

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

December 12, 2024

Sarah J. Helming
Deputy Administrator
Animal and Plant Health Inspection Service
U.S. Department of Agriculture

Via e-mail: Sarah.J.Helming@usda.gov

Dear Ms. Helming:

Good morning. I am writing on behalf of People for the Ethical Treatment of Animals (PETA, Inc.) to request that the U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service investigate possible violations of the federal Animal Welfare Act (AWA) related to the use and treatment of common marmoset monkeys (*Callithrix jacchus*) in sleep fragmentation experiments. The procedures in question were led by principal investigator (PI) Ricki Colman and conducted at the University of Wisconsin–Madison (Certificate No. 35-R-0001) and involved subjecting marmoset monkeys to sleep deprivation and other procedures under approved protocol #G006540.

In response to several Public Records requests, PETA received hundreds of documents related to these experiments, including veterinary care logs for the six marmoset monkeys enrolled in protocol #G006540. These veterinary records indicate the marmosets were all in poor health when subjected to various experimental procedures.

More specifically, at the time of training, urine collections, and sleep deprivation, there appears to have been a colony outbreak of diarrhea. **All six marmosets enlisted in this study were observed to have diarrhea in the cages for four to seven consecutive days at the time of testing**, and some were observed to have swollen anuses or feces caked on their bodies. One marmoset ([CJ2122](#)) had **lost 3% of her body weight before the sleep fragmentation** procedure administration on April 15, 2024. Two marmosets ([CJ2129](#) and [CJ2093](#)) had **diarrhea so severe** that they were treated with budesonide and required a special diet for weeks before, during, and after testing was performed.

Despite these ongoing health issues and the likelihood that they would impact the integrity of the data being collected, the experimenters chose to forge ahead to ensure that some amount of data was acquired before the scheduled end date of this project.

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

Entities

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

We believe this may indicate a **failure on the part of the Institutional Animal Care and Use Committee (IACUC) to ensure that procedures involving animals will avoid or minimize discomfort, distress, and pain to the animals [9 C.F.R. §2.31(d)(1)(i)]**. Allowing these six marmosets, whose gastrointestinal issues may have been the result of stress, infection, poor diet, or the onset of marmoset wasting disease, to remain on study and be subjected to repeated behavioral testing, urine collection, and a night of noise-induced repeated sleep disruption, the experimenters likely exacerbated the discomfort, distress, and or pain the animals would experience from those procedures.

This decision is especially concerning given that the UW-Madison IACUC classified this protocol as Category E for pain and distress and that waiting until the marmosets were healthy to perform any Category E procedures would have been ethically and scientifically prudent. It appears the experimenters put the project's data collection timelines over the health and well-being of the animals. We request that the USDA investigate whether any AWA regulations were violated. Thank you in advance for your time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katherine Roe', written in a cursive style.

Katherine Roe, Ph.D.
Chief Scientists
Laboratory Investigations Department

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