June 9, June 14, June 21, June 22, June 28, June 29, July 5, July 8, July 11, July 12, July 13, July 19, July 27, July 29, July 30, August 2, August 3, August 4, August 5, August 6, August 9, August 16, August 21, August 23, and August 24.⁶⁵ Sometimes, Sainte would stop rocking when our investigator left the room; but other times, Sainte would be observed rocking after PETA's investigator had left the room, or through a window, through which Sainte would not have seen or been aware of the investigator. On June 6, PETA's investigator observed that Sainte was being used for breeding—even though his behavior indicated that he suffered profound psychological distress.

- vii. On May 4, while in room B110, PETA's investigator observed one monkey who was pacing in circles. Other monkeys grimaced, bared their teeth, and avoided eye contact with the investigator.⁶⁶
- viii. On May 21, while in room B117, PETA's investigator observed that the monkey with tattoo number r05028, Zak, was pacing back and forth. He then he lunged at the wall of the cage and nipped at his leg. This part of the cage that Zak lunged at did not open into another cage; it was a solid wall.⁶⁷ According to EHR, Zak was born on June 22, 2005; he was caged alone.
- ix. On June 18, while in room B117, PETA's investigator observed that the monkey with tattoo number r98055 was pacing back and forth.⁶⁸
- x. The monkey with tattoo number r10033 (Cornelius):
 - a. On June 28, while in room B108, PETA's investigator observed that the monkey with tattoo number r10033—whose name, our investigator later learned, was Cornelius—was almost always sitting in the cage looking down, or had his head leaned against the cage door.⁶⁹ PETA's investigator observed that Cornelius was caged alone when he was not being used to breed. Cornelius was born on May 16, 2010 at WNPRC.
 - b. On June 29, PETA's investigator again observed that Cornelius was hunched over and looking down. At one point, he sat up, but pressed the side of his face into the cage door.⁷⁰

⁶³Please see Photographs 2020-05-24_09 and 2020-05-24_11.

⁶⁴Please see Video 2020-06-01_V1, 3:46 – 6:13.

⁶⁵Please see Video 2020-08-21_V10.

⁶⁶Please see Video 2020-05-04_V1, 0:40 – 0:48, 0:55 – 1:04, 2:47 – 2:56 and 3:14 – 3:18.

⁶⁷Please see Video 2020-05-21_V7, 0:00 – 0:18. Please also see Photograph 2020-06-18_16.

⁶⁸Please see Video 2020-06-18_V4, 0:00 – 0:21.

⁶⁹Please see Video 2020-06-28_V2, 0:00 – 0:28.

⁷⁰Please see Video 2020-06-29_V4, 0:00 – 0:30.

- c. On July 5, PETA’s investigator observed that Cornelius was sitting in the cage with his face leaned against the cage door. An animal research technician named ██████████ mentioned that Cornelius used to be a “semen donor.”
- d. On July 11, PETA’s investigator observed Cornelius sitting on the perch in the cage with his head down. Cornelius was now confined to one cage instead of a double cage and there was a divider in between this cage and the next.⁷¹
- e. On July 15, PETA’s investigator discussed Cornelius’ case with ██████████ ██████████, colony management supervisor at WNPRC; and suggested that the monkey’s apparent depression might be alleviated somewhat through the provision of different “enrichments.” ██████████ gave PETA’s investigator permission to provide Cornelius with something “every day,” as long as it wasn’t food related. ██████████ cautioned: “Just know that when you’re not in there, it’s probably not gonna happen.”⁷² ██████████’s statement betrays the extent to which the psychological well-being of monkeys at WNPRC is simply not a priority for even the colony management supervisor.
- f. On July 16, following ██████████’s recommendation, PETA’s investigator gave Cornelius a piece of wood. Cornelius accepted the item and immediately began to engage with it.⁷³ The change in Cornelius from the piece of wood was night and day, but ██████████’s comment suggests that in the absence of PETA’s investigator intervening on Cornelius’ behalf, no one else at WNPRC would be bothered to help Cornelius.⁷⁴
- xi. On July 4, while in room B165, PETA’s investigator observed the monkey with tattoo number r05074. This monkey pretended to bite at his arm whenever the investigator looked at him or was near his cage.⁷⁵ On July 6, PETA’s investigator again saw this monkey engage in this strange behavior of mock biting his arm. This monkey was born at WNPRC on September 24, 2005.
- xii. On August 9, while in room B108, PETA’s investigator observed that the monkey with tattoo number r14018 was caged alone and was pacing from side to side for approximately 30 seconds.⁷⁶ On August 24, PETA’s investigator again observed this monkey pacing and circling.⁷⁷

B. Alopecia

Many monkeys at WNPRC suffered from alopecia. When PETA’s investigator asked training coordinator ██████████ whether they should report animals with hair loss, ██████████ responded: “Usually, once an animal is marked for alopecia and ... self-injurious behavior, it’s in their record ... forever.”⁷⁸ This comment suggests a sense of resignation regarding monkeys exhibiting alopecia or other self-injurious behaviors, a sense that the animals could not get better. On June 10, PETA’s investigator asked another member of

⁷¹Please see Video 2020-07-11_V2, 0:00 – 0:20.

