

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

May 07, 2025

Sarah Helming
Deputy Administrator
Animal Care
Animal and Plant Health Inspection Service
U.S. Department of Agriculture

Via e-mail: sarah.j.helming@usda.gov; ac.complaints@usda.gov

Dear Ms. Helming:

I'm writing on behalf of People for the Ethical Treatment of Animals, Inc. (PETA) and our more than 9 million members and supporters worldwide to respectfully request that the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) investigate possible violations of the Animal Welfare Act (AWA) related to the use and treatment of marmosets at the University of Massachusetts–Amherst (UMass; USDA Certificate No. 14-R-0036) in the laboratory of Agnès Lacreuse.

In response to a December 9, 2024, public records request to UMass, PETA received clinical and veterinary care records for ten marmosets held in the Lacreuse laboratory. A review of these documents revealed treatment of animals that may constitute violations of Animal Welfare Regulations, including the following.

1. Failure to maintain a program of adequate veterinary care

Section 2.33(b) of the AWRs states: "Each research facility shall establish and maintain programs of adequate veterinary care." The regulation further specifies that adequate care includes the "availability of appropriate facilities, personnel, equipment, and services," the "use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and the availability of emergency, weekend, and holiday care," "daily observation of all animals to assess their health and well-being," "a mechanism of direct and frequent communication [to veterinary staff] on problems of animal health, behavior, and well-being," and "adequate pre-procedural and post-procedural care in accordance with current established veterinary medical and nursing procedures."

However, animal care records obtained by PETA reveal that marmosets at UMass suffered from numerous health issues, including dental disease, broken teeth, and chronic diarrhea. "Daily Event Records" for multiple marmosets repeatedly referenced a "follow-up on loose stool outbreak in [the] colony" throughout most of October 2023. For many of these health

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issues, the records provide no indication that UMass made meaningful efforts to either treat the conditions effectively or investigate their underlying causes to prevent recurrence.

Additionally, many marmosets were identified as being either “thin” or “very thin,” which is highly concerning as it could signal the onset of **chronic wasting syndrome**, a debilitating condition in marmosets associated with severe health deficits, including muscle loss, weakness, and organ dysfunction. However, the records provide no indication that UMass made meaningful or sustained efforts to investigate or address the animals’ condition.

2. Failure to ensure that personnel conducting procedures are qualified to perform their duties

Section 2.32 (a) of the AWRs states that: “It shall be the responsibility of the research facility to ensure that all scientists, research technicians, animal technicians, and other personnel involved in animal care, treatment, and use are qualified to perform their duties.” And §2.32(c) specifies that “[t]raining and instruction of personnel must include guidance in ... [h]umane methods of animal maintenance and experimentation including: ... (i) The basic needs of each species of animal [and] (ii) proper handling and care for the various species of animals used by the facility.”

However, notations in the marmosets’ records suggest inadequate training. For example, one marmoset’s weight of 407 grams was considered “ideal ” at one point, while at another, her weight of 409 grams was considered “thin.” Without proper training on appropriate health metrics, staff are not able to flag problems as they arise, leaving the animals without adequate monitoring or care.

Additionally, notations in multiple marmosets’ records indicate “extravascular seepage” during blood draws. Such leaking of blood into surrounding tissues could suggest that employees applied excessive pressure when drawing blood and can contribute to bruising or hematoma formation.

3. Failure to handle animals appropriately

Section 2.38(f)(1) of the AWRs specifies that “handling of all animals shall be done as expeditiously and carefully as possible in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort.”

However, the records obtained by PETA from UMass document multiple incidents in which marmosets sustained injuries—either due to improper handling, unsafe caging, or an altercation with a neighbor. Several marmosets suffered nail avulsion—the partial or complete detachment of a nail from the nail bed. The cause of this traumatic injury was not always known, but such injuries can be due to improper handling, getting the nail caught in caging or enrichment materials, bacterial or fungal infections, excessive grooming due to stress or discomfort, or metabolic bone disease, which would lead to weak nails and bones. Since marmosets rely on their nails for climbing and grasping, nail injuries can impact their mobility and cause considerable distress.

4. Failure to promote the psychological well-being of nonhuman primates

Section 3.81 of the AWRs states that “research facilities must develop, document, and follow an appropriate plan for environment enhancement adequate to promote the psychological well-being of nonhuman primates.”

However, the records obtained by PETA from UMass suggest that some marmosets exhibited psychological distress with such actions as shredding paper.

The concerns outlined above are evident in the records of individual marmosets, as detailed below.

