



October 10, 2025

Via e-mail

Douglas Burgum
Secretary
U.S. Department of the Interior
interior.regulatory@doi.gov

Naimah Aziz
Head
Division of Management Authority
International Affairs
U.S. Fish & Wildlife Service
Naimah_Aziz@fws.gov

Gina Shultz
Acting Assistant Director
Ecological Services
U.S. Fish & Wildlife Service
Gina_Shultz@fws.gov

Brian Nesvik
Director
U.S. Fish & Wildlife Service
Brian_Nesvik@fws.gov

Doug Ault
Chief
Office of Law Enforcement
U.S. Fish & Wildlife Service
Douglas_Ault@fws.gov

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

Washington
1536 16th St. N.W.
Washington, DC 20036
202-483-PETA

Los Angeles
2154 W. Sunset Blvd.
Los Angeles, CA 90026
323-644-PETA

Norfolk
501 Front St.
Norfolk, VA 23510
757-622-PETA

Info@peta.org
PETA.org

Re: Long-Tailed Macaque Status Review

Dear Secretary Burgum, Director Nesvik, Ms. Aziz, Chief Ault, and Assistant Director Shultz:

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) to urge the U.S. Fish & Wildlife Service (FWS or “Service”) to undertake a status review of the long-tailed macaque (*Macaca fascicularis*) on its own accord as it acknowledges it should do (regardless of the receipt of a petition) when the FWS is aware of a species that may be in danger of extinction,¹ and as it is authorized to do, pursuant to the Code of Federal Regulations, 50 C.F.R. § 424.21. Across its various departments and over the course of decades (including the past twenty years during which law enforcement investigation records are required to be retained after a case closes),² the Service has compiled a substantial body of credible information that points to the certainty of this risk for long-tailed macaques (LTMs). The information sources are widespread, including (but not limited to):

- petitions for rulemaking that contain thousands of pages of exhibits;
- letters from PETA and other non-government organizations (NGOs);

¹ See FWS, FED. DOCKET NO. FWS-HQ-ES-2023-0228, 90-DAY FINDING PETITION REVIEW FORM 1 (2023).

² See Combined U.S. Fish and Wildlife Service Disposition Manual, FWS 39–40 (2025), https://www.fws.gov/sites/default/files/policy/pdfs/appendix-1-283-fw-1_3-24-2025.pdf (283 FW 1).

Entities:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

- an investigative report from an independent research company that examined public records, regulatory filings, social media, financial reports, open source media reporting, and industry publications;
- International Union for Conservation of Nature (IUCN) assessments;
- a population viability analysis conducted by the IUCN Species Survival Commission Conservation Planning Specialist Group;
- population statistics disclosed by the Cambodian government that cannot be reconciled unless breeding operations were supplementing stock with wild-caught LTMs;
- a high-priority multi-year FWS Office of Law Enforcement (OLE) investigation that uncovered overwhelming evidence and documentation of illegal wild collection of LTMs in Cambodia and subsequent laundering by captive breeding facilities in Cambodia from 2018 to 2021.

Additionally, the Service has supplied the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Secretariat with a mountain of irrefutable evidence documenting the unlawful collection and delivery of thousands of wild monkeys to Vanny Bio Research, falsification of breeding stock, population numbers, and CITES export documents that resulted in the laundering of tens of thousands of wild-caught monkeys into the laboratory supply chain.³ Based on the staggering amount of evidence and supporting documentation at the Service’s fingertips of large-scale wildlife trafficking of a species in peril (examples of which are described herein), and the IUCN’s recently revised reassessment that elevated the species status from Endangered A3cd to Endangered A2cd+3cd+4cd,⁴ PETA urges the FWS to use its authority and immediately initiate a status review.

The following, while only a sampling, demonstrates the overwhelming amount of evidence the FWS has collected that should compel the Service to take the obvious next step of undertaking a status review of the species.