⁷²Please see Video 2020-07-15_V3, 0:05 – 3:34.

⁷³Please see Video 2020-07-16_V5, 0:00 – 1:32. Please also see Video 2020-07-26_V3, 0:00 – 2:00.

⁷⁴Please see Photographs 2020-08-13_6, 2020-08-21_1 and 2020-08-26_1.

⁷⁵Please see Video 2020-07-04_V2, 0:00 – 0:15.

⁷⁶Please see Video 2020-08-09_V2.

⁷⁷Please see Video 2020-08-24_V1.

⁷⁸Please see Video 2020-04-02_V7, 0:06 – 0:43.

the behavior team named [REDACTED] what was done for animals with alopecia. [REDACTED] responded that workers could give the animals extra foraging devices or pair them with another animal. However, she also said that ultimately there's "nothing much" they can do for them and that this is not "high" on their list of behaviors. She said they focus more on "biting." The implication in the comments of both [REDACTED] and [REDACTED] seemed to be that even members of the training and behavior teams at WNPRC believed that nothing could be done for animals who suffered with hair loss. Moreover, [REDACTED]'s admission that alopecia was not considered a priority in addressing welfare deficits does not comport with a significant body of work indicating that alopecia can be a marker of chronic stress.

- i. On March 25, while in room B110, PETA's investigator observed that a macaque, with tattoo number rh2532 and named Maya, was caged alone and missing almost all of her hair. On March 26, PETA's investigator observed that this monkey was 14.8 years of age, and came from the New England Primate Research Center. Maya was being treated for diarrhea and was also receiving supplemental food to try to address her weight loss (please see information on Maya in those sections). PETA's investigator also observed that most of the monkeys in this room were missing patches of hair.
- ii. On March 28, again on March 30, and again on March 31, while in room B161, PETA's investigator observed approximately five macaques who were missing patches of hair. Most of these animals were swinging from the tops of the cages, shaking the cage bars, screeching and grimacing.
- iii. On March 30 and again on March 31, while in room B163, PETA's investigator observed approximately three macaques who were missing patches of hair. They observed that these monkeys were swinging from the tops of the cages, shaking the cage bars, screeching and grimacing.
- iv. On April 3, PETA's investigator noted that several of the monkeys in room B140 had alopecia. According to a notation in EHR from January, at that time, almost all the monkeys in B140 and B142 had alopecia. EHR did not indicate any treatment for the animals' condition.
- v. On April 16, while in room B110, PETA's investigator observed that the monkey with tattoo number rh2786 was missing approximately 70 percent of her hair.⁷⁹ In the same room, a monkey circled in the cage and appeared to be missing a large patch of hair on his or her back.⁸⁰
- vi. The monkey with tattoo number rh2519 (named Princess by PETA's investigator):
 - a. On April 16, while in room B110, PETA's investigator observed that the monkey with tattoo number rh2519 was missing almost all of her hair. This monkey was due to give birth on April 29.⁸¹
 - b. On May 4, PETA's investigator observed that notations in EHR indicated that this monkey was first recorded to have alopecia on June 5, 2014. She was assigned an "alopecia score" of 4; the cause was deemed to be "behavioral," and hair loss was observed on this monkey's head, upper

⁷⁹Please see Video 2020-04-16_V3, 1:34 – 1:48.

⁸⁰Please see Video 2020-04-16_V3, 6:42 – 7:04.

⁸¹Please see Videos 2020-04-16_V1, 9:10 – 9:48 and 2020-04-16_V3, 5:51 – 6:18.

