

Comments in response to the May 18, 2018 Report from the
Council of Councils Working Group on
Assessing the Safety of Relocating At-Risk Chimpanzees

Recommendation 1: The NIH and the facilities that house NIH-owned and NIH-supported chimpanzees should relocate all of these chimpanzees to the federal sanctuary system unless relocation is extremely likely to shorten their lives.

The Animal Welfare Institute is dedicated to reducing the sum **total** of pain and distress caused to animals by people and has been at the forefront of the movement to improve conditions for nonhuman primates. Since AWI's founding in 1951, it has worked toward adoption of a wide range of measures to improve the welfare of animals (e.g., the Improved Standards for Laboratory Animals amendment, including the mandate to provide for the psychological wellbeing of primates; the CHIMP Act and its subsequent amendments) and it has and continues to press for the retirement of all NIH-owned or -supported chimpanzees. AWI's position is that these chimpanzees must be transferred to sanctuary where they can be maintained in an optimum, species-appropriate environment under the care of professionally trained, compassionate personnel. Following are our responses to the recommendations of the Council of Councils.

The proviso "unless relocation is extremely likely to shorten their lives" must be removed from this recommendation. There is NO evidence that transferring chimpanzees to other facilities poses a risk to ANY chimpanzees when it is conducted with the proper expertise. Hundreds of privately owned and NIH-owned chimpanzees have been moved to sanctuaries with no adverse effects. There simply is no evidence to support the idea that there is any risk. Only in those extremely rare cases where a chimpanzee is in the end stages of life, with death imminent, should he or she not be transferred, which is consistent with the ASA class V definition, referenced in the report.

The quality of life for these chimpanzees, not merely the length of their lives, is vitally important. Considering merely the length of the life alone is wholly inadequate. Chimpanzees are sentient, social, and intelligent and deserve to live in the best possible housing, with ample enrichment and socialization with companions. All captive chimpanzees should live in sanctuaries that are specifically designed for their well-being. Laboratories, in contrast, are focused on facilitating research protocols. The NIH's own Institute of Medicine report stated that sanctuaries are best suited to provide ethologically appropriate environments.

Recommendation 2: The NIH should oversee the development of standardized approaches by facilities that house NIH-owned or -supported chimpanzees for assessing each chimpanzee based on its health, behavior, social needs, and environmental requirements. This assessment should be used to better understand the animal's needs in its current and future environments and should inform relocation decisions.

While this is a step in the right direction it fails to consider the whole of what constitutes well-being in chimpanzees. Instead it considers only physical health factors and behavioral problems. This excludes chimpanzees with behavioral issues and trauma, and limits those with "severe behaviors." This is vague in terms of behaviors and fails to recognize that many chimpanzees experience improved psychological well-being in a new home. This recommendation must include input from behavioral experts. The Quality of Life assessment already in place for some of the federal institutions, includes social and behavioral aspects of well-being.

This recommendation fails also to consider the chimpanzees' current living condition and the potential--and urgency--for that to be improved. The report of the Council of Councils Working Group on the Use of Chimpanzees in NIH-Supported Research recommends that chimpanzees live in social groups of 7-8 individuals. Groups of 2-3 chimpanzees are not recommended by the Association of Zoos and Aquariums. If the holding institutions are currently not accommodating and working towards all the chimpanzees being in larger groups, there is no reason to believe that would occur in the future. Sanctuaries are expressly designed to integrate chimpanzees and house them in large groups. Additionally, they have the flexibility to allow for short visits and special accommodation for chimpanzees with limited social skills.

Assessment of whether a receiving facility can provide care for at-risk chimpanzees makes no consideration for staffing beyond veterinary care. Consideration must include staff training in understanding and recognizing chimpanzee behaviors and psychological health, and understanding of and experience with chimpanzee social behavior and group dynamics.

While the underlying premise of communication between facilities is an excellent suggestion, this must not slow the process of transferring chimpanzees.

Recommendation 3: All facilities that house NIH-owned or -supported chimpanzees must use the same health and behavioral categorization system for these animals so that sending facilities, receiving facilities, and the NIH all understand why a chimpanzee has been assigned to a certain health status category. Veterinary records must be shared between sending and receiving facilities so that the receiving facility can provide informed feedback about the animal(s) considered for relocation.

We support this recommendation. It acknowledges the problems identified in recommendation 2 in that it suggests incorporating behavioral and social factors. The recommendation that “veterinary records must be shared” must include behavior and management records.

Recommendation 5: With guidance from the NIH, facilities that house NIH-owned or -supported chimpanzees should develop shared relocation standard operating procedures (SOPs). These SOPs should describe risk-mitigation strategies (e.g., engaging veterinarians, behaviorists, and caregivers at the sending and receiving facilities in regular discussions before and after a chimpanzee’s transportation; sending chimpanzees in intact social groups; and providing flexibility to house smaller social groups at the receiving facility) that can be used when relocating at-risk chimpanzees.

Everything in this recommendation is beneficial for chimpanzees. However, it is essential that the development of the recommendations must not delay the transfer process.

Recommendation 6: When facilities disagree about whether to relocate a chimpanzee, independent expert veterinary opinion should be sought to inform the relocation decision.

The decision regarding transfer in ambiguous cases must not just include the sending and receiving veterinarians. At this stage, when fewer than 300 government-owned and -supported chimpanzees remain in laboratory settings, an independent team must be assembled to assess the remaining chimpanzees in laboratory settings and work with the NIH and the sanctuary on coordinating the transfer of the remaining chimpanzees to sanctuary as soon as possible. Independent experts, including at least one veterinarian with ape and sanctuary experience, should assess behavior and social management as well as health. Priority should be given to those chimpanzees considered worst off, along with their social groups.

Recommendation 7: Facilities housing NIH-owned or -supported chimpanzees should give the NIH sufficient information to undertake actuarial and demographic analyses of data on these chimpanzees.

NIH must have complete health records in addition to behavioral and social management information for all of its chimpanzees.

Other considerations

There is a huge problem (bias) in that the decision on which chimpanzees to move rests with the sending facility. It presents a conflict of interest as the sending facility receives funding for the chimpanzees in its care. This typically includes at the minimum a daily per diem and indirect overhead costs. This places the veterinarian in a conflict of interest. There would be little to no motivation to move chimpanzees to sanctuaries while the labs are being paid for keeping each one. The working group ignored this problem in its study and recommendations. Finally, it is clear that it is less expensive overall to house chimpanzees in sanctuaries, and this is of interest to taxpayers, in addition to their concern for the welfare of chimpanzees in general.

We understand that the current contractor that manages the Alamogordo Primate Facility (APF), Charles River Laboratories, is advocating for the approximately 50 remaining chimpanzees there to be deemed "ineligible" for transfer to sanctuary. An uncertain but significant number of chimpanzees at Southwest National Primate Research Center and the Michael Keeling Center for Comparative Medicine and Research would be affected by this decision as well. This is untenable and unethical.