



October 17, 2023

Donald Payne, Commissioner Precinct 1
 Ryan Cade, Commissioner Precinct 2
 Stacy Adams, Commissioner Precinct 3
 David Linder, Commissioner Precinct 4

Brazoria County Courthouse
 111 E. Locust St.
 Angleton, TX 77515

Via e-mail: dudep@brazoriacountytx.gov; rcade@brazoria-county.com;
StacyA@brazoriacountytx.gov; davidl@brazoriacountytx.gov

Dear Commissioner Linder, Adams, Cade and Payne:

I'm writing on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 9 million members and supporters globally, including over 329,000 in Texas, with 3,600 in Brazoria County—regarding Charles River Laboratories' recent purchase of land in Brazoria County under the name Kandurt LLC. You may be aware of the company's intention to develop a sprawling monkey facility that would receive newly imported monkeys as well as warehouse and possibly breed them for sale and use in the animal experimentation industry. Multiple Brazoria County residents have contacted us out of justifiable concern for their water, land, and safety.

The critical information below was compiled by PETA scientists. It concerns public health disease risks, water and soil contamination, the likelihood of primates escaping from the facility, and the federal investigations that Charles River is facing because of its monkey business. We ask that you consider all these issues before you decide on Kandurt/Charles River's request to house hundreds of monkeys at a facility—and to move thousands of them in and out of that facility—in Brazoria County.

What Is Charles River Laboratories?

Charles River is a top importer of long-tailed macaque monkeys to the U.S. It experiments on more monkeys—16,000 in 2022 alone—than any other laboratory. It has monkey holding facilities or laboratories across the country, including in Ashland, Ohio; Houston; Kansas City, Missouri; LaBelle, Florida; Mattawan, Michigan; Reno, Nevada; and Shrewsbury, Massachusetts. None of these facilities are in such an ecologically sensitive area as the proposed site in your county. Charles River has a sordid history of violations of animal welfare regulations and of upsetting neighbors. It has failed to provide adequate veterinary care to animals, failed to provide suffering animals with pain relief, failed to ensure the psychological well-being of primates, and pathologically neglected animals, resulting in horrific deaths. The U.S. Department of Agriculture (USDA) issued the company the maximum fine for violating the federal Animal Welfare Act after 32 monkeys baked to death at its Nevada laboratory when a thermostat malfunctioned and no one noticed. The company

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- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
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once [owned islands](#) in the Florida Keys, where it allowed a monkey colony to decimate the mangrove forest, pollute public waters, and erode the shoreline.

Earlier this year, Charles River admitted that it's under [federal investigation](#) by the U.S. Department of Justice (DOJ) related to the alleged illegal smuggling of monkeys from Asia in order to sell them to U.S. laboratories. Shortly after this news broke, some of its investors initiated a lawsuit against the company for failing to release information about this threat to company profits. This development follows DOJ [indictments](#) of Cambodian officials and nationals for allegedly selling monkeys abducted from their forest home and falsely labeled as bred in captivity. The U.S. Fish & Wildlife Service (FWS) ended the importation of monkeys from Cambodia following the indictments. In August 2023, Charles River also admitted that the U.S. Securities and Exchange Commission had opened a new inquiry into its monkey-importation practices. CEO James Foster recently told investors that the company was moving its monkey business to areas with more friendly governments, and it appears that it has set its sights on rural Brazoria County.

Risk of Spreading Dangerous Pathogens and Diseases

The Centers for Disease Control and Prevention (CDC) has warned that imported monkeys pose a significant risk to public health. Bacteria and viruses that the monkeys are exposed to in Asia and Mauritius can be spread to humans and other animals here. Monkeys involved in the wildlife trade for experimentation are known to carry and transmit a slew of nasty pathogens and diseases, including herpes B virus, tuberculosis, antimicrobial-resistant microbes, Ebola-like viruses, simian hemorrhagic fever virus, shigellosis, salmonellosis, Campylobacter, malaria, dengue, and leprosy. More than a decade ago, a representative of the CDC testified before a congressional subcommittee that “nonhuman primates imported into the United States from foreign countries often have an uncertain health history and may potentially carry diseases infectious to humans.” Documents received by PETA from the CDC via a Freedom of Information Act request showed a startling increase in monkeys arriving into the U.S. infected with deadly pathogens and diseases, including tuberculosis, Shigella, Campylobacter, and malaria, over the past three years.

