



February 12, 2025

Sarah J. Helming
Deputy Administrator
Animal and Plant Health Inspection Service
U.S. Department of Agriculture
Via e-mail: Sarah.J.Helming@usda.gov

Subject: Concerns Regarding USDA's Inspection Report on Alpha Genesis

Dear Ms. Helming,

As a primate scientist who has observed and provided care for free-ranging macaques in Asia and worked with macaques within biomedical facilities in the U.S., I am deeply familiar with the stresses and dangers these monkeys face. It is stunning that the USDA's focused inspection report of Alpha Genesis (56-B-0120), dated November 25, 2024, which PETA obtained through a Freedom of Information Act request to the National Institutes of Health's Office of Laboratory Animal Welfare (OLAW), failed to classify the escape of 43 young rhesus macaques as a critical violation—despite clear evidence that it meets the USDA's own criteria for such a designation.

USDA Issued a Final Report While Monkeys Remained at Large

The inspection report does not mention any escaped animals' health and welfare. Rather, the focus appears to be on verifying that doors were left unlocked during the routine husbandry duties provided by a group of caretakers. Your Veterinary Medical Officer referenced only Section 2.131(b)(1) of the Animal Welfare Regulations (AWRs). How, at a minimum, would Sections 3.82 (Feeding) and 2.40 (Veterinary care, in reference to dealers and exhibitors) of the AWA not apply in this situation?

A review of the documents that AGI and USDA submitted to OLAW does not indicate that the USDA Veterinary Medical Officer conducted any direct inspection of the 39 animals whom AGI claimed they had "safely captured utilizing traps and returned in good states of health and welfare." And, of course, there could be no evaluation of the four animals who were at that time unaccounted for. Given Alpha Genesis' long history of opacity and obfuscation regarding animal welfare, the USDA should not accept its claims at face value.

A Dangerous, Uncontrolled Environment

The 43 purpose-bred macaques, removed from the NIH's Morgan Island provisioned colony prior to their escape from the AGI facility, were born and subsequently maintained in a controlled environment as required by the AWA for primates used in experimentation. When these animals escaped AGI's notoriously porous facility (over the past decade, 109 macaques have escaped,

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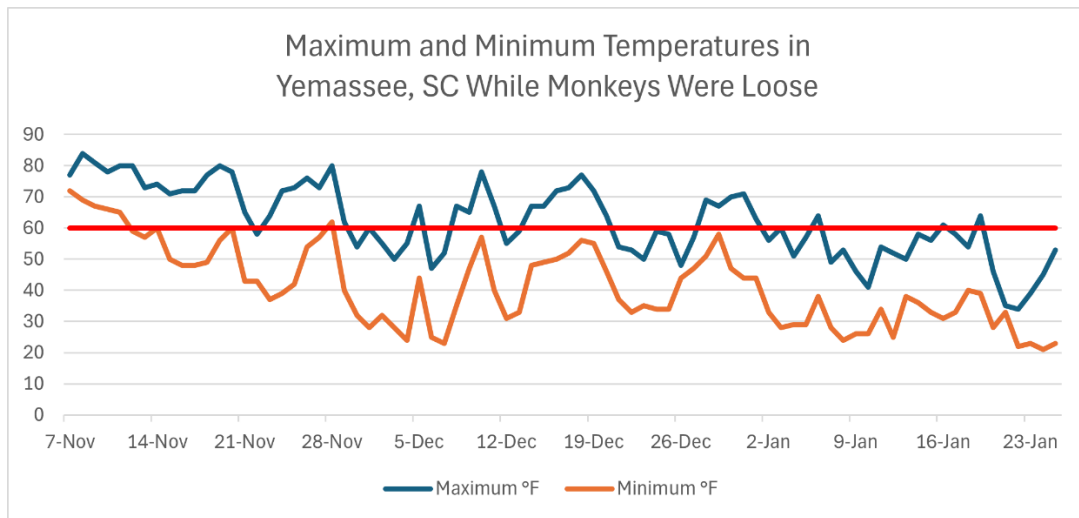
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and not all of them have been recovered¹) on November 7, they entered an environment that lacked the AWA-required diet, veterinary oversight, stable housing temperature ranges, and daily observations.

