



PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

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October 11, 2024

Mathew Green, MP
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Laurel Collins, MP
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Dear MP Green and MP Collins,

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 more than 495,000 in Canada. On August 10, 2024, a cargo plane carrying monkeys destined for use in experimentation landed at Montréal-Mirabel International Airport, defying the Canadian Transportation Agency's refusal to issue a landing permit. The plane, operated by SkyTaxi and chartered by Charles River Laboratories, had departed more than 48 hours earlier from Phnom Penh, Cambodia. In wooden crates, stacked one atop the other, were 680 long-tailed macaques (*Macaca fascicularis*), classified as endangered by the International Union of the Conservation of Nature (IUCN). The pain, suffering, and terror that these self-aware, highly social, and emotional typically one- to two-year-old macaques endure is [undeniable and well documented](#), as is the consistent failure of experiments that rely on the monkeys to result in safe and reliable drugs and treatments to improve human health.

We have since learned that [Charles River Laboratories' SkyTaxi charters violated the Canada Transportation Act](#) each time they operated their international goods charter, from Phnom Penh, Cambodia to Montréal, Canada, because they had failed to obtain the required charter permit, thereby contravening section 21 of the Air Transportation Regulations. SOR/88-58 (ATR).

Charles River Laboratories' SkyTaxi Charters to Canada	Number of Cambodian-origin Monkeys	Declared Value of the Shipments
April 11, 2024	680	\$13,233,528
June 8, 2024	620	\$12,775,995
Aug. 10, 2024	680	\$13,299,352

Entities:

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



We were astonished to learn that within the past 22 months, Canada has emerged as the largest importer in the world of Cambodian-origin long-tailed macaques. This ignominious distinction can apparently be attributed to a northerly shift in the trade following a de facto halt of these shipments into the U.S. In November 2022, following a five-year undercover investigation by the U.S. Department of Justice (DOJ) and the U.S. Fish & Wildlife Service into the alleged laundering and export of Cambodian wild-caught macaques passed off as captive-bred, the DOJ indicted Cambodian government officials and Cambodian monkey farm owners for their alleged involvement in falsifying CITES export permits. [A few months later Charles River announced in an earnings call that they had been subpoenaed by the DOJ, “relating to an investigation into the Cambodian non-human primate \(NHP\) supply chain”](#) and that their five most recent shipments of macaques from Cambodia into the U.S. had been denied clearance by the U.S. CITES Management Authorities because the company was unable to prove that the monkeys were not falsely labeled as captive-bred.

Currently, Charles River is barred from using any of the 1,269 Cambodian-origin macaques they imported into the U.S. in late 2022 and early 2023.

In 2023, Charles River began pouring Cambodian-origin long-tailed macaques into Montréal and over the past 22 months 6,766 of these monkeys have arrived, 1,980 of them via the illegal SkyTaxi charters. There is no indication that the Canadian CITES Management Authority, which is administered within your Ministry, has implemented additional scrutiny of these shipments to determine whether the trade is legal, sustainable, and traceable.

There is no indication that Canadian CITES authorities have investigated whether the violations of the Canada Transportation Act by Charles River’s SkyTaxi charters would trigger action under the Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act (WAPPRIITA), the law through which Canada fulfills its obligations under CITES. WAPPRIITA is enforced by the Canadian Border Services Agency (CBSA) on behalf of Environment and Climate Change Canada. According to WAPPRIITA, “Documentation submitted to the CBSA must be true, accurate, and complete.”

David Beecham, director of global category procurement for Charles River, was apparently the individual responsible for obtaining the documentation required under Canadian or foreign law for the importation of the macaques and for verifying the international travel route for these shipments. Mr. Beecham has been in the business of facilitating the movement of monkeys around the world for decades, and it defies belief that he would not have been aware that SkyTaxi was [only permitted to fly charters from Poland to Canada](#) for his employer, Charles River. This raises the question of whether Mr. Beecham, SkyTaxi, and/or Charles River knowingly provided false information on the International Air Transportation Association (IATA) shipper's certifications or other documents that accompanied these shipments and would have been submitted to CBSA. Given the blatant

violations of the Canada Transportation Act and possible violation of IATA regulations requiring that, “Before any package containing live animals is tendered for transport by air, the shipper must ensure that: the animals being tendered for transportation are not prohibited by governments,” as well as possible falsification of documents, the decision now for the Canadian CITES Management Authority is whether or not to invalidate the Cambodian CITES export permits that these 1,980 macaques traveled on.

