

July 10, 2009

Dr. Elizabeth Goldentyer  
Eastern Regional Director  
USDA/APHIS/AC



**Via e-mail:** [REDACTED]

Dear Dr. Goldentyer,

I hope this letter, written on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 2 million members and supporters, finds you well. I am writing to ask that you investigate a disturbing situation at the University of Wisconsin-Madison (UW; 35-R-0001) involving the extended solitary confinement of nonhuman primates.

PETA has learned that UW's Richard Weindruch initiated caloric restriction experiments using monkeys in 1989, and for the past 20 years, he has confined the same group of rhesus macaque monkeys to individual cages where they have been deprived of any companionship with conspecifics. The monkeys used in these longitudinal studies are fed a 30 percent restricted diet to determine the effect of such restriction on the biological indicators of aging, including increased "health span" and increased longevity.

We believe that Weindruch's decision to cage the primates in isolation through the duration of his decades-long experiment—and the decision on the part of the UW Institutional Animal Care and Use Committee (IACUC) to approve such housing—constitute serious violations of the Animal Welfare Act (AWA):

- Failure to promote psychological well-being of nonhuman primates;
- Failure on the part of the UW IACUC to ensure that procedures involving animals will minimize distress to the animals; and
- Failure on the part of the UW IACUC to ensure that the animals' living conditions will be appropriate for their species and will contribute to their health and comfort.

**I. Failure to promote psychological well-being of nonhuman primates**

Title 9, section 3.81 (a) of the Code of Federal Regulations mandates that the environmental enhancement plan for nonhuman primates "include specific provisions to address the social needs of nonhuman primates of species known to exist in social groups in nature." Rhesus macaque monkeys—the nonhuman primates used in Weindruch's experiments—are, of course, known to exist in



**PETA**

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intricate social groups in nature, and yet Weindruch's protocol has condemned these animals to solitary confinement for two full decades.

Weindruch has justified this protracted period of isolation by claiming that he was unable to create an experimental design that separated the monkeys for feeding but permitted socialization for the remainder of the time. As you know, there are three exceptions noted in the regulations wherein specific circumstances would permit single-housing of nonhuman primates. These are:

1. If a nonhuman primate exhibits overly aggressive behavior that would threaten the safety of other primates, or if a primate is debilitated in a way that would jeopardize his or her safety
2. If a nonhuman carries or is suspected of carrying a contagious disease; and
3. If there are no other primates or other animals of a compatible species in the facility.

Clearly, Weindruch's "justification," comprised of logistical difficulties, does not meet the criteria of the three exceptions noted in the regulations.

## **II. Failure on the part of the UW IACUC to ensure that procedures involving animals will minimize distress to the animals**

Title 9, section 2.31 (d)(1)(i) of the Code of Federal Regulations mandates that the IACUC shall ensure that "[p]rocedures involving animals will avoid or minimize discomfort, distress, and pain to the animals." The monkeys used in Weindruch's protocol are housed in UW's laboratories so that they can be used in the protocol; as such, the manner in which they are housed comprises a procedure that is part of the larger protocol. By approving a protocol in which monkeys were singly-housed, the UW IACUC subjected the monkeys to greater distress than that which would be considered "necessary" for the purposes of the experiment.

## **III. Failure on the part of the UW IACUC to ensure that the animals' living conditions will be appropriate for their species and will contribute to their health and comfort**

Title 9, section 2.31 (d)(vi) of the Code of Federal Regulations mandates that the "animals' living conditions will be appropriate for their species ... and contribute to their health and comfort." When monkeys are housed alone, their isolation is inarguably the single predominant factor that describes, for them, their "living conditions." No quantity of brightly colored balls, scratched mirrors, or perches can compensate for the fact that these highly social animals are being deprived of companionship. By approving Weindruch's protocol, with its specification that the monkeys would be housed alone, the UW IACUC failed to ensure that the monkeys' living condition would contribute to their health and well-being.

We emphasize that in contrast to toxicity studies—where monkeys may be singly-housed for several weeks to 72 months—the monkeys in Weindruch's protocol

have been kept in solitary confinement for 20 years. We respectfully urge you to investigate these egregious violations of the AWA at the University of Wisconsin-Madison.

The monkeys in Weindruch's experiments have suffered acute and enduring injury purely through the failure of the protocol to allow for group-housing, or at the very least, pair-housing. It is stupefying to us that Dr. Weindruch was unable to create an experimental design that separated the monkeys for feeding but permitted socialization for the remainder of the time. And it is disappointing that the IACUC felt, and apparently continues to believe, that the suffering endured by the monkeys is justified by the perceived benefit of the experiment. This calls into question the overall adequacy of the IACUC's oversight in general, and the adequacy of the facility's environment enhancement plan in particular.

May I please hear from you at your earliest convenience regarding the actions that you will take in this matter? I can be contacted at [REDACTED] or via e-mail at [REDACTED]. Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Alka Chandna".

Alka Chandna, Ph.D.  
Laboratory Oversight Specialist  
Laboratory Investigations Department