Although commercial monkey importers like Charles River are required to screen for deadly pathogens that could infect humans, these pathogens are often missed, not all can be detected, and some don't show up until months or years later. In addition, new, unidentified viruses that have the potential to cause pandemics are a risk. Researchers interested in the inherent zoonotic disease risks associated with the international animal trade have determined that trade in two primate species—long-tailed macaque monkeys and rhesus macaque monkeys—have the greatest potential for the transmission of zoonotic disease. This situation is of particular concern, as it's almost certain that Charles River would be housing one or both of these species in Brazoria.

Additionally, PETA has [caught](#) Charles River failing to conduct required veterinary exams before trucking monkeys, often by the dozens, across the country. The USDA cited the company for this violation. As these exams are meant to prevent the spread of disease, it's deeply concerning that monkeys who haven't been examined for diseases may be transported by the hundreds across Texas highways to Brazoria County.

Charles River is proposing to warehouse imported monkeys on agricultural and environmentally sensitive land in Texas. They would generate an enormous amount of biological waste. Monkey urine, feces, saliva, blood, and other bodily fluids would be introduced into the environment, along with any infectious agents present in those bodily fluids. Last year, the [CDC alerted public health](#)

[veterinarians](#) around the country following the importation of long-tailed macaques who were infected with a deadly bacteria that can contaminate soil and water.

The waste generated by this facility would contaminate the soil and water as well as attracting insects, birds, and other wildlife, who would be drawn to the smell of food and the presence of monkeys. Texas has numerous insects capable of increasing the risk of transmission of parasites, bacteria, and viruses. The threat of zoonotic malaria transmission looms large, given that the proposed facility would house monkeys who could be naturally infected with malaria parasites from Asia and that the presence of standing water would create ideal breeding grounds for mosquitoes, who could feed on the monkeys' blood and then transmit malaria parasites to humans.

Only a handful of these sprawling monkey facilities exist in the U.S., and we're monitoring their detrimental impact on the areas they occupy. Another monkey importer, Inotiv, is [currently under investigation](#) for possible violations of the Clean Water Act, the Texas State Water Control Law, and local pretreatment requirements at its monkey-breeding farm in Alice.

Risk of Escape

Monkeys being transported in and out of quarantine facilities pose another dangerous risk—they may escape into the surrounding area. Last year, a transport pickup truck on its way to a quarantine facility hauling a trailer with 100 long-tailed macaques—who had been flown from Mauritius to John F. Kennedy International Airport in New York—[collided](#) with another vehicle outside Danville, Pennsylvania. Dozens of wooden crates holding these monkeys were propelled out of the trailer and onto a highway. Several monkeys escaped, and authorities confirmed that three had been shot dead. Some of the people who stopped to survey the scene of the accident had direct contact with the newly imported monkeys, and at least one individual required preventive treatment after being exposed to macaque bodily fluids.

Primates have escaped from even the most “prestigious” monkey laboratories. In 2018, four baboons who had broken out of Texas Biomedical Research Institute were seen by passersby on a highway before they were recaptured. Before that, [chimpanzees escaped](#) from MD Anderson Cancer Center in Bastrop, Texas, on two occasions. Monkeys have also escaped from Tulane University, Oregon Health & Science University, Emory University, and Wake Forest University. Since such escapes occur at facilities with supposedly the most secure level of laboratories, it's reasonable to say that monkey escapes from Charles River would not be a question of *if* but *when*.

Importing Endangered Monkeys for Deadly Experiments

The number of long-tailed macaques in Southeast Asia is plummeting, and the species was recently elevated from “vulnerable” to “endangered” status by the International Union for Conservation of Nature. Corporations such as Charles River were cited as a significant threat to these monkeys. Monkeys shipped to facilities like the one Charles River is attempting to establish in your county were torn away from their homes in nature or else were confined on squalid breeding farms in Asia or Africa. When these monkeys are shipped to the U.S., they're separated from their families, locked inside small wooden crates, and crammed into dark, terrifying airplane cargo holds for as long as 30 hours. Eventually, if they pass the quarantine at facilities like the one Charles River is proposing, they're trucked to laboratories that will poison them, cut them up, and kill them.

Please Keep Charles River Laboratories Out of Brazoria County

It's of grave concern that this scandalous company has purchased more than 500 acres in Brazoria for a dangerous monkey facility, particularly as it appears to be an old-growth oak forest surrounded

by floodplain and other ecologically sensitive land. We urge the committee to immediately investigate all options to prevent Charles River from setting up this dangerous facility. Please contact me if you want further details or other support. Thank you for your consideration of this important matter.

Sincerely,

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

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