Primate Importation and Climate Change Contribute to the Emergence of Melioidosis¹ and Spillover of Other Disease

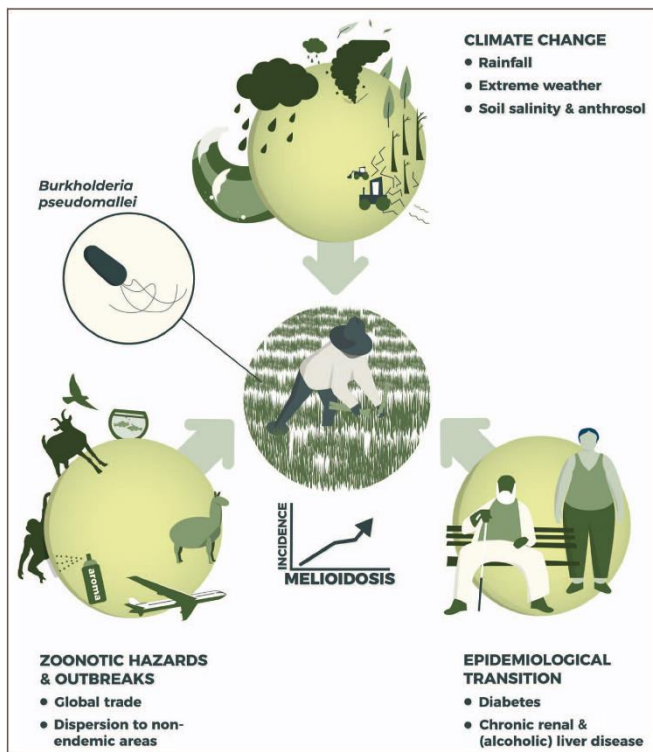
Canada’s involvement in the wildlife trade of monkeys from Cambodia also places it directly in the path of pathogen spillover. A study published in 2023, “[An analysis of Canada's declared live wildlife imports and implications for zoonotic disease risk](#)” by Canadian scientists examined wildlife imported between 2014-2020. The authors pointed to biosecurity challenges at the Canadian border and the lack of coordination between Canadian agencies, which collectively hinder the accurate assessment of zoonotic disease risk associated with live wildlife importations.

In 2022, at least five [monkeys imported from Cambodia](#) who had entered the U.S. were released from quarantine, after the importers failed to notice that the monkeys were harboring *Burkholderia pseudomallei*, a bacteria found in the environment in Southeast Asia and classified in the U.S. as a

bioterrorism agent capable of posing a severe threat to human and nonhuman animal health. The pathogen can be shed in urine, feces, blood, saliva, and pus and can become established in soil and water. Scientists around the globe are raising concerns about the likelihood that climate change, severe weather events, and the trade in primates will increase the risk of the bacteria becoming established in new environments.

The [lethality of *Burkholderia pseudomallei* cannot be overstated](#). Melioidosis, the disease caused by the bacterium, can manifest in various forms in both monkeys and humans, ranging from mild localized infections to severe systemic illness with a high mortality rate if left untreated. Compounding the challenge, infection with *Burkholderia pseudomallei* can mimic other, more common diseases, leading to misdiagnosis and delayed treatment.

Between 2019 and 2023, monkeys imported for experimentation into the U.S. arrived infected with *Macacine herpesvirus 1* (herpes B), a highly pathogenic zoonotic virus; *Mycobacteria tuberculosis*, *M. bovis*, *M. caprae*, *M. orygis*, [the causative agents of tuberculosis](#); and [deadly gastrointestinal](#)



¹ Source Drivers of melioidosis endemicity: epidemiological transition, zoonosis, and climate change Current Opinion in Infectious Diseases35(3):196-204, June 2022.

[pathogens, including Yersinia, Shigella, Campylobacter, and Salmonella](#). In addition, monkeys in quarantine in the U.S. showed clinical signs consistent with filovirus (Ebola-like viruses) infections. These data from the U.S. as well as documentation of the [recent outbreak and spread of tuberculosis in facilities throughout the EU](#) following the importation of long-tailed macaques from Vietnam, demonstrate that mandatory importation quarantines do not consistently detect monkeys infected with the bacteria, mycobacteria and viruses listed above. It is concerning that there is no readily accessible information about the infectious agents that have been detected during and after primate quarantine here in Canada.



The chances of the wildlife trade in primates for experimentation igniting the next global pandemic, through a lab leak or facilitating the spillover of a deadly pathogen via their sloppy handling of monkeys along every stage of the importation pipeline, cannot be dismissed. Workers who have contact with the crates of monkeys, including those with the airline, airport cargo handling crews, truck drivers, and laboratory staff, are potentially at risk, and these infections can be transmitted to the community. Handlers of previous SkyTaxi shipments of monkeys to the U.S. have lacked appropriate personal

protection equipment and training. Since SkyTaxi has reportedly failed to contain the animals' waste in some of its shipments properly, the problem extends beyond these directly-involved workers, as leaking crates can lead to a broader environmental exposure to deadly pathogens.