- arms, lower arms, upper legs, and lower legs.⁸² The most recent entry for alopecia for this monkey was January 23; the alopecia score was still 4—but in addition to the head and limbs, hair loss in the 2020 entry also included the hips, rump, dorsum, and back of head.⁸³
- c. On July 13, PETA’s investigator observed the monkey with tattoo number rh2519 sleeping in the cage with her infant. She was missing patches of hair on her arms, sides, parts of her head and most of her chest. Her infant was missing patches of hair on her back.⁸⁴ The cage was devoid of additional “foraging” enrichment items, such as logs or coconuts.
 - d. On July 14, PETA’s investigator observed that Princess’ infant (tattoo number r20031) had a scab next to her right eye and a red mark on top of her head.
 - e. On July 26, PETA’s investigator observed a sign outside room B144, informing employees that the monkey in the cage adjoining the cage in which Princess and her infant were held would bite the infant—and so a panel separating the cages needed to be kept in place. At this point, Princess’ infant, born on May 1, had extensive hair loss over her body.⁸⁵
- vii. On April 26, while in room B144, PETA’s investigator observed that approximately half of the animals were either missing patches of hair or 25 percent of their hair.
 - viii. On May 2, while in room B108, PETA’s investigator observed that a monkey was missing hair on her tail and left arm.⁸⁶
 - ix. On May 5, while in room B118, PETA’s investigator observed that several monkeys were missing patches of hair, including one monkey who was missing most of his hair on his back and the back of his head.⁸⁷
 - x. On May 6, while in room B144, PETA’s investigator observed a mother monkey who was missing a large amount of hair from the front of her body.⁸⁸
 - xi. On May 14, while in room B111, PETA’s investigator observed that the monkey with tattoo number rh2973 was missing hair in three patches on her right leg. On May 17, PETA’s investigator followed a recommendation on EHR that items given to the monkey be rotated—and gave this monkey a wooden stump.
 - xii. On June 3, PETA’s investigator observed that two monkeys in room B113 were missing hair; one monkey was missing approximately 80 percent of his hair, while the other was missing patches of hair.
 - xiii. On June 6, PETA’s investigator observed that approximately 30 percent of the monkeys in room B161 were missing patches of hair.

⁸²The National Centre for the Replacement, Refinement & Reduction of Animals in Research describes an alopecia scoring system in which a score of 1 indicates good coat condition, while a score of 5 indicates that the back is completely bald, and more skin is visible than hair. A score of 4 indicates generalized alopecia, with more than 50% hair loss on the back (see: <https://www.nc3rs.org.uk/macaque/welfare-assessment/health-indicators/>).

⁸³Please see Photographs 2020-05-04_01, 2020-05-04_02, 2020-05-04_03 and 2020-05-04_04; and Video 2020-05-04_V1, 2:23 – 2:32.

⁸⁴Please see Photograph 2020-07-13_3.

⁸⁵Please see Video 2020-07-26_V1.

⁸⁶Please see Video 2020-05-02_V2, 0:41 – 0:45.

⁸⁷Please see Video 2020-05-05_V2, 0:31 – 0:37.

⁸⁸Please see Video 2020-05-06_V7, 0:55 – 0:59.

- xiv. The monkeys with tattoo numbers r02034 and r02026 (named Lulu and Lemon by PETA’s investigator): On June 7, PETA’s investigator observed that Lulu and Lemon were caged together in room B144—and both monkeys were missing almost all their hair.⁸⁹ Our investigator had seen Lemon attempting to groom the patches of hair that Lulu had left on her back. PETA’s investigator observed several times that Lemon had diarrhea or watery diarrhea. Lulu was being treated for diarrhea, but almost always had watery diarrhea or soft feces. In spite of her poor condition, Lulu was used for breeding. On July 16, PETA’s investigator observed an orange tag on the cage that held Lulu and Lemon, indicating that Lulu was pregnant and due to deliver on September 2.
- xv. On June 8, PETA’s investigator observed that approximately 50 percent of the monkeys in rooms B110 and B111 were missing hair. In room B108, approximately 25 percent of the monkeys were missing hair. In room B113, approximately 30 percent of the monkeys were missing hair. In room B112, approximately 25 percent of the monkeys were missing hair. In room B117, approximately 10 percent of the monkeys were missing hair.
- xvi. On June 10, PETA’s investigator observed that approximately 30 percent of the animals in room B118 were missing hair. In room B119, approximately 30 percent of the animals were missing hair. In room B120, approximately 20 percent of the animals were missing hair. In room B140, approximately 40 percent of the animals were missing hair. In room B165, approximately 20 percent of the animals were missing hair.
- xvii. On July 11, PETA’s investigator observed that the monkey with tattoo number r14098 (named Charlie by our investigator) was missing patches of fur across the front of his body, his shoulders, his upper back and the back of his head.⁹⁰ On July 27, PETA’s investigator witnessed Charlie pulling out his hair. When the investigator approached Charlie, he stopped.

C. *Incompatible Cage Mates*

WNPRC’s failure to ensure that monkeys who were caged together were compatible resulted in monkeys sustaining painful and traumatic injuries. On April 17, while in room B118, ██████████ admitted that monkeys could have “scratches on their back, their arms, because they play so rough.”⁹¹ While observing the monkeys in this room, ██████████ commented on injuries sustained by several of them: “And 25 has a scratch on her face. You can see on the left ... Scratch on the right cheek. The right side of her face ... You can see that one has [blood] all over her tail.” ██████████ also pointed out diarrhea on the wall and on toys, and observed that a monkey had diarrhea on her tail: “You can see this one. 11. It has diarrhea on her tail.”⁹²

Many of the incidents detailed in Section I.C on WNPRC’s failure to use appropriate methods to prevent injuries in monkeys stemmed from the facility’s failure to ensure that monkeys who were caged together were compatible.