The forests, streets, backyards, and Chinese restaurant dumpsters of Yemassee, South Carolina, do not constitute controlled environments. Much like the environments that free-ranging macaques in Asia inhabit, the macaques ranging in and around Yemassee were forced to contend with vehicles (as we have already notified your agency, a whistleblower from AGI reported that one of the escaped monkeys was hit and killed by a car right outside the facility on November 7); they would have confronted domesticated dogs, terrestrial wildlife, and raptors; they would have foraged for food wherever they could find it; and low ranking and/or younger animals would have been particularly vulnerable to aggression from the other monkeys, as well as reduced access to food. The temperatures in Yemassee ranged from 21 degrees to 84 degrees from November 7th to January 25th. There were 72 days when the low reached below 60 degrees, which includes 18 days when it dipped below 30 degrees. There is almost nothing more heartbreaking—and life-threatening and limb/digit/tail deforming—than cold, hungry monkeys left to fend for themselves. AGI receives millions in taxpayer funding to ensure that monkeys in its care are not subjected to harsh, uncontrolled environmental conditions.



Did Anyone Even Look at the Monkeys?

Anyone understanding basic macaque morphology who looks at the videos of the escaped macaques would see that AGI's claim that all were young rhesus macaques is absurd. There were obviously older and adult animals in the escaped group. It is our understanding that when macaques are removed from Morgan Island to fulfill an order for the NIH, they are tattooed on the island before being transferred to the Yemassee facility. Therefore, there must be records that provide

¹ <https://www.peta.org/wp-content/uploads/2025/02/2024-11-25-alpha-genesis-ir-escaped-monkeys.pdf>; <https://www.peta.org/wp-content/uploads/2024/11/2022-09-20-agi-dealer-3-critical-violations.pdf>; <https://www.peta.org/wp-content/uploads/2024/12/2017-07-24-agi-settlement-12600-1.pdf>; <https://www.peta.org/wp-content/uploads/2024/11/2016-02-23-agi-dealer-2-violations-1-was-critical.pdf>; <https://www.peta.org/wp-content/uploads/2024/11/2015-04-01-agi-dealer-1-violation.pdf>

unique identifiers for the 43 macaques. We note in the USDA report and the documents received from OLAW that the USDA inspector reported that they had inspected 218 rhesus macaques on November 25, 2024. Did your inspector personally examine the physical conditions of the 39 macaques that AGI claimed to have “recovered”? Did your inspector verify that the 39 “recovered” macaques had the same tattoo numbers as the 39 who were removed from Morgan Island? Has anyone examined the four macaques who reportedly spent 78 days on the loose? The USDA appears to have relied solely on AGI’s self-reporting, an unacceptable practice given the company’s history of noncompliance.

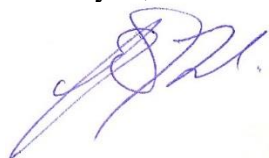
AGI itself acknowledged that the last four escaped macaques were observed huddling in trees—behavior that, while normal, would not have protected them from prolonged cold exposure. These animals would have been particularly vulnerable, given that they had been out in the elements for months.

The USDA’s own Animal Welfare Inspection Guide defines critical noncompliance as a situation causing “serious or severe adverse effects on an animal’s health and well-being.” The lack of proper housing, nutrition, and veterinary care for these macaques makes it undeniable that the standard for critical noncompliance standard was met.

This incident raises broader questions about the USDA’s oversight of Alpha Genesis. The National Institutes of Health currently holds \$19 million in contracts with Alpha Genesis. Was the USDA’s report in any way influenced by NIH’s financial ties to the company? The public should know whether federal regulators are acting in the interest of the animals they are protecting or if external pressures are shaping enforcement decisions.

We urge USDA APHIS Animal Care to reconsider the classification of this violation in light of the severe risks and suffering endured by these animals. We appreciate your attention to this matter and look forward to your response.

Thank you,



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