AN INTERNATIONAL ORGANIZATION DEDICATED TO PROTECTING THE RIGHTS OF ALL ANIMALS

July 17, 2024

Roxanne Mullaney, D.V.M. Deputy Administrator Animal and Plant Health Inspection Service U.S. Department of Agriculture

Via e-mail: <u>Roxanne.C.Mullaney@usda.gov</u>

Dear Dr. Mullaney:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) to request that the U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS) immediately investigate whistleblower reports concerning monkeys imported by SkyTaxi (USDA Certificate No. 10-T-0023), reportedly for Charles River Laboratories Inc. (USDA Certificate No. 14-B-0013). According to the reports, a recent shipment of long-tailed macaques violated the federal Animal Welfare Act (AWA) and the associated Animal Welfare Regulations (AWR).

Crates of imported monkeys were "leaky" after landing in the U.S. PETA

received whistleblower reports concerning a shipment of reportedly more than 500 long-tailed macaques from Vietnam to Virgina on June 28. SkyTaxi transported the monkeys on a flight (tail number SP-MRG) that lasted approximately 26 hours. According to a whistleblower on the scene, when the crates arrived at Dulles International Airport, the ones holding monkeys were particularly smelly and "leaky" while they were being offloaded. It was also reported that the offloading was very disorganized and that no government officials were present, despite PETA's persistent attempts to urge the USDA, the U.S. Fish & Wildlife Service (FWS), and the Centers for Disease Control and Prevention (CDC) to inspect the shipment.

SkyTaxi's plane reportedly wasn't properly sanitized between monkey

shipments. Before flying to Vietnam with this shipment, the same SkyTaxi plane reportedly delivered hundreds of monkeys from Mauritius to Houston on June 24. A whistleblower reported that the odor from the plane was overwhelming and that the aircraft hadn't been properly cleaned and disinfected before it departed less than 24 hours later, with a layover in Anchorage, Alaska, for the Vietnam shipment.

Violations of the AWA and AWRs

We believe the June 28 shipment of monkeys from Vietnam failed to comply with the following AWRs.

1. Failure to provide a leak-proof enclosure

Section 3.87(a)(10) of the AWRs states the following:

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Primary enclosures used to transport nonhuman primates ... must be constructed so that: *The primary enclosure has a solid, leak-proof bottom, or a removable, leak-proof collection tray* under a slatted or wire mesh floor that prevents seepage of waste products, such as excreta and body fluids, outside of the enclosure. ... It must contain enough previously unused litter to absorb and cover excreta. The litter must be of a suitably absorbent material that is safe and nontoxic to the nonhuman primate and is appropriate for the species transported in the primary enclosure. [*Emphasis added*.]

The "leaky" crates report from people on the ground at Dulles when the shipment arrived indicates a clear violation of this regulation.

2. Failure to keep cargo space clean

Section 3.88(h) of the AWRs states that "the interior of the animal cargo space must be kept clean."

SkyTaxi failed to ensure that the crates didn't leak. Consequently, the interior cargo space was fouled with escaping waste. The airline also failed to sanitize the plane properly after transporting monkeys from Mauritius before picking them up from Vietnam.

High Risk of Spreading Tuberculosis and Other Diseases

Whistleblower allegations concerning these shipments of monkeys are particularly concerning, as monkey-breeding facilities in Mauritius and Vietnam are known to be riddled with disease. Mauritius facilities have had repeated outbreaks of *Mycobacterium tuberculosis*, a highly infectious pathogen that's readily transmitted between monkeys and humans. Last year, the Division of Global Migration and Quarantine at the Centers for Disease Control and Prevention issued an alert to primate importers and other stakeholders notifying them that between 2020 and 2022, four different strains of tuberculosis—*Mycobacterium tuberculosis*, *M. bovis*, *M. caprae*, and *M. orygis*—had arrived in the U.S. with monkeys imported from Southeast Asia and Mauritius. As SkyTaxi traversed the globe, transporting more than a thousand monkeys from geographically distinct regions within a 96-hour period, they stopped at multiple international airports, including Brussels Airport in Belgium. Like the U.S., Europe is also grappling with the importation of monkeys infected with diverse strains of tuberculosis and has recorded zoonotic exposures among workers.

Crowding immunocompromised monkeys from areas with known cases of tuberculosis into a cargo hold that hasn't been disinfected between flights amplifies the health risk for both monkeys and airport staff. The report that the monkey crates were leaking while being unloaded indicates a particularly dangerous situation for ground handlers and any other individuals coming into contact with the crates, monkey feces, and/or bodily fluids. In addition to tuberculosis, long-tailed macaques are known to harbor a variety of pathogens, including species of Campylobacter, Shigella, Samonella, and Yersina, many of which can be transmitted to humans. All these pathogens can undermine the animals' immune systems, which can result in increased shedding of pathogens in bodily fluids. Additionally, long-tailed macaques are known carriers of *Macacine herpesvirus* 1 (herpes B), a highly pathogenic zoonotic virus. Herpes B is shed in the bodily fluids of macaques, and infections in humans can occur following exposure.

SkyTaxi's recent USDA violations demonstrate the need for extra scrutiny. Just last month, the USDA cited the airline for three violations of the AWA following a shipment of 194 dogs and 99 cats from Afghanistan to Virgina. According to the <u>inspection report</u>, one of the wooden crates, containing an adult lab/hound mix dog named Megan, pulled apart when workers tried to lift it up. Every one of the crates was insufficiently built to allow proper ventilation, and several of the animals didn't have sufficient access to food or water. In addition to the violations, once the flight arrived, SkyTaxi apparently left the animals on the hot tarmac in Kabul for six hours.

FWS appears to have launched a law-enforcement investigation. In response to a Freedom of Information request submitted by PETA in May to FWS for documents related to the importation and transportation of long-tailed macaques by SkyTaxi from the Mauritius Noveprim facility to the Charles River Lab facility in Houston, we were notified by the agency that responsive documents would not be released because of the following:

Exemption 7(a) protects law enforcement records if their release could reasonably be expected to interfere with enforcement proceedings. For the material you have requested, is being withheld under 7(A), because it is a law enforcement record for a pending or prospective investigation and releasing it could reasonably be expected to interfere with enforcement proceedings because its premature release could prematurely reveal the full scope of evidence obtained; the assessment of the evidence; strengths and weaknesses of the government's evidence and case; and the progress, status, direction, and limits of the government's investigation.

In conclusion, we urge you to investigate the June 28 SkyTaxi shipment of monkeys and take swift, decisive action that includes citing the airline for violations of the AWA and the AWRs.

Thank you for your consideration of this important matter.

Sincerely,

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

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