



May 14, 2024

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:

I'm writing on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 9 million members and supporters globally—to provide newly uncovered information about incidents with marmosets at the University of Massachusetts—Amherst (UMass; USDA Certificate No. 14-R-0036) in the laboratory of Agnès Lacreuse. In light of this information, we urge the U.S. Department of Agriculture's (USDA) APHIS to increase inspections of Lacreuse's laboratory and to issue heightened penalties to UMass for violations of the federal Animal Welfare Act (AWA).

In December, we wrote to inform you that PETA had obtained records from the Office of Laboratory Animal Welfare (OLAW) documenting that on May 13, 2023, one marmoset had escaped from a cage and another one had been injured. On January 12, APHIS conducted a focused inspection and cited UMass with a "primary enclosures" violation for the May 13 incident. The inspection report notes, "Primary enclosures must contain the animals and prevent opening of the enclosure by the animal. The facility must ensure that the animals are securely contained by their primary enclosures."

This incident was not the first time that a marmoset has been injured in Lacreuse's laboratory. She and her laboratory staff have repeatedly demonstrated inattentive handling of marmosets, which has resulted in animals escaping from cages and sustaining injuries. Additionally, we now know that UMass has provided incorrect and incomplete information about prior incidents in Lacreuse's laboratory.

UMass provided incorrect information about an incident in which a marmoset's tail was amputated. According to a USDA inspection report dated June 26, 2017, a marmoset escaped from an acclimation device and the "animal's tail was injured during ... recapture by laboratory staff." In documents that PETA obtained from UMass, the daily event records for April 25, 2017, describe the tail injury as follows: "tail tip got caught in metal flange at bottom of air duct, distal approximately 1 cm of tail tip avulsed with amputation of distal tip." However, the notification that UMass submitted to OLAW states that this incident occurred on April 27 rather than 25. The UMass notification also states, "Tail injured during recapture. Tail amputated and animal doing fine." OLAW summarized the injury by stating that the "animal's tail was damaged requiring amputation." A tail that's accidentally amputated by getting caught in a metal flange is not the

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same thing as a tail injury that's then addressed via surgical amputation, and UMass didn't offer a correction.

Additionally, UMass didn't report at all when, in July 2018, the same marmoset sustained bruising to his mouth and had an abscess under his chin that required topical antibiotics. The bruising seems to have resulted because the marmoset's ID necklace became caught in his mouth. Four days later, an abscess was noted under his chin, which may have been caused on his ID necklace or a neck-worn device to monitor the overnight activity of marmosets on his protocol. This incident should have been reported, as the Public Health Service Policy on Humane Care and Use of Laboratory Animals and the *Guide for the Care and Use of Laboratory Animals* (the Guide) require that an institution "develop methods for reporting and investigating animal welfare concerns" and that the institutional official and Institutional Animal Care and Use Committee have the responsibility to review and investigate concerns (the Guide, p. 23). Additionally, the OLAW notice on "Guidance on Prompt Reporting to OLAW Under the PHS Policy on Humane Care and Use of Laboratory Animals" states that "conditions that jeopardize the health or well-being of animals" are reportable situations.<sup>1</sup>

Given the pattern of marmoset injuries and escapes at UMass—along with this information about UMass's incorrect and incomplete reporting—we urge you to increase inspections and issue heightened penalties for AWA violations, in addition to inspecting the records and conditions of the other marmosets in the custody of UMass. As of March, Lacreuse's laboratory held 24 marmosets.

Thank you for your consideration of this important matter. You can contact me at [AmandaSc@peta.org](mailto:AmandaSc@peta.org).

Sincerely,



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cc: Animal Care Complaints, APHIS ([AC.Complaints@usda.gov](mailto:AC.Complaints@usda.gov))  
Dr. Michael Watson, Administrator, APHIS ([michael.t.watson@aphis.usda.gov](mailto:michael.t.watson@aphis.usda.gov))

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<sup>1</sup>The notice is available at <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-05-034.html>.