



July 8, 2019

Andrew W. Grady, D.V.M.
President, Council on Accreditation
Association for Assessment and Accreditation of
Laboratory Animal Care International (AAALAC)
5205 Chairman's Court, Suite 300

Frederick, MD 21703

Dear Dr. Grady:

I am writing to respectfully request that your office consider revoking the AAALAC Accreditation for the University of California-Davis (UC-Davis) given the latest evidence of chronic animal welfare violations taking place at this AAALAC-accredited facility. As you may know, on June 16th, 2019 The Guardian reported that:

*"Seven infant monkeys were accidentally poisoned and died at one of the largest primate research centers in the US...The young macaques died after their mothers were marked with dye at the University of California, Davis, primate research laboratory."*¹

Expert Statement in Support of AAALAC Action Against UC-Davis

"As an experimental psychologist trained in behavioral primatology and the former Director of a small primate colony and laboratory, I am aware that animal welfare requires more than good intentions. I have examined the welfare violations issued by USDA-APHIS and accrued by the University of California – Davis Primate Center during the last three years, including the poison death of seven infant rhesus monkeys. In my opinions this pattern should be seen as evidence of broad institutional problems that do not meet the respected standards of a facility accredited by AAALAC-International.

John P. Gluck Ph.D.
Emeritus Professor of Psychology, University of New Mexico
Faculty Affiliate, Kennedy Institute of Ethics, Georgetown University
Date of Statement: July 8, 2019

Precedent for AAALAC Intervention

Although we believe a revocation of UC-Davis's AAALAC Accreditation is fully warranted, at the minimum we would request that AAALAC put UC-Davis on a

¹<https://www.theguardian.com/science/2019/jun/16/baby-monkeys-poisoned-us-research-center-university-of-california>



probationary status, which would be consistent with AAALAC's intervention after similar abuses at another American university.

Specifically, as reported by the Boston Globe², in 2012 AAALAC reportedly placed the New England Primate Research Center on probationary status following the deaths of 2 primates.

Pattern of Animal Welfare Violations

As noted in The Guardian story referenced above,

"In 2016, it emerged that UC Davis was among nine federally funded research centers being investigated over mistreatment of primates. In March of that year, a primate fractured both legs after escaping through an unsecured door at the facility, with another primate subsequently injured following a similar incident."

In total, UC-Davis has been cited 6 times by the United States Department of Agriculture's Animal Plant Health Inspection Service (USDA-APHIS) in the last 3 years for *critical* animal welfare violations. In the last 21 months alone, UC-Davis has also reported 10 instances of noncompliance to the National Institutes of Health's Office of Laboratory Animal Welfare (NIH-OLAW).

Authority to Revoke

The pattern of abuse at UC-Davis, which has been documented by multiple independent third parties constitutes due cause for a revocation of their AAALAC Accreditation. As stated in the AAALAC Rules of Accreditation³,

"Accreditation may be granted, withheld or revoked by AAALAC International. Once granted, accreditation may be revoked in the event of a change in the nature, structure, location or operation of an accredited unit, which in the opinion of AAALAC International is sufficient to warrant such revocation. Any unit previously accredited shall be evaluated as often as deemed necessary by AAALAC International...Accreditation may be revoked by AAALAC International at any time for due cause."

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Ryan", written over a horizontal line.

Michael Ryan
Director, Policy & Government Affairs
New England Anti-Vivisection Society (NEAVS)

CC: AAALAC President Emeritus Chris Newcomer, DVM

² "Harvard Medical School warned on lab animals" Boston Globe, 9/14/12, Accessed online 7/1/2019

³ <https://www.aaalac.org/accreditation/rules.cfm>