1. Diana (Female, ID No. 048, Date of Birth: April 15, 2014, Date Killed: July 11, 2024)

- a. On July 24, 2023, Diana was observed during a physical examination to have a broken upper left canine.¹ And on March 18, 2024, her upper left canine was still fractured.² There is no indication of any veterinary care administered to Diana for this, and nothing indicates that efforts were made to address what may have caused the tooth deterioration. On July 25, 2024, Diana was observed to have bruising, 1 centimeter in diameter from the physical exam the previous day.³ This suggests improper handling during the physical examination and possibly inadequate training for the employees who administered the examination.
- b. On September 25, 2023, “fresh green diarrhea” was observed in the cage in which Diana was held.⁴ Notations in these records also report “follow-up on loose stool outbreak in [the] colony.”⁵
- c. On October 13, 2023, Diana was found with blood in her cage and an avulsed nail. Although the injury was cleaned and Diana was given a painkiller, there is no indication in the notes of any attempt to determine the cause of the injury.⁶ The avulsed nail may have been the result of improper handling or unsafe caging. Additionally, the cage liner had been shredded, possibly indicative of psychological distress.
- d. On May 23, 2024, Diana sustained an injury to her tail while being moved from an experimental apparatus to her home cage—suggesting improper handling. A physical exam revealed a laceration on the tail, 0.5 to 0.75 cm in length.⁷

2. Chloe (Female, ID No. 224, Date of Birth: August 3, 2015, Date Killed: August 12, 2024)

- a. On April 25, 2023, Chloe was found to have a nail avulsion. Records for Chloe suggest that the nail avulsion may have resulted from a conflict with her neighbor, Celeste, noted the previous day, although this remained unconfirmed.⁸ According to the records, Chloe was not given a painkiller for the avulsion. The records also indicate “paper shredding,” possibly indicative of psychological distress.

¹ Please see page 4 of “048 (Diana)_Redacted.pdf”

² Please see pages 3 of “048 (Diana)_Redacted.pdf”

³ Please see page 14 of “048 (Diana)_Redacted.pdf”

⁴ Please see page 12 of “048 (Diana)_Redacted.pdf”

⁵ Please see pages 10, 11, 13 of “048 (Diana)_Redacted.pdf”

⁶ Please see page 11 of “048 (Diana)_Redacted.pdf”

⁷ Please see page 9 of “048 (Diana)_Redacted.pdf”

⁸ Please see page 11 of “224 (Chloe)_Redacted.pdf”

- b. On July 6, 2023, Chloe suffered a partial nail avulsion—and the records again suggest that a cage conflict may have caused the injury. She was given a painkiller for this injury.⁹
- c. Notations in Chloe’s records report “follow-up on loose stool outbreak in [the] colony.”¹⁰

3. Wakanda (Male, ID No. 313, Date of Birth: August 3, 2015, Date Killed: August 12, 2024)

- a. On July 31, 2023, Wakanda was observed to be “thin” (381 grams) and missing his lower right canine during a physical examination. Blood was drawn from both of his legs, causing minor bruising on his left leg and significant bruising on his right.¹¹
- b. On March 19, 2024, Wakanda was again observed to be “thin” (372 grams).¹²
- c. Notations in Wakanda’s records report “follow-up on loose stool outbreak in [the] colony.”¹³

4. Yax (Male, ID No. 387, Date of Birth: November 28, 2011, Date Killed: August 2, 2024)

- a. On July 24, 2023, Yax was observed to be “thin” (402 grams) during a physical examination. He was also observed to have a fracture in the tip of his upper canine tooth. The employee drawing blood from Yax was not able to access the right vein and noted “minor extravascular seepage.”¹⁴
- b. On March 1, 2024, Yax was observed to be exhibiting blepharospasm—a neurological disorder characterized by involuntary and forceful contractions of the eyelid muscles resulting in rapid, repetitive blinking or eye closure—and increased lacrimation (flow of tears). Blepharospasm can be caused by infection, irritation, neurological disorders, or inflammation. Although Yax was treated with ophthalmic ointment and antibiotics, the records do not indicate any effort to identify the underlying cause of the condition to prevent such occurrences in the future.¹⁵
- c. On March 18, 2024, Yax was again observed to be “thin” (399 grams). His upper left canine was still chipped.¹⁶
- d. Notations in Yax’s records report “follow-up on loose stool outbreak in [the] colony.”¹⁷

5. Cactus (Male, ID No. 388, Date of Birth: May 23, 2017, Date Killed: August 5, 2024)

- a. On March 18, 2024, bloodwork for Cactus indicated a layer of lipemia, which is concerning as it could signal underlying metabolic issues to which marmosets in

⁹ Please see page 11 of “224 (Chloe)_Redacted.pdf”

¹⁰ Please see pages 7 – 10 of “224 (Chloe)_Redacted.pdf”

