



Animal Welfare Institute

900 PENNSYLVANIA AVENUE, SE, WASHINGTON, DC 20003 • 202-337-2332 • AWIONLINE.ORG

November 15, 2024

Sarah Helming
Deputy Administrator, Animal Care
U.S. Department of Agriculture
sarah.j.helming@usda.gov

Dear Ms. Helming,

On November 7, 2024, 43 rhesus macaques escaped from the Alpha Genesis Incorporated (AGI) primate research facility in Yemassee, South Carolina, putting the health of the monkeys and the town's residents at risk. The Animal Welfare Institute (AWI) is writing to **request the USDA (1) conduct an immediate, focused inspection and investigation at the facility, and (2) sanction the facility to the fullest extent of the law—including imposition of the maximum available fines—for noncompliances with the Animal Welfare Act (AWA)**. Moreover, if the outcome of the investigation is as serious as available information suggests, termination of their license and registration may well be warranted.

These 43 monkeys were able to escape after a caretaker [reportedly](#) failed to properly latch the door(s) to the monkeys' enclosure. This violates the AWA regulations requiring that "primary enclosures must be constructed and maintained so that they ... contain the nonhuman primates securely and prevent accidental opening of the enclosure, including opening by the animal."

AGI has repeatedly been cited for violating the AWA over the past 12 years, including for previous escapes that resulted in injury, death, and failure to recapture. In 2014, 26 monkeys escaped from their enclosure (one suffered an injury resulting in digit amputation) after employees failed to follow protocol, and another monkey escaped during transport and was never recaptured. Two more monkeys escaped in 2015 (one monkey suffered internal injuries and died), and another escaped her primary enclosure in 2016 due to her cage being secured with a clip instead of a lock. As recently as 2022, the USDA reported six separate incidents of animals opening or escaping their primary enclosures within a seven-month period; four animals required veterinary care resulting from these incidents.

Multiple monkeys have also sustained injuries or died as a result of improper handling and care at the facility. In 2022 alone, animals were placed in incorrect enclosures on six separate occasions; one animal died from trauma caused by the resident animals and four animals required veterinary care. Also in 2022, in two unrelated incidents, two animals caught their fingers in structures within their enclosures. Those animals were eventually found dead in their enclosures with fingers still entrapped; the facility was cited for failing to provide sufficient daily observations to assess their health and well-being. In the same year, an infant died after becoming entangled in a stretch gauze material that was used to hold a water bottle. As a result of that death, “the use of proper water bottle fasteners was implemented.” In 2023, during a USDA inspection, multiple enclosures were found to have temperature readings outside the required range of 45 degrees to 85 degrees Fahrenheit. The staff are required to record when temperature readings fall outside of the acceptable range, but no records were available at the time of inspection.

The 2022 and 2023 violations echo similar issues for which AGI had been cited in previous years. In 2015, a monkey was placed in the wrong social group and died from injuries. Also in 2015, a monkey was found dehydrated in the home cage and needed immediate treatment; the next day another monkey from the same cage was found dehydrated. Only then did staff discover that the water line to the cage had been turned off seven days earlier, and the five remaining animals were treated for dehydration. During that period, three different animal care technicians failed to check water levels during the cage wash. As reported by the USDA, “In this case, lack of following protocols and inattention led to discomfort and illness of several animals and the death of one.”

In 2014, the USDA issued AGI an official Warning Notice of violations that had occurred in 2012 and 2014, including staff negligence causing the death of a monkey in two separate incidents. In 2017, the USDA fined AGI \$12,600 for the monkey escapes and staff negligence that occurred in 2014, 2015, and 2016. In 2022, the USDA issued another official Warning Notice of alleged violations that occurred that year. Yet, as described above, several similar incidents have occurred between 2017 to 2021 and since 2023—including the escape of 43 monkeys earlier this month. **This points to the possibility of systemic problems at AGI that have not been resolved following the 2017 fine or the 2014 and 2022 Warning Notices, resulting in multiple preventable monkey injuries and deaths.**

Over the past two decades, the Office of the Inspector General (OIG) has repeatedly called on the USDA to more effectively penalize AWA violators (see the [2005 report](#) on research institutions and the [2010 report](#) on dog breeders), including recommending larger fines for research facilities. AWI has also repeatedly called on the USDA to impose meaningful sanctions for serious and/or recurring violations (for more recent examples, see *AWI Quarterly*, [spring 2024](#), [summer 2022](#), [winter 2021](#)). Decisive action by the USDA now, including imposition of the most significant available sanctions and fines, represents the only reasonable step in addressing AGI’s repeated violations of the AWA.

We request that the USDA, at minimum, conduct an immediate focused inspection and investigation at the AGI facility. Moreover, we request that the USDA sanction the facility

to the fullest extent of the law for noncompliances—per Section 19(b) of the Animal Welfare Act (7 U.S.C. 2149(b)), the fine would amount to \$10,000 per violation per day during which a violation continues. Finally, if the outcome of the investigation is as serious as available information suggests, termination of this facility's license and registration may well be warranted.

Sincerely,



Susan Millward
Executive Director/CEO



Joanna Makowska, PhD
Director & Senior Scientist
Animals in Laboratories Program

cc: Michael Watson, PhD, APHIS Administrator
michael.t.watson@usda.gov

ac.complaints@usda.gov