



December 20, 2023

Roxanne Mullaney, D.V.M.  
Deputy Administrator  
Animal and Plant Health Inspection Service  
U.S. Department of Agriculture

Via e-mail: [Roxanne.C.Mullaney@usda.gov](mailto:Roxanne.C.Mullaney@usda.gov)

Dear Dr. Mullaney:

We're writing on behalf of People for the Ethical Treatment of Animals (PETA), One Voice, Action for Primates, Abolición Vivisección, and Cheshire Animal Rights Campaigns to request that the U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS) investigate whistleblower allegations about the mistreatment of animals during transport by Bluebird Nordic (Bluebird; USDA Certificate No. 10-T-0024).

PETA received information from anonymous whistleblowers alleging that Bluebird isn't providing food or water for monkeys during air transport but is falsifying its paperwork to claim that it is. Bluebird flights with monkey shipments typically stop in about four airports for refueling, and the total transport time is about 35 hours from the initial takeoff to landing at the final destination. Each flight carries up to 720 monkeys.

On September 15, Bluebird flight BO317 departed from Mauritius reportedly transporting long-tailed macaques destined for Charles River Laboratories. The B738 aircraft used in this case has a relatively short range that would require multiple fuel stops for such a distance, and the flight made a total of five stops after departing from Mauritius: Jeddah, Saudi Arabia; Brussels; Keflavik, Iceland; Boston; and Houston. The ordeal lasted over 35 hours, not including the initial and final loading and unloading times. According to reports PETA received, the shipment included 147 crates, which likely contained several hundred monkeys. Another shipment on October 20, on the same aircraft, required four stops after departing Hanoi, Vietnam: Delhi; Tbilisi, Georgia; Reykjavik, Iceland; and Washington, D.C. Documents we obtained indicate that this shipment contained 720 long-tailed macaques exported from Thanh Cong Biological Creature Co. Ltd. and imported by Charles River Laboratories. On December 9, a shipment from Hanoi arrived in Houston after more than 38 hours and five stops.

If the allegations that Bluebird didn't provide monkeys with food and water during air transport are accurate, we believe the airline is violating the federal Animal Welfare Act (AWA) and the associated Animal Welfare Regulations (AWR) with each shipment of monkeys it carries. Specifically, the allegations suggest that Bluebird fails to meet food and water requirements for monkeys and fails to observe monkeys as required during transport.

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## **1. Bluebird is failing to meet food and water requirements for monkeys.**

Under Section 3.89 of the AWR, “Each nonhuman primate [who] is 1 year of age or more must be offered food at least once every 24 hours. Each nonhuman primate [who] is less than 1 year of age must be offered food at least once every 12 hours. Each nonhuman primate must be offered potable water at least once every 12 hours. ... These time periods apply to carriers and intermediate handlers.”

Therefore, a total transport time of 35 hours for a Bluebird shipment of monkeys requires that the airline offer food to monkeys over 1 year of age at least once during transport and to monkeys under 1 year of age at least twice. For all the monkeys, the transport time requires that Bluebird offer them water at least twice. If true, the whistleblowers’ allegations—that Bluebird doesn’t offer any food or water to monkeys during transport—would mean that the airline is violating animal welfare requirements three or four times *per monkey* in every shipment. For any transport time beyond 36 hours, including the shipment that arrived in Houston on December 9, Bluebird is violating the animal welfare requirements additional times.

Additionally, when monkeys are stressed—and air transport is inherently stressful for monkeys, especially on flights that ascend and descend multiple times on flight routes that include stops—their metabolism increases and their need for water increases. Restricting or not providing them with water seriously compromises their welfare.

## **2. Bluebird is failing to observe monkeys as required during air transportation.**

Additionally, Section 3.90 of the AWR states the following:

During air transportation of nonhuman primates, it is the responsibility of the carrier to observe the nonhuman primates as frequently as circumstances allow, but not less than once every 4 hours if the animal cargo area is accessible during flight. If the animal cargo area is not accessible during flight, the carrier must observe the nonhuman primates whenever they are loaded and unloaded and whenever the animal cargo space is otherwise accessible to make sure that the nonhuman primates have sufficient air for normal breathing, that the ambient temperature is within the limits provided in § 3.88(d) of this subpart, and that all other applicable standards of this subpart are being complied with. The carrier must determine whether any of the nonhuman primates is in obvious physical distress, and arrange for any needed veterinary care for the nonhuman primates as soon as possible.

If the whistleblowers’ allegations are true and Bluebird is failing to provide the survival necessities of food and water for monkeys during 35 hours of stressful transport, we suspect that the airline is also not taking the essential welfare measure of observing monkeys every four hours during flight or at each refueling stop. Additionally, we question whether adequate welfare checks can even be carried out at all the required times for shipments containing hundreds of monkeys.

The likelihood that monkeys aren’t being observed is particularly concerning, given the significant increase in shipments from both Mauritius and Southeast Asia with confirmed tuberculosis (TB) cases among monkeys. In January 2023, 26 long-tailed macaques imported from Southeast Asia were found to be infected with *Mycobacterium orygis*, a bacterial strain causing TB that had never been seen in animals in the U.S. Monkeys taken from their forest home in Mauritius entered the

U.S. and were quarantined under CDC rules—and then exited quarantine infected with TB. These animals were transported across the country and ultimately triggered [a reportable disease outbreak in Michigan](#) this year after laboratory workers were exposed to infected animals. Crowding immunocompromised monkeys from areas with known cases of TB into an aircraft for 35 hours amplifies the health risk not only for these monkeys but also for all other monkeys and humans they encounter during each step of shipment to laboratories.

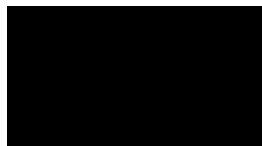
**In conclusion**, we urge you to investigate the allegations against Bluebird summarized in this letter and, if they're substantiated, to take swift, decisive action that includes citing the airline for violations of the AWA and AWR.

Thank you for your consideration of this important matter.

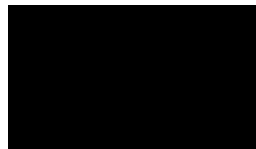
Sincerely,



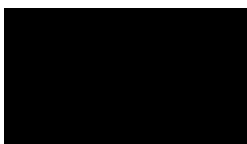
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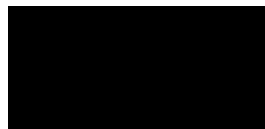
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