¹¹ Please see page 4 of “313 (Wakanda)_Redacted.pdf”

¹² Please see page 3 of “313 (Wakanda)_Redacted.pdf”

¹³ Please see pages 7 – 10 of “313 (Wakanda)_Redacted.pdf”

¹⁴ Please see page 4 of “387 (Yax)_Redacted.pdf”

¹⁵ Please see page 7 of “387 (Yax)_Redacted.pdf”

¹⁶ Please see page 3 of “387 (Yax)_Redacted.pdf”

¹⁷ Please see pages 7 – 10 of “387 (Yax)_Redacted.pdf”

laboratories are vulnerable. However, the records do not indicate any treatment for Cactus's condition.¹⁸

- b. Notations in Cactus's records report "follow-up on loose stool outbreak in [the] colony."¹⁹

6. Jolly (Male, ID No. 389, Date of Birth: December 19, 2016, Date Killed: August 9, 2024)

- a. On July 24, 2023, Jolly was observed to have no grip in the fourth digit of his right hand. He was also missing several incisors and showing signs of dental disease.²⁰
- b. On February 21, 2024, Jolly was observed to have a loose tooth that had dislodged during an oral examination. He also had moderate gingivitis and mild bleeding. On February 23, 2024, Jolly was observed to have a molar abscess. He had some increased swelling in his commissures, and his jaw was deviating to the right—"likely part of [the] cause of [Jolly's] difficulty chewing."²¹
- c. On March 7, 2024, Jolly was observed to be "thin," although his weight was not recorded on the physical examination record. Five of his teeth were removed.²²
- d. Notations in Jolly's records report "follow-up on loose stool outbreak in [the] colony."²³

7. Noel (Male, ID No. 390, Date of Birth: December 19, 2016, Date Killed: July 11, 2024)

- a. On July 24, 2023, Noel was observed to be "slightly thin" (383 grams). He was missing several incisors, and his upper left canine was loose and broken. The blood draw led to "slight extravascular seepage."²⁴
- b. On September 25, 2023, "fresh green diarrhea" was observed in Noel's cage, and on October 1, 2023, there was considerable diarrhea in his cage.²⁵
- c. On March 18, 2024, Noel was observed to be "thin" (361 grams). He was also observed to have an irregular heartbeat (arrhythmia). Although experimenters attempted to draw blood from both of Noel's legs, no blood was drawn.²⁶
- d. On June 20, 2024, Noel was observed to be "very thin" (323 grams)—a 10.5% drop in weight over three months. He had a small, firm, round area (a nodule) the size of a marble on his upper abdomen. Experimenters again attempted to draw blood from both legs but were unable to draw blood from the right saphenous vein. Noel's records also indicate that he was quiet during this physical examination.²⁷ Following the physical examination, Noel was quiet and "hovering in remote sections of the cage." A notation in the records indicates: "Decreased muscle mass in lower torso and legs may be contributing to reduced activity."²⁸

¹⁸ Please see page 3 of "388 (Cactus)_Redacted.pdf"

¹⁹ Please see pages 9 – 11 of "388 (Cactus)_Redacted.pdf"

²⁰ Please see page 4 of "389 (Jolly)_Redacted.pdf"

²¹ Please see page 7 of "389 (Jolly)_Redacted.pdf"

²² Please see page 3 of "389 (Jolly)_Redacted.pdf"

²³ Please see pages 7 – 9 of "389 (Jolly)_Redacted.pdf"

²⁴ Please see page 5 of "390 (Noel)_Redacted.pdf"

²⁵ Please see page 17 of "390 (Noel)_Redacted.pdf"

²⁶ Please see page 4 of "390 (Noel)_Redacted.pdf"

²⁷ Please see page 3 of "390 (Noel)_Redacted.pdf"

²⁸ Please see page 13 of "390 (Noel)_Redacted.pdf"

On June 29, 2024, the records report: “Continued weight loss (2-5 g per week) with correlating muscle atrophy.”²⁹

- e. Notations in Noel’s records report “follow-up on loose stool outbreak in [the] colony.”³⁰

8. Lara (Female, ID No. 646, Date of Birth: June 6, 2014, Date Killed: August 5, 2024)

- a. On July 24, 2023, a small nick was observed on one of Lara’s upper canine teeth.³¹
- b. On March 18, 2024, chips were observed on Lara’s right and left upper canine teeth. Experimenters attempted to draw blood from the right saphenous vein but were unsuccessful. They were able to draw blood from the left saphenous vein.³²
- c. Lara was observed to have diarrhea on multiple days, and notations in her records report “follow-up on loose stool outbreak in [the] colony.”³³