³ See *Illegal Trade and Enforcement*, SC78 Doc. 38.1, CITES 3 (Feb. 3, 2025), <https://cites.org/sites/default/files/documents/E-SC78-38-01.pdf> (“In late November 2024, the United States of America shared with the Secretariat and the Chair of the Animals Committee extensive information on investigations conducted by authorities from the United States of America regarding *Macaca fascicularis* exported from Cambodia.”); *Resolution Conf. 17.1 (Rev. CoP19) on Review of Trade in Specimens Reported as Produced in Captivity*, SC78 Doc. 35.1, CITES 32 (Jan. 13, 2025), <https://cites.org/sites/default/files/documents/E-SC78-35-01.pdf> (“Overall, concerns remain that the high productivity rates cannot reflect a closed-cycle breeding operation in five out of six facilities reported by Cambodia, according to analyses conducted by the United States of America (National Fish and Wildlife Forensics Laboratory). The report shows that the reported breeding output from five out of six of the captive-breeding facilities exceeds the biological capacity of the species to produce that number of offspring in captivity; in two cases, the supposed monthly breeding outputs exceeded the highest documented breeding outputs by an order of magnitude for months on end. This seems to point to these five facilities obtaining new stock (presumably from the wild) rather than breeding them in-house.”).

⁴ See M.F. Hansen et al., *Macaca fascicularis*, THE IUCN RED LIST OF THREATENED SPECIES (2025), <https://www.iucnredlist.org/species/12551/273015436#assessment-information> (“The Long-tailed Macaque (*Macaca fascicularis*) has been assessed as Endangered under the A2cd, A3cd, and A4cd criteria . . . **due to an inferred 50-70% decline over the past three generations (30 years)** due to habitat loss and high levels of exploitation. In addition, as the threats facing the species and levels of exploitation have not been mitigated and are continuing at a similar pace, it is suspected that the species will continue to experience a population decline at a similar rate (50-70%) over the coming three generations (30 years), and therefore in addition over any three generation period including some past and some future years. This assessment is based on a range of data, both quantitative and qualitative, including historical and recent population estimates.”).

- Beginning in 2017 and spanning more than five years, the OLE conducted Operation Long-Tail Liberation (OLL).⁵ This undercover inter-agency operation provided evidence that an estimated 30,000 wild-caught macaques of Cambodian origin had been illegally exported from Vanny Bio Research (a Cambodian monkey farm) to the U.S. and elsewhere, utilizing fabricated CITES documents that falsely identified the wild macaques as bred in captivity.⁶ Investigative information, some of which was released during the 2024 trial of Masphal Kry, the Deputy Director of the Department of Wildlife and Biodiversity within the Forestry Administration of the Cambodian Ministry of Agriculture, Forestry and Fisheries (MAFF) who the U.S. Department of Justice (DOJ) indicted on charges related to monkey laundering, clearly revealed the illegal collection of LTMs by black market suppliers, the subsequent laundering, and the illegal export of wild LTMs directly to the United States.⁷ Kry's attorney conceded to Vanny Bio Research's unlawful activities in her opening statement:

You will learn that long tailed Macaques are used in the United States and around the world for medical research. You will also learn that Cambodia is home to a number of long tailed Macaque breeding farms. Vanny is one of those farms. So there will be a lot of evidence in this courtroom about Vanny and its employees -- that it did not operate lawfully -- that Vanny was conspiring to import wild caught long tailed Macaques to the United States. You will see lots of e-mails, you will see lots of charts, you'll see lots of text messages, and you will see pictures and videos -- you'll see 100 videos that will show that Vanny was doing just that.⁸

Even though, during the OLL investigation, the OLE documented thousands of wild LTM deliveries arriving at Vanny Bio Research, the FWS failed to initiate timely measures to protect the remaining wild LTM populations in Cambodia. Shipments of LTMs into the U.S. continued, evidencing that the FWS did not (1) notify the Division of Management Authority that the CITES permits being issued by Cambodia for LTMs being imported into the U.S. were not valid; (2) take measures to halt the imports into the U.S. until Cambodia provided information fully documenting the captive-bred status; (3) notify Cambodia that before allowing the import of any additional LTM shipments, the U.S. would require more information, documentation, and assurances that the LTMs being exported from Cambodia to the U.S. were captive bred; (4) notify the CITES management authority of the same.

