



Stop Animal Exploitation NOW!

Dr. Robert Gibbens
Director, Animal Welfare Operations, USDA/APHIS/AC,
2150 Center Ave.
Building B, Mailstop 3W11
Fort Collins, CO 80526-8117

9/23/21

Dr. Gibbens,

I am writing to you today to file an Official Complaint against the University of Louisiana, Lafayette, (72-R-0007 ULL) for clear violations of the Animal Welfare Act.

As you know, ULL was inspected by the USDA on 8/26/21, and was issued a Critical citation for the deaths of five infant macaque monkeys due to dehydration:

“3.75(d) Housing facilities, general: On July 19, 2021 in modular 31D there was an unresponsive infant rhesus macaque showing signs of dehydration with a poor prognosis which was euthanized. However, the dam was slightly underconditioned with adequate hydration and was placed on conservative treatment. The facility conducted daily study observations mid to late Monday morning with no indication of dehydration in any of the animals in the building . On July 20, 2021 two infant rhesus macaque deaths were reported and two infant rhesus macaques were reported unresponsive, and a third was reported dehydrated, but aware of it's surroundings. The attending veterinarian was notified of the water issue and treated all 3 animals. By the end of the day one macaque responded well to treatment while the others did not, and they were euthanized.”

It is simply unconscionable that ULL staff is incapable of effectively monitoring primates, noticing issues only when the animals are either dead, or unresponsive. The inspector was totally justified in issuing this CRITICAL citation, additional citations could also have been issued under Sec. 2.38 (f)(1) Animal Handling as well.

However, this is NOT the only incident at the University of Louisiana, Lafayette, which has killed monkeys recently. I have obtained a ULL report which is relevant to three more monkeys deaths.

The report, dated 8/26/20 states: ***"Animals were transferred outside between the hours of 8 am and 9:10 am. . . . At 12:30 pm three animals were found deceased. . . . The gross necropsy and pathology reports strongly suggest heat stroke."***

The report states that in the morning when the animals were released ***"The ambient temperatures were comfortable for that time of year, with a humidity of 60% and 80 - 83 degrees Fahrenheit."***

However, temperature archives for 8/5/20 (the date of the incident) show that by noon the temperature had reached 93 degrees Fahrenheit, and these monkeys were found dead at 12:30. Failure to protect these animals from temperature extremes is sheer negligence.

These additional monkey deaths, (apparently by heat stroke), clearly violate ***Sec. 2.38 Misc (f)(1) Animal Handling: Handling of all animals shall be done as expeditiously and carefully as possible in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort.***

Additionally, any non-compliance issued against University of Louisiana, Lafayette, for these 3 additional deaths should be in the Critical category because this incident had ***"a serious or severe adverse effect on the health and well-being of the animal."*** Clearly this incident had an adverse impact on these monkeys because they died, there is no more serious impact.

Since University of Louisiana, Lafayette, staff negligence unnecessarily killed a total of eight monkeys in two separate incidents, I must insist that you take the most severe action allowable under the Animal Welfare Act and immediately launch a full investigation, and at the conclusion of the investigation issue the maximum fine allowable against University of Louisiana, Lafayette (72-R-0007) -- \$10,000 per infraction/per animal.

I look forward to hearing from you in the near future about the fate of this facility.

Sincerely,

Michael A. Budkie, A.H.T.,
Executive Director, SAEN

Attachment: 1 USDA inspection report; 1 University of Louisiana, Lafayette Report



Inspection Report

UNIVERSITY OF LOUISIANA AT LAFAYETTE
P.O. BOX 41008
LAFAYETTE, LA 70504

Customer ID: **1451**
Certificate: **72-R-0007**
Site: 001
UNIVERSITY OF LOUISIANA AT
LAFAYETTE

Type: FOCUSED INSPECTION
Date: 26-AUG-2021

3.75(d) Critical

Housing facilities, general.

