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May 27, 2026

Dr. Jay Bhattacharya
Acting Director
Centers for Disease Control and Prevention
1600 Clifton Road
Atlanta, GA 30329

Dear Dr. Bhattacharya,

We, the undersigned scientists and experts in the care, behavioral management, veterinary oversight, and social housing of non-human primates (NHPs) maintained in biomedical research and large breeding colony settings, write to express our serious concerns regarding the CDC's plan to retire approximately 160 rhesus macaques (*Macaca mulatta*) and pigtailed macaques (*Macaca nemestrina*) to the Born Free USA Primate Sanctuary in Texas. According to the CDC's sole source justification posted on SAM.gov, the agency intends for the macaques to be transferred to Born Free in phased cohorts of around 25 animals, with the sanctuary ultimately combining male and female rhesus macaques into one social group and female pigtailed macaques into another. These plans are inconsistent with best practices for the introduction of adult macaques into a large social group setting, particularly animals with histories of single or pair housing. The behavioral and social risks associated with such a rapid, large-scale introduction are profound and predictable.

Rhesus and pigtailed macaques are highly social, but intensely hierarchical primate species. The successful formation of large social groups requires gradual, carefully managed introductions that begin with small compatible cohorts and slowly expand over time. Experts consistently recommend preserving established compatible pairs, forming small groups of four to ten animals, utilizing protected-contact systems, and allowing stable dominance relationships to emerge before attempting larger integrations.

Attempting to combine dozens of unfamiliar adult macaques, especially adult rhesus males that have spent most of their lifetime to date singly or pair housed, into massive social groups is widely recognized as extremely high risk. Such introductions will rapidly escalate into severe fighting, coalition aggression, chronic terrorization of subordinate animals, traumatic injury, social fragmentation, and fatalities.

Successful introductions of macaques retired from research environments require highly complex facilities with ample vertical space, visual barriers, multiple feeding and watering stations, retreat areas, protected-contact systems, separation capability, and intensive behavioral monitoring. These transitions also require experienced veterinary and behavioral management teams capable of evaluating affiliative behavior, monitoring social stability, identifying vulnerable animals, intervening during escalating aggression, and implementing contingency separation plans. Introductions should be overseen by personnel specifically trained and experienced in macaque social dynamics and research-to-sanctuary transitions.

We submit that Born Free lacks the staffing and expertise necessary to safely execute a transition of this magnitude and complexity. Based on publicly available information, Born Free has only one veterinarian, who does not possess professional training in NHP care or colony management, and no dedicated behavioral management personnel. The sanctuary also appears understaffed to provide the level of husbandry, observation, behavioral assessment, injury monitoring, and rapid intervention required for the safe social integration of more than 160 macaques with complex social and medical histories. Inadequate staffing during introductions of this scale will inevitably delay detection of escalating aggression, social exclusion, injuries, and chronic stress. It is also unlikely that the complex infrastructure required to introduce and protect the macaques, while transitioning them safely to successively larger group integrations, can be built in the twelve-week timeline referenced in the sole source justification.

The CDC's reliance on Born Free's GFAS accreditation provides little meaningful reassurance regarding the welfare oversight of these animals. Unlike the oversight system currently governing the monkeys at CDC facilities, GFAS inspection reports are confidential and unavailable for public review. Once transferred to Born Free, the welfare, health outcomes, injury rates, and deaths of these monkeys will effectively become invisible to the public and the broader professional community. By contrast, the monkeys currently housed by the CDC are subject to federal oversight in accordance with their formal Assurance with the NIH Office of Laboratory Animal (NIH-OLAW). All reports and communications with NIH-OLAW are publicly accessible and provide transparency and accountability regarding animal welfare standards and compliance.

We also question the validity and accuracy of the CDC's sole source justification for selecting Born Free as the only qualified retirement option. The justification states that Born Free was the "only identified GFAS-accredited source" capable of meeting the agency's requirements for species expertise, capacity, and schedule. However, we understand that no formal Request for Proposal (RFP) was issued by the CDC and that at least two USDA-regulated organizations (that exceed GFAS standards) expressed interest in retiring the monkeys in response to informal CDC inquiries. We further understand that one of these organizations can accept all CDC macaques in less than twelve weeks. Neither organization was formally reviewed or visited prior to the release of the sole source determination. These facts call into question the completeness, honesty, and scientific rigor of the market research and comparative analyses described in the CDC's justification document.

The welfare of these macaques must be the overriding priority in any retirement decision. Alternative retirement options involving organizations with the demonstrated expertise, infrastructure, veterinary resources, behavioral management programs, and staffing necessary to safely care for large populations of rhesus and pigtailed macaques in a sanctuary setting must be fully reviewed and objectively evaluated before these animals are transferred anywhere. If the CDC nevertheless insists on transferring these animals to Born Free, then we recommend that the CDC establish an independent advisory panel responsible for guiding and overseeing the veterinary, behavioral, and social management of the CDC macaques throughout the transition and long-term care process. This advisory panel must include experts in NHP behavior, veterinary medicine, social management, and research-animal retirement from the biomedical research community, as well as professionals experienced in sanctuary-based primate care. We welcome an opportunity to collaborate with the decision makers at the CDC to establish such a panel in the interest of ensuring that animals retired from research at the CDC are provided the lifetime care they so richly deserve.

We, the undersigned, respectfully request a retirement plan for the CDC macaques that is transparent and prioritizes their welfare, safety, behavioral stability, and long-term quality of life.

Sincerely,

3Rs Collaborative

American Association for Laboratory Animal Science

American College of Neuropsychopharmacology

Americans for Medical Progress

American Psychological Association

American Society for Pharmacology and Experimental Therapeutics

Associated Medical Schools of New York

Association of Primate Veterinarians

California National Primate Research Center

College on Problems of Drug Dependence

Emory National Primate Research Center

National Animal Interest Alliance

New England Society for Biomedical Research

New Jersey Association for Biomedical Research

North Carolina Association for Biomedical Research

Northwest Association for Biomedical Research

Peaceable Primate Sanctuary

Pennsylvania Society for Biomedical Research

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