⁸⁹Please see Photographs 2020-06-07_1 (Lulu), 2020-06-07_3 (Lemon) and 2020-06-07_4 (Lemon).

⁹⁰Please see Video 2020-07-11_V3, 0:00 – 0:26.

⁹¹Please see Video 2020-04-17_V05, 4:36 – 5:18.

⁹²Please see Videos 2020-04-17_V05, 6:50 – 9:24 and 2020-04-17_V06, 4:46 – 5:02.

V. Failure to provide appropriate training and instruction to personnel

The *Guide* instructs that all “personnel involved with the care and use of animals must be adequately educated, trained, and/or qualified in basic principles of laboratory animal science to help ensure high-quality animal science and animal well-being.” The *Guide* continues: “Personnel caring for animals should be appropriately trained ... and the institution should provide for formal and/or on-the-job training to facilitate effective implementation of the Program and the humane care and use of animals. Staff should receive training and/or have the experience to complete the tasks for which they are responsible.”

However, PETA’s investigator observed or became aware of multiple incidents at WNPRC that suggested that workers were not appropriately or adequately trained in the humane care and treatment of animals.

- a. During a March 3 training, PETA’s investigator listened as employees stated that during daily observations of animals, certain concerns should not be written up. These included incidents of fighting amongst animals who are caged together or injuries sustained by animals. One employee explained that such incidents should not be reported on observation checks because those files go online and can be requested by the public—making them accessible to “animal activists.” Withholding information from daily observation reports undermines the purpose of observing animals “for signs of illness, injury, or abnormal behavior,” as specified by the *Guide*, and goes against current established veterinary medical procedures.
- b. On June 7, PETA’s investigator observed the presence of a cage restraint device in room B167. The monkeys in the room could see this device from the cages. Given that employees at WNPRC were well aware that the cage restraint device caused considerable fear and trauma to the monkeys, the decision to store the device in an animal housing room failed to consider the animals’ welfare.

VI. Failure to maintain standards related to cleaning, sanitization, housekeeping, and pest control

The *Guide* recommends cleaning and disinfection of the macroenvironment: “All components of the animal facility, including animal rooms and support spaces (e.g., storage areas, cage-washing facilities, corridors, and procedure rooms) should be regularly cleaned and disinfected as appropriate to the circumstances and at a frequency based on the use of the area and the nature of likely contamination.”

However, WNPRC workers frequently commented that rooms smelled of feces. In particular, rooms B108, B111, B112, B113, B140, and B144 were noted to have a strong odor of feces. The pervasive odor could stem from the recurrent and chronic diarrhea suffered by so many monkeys at WNPRC, but regardless of the origin, the persistent smell would certainly compromise the welfare of the monkeys forced to “live” in those rooms.

Additionally, PETA’s investigator documented several instances where it appears that WNPRC failed to comply with these requirements.

- a. On March 23, while in room B110, PETA’s investigator observed a puddle of water on the floor with debris in it; and a dark brown stain following the path of the standing water to the drain on the floor.⁹³
- b. On April 2, animal research technician named [REDACTED] commented that room B113 smelled “so bad.”⁹⁴ This room had smelled of feces.
- c. On May 12, while in room B111, PETA’s investigator recorded video footage of a trail of water on the floor, leading to the drain. It appeared that there may have been drainage issues in that room.⁹⁵
- d. On May 28, while in room B144, PETA’s investigator noticed that the trough on the right side of the room was filled with feces-contaminated water. This water was slightly overflowing onto the floor. Our investigator notified others, and a worker came to the room to fix the drain; once the worker was able to access the drain, they found that an enrichment mirror had covered the drain hole. It took approximately 20 minutes for the trough to drain. An animal research technician named [REDACTED] commented that the drain had been plugged for three days, which suggests that she was aware of the problem but didn’t bother to try to fix it. Additionally, [REDACTED] and a recently-hired animal research technician had washed the cages in this room the previous day. If that cleaning was done as part of the new technician’s training, this would suggest not only that [REDACTED] and the new technician failed to address the plugged drain—but through this failure, [REDACTED] was also failing to train the new technician in appropriate methods of animal care.

⁹³Please see Video 2020-03-23_V1, 0:53 – 0:59.

⁹⁴Please see Video 2020-04-02_V5, 0:52 – 1:01.

⁹⁵Please see Video 2020-05-12_V1, 0:21 – 0:27.

