



Stop Animal Exploitation Now!

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Dr. Elizabeth Goldentyer  
USDA/APHIS/AC  
920 Main Campus Drive, Suite 2000  
Raleigh, NC 27606

1/18/14

Dr. Goldentyer,

I am writing to you today to file an Official Complaint against the University of Wisconsin, Madison (35-R-0001), for what I believe are clear violations of the Animal Welfare Act which occurred in the past several years.

The incidents that I am referencing were reported by the University of Wisconsin to the National Institutes of Health as being non-compliances with PHS policy on animal care/use. These incidents are also clearly violations of the Animal Welfare Act, upon which the NIH policies are based.

On June 5th, 2013, the University of Wisconsin reported the strangulation death of a primate due to becoming entangled in an enrichment device. This is clearly a violation of section 2.38 (f)(1) Animal Handling (see 1/14/12 Inspection report for Covance lab 35-R-0030 for a similar death and citation).

On May 15th, 2013, the University of Wisconsin reported three incidents. The first involved staff failure to administer pain relief to several primates. The second involved staff failure to provide food and treatments to infant monkeys. The third incident involved a primate fight with injuries caused by staff failure to replace a cage divider. These incidents potentially violate multiple sections of the Animal Welfare Act including 2.32 Personnel Qualifications, 2.31 Institutional Animal Care and Use Committee, 2.33 Attending Veterinarian and Adequate Veterinary Care.

On February 26, 2013, the University of Wisconsin reported improper administration of anesthesia to a primate. This incident potentially violates multiple sections of the Animal Welfare Act including 2.32 Personnel Qualifications, 2.31 Institutional Animal Care and Use Committee, 2.33 Attending Veterinarian and Adequate Veterinary Care.

On February 7, 2013, the University of Wisconsin reported the death of a marmoset during surgery due to staff negligence in closing a valve which caused a pneumothorax. This incident potentially violates multiple sections of the Animal Welfare Act including 2.32 Personnel Qualifications, 2.31 Institutional Animal Care and Use Committee, 2.33 Attending Veterinarian and Adequate Veterinary Care.

On January 22, 2013, the University of Wisconsin reported the death of a cow which occurred when the animal made his/her way into an auger channel and was severely injured. This incident is potentially a violation of section 3.1 Housing, Facilities General or 3.4 Outdoor Housing Facilities.

On October 17, 2012, the University of Wisconsin reported several incidents to the National Institutes of Health. After cage sterilization, a male and female who were not long-term cagemates were mistakenly paired. The female sustained a laceration from this incorrect cagemate. The male was reported two days later, at which time the misidentification was still not ascertained, for self-injurious behavior injuries. At this time the male was dosed incorrectly due to misidentification.

At this time the University of Wisconsin also disclosed the failure of their staff to properly lock cages. This failure resulted in the escape of one monkey while two others were able to remove a cage divider, and the resulting conflict caused significant injuries. These incidents clearly violate section 2.38 (f)(1) Animal Handling.

On June 18, 2012, the University of Wisconsin reported a burn injury to a macaque monkey due to improper use of devices meant to keep the monkey warm. This is clearly a violation of section 2.38 (f)(1) Animal Handling.

On June 1, 2012, the University of Wisconsin reported the death of a primate whose head had become trapped between a cage and support bar, the cause of death was assumed to be suffocation. This is a violation of section 3.80 (a)(2)(ii) Primary Enclosures.

On January 30, 2012, the University of Wisconsin reported the use of a marmoset in a terminal perfusion procedure which was not part of the approved protocol. At the same time the lab also reported a thermal injury to a cynomolgus monkey during an MRI procedure. This is clearly another violation of section 2.38 (f)(1) Animal Handling. At the same time the lab also reported failure to provide water to a monkey and the use of the incorrect species of primate in an experimental protocol. These incidents potentially violate multiple sections of the Animal Welfare Act including 2.32 Personnel Qualifications, 2.31 Institutional Animal Care and Use Committee, 2.33 Attending Veterinarian and Adequate Veterinary Care.

On January 12, 2012, the University of Wisconsin reported the failure to provide adequate water to several primates for as much as three months. This incident is likely a violation of section 3.83 Watering and possibly 2.36 (b)(7) Annual Report.

During this same time period, USDA/APHIS/AC has cited the University of Wisconsin for an incident of improper Animal Handling (non-compliance with section 2.38 (December of 2012) and for 2.32 Personnel Qualifications (July 2012) for serious incidents which killed one animal and injured another. Obviously, these incidents were only the dip of the iceberg relevant to Animal Welfare Act non-compliance at the University of Wisconsin.

Obviously, the thirteen additional non-compliances which are addressed in this letter are very serious. Collectively, they have accounted for 5 animal deaths (4 primates and 1 cow), 5 animal injuries, 1 primate escape, and multiple other non-compliances. All of these incidents are obviously major non-compliances which directly impacted the health and well-being of the animals at the University of Wisconsin.

I know that your office considers major violations of the Animal Welfare Act to be very serious in nature, especially when these violations kill or seriously injure animals. The treatment of animals at this facility illustrates attitudes of carelessness and negligence that must be punished so that meaningful changes can be made. Therefore, I also insist that you take the most severe action allowable under the Animal Welfare Act and immediately begin the process of issuing the maximum fine allowable against the University of Wisconsin Madison at the completion of your investigation. I am especially concerned about this facility because apparently your office already has an open case against the lab dating back to 2010 & 2011, case number WI10033, which to my knowledge has never been resolved.

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

Attachments: 14 NIH Non-Compliance Reports