⁵ See generally Testimony of Martha Williams, House Comm. Nat. Res. 4 (Sept. 10, 2024), https://naturalresources.house.gov/uploadedfiles/testimony_williams01.10.pdf.

⁶ Trial Tr. at 77:7-25, 78:1-10, March 14, 2024, United States v. Kry, 1:22-cr-20340 KMW-8 (S.D. Fla. 2024).

⁷ See generally Superseding Indictment, United States v. Keo, 22-20340-CR-WILLIAMS(s) (S.D. Fla. filed Nov. 3, 2022), <https://www.peta.org/wp-content/uploads/2022/11/US-v-KEO-et-al.pdf>; Trial Tr. at 66:1-15, 67:25, 68:1-17, March 12, 2024, United States v. Kry, 1:22-cr-20340 KMW-8 (S.D. Fla. 2024) (describing a photograph showing two individuals sitting together at a table at the Sun Moon Hotel in Phnom Penh, Cambodia: Geraldine Fleurie (the veterinarian responsible for inspecting Vanny Bio Research LTMs prior to export to her employer, Orient BioResource, in the U.S.) and Hing Ip Chung (the general manager of Vanny Bio Research who was later named in the OLL indictment for allegedly "facilitat[ing] payments to Cambodian government officials for their involvement in the capture of wild long-tailed macaques and payments made to black market collectors of wild-caught long-tailed macaques for export to the United States")).

⁸ Trial Tr. at 32:14-25, 33:1, March 12, 2024, United States v. Kry, 22-CR-20340 (S.D. Fla. 2024).

- In 2023, an NGO located in Cambodia reported to the OLE that wild LTMs seized by the Cambodian MAFF and placed at the NGO’s rescue facilities were unexpectedly removed by MAFF officials in the early morning hours without any security check-in or coordination with the NGO’s management. The NGO’s management reported that MAFF transported these seized wild LTMs to local breeding farms to supplement the farms’ stock. Due to the frequency of occurrence, the NGO’s management became suspicious and began to mark the wild macaques with marking solutions in an attempt to track their journey. The NGO reported this marking project to OLE.
- On April 12, 2023, PETA, along with thirty-seven individuals/organizations, submitted a [petition](#) urging the FWS to list the LTM as a threatened or endangered species under the Endangered Species Act.⁹ The petition summarized, supplemented, and incorporated by reference the IUCN’s detailed 2022 assessment, which elevated the status of LTMs from “vulnerable” to “endangered” on the IUCN Red List of Threatened Species.¹⁰ The assessors estimated that the species “experienced a decline of at least 40% over the last three generations (approximately 40 years)” and anticipated that the current level of exploitation would cut the population at least in half over the next three macaque generations.¹¹ In its 90-day determination, the FWS irresponsibly rejected the petition, deciding that the findings in the assessment—which were scientifically sufficient to cause the IUCN to elevate the species status to “endangered”—did not, at a minimum, raise enough concern to trigger a comprehensive assessment by the FWS.¹²
- On November 21, 2024, PETA alerted Ms. Aziz in a [letter](#) about a scheme Charles River Laboratories had been engaging in since January 2023, to circumvent FWS scrutiny of the validity of their permits to import live LTMs from Cambodia, by importing over 6,800 endangered monkeys of Cambodian origin into Canada instead. Once in Canada, the animals’ blood, tissues, and other body parts were reclassified as “specimens” and re-exported to Charles River’s U.S. facilities. The letter linked to the [analysis](#) PETA prepared on July 10, 2024, that raised questions regarding the reliability and validity of claims made by Cambodia about their success with captive breeding. The report described growth rates reported to CITES by Cambodian monkey farms, Vanny Bio Research and K-F Cambodia, between 2017 and 2023, which were biologically impossible. Despite having this information, the FWS failed to halt the import of specimens derived from laundered LTMs.
- On January 27, 2025, PETA, along with thirty-nine individuals/organizations, submitted a [petition](#) to the FWS, again urging the FWS to list the LTM.¹³ The 2025 petition supplemented the 2023 petition with new information that documented that the species’ catastrophic population declines were even more severe than those considered in the 2023 petition.¹⁴ The

⁹ See *Petition*, ECOS (Apr. 12, 2023), https://ecosphere-documents-production-public.s3.amazonaws.com/sams/public_docs/petition/4093.pdf (exhibits omitted).