Disease proliferates at the monkey farms, too. Long-tailed macaques are highly social animals living in large multi-male, multi-female troops that can travel for kilometers each day as the monkeys forage for food, socialize and protect their territory. In the evening, they return to a sleeping tree in their home range where mothers cradle their infants, young animals play, and older animals stretch out on branches to sleep and groom. In their natural habitats these monkeys are critical to maintaining healthy ecosystems, functioning as seed dispersers, prey for other animals, and buffers for the transmission of vector born parasites to humans (many of the mosquitos that transmit malaria prefer to feed on monkeys up in the trees rather than on humans, but when the forest is emptied of monkeys the mosquitos bite and infect humans). Captured and placed into concrete and metal cages in the monkey "farms" of Asia and Mauritius, the monkeys quickly become depressed, injured and sick. Deadly pathogens transmitted through the constant contact with feces-contaminated surfaces and water result in very high mortality in the animals that are born in these facilities. Many of the monkeys die or are injured in the crowded, filthy, barren cages like the ones seen here taken at a monkey farm in Laos.

Extinction is Imminent

Breeding long-tailed macaques in captivity doesn't produce enough monkeys to meet the experimenters' demand. This has led to a deadly trade in wild-caught monkeys in which entire troops of macaques are targeted in vicious trapping schemes that involve cutting down the forest

areas around the sleeping tree to isolate the troop and capture as many members as possible. Macaques destined for Canada are boxed up at monkey factory farms like Charles Rivers' supplier K-F Cambodia. Earlier this year the [IUCN Species Survival Committee Conservation Planning Specialist Group released a population viability analysis](#) which showed that removing adult female long-tailed macaques, the preferred target for trappers, from their native habitat leads to plummeting populations that are difficult, if not impossible, to recover. If this is not stopped, Cambodia's forests will be entirely emptied of long-tailed macaques within a decade.

Current Fines Are Insufficient to Deter Violations

SkyTaxi was fined an anemic \$7,500 by CTA. Minor fines such as this are easily written off as the "cost of doing business" and are wholly inappropriate and ineffective for highly profitable companies like Charles River. To date, Charles River has not been penalized for these illegal importations despite a declared value of nearly \$40,000,000 worth of monkeys, and the company stands to make much more money if these 1,980 monkeys are sold to their clients. The only real deterrent would come from civil and criminal enforcement including large fines, seizure of animals, and the closure of Canada's borders to the international trade in endangered species of primates for experimentation. This evolving situation can't be allowed to develop into another SNC-Lavalin type affair where those with the financial means are given preferential treatment because they throw their weight around as employers. The laws exist precisely to make sure these big industry bullies do not get preferential treatment over the average Canadian.

Time for Canada to Act

It is imperative that Canada do its part to end the dangerous, unethical wildlife trade of endangered macaques for use in experimentation. Canadians have a responsibility not only for the well-being of people here and around the world, but for the sustainability of the few remaining forests in Asia and Mauritius that are fundamental to its Indigenous people's culture and livelihoods.

We urge the Government of Canada to immediately:

- Require definitive, biological evidence that long-tailed macaques imported from Cambodia were bred and born in breeding facilities, as the U.S. has done.
- Require definitive, biological evidence that long-tailed macaques imported from Cambodia were not trafficked across the border of Vietnam, Thailand, or Laos.
- Invalidate the CITES permits of the monkeys imported on the illegal Charles River SkyTaxi chartered flights.
- Ensure that all entities involved and within the jurisdiction of Canadian law, including corporations and individuals, be prosecuted to the fullest extent of the law.
- Increase penalties for permit violations as a deterrent against repeated violations so that paltry fines are not merely shrugged off as the cost of doing business here, and Canada is no longer perceived as a lax jurisdiction where Canadian and international laws that protect our global natural environment can easily be flouted.
- Ensure that all Canadian agencies including Environment and Climate Change Canada, Canada Border Services Agency, Canadian Food Inspection Agency, Canadian Wildlife Service and the Wildlife Enforcement Directorate are coordinating and using best practices to prevent the illegal wildlife trade of long-tailed macaques and accurately assessing the zoonotic disease risks.

- Develop legislation that would prohibit the importation of all species of primates for use in biomedical experimentation.
- Develop legislation that would benefit the conservation of long-tailed macaques by increasing global awareness of the threats they face.

Sincerely,

A handwritten signature in blue ink, appearing to read 'L. Jones-Engel', written in a cursive style.

Lisa Jones-Engel, Ph.D.
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PETA
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