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## Summary of IACUC Approved Exceptions to the AWA:

### 1. Sanitation Exceptions:

The Animal Welfare Act requires sanitation of the primary enclosure of nonhuman primates "at least once every 2 weeks and as often as necessary to prevent an excessive accumulation of dirt, debris, waste, food waste, excreta, or disease hazard." An exception to the AWA requirements for cage sanitation for nonhuman primates was approved for nonhuman primates assigned to research projects that included live births.

This variance allows an extension from the AWA requirements for cage sanitation at 14-day maximum intervals. The IACUC approved a delay in change-out of cage 4-packs for sanitation for two days following a live birth. In cases where a birth occurs on the second day following the extension of the 14-day period, an additional two day extension is applied. Cages are visually monitored by Husbandry personnel during daily room cleaning and/or by research staff during study procedures and any "grossly soiled" cages (e.g., excessive amounts of debris, food waste, or excreta) are reported to the Colony Manager, Study Supervisor, Veterinarians, and Study Director to evaluate the appropriate course of action taking into consideration each animal's condition and status (e.g., close to delivery, shortly after delivery, excessively nervous animal, etc.). Because cage change activity can affect all animals in the room, these exceptions applied to all cages in the affected rooms.

Due to issues of maternal stress and the potential for infant rejection, this exception was implemented to minimize the amount of activity in the room, and to prevent new mothers from having their cages changed out until a sufficient amount of time has passed to allow bonding and to minimize the possibility of infant rejection or injury. The highest priority is to avoid any infant injury or loss due to cage changing / sanitation procedures. Daily room cleaning was not included in this exception.

One of the three research projects that used this variance is ongoing, but the animals on this study have all been born. The in-life portion of the other two studies is complete. The total number of animals affected by this variance during the reporting year is 174.

### 2. Exception: Minimum space requirements for Group 1 and 2 housing

The Animal Welfare Act states, "The minimum space that must be provided to each nonhuman primate, whether housed individually or with other nonhuman primates, will be determined by the typical weight of animals of its species."<sup>1</sup> Non human primates are divided into 6 groups by species and size. Group 1 is defined as "marmosets, tamarins, and infants (less than 6 months of age) of various species." The table detailing minimum space requirements by group determines that animals falling into Group 1 must meet the following criteria for housing: Weight - under 2.2lbs or under 1kg; Floor area – 1.6 ft sq or 0.15 m sq; Height – 20" or 50.8 cm. Group 2 is defined as "capuchins, squirrel monkeys and similar size species, and juveniles (6 months to 3 years of age) of various species. Minimum

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<sup>1</sup> Code of Federal Regulations, Title 9, Chapter I, Part 3, Subpart D, Section 3.80 (b)

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housing requirements for group 2 are: Weight – 2.2 – 6.6lbs or 1 – 3 kg; Floor area – 3.0 ft sq or 0.28 m sq; Height – 30" or 76.2 cm.

This variance from the aforementioned regulations allows for the reduction of housing space for infants requiring incubation care. On occasion, it is necessary to place infants in incubators for clinical reasons, typically body temperature support. The incubators do not meet the minimum requirements for Group 1 or Group 2 housing. This request is to waive the sizing requirements for the duration of incubation as determined by a veterinarian. Infants are removed from incubation and placed in housing meeting or exceeding the minimum standards as set forth in the regulations as soon as it is determined by a veterinarian to be beneficial to the health and welfare of the infant.

The number of animals impacted by this variance during the 2010-2011 reporting year was twelve.

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