

July 22, 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

Dear Ms. Helming:

I'm writing on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 10 million members and supporters globally—to request that the U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS) investigate apparent unreported and ongoing hazardous enclosures confining monkeys at Oregon Health & Science University's (OHSU; USDA Certificate No. 92-R-0001) Oregon National Primate Research Center.

PETA <u>obtained a report</u> that OHSU submitted to the National Institutes of Health's Office of Laboratory Animal Welfare (OLAW) following the death of a monkey in one of its outdoor enclosures. He was discovered dead on May 14 after his arm was entangled in the structure near the top of the pen, and other stressed monkeys in the cage mauled him.

This wasn't the first time this monkey's arm was entangled in the enclosure he was confined to. Though apparently unreported to OLAW or USDA at the time, this same rhesus macaque had his arm entrapped in a separate enclosure about a year before this incident, which caused swelling, abrasions, and a dislocated elbow.

We believe OHSU is in violation of the federal Animal Welfare Act (AWA) and the associated Animal Welfare Regulations (AWRs). Specifically, OHSU failed to provide adequate housing and enclosures and appears to be failing to provide appropriate training and instruction to personnel.

1. OHSU is failing to provide adequate housing and primary enclosures Under Section 3.75 of the AWR, "Housing facilities for nonhuman primates must be designed and constructed so that they are structurally sound for the species of nonhuman primates housed in them. They must be kept in good repair, and they must protect the animals from injury, contain the animals securely, and restrict other animals from entering."

Under **Section 3.80** of the AWR, "Primary enclosures must be constructed and maintained so that they...Protect the primates from injury."

OHSU failed to provide a housing facility and enclosure that would have prevented this monkey from injury in April 2024, and again failed to provide a

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housing facility and enclosure that would have protected the monkey from death in May 2025.

2. OHSU appears to be failing to provide appropriate training and instruction to personnel Section 2.32(c)4 mandates that training must cover "methods whereby deficiencies in animal care and treatment are reported, including deficiencies reported by any employee of the facility. We highlighted this section in our June 27 complaint to the USDA based on whistleblower reports received about OHSU's primate center leadership directing staff to minimize documentation of animal welfare problems.

Based on documents that PETA receives through FOIA, it appears the April 2024 incident, when the monkey first got his arm stuck in an enclosure, was never reported to OLAW. We believe this incident constitutes a serious adverse event that should have been reported. If it had been reported, perhaps the issue would have been taken more seriously, and this monkey's gruesome death could have been prevented.

3. History of adequate housing and primary enclosure violations

While it appears, as of today, that the USDA has not cited OHSU for these incidents, it has found violations of these same AWR sections for **four other instances in the last nine months.** In March, USDA <u>cited</u> OHSU with two violations under Section 3.75 and one under 3.80. Enclosures were found with rusted metal, "irregularly shaped holes" with sharp jagged edges, chipping paint, frayed jagged edges, and other inefficiencies that could cause injury to the monkeys. Dozens of Japanese macaques were confined to cages too small for days. In an October 2024 <u>report</u>, USDA found OHSU in violation of Section 3.80 after a monkey was able to move a sliding mesh opening that separated two enclosures. This led to an adult male monkey causing cuts to the head and ear of an old rhesus macaque in the neighboring enclosure.

In conclusion, we urge the USDA to investigate these apparent violations at OHSU and take swift, decisive action, including issuing citations for each incident that violated the AWRs. Because OHSU's Oregon National Primate Research Center has consistently violated the housing and primary enclosure AWRs, we urge you to also refer the matter to the USDA's Investigative and Enforcement Services for further action.

Thank you for your consideration of this important matter.

Sincerely,

Amy Meyer

Associate Director of Primate Experimentation Campaigns

Laboratory Investigations Department

People for the Ethical Treatment of Animals