On July 19, 2021 in modular 31D there was an unresponsive infant rhesus macaque showing signs of dehydration with a poor prognosis which was euthanized. However, the dam was slightly underconditioned with adequate hydration and was placed on conservative treatment. The facility conducted daily study observations mid to late Monday morning with no indication of dehydration in any of the animals in the building . On July 20, 2021 two infant rhesus macaque deaths were reported and two infant rhesus macaques were reported unresponsive, and a third was reported dehydrated, but aware of it's surroundings. The attending veterinarian was notified of the water issue and treated all 3 animals. By the end of the day one macaque responded well to treatment while the others did not, and they were euthanized. Animal Resources confirmed that the lixits were working properly on Monday, but it was determined on Tuesday that there was a reduction in water pressure to the lixits. At this point, the water was shut off to prevent bloat, and all animals housed in the building were supplemented with water until the water supply was deemed functional. Upon further investigation, it was determined by the Physical Facility personnel that the pressure regulator to the the housing room/lixits was not working properly, thus reducing the water pressure to the animal room excessively. The housing facility must provide reliable running potable water for a nonhuman primates' drinking needs to prevent dehydration. The facility has implemented several corrective actions including daily manual checks and records of water pressure, monthly water flow confirmation

Prepared By: ANNETTE CHAPMAN
USDA, APHIS, Animal Care
Title: VETERINARY MEDICAL
OFFICER

Date:
26-AUG-2021

Received by Title: Facility Representative

Date:
26-AUG-2021



Inspection Report

checks, water flow monitoring plan and facility water system evaluations to identify points of risk for additional monitoring. The Center is offering the animals more high-water content supplements and all infant studies will consistently include twice daily observations. The facility is in the process of utilizing a Building Automation System based automatic pressure monitoring and alarm system to receive alerts for pressure values outside of acceptable ranges. Correct from this day forward.

This inspection and exit interview were conducted with the facility representative.

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USDA, APHIS, Animal Care
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UNIVERSITY
OF
LOUISIANA
L a f a y e t t e

Office of the Director

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Université des Académies

August 26, 2020

Neera V. Gopee, DVM, PhD, DABT, DAACLAM
Director, Division of Policy and Education
Office of Laboratory Animal Welfare, NIH
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Dear Dr. Gopee,

This letter pertains to an animal incident that occurred on Aug 5, 2020 at the University of Louisiana at Lafayette New Iberia Research Center (Assurance [A3029-01](#)). Several breeding groups of rhesus macaques were transferred to outdoor housing after completing on-boarding isolation procedures (approximately 30 days). The animals originated from Alice, TX where they had been housed in outdoor housing at temperatures very similar to those at the New Iberia Research Center. Discussion and planning with regard to group formations and safely moving the animals to outdoor housing did include consideration for an appropriate day and time of day due to the ambient August Louisiana heat. Animals were transferred outside between the hours of 8 am and 9:10 am. The ambient temperatures were comfortable for that time of year, with a humidity of 60% and 80-83 degrees Fahrenheit. Animals were observed for 1-2.5 hours, showing no evidence of undue aggressive behavior, with a plan to recheck them in the early afternoon. Furthermore, afternoon checks this time of year, per SOP (G-53.02 *Extreme Environmental Temperature Assessment and Action Plan*) include but are not limited to setting up sprinklers/misters and providing frozen fruit juice and other enrichment to offset the heat. At 12:30 pm 3 animals were found deceased. Each animal was settling into each of 3 separate social groups. No wounding was noted. All animals appeared healthy and normal at the time of group set up. The gross necropsy and pathology reports strongly suggest heat stroke. Prior social groups had been established from this colony during similar environmental conditions without incident or concern, and thus, the Center staff could not have anticipated these deaths; however, we recognize that additional preventative measures will be necessary moving forward. Wading pools and sprinklers will be set up prior to assembling social breeding groups and introduction into corncrib cages during hot weather, thus providing some cooling enrichment and extending the behavioral observations time. Additionally, the Center has identified indoor/outdoor housing that will be utilized during the summer to establish social groups. Indoor portions of this housing is air-conditioned. The remaining social breeding groups are currently stable and no additional animals have presented with heat-related illness.

The IACUC has been informed and has formulated a subcommittee to review the circumstances and practices implemented.

Should you have questions or concerns please feel free to contact me.

Sincerely,

Francois Villinger

(b) (6)

Francois Villinger
Director, New Iberia Research Center

CC: Dr. Ramesh Kolluru, VP, OVPRIED