¹⁰ See generally M. F. Hansen et al., *Macaca fascicularis*, THE IUCN RED LIST OF THREATENED SPECIES 10 (2022), <https://www.iucnredlist.org/species/12551/221666136> (click “Download” and “Assessment”).

¹¹ *Id.* at 3.

¹² See FWS, *supra* note 1.

¹³ See *Petition*, ECOS (Jan. 27, 2025), https://ecosphere-documents-production-public.s3.amazonaws.com/sams/public_docs/petition/22056.pdf (exhibits omitted).

¹⁴ See Andre L. Koch Liston et al., *A Model for the Noninvasive, Habitat-Inclusive Estimation of Upper Limit Abundance for Synanthropes, Exemplified by M. fascicularis*, 10 SCI. ADVANCES 4 (2024), <https://www.science.org/doi/epdf/10.1126/sciadv.adn5390>.

2025 petition included, inter alia, a [population viability analysis](#) (PVA) conducted by the IUCN Species Survival Commission Conservation Planning Specialist Group and published in 2024 that described the severity of the threats affecting populations of LTMs in different regions across the species' range and examined how various threats impacted population viability via modeling.¹⁵ The PVA described how “the capture of adult females is highly valued . . . as they are prized as breeders in captive rearing [sic] facilities” and explained that removing adult female long-tailed macaques from their native habitat (as well as randomly removing individuals across age classes) leads to plummeting populations that are difficult, if not impossible, to recover.¹⁶ The FWS's 90-day determination on this petition is pending.

- On February 28, 2025, PETA supplemented the 2025 petition with an in-depth investigative [report](#) produced earlier that month by Sandy River Research: *Unveiling the Dark Side of the Monkey (Macaque) Trade: A Comprehensive Exposé on Corruption and Illegality in Mainland Asia*.¹⁷ The report revealed how, in Cambodia, Vietnam, Laos, and China, the “legal” trade in non-human primates (NHPs) is systematically manipulated and described how “NHP breeding farms have disguised their inability to purpose breed sufficient NHPs to meet global demand by, with the assistance of corrupt officials, . . . illegally supplementing their farms with monkeys routinely laundered from the wild.”¹⁸ The report's key findings included:

Biologically impossible breeding rates. Facilities in Cambodia and Vietnam self-report birth rates greatly exceeding scientifically established limits—discrepancies that could only arise if large numbers of wild-caught macaques were being falsely labeled as “captive bred.”

Contradictory facility data. Satellite imagery and official documentation reveal that many farms dramatically overstate their housing capacity and breeding operations. These inconsistencies strongly indicate the laundering of wild-caught macaques on an industrial scale.

Alarming volume of “missing” animals. Our calculations demonstrate that tens of thousands of primates exported under supposedly legal CITES permits could not plausibly have come from legitimate breeding operations. The only logical explanation is an influx of wild-caught stock.

Compliance failures of imports and [Contract Research Organizations (CROs)]. Despite public commitments to source only “legally bred” animals, prominent [CROs] and importers continue

¹⁵ See generally A POPULATION VIABILITY ANALYSIS (P.V.A.) APPROACH TO THE CONSERVATION OF THE LONG-TAILED MACAQUE (MACACA FASCICULARIS) (Simon Valle ed. 2024), <https://www.cpsg.org/sites/default/files/2024-10/PVA%20for%20the%20Long-tailed%20Macaque%20%28Macaca%20fascicularis%29.pdf>.

¹⁶ *Id.* at 15, 34.

¹⁷ See generally *Unveiling the Dark Side of the Monkey (Macaque) Trade*, SANDY RIVER RSCH. (Feb. 18, 2025), <https://sandyriverresearch.com/unveiling-the-dark-side-of-the-monkey-macaque-trade/>.

¹⁸ *Id.*

to buy from Mainland Asian farms that cannot substantiate their claimed captive-breeding standards. Due diligence processes remain critically deficient.