9. Xena (Female, ID No. 648, Date of Birth: December 30, 2014, Date Killed: August 9, 2024)

- a. On July 24, 2023, Xena was observed to have enlarged lymph nodes and swelling in her neck. She was missing many teeth and had gum recession and facial edema. When experimenters drew blood from her, there was some extravascular seepage. At 407 grams, her weight was considered “ideal.”³⁴
- b. On August 7, 2023, Xena exhibited signs of infected gums. Her upper right incisor and upper right molar were pulled. She was “slightly hypothermic.” Her weight was not recorded.³⁵
- c. On August 10, 2023, Xena was observed to have “mild neutropenia likely secondary to inflammation such as dental disease.” Xena’s neutropenia—abnormally low levels of certain white blood cells crucial for fighting inflammation—could have been indicative of serious illness, malnutrition, or an adverse reaction to treatment. However, the records do not indicate any effort to identify the underlying cause of the condition to prevent such occurrences in the future.³⁶
- d. On March 18, 2024, Xena was missing many teeth. She weighed 409 grams—more than the “ideal” weight of 407 grams in July 2023—but was classified as “thin.”³⁷
- e. Notations in Xena’s records report “follow-up on loose stool outbreak in [the] colony.”³⁸

10. Gabrielle (Female, ID No. 652, Date of Birth: November 8, 2014, Date Killed: August 2, 2024)

²⁹ Please see page 12 of “390 (Noel)_Redacted.pdf”

³⁰ Please see pages 14 – 16 of “390 (Noel)_Redacted.pdf”

³¹ Please see page 4 of “646 (Lara)_Redacted.pdf”

³² Please see page 3 of “646 (Lara)_Redacted.pdf”

³³ Please see pages 9 – 11 of “646 (Lara)_Redacted.pdf”

³⁴ Please see page 5 of “648 (Xena)_Redacted.pdf”

³⁵ Please see page 4 of “648 (Xena)_Redacted.pdf”

³⁶ Please see page 16 of “648 (Xena)_Redacted.pdf”

³⁷ Please see page 3 of “648 (Xena)_Redacted.pdf”

³⁸ Please see pages 14 – 15 of “648 (Xena)_Redacted.pdf”

- a. On July 24, 2023, Gabrielle was observed to be “slightly thin” (383 grams). The tip was broken on her lower incisor.³⁹
- b. On September 25, 2023, Gabrielle was found with blood in her cage and an avulsed nail. Paper shredding was noted on the corner of the cage liner adjacent to the neighboring cage, suggesting that a conflict was the cause of the avulsion.⁴⁰
- c. On March 21, 2024, Gabrielle was not bearing weight on her right rear leg. She was started on a regimen of painkillers, but on March 26, she was “still reluctant to use” the affected leg. By April 3, Gabrielle was observed climbing out of her hammock, but she seemed to not use her right leg and foot to grasp the side of her cage.⁴¹ On April 5, a notation in Gabrielle’s records suggests that her leg may have been reinjured when she was captured for a cage wash. On April 8, a notation in Gabrielle’s records indicated that she could not fully straighten the affected leg, suggesting an injury to the knee.⁴² On April 26, Gabrielle was still unable to straighten the affected leg.⁴³ A notation dated May 28, 2024, indicated: “Soft tissue injury in R leg appears stable and resolved, but [Gabrielle] preferentially uses L leg.”⁴⁴ While Gabrielle was administered painkillers meloxicam and gabapentin to address her leg injury, the records do not indicate that any effort was made to determine how she was injured.
- d. Gabrielle was observed to have diarrhea on multiple days, and notations in her records report “follow-up on loose stool outbreak in [the] colony.”⁴⁵

Given the gravity of these concerns and the documented history of AWA violations at UMass Amherst, we urge APHIS to take appropriate action to ensure compliance with federal animal welfare standards. We appreciate your time and attention to this matter and look forward to your response. Please do not hesitate to contact us if we can provide any additional information.

Sincerely,



Katherine Roe, Ph.D.
Chief Scientist, Laboratory Investigations Cases
Laboratory Investigations Department

³⁹ Please see page 5 of “652 (Gabrielle)_Redacted.pdf”

⁴⁰ Please see page 15 of “652 (Gabrielle)_Redacted.pdf”

⁴¹ Please see page 11 of “652 (Gabrielle)_Redacted.pdf”

⁴² Please see page 10 of “652 (Gabrielle)_Redacted.pdf”

⁴³ Please see page 10 of “652 (Gabrielle)_Redacted.pdf”

⁴⁴ Please see page 9 of “652 (Gabrielle)_Redacted.pdf”

⁴⁵ Please see pages 12 – 14 of “652 (Gabrielle)_Redacted.pdf”