



September 11, 2023

Étienne Bonbon
President
Terrestrial Code Commission
World Organisation for Animal Health

Jérôme Salomon, Ph.D.
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Via e-mail: tcc.secretariat@woah.org; salomonj@who.int

Dear Mr. Bonbon and Dr. Salomon:

I'm writing on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 9 million members and supporters globally—and Abolición Vivisección concerning the failure to reliably detect and contain dangerous zoonotic pathogens, including, most recently, *Mycobacterium tuberculosis* (MTB). These pathogens are being transported around the globe along with shipments of primates in the wildlife trade. In particular, the trade of two primate species being used for experimentation—the long-tailed macaque (*Macaca fascicularis*) and the rhesus macaque (*Macaca mulatta*)—is recognized as a driver of spillover risk and disease spread.¹ The primate experimentation import and export industry has operated with impunity for decades while transporting tens of thousands of primates around the world via air and roads each year. The public health consequences of the industry's inadequate adherence to World Organisation for Animal Health (WOAH) Terrestrial Code testing and surveillance standards are being felt around the globe. We urge you to compel your member states to conduct enhanced inspections immediately and use their authority to better implement the WOAH Terrestrial Code in order to quell the hazardous movement of primates in the primate experimentation pipeline.

According to publicly available documents as well as ones [released to PETA](#) through the Freedom of Information Act, primates imported into the U.S. within the last four years were infected with *Burkholderia pseudomallei* (a Tier 1 Select Agent), *Yersinia pseudotuberculosis*, *Yersinia enterocolitica*, Shigella, Campylobacter, tuberculosis, simian retrovirus, and *Macacine herpesvirus 1* as well as undetermined pathogens that caused hemorrhagic gastroenteritis (bloody diarrhea) and erosive colitis with serositis (diarrhea so intense that the lining of

¹Johnson CK, Hitchens PL, Pandit PS, et al. Global shifts in mammalian population trends reveal key predictors of virus spillover risk. *Proc. Biol. Sci.* 2020;287(1924):20192736. doi:10.1098/rspb.2019.2736; Borsky S, Hennighausen H, Leiter A, et al., CITES and the Zoonotic Disease Content in International Wildlife Trade. *Environ. Res. Econ.* 2020; 76:1001–1017. <https://doi.org/10.1007/s10640-020-00456-7>; Campbell, S, Timoshyna A, Sant G, et al., Options for managing and tracing wild animal trade chains to reduce zoonotic disease risk. 2022. *TRAFFIC*, Cambridge U.K.

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the gut is shed).² These pathogens shouldn't and wouldn't be entering the U.S. if importers were abiding by WOAHS standards.

Latest Exposé: Europe's Largest Monkey Supplier

The U.S. isn't the only country being exposed to pathogens by an industry that appears to be flouting WOAHS standards. Abolición Vivisección recently [revealed](#) that the Camarney primate facility in Camarles, Tarragona, Spain—the largest supplier of monkeys in Europe—is riddled with concerning animal welfare and health reports. Camarney is owned by Noveprim Limited, a Mauritian company, 49% of whose shares are owned by Charles River Laboratories, the world's largest mover of primates. The reports reveal significant negligence in direct noncompliance with the standards set out by the WOAHS Terrestrial Code, articles 6.12.2 and 6.12.6., which outline important standards that should apply before shipping nonhuman primates, including the following:

[6.12.2] Veterinary Authorities should make sure that the animals are individually identified by approved methods that assure traceability and to avoid transmission of disease.

The health certificates of some macaques appear to have been erased from the entry register in Camarney, making traceability impossible.

[6.12.6] The animals come from premises which are under permanent veterinary supervision, and where a suitable health monitoring programme is followed, including microbiological and parasitological tests as well as necropsies.

- In December 2018, inspectors were unable to access the interior of the facilities with monkeys because Camarney did not have “updated results from TB test, as it's required according to the center intake protocol.” *[Translated from the original in Catalan]*
- Neither cause of death nor necropsy results were recorded for macaques who died in Camarney.
- “In the hospitalization zone diverse structural deficiencies are observed that don't allow an appropriate isolation of the unit; from a sanitary standpoint, the distribution of the space can be improved as well.” *[Translated from the original in Catalan]*

Long-tailed macaques are the most common primate exported for laboratories in the U.K. and the EU. All member countries that are importing monkeys from Camarney should be notified of these problems.

Recent TB Outbreak on Mauritius Monkey Farm

The Camarney case is only the latest exposé of worrisome MTB monitoring among primate exporters, importers, and laboratories. In May, 200 monkeys at Bioculture Mauritius, the country's largest exporter of macaques to facilities in the U.S. and Europe, were euthanized during an [outbreak of tuberculosis](#). It's our understanding that the company continues to ship primates, and it's unknown whether it's abiding by the standard that “no case of tuberculosis ... has occurred during the last two years prior to shipment in the building where the animals are kept.”

²Johnson AL, Keesler RI, Lewis AD, Reader JR, Laing ST. Common and not-so-common pathologic findings of the gastrointestinal tract of rhesus and cynomolgus macaques. *Toxicol. Pathol.* 2022 Jul;50(5):638-659. doi: 10.1177/01926233221084634. Epub April 1, 2022. PMID: 35363082; PMCID: PMC9308647. See Table 1.

U.S. States Are Failing to Administer Timely TB Tests

States across the U.S. have allowed monkeys to be boxed up and trucked throughout the country from laboratory to laboratory without timely TB tests despite the well-known phenomenon of immune-compromising stress before, during, and after transport. The Terrestrial Code states that monkeys who are shipped internationally should be “subjected to a tuberculosis test on two occasions with negative results, at an interval of at least two weeks between each test during the 30 days prior to shipment.” PETA recently [documented](#) that nine U.S states appear to have flaunted this critical standard on at least **25 occasions** since August 2021. These domestic transports, which can take longer than 24 hours in cramped trucks, should be held to the same standard of TB screening and detection that are applied to international shipments.

TB Outbreak at Michigan Laboratory

In the U.S. state of Michigan, [a reportable disease investigation](#) was initiated after employees at a primate facility were exposed to the infected macaques and two workers were referred for treatment. These animals would have undergone multiple tests for MTB while in quarantine mandated by the Centers for Disease Control and Prevention (CDC). They would also have been tested for MTB prior to being exported from Mauritius. Documents from the CDC show that beginning in 2021, there was an eightfold increase in the detection of MTB in imported monkeys to the U.S. infected with MTB during the CDC-mandated quarantine. The Michigan outbreak is the most recent example of monkeys exiting CDC quarantine infected with MTB.

Long-Tailed Macaques Are Now Endangered

In July 2022, the International Union for Conservation of Nature [uplisted](#) long-tailed macaques to *endangered* status, in large part due to the demand by the primate experimentation industry. Article 7.87 of the Terrestrial Code states that “[e]ndangered species should only be used in exceptional circumstances where there is strong scientific justification that the desired outcomes cannot be achieved using any other species.” Experiments on monkeys are not leading to desired outcomes—the U.S. National Institutes of Health admits that 95% of all drugs that are shown to be safe and effective in tests on animals fail in human trials.

Long-tailed macaques are disappearing from the forests, and as they are shipped to monkey breeders and experimenters around the world, dangerous pathogens are coming with them. We strongly encourage you to contact your member states immediately in order to urge that they start following the WOAHP Terrestrial Code. Clearly, MTB-infected macaques have been circulating throughout the primate-experimentation pipeline around the globe, and we need a global solution before the situation escalates even further.

Thank you for your immediate attention to this important matter.

Sincerely,



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