Regulatory gaps and corruption. Recurrent false statements submitted to CITES, along with documented corruption in China, Cambodia, Vietnam, and Laos, create an environment where smugglers and unscrupulous farms profit from high global demand. Regulatory agencies have thus far failed to effectively curtail these rampant abuses.¹⁹

- In March 2025, the Cambodian MAFF published photographs on its website showing former Department of the Interior Secretary David Burgum—who oversaw the FWS during OLL—at Cambodian breeding facilities (including Vanny Bio Research) on the same day that DOJ-indicted fugitive Hing Ip Chung (the general manager of Vanny Bio Research) was present. A U.S. Charles River Laboratories representative was also pictured. PETA raised concerns about the apparent business relationship, particularly amid allegations that the FWS was considering releasing the monkeys at the center of the OLL investigation to Charles River, in a [letter](#) it sent on July 10, 2025, to Secretary Burgum and others. PETA wrote: “A former cabinet official doing business with a Charles River executive and a monkey exporter wanted for federal crimes in the U.S. undermines the ability of authorities to enforce trafficking laws and impacts the prosecution of wildlife smuggling cases.”

When testifying about OLL before the House Committee on Natural Resources, Director Martha Williams affirmed the Service’s commitment to combating the illegal wildlife trade.²⁰ Likewise, the OLE identifies preventing the unlawful import and export of wildlife as a fundamental strategic goal.²¹ So why, when the FWS has substantial incontrovertible evidence regarding the large-scale (i.e., tens of thousands per year) illegal collection of wild LTMs in Southeast Asia (specifically, Cambodia) and their subsequent sale and export to the U.S. biomedical and pharmaceutical industry, has the Service not taken independent action to initiate a status review? Is the FWS sharing information internally across departments and with Service biologists involved in the candidate assessment process?²²

While the FWS drags its feet, the monkey laundering carries on. As recently as last month, a whistleblower relayed to PETA that hundreds of LTMs died while en route to K-F Cambodia when the trucks transporting them broke down. This farm is on record with CITES as only

¹⁹ *Id.* “[I]n 2020, 2021, and 2022, the number of infants the Cambodian government . . . reported that had been born in each year exceeded what was possible from the maximum female breeder population by approximately 110,000 macaques—NHPs that could not have been born on the farms and would have had to have been laundered onto the farms, just as the CITES Animals Committee had determined.” *Id.* at 35.

²⁰ Testimony of Martha Williams, House Comm. Nat. Res, *supra* note 5, at 4.

²¹ U.S. FISH AND WILDLIFE SERVICE OFFICE OF LAW ENFORCEMENT STRATEGIC PLAN 2021-2025, FWS 4, <https://www.fws.gov/sites/default/files/documents/OLE%20Strategic%20Plan%20-%202021-2025%20plan.pdf> (last visited Oct. 2, 2025).

²² *See Foreign Species and the Endangered Species Act*, FWS (Sept. 2020), <https://www.fws.gov/sites/default/files/documents/2025-09/foreign-species.pdf>.

engaging in captive breeding, which begs the questions: Why would K-F Cambodia be bringing in several hundred LTMs, and where were these monkeys sourced from?²³

The large-scale collection of wild-caught LTMs—prodded by industry demands—is unprecedented and unsustainable. It is incumbent upon the FWS to work collectively—for the OLE to communicate with the Division of Management Authority (i.e., the U.S. CITES Management Authority) and Service biologists and share investigative information. The FWS has the information to warrant initiating a status review of the species—and it is overwhelming. Now it must act.

Thank you for your immediate attention to this matter. May I please hear from you as soon as possible?

Sincerely,

A handwritten signature in blue ink, appearing to read 'L. Jones-Engel', with a stylized flourish at the end.

Lisa Jones-Engel, Ph.D.
Senior Science Advisor, Primate Experimentation
Laboratory Investigations Department
LisaJE@peta.org
206-372-6190

²³ See *Captive-Bred and Ranches Specimens*, AC33 Doc. 15.2, CITES (July 12, 2024), https://cites.org/sites/default/files/documents/E-AC33-15-02_2.pdf (Cambodia's response to question code F4).