



# USDA-APHIS-Animal Care



ANIMAL WELFARE COMPLAINT			
Complaint No. AC19-436	Date Entered: 26-Jun-19	Processed By: ERF	
Referred To: McHenry / Shaver		Reply Due: 28-Jul-19	
<b>Facility or Person Complaint Filed Against</b>			
Name: Covance Laboratories Inc.	Customer No.: 640	License No.: 35-R-0030	
Address: 2001 WEST MAIN STREET		Email Address:	
City: GREENFIELD	State: IN	Phone No.: (608) 242-2712	
<b>Complainant Information</b>			
Name: Anonymous		Organization:	
Address:		Email Address:	
City:	State:	Phone No.:	
How was the Complaint received? Email			
Details of Complaint: SEE ATTACHED			
<b>Results:</b> Summary of complaint: 1) broken cagewash; 2) blocked doors to animal rooms; 3) overcrowded rooms, small work area, questionable safety; 4) NHPs escaping rooms, inadequate employee training; 5/6/7) rodents alive in necropsy, freezer, died in water maze; 8) incorrect PPE for NHPs, NHP transporting, dirty cage transport SOP; 9) animals without food and water; 10) biosafety studies without proper training  1) The broken cage wash was broken for about two weeks while parts and service could be obtained. Procedures included hand washing of cages per the SOP or moving the cages to other functioning cage wash areas. The facility has multiple cage wash areas with different size machines to handle washing. 2) No blocked animal room doors were observed during the inspection. The hallways were wide open or only partially narrowed at PPE don/doff stations and these areas did not interfere with animal room doors. 3) The selection of animal rooms that were observed had sufficient space for individuals to walk into the rooms and remain at a safe distance from animal enclosures. There was no overcrowding of animals observed. Many rooms have attached ante rooms where procedures can be performed and the animals do not have to enter the hallways for procedures. The rooms observed had sufficient space for working areas and safety of both employees and animals. 4) Facility reported very few animal escapes in past year and that the few were only out of enclosures and animals were still in the animal room. Capture is conducted by gently luring them back to the enclosure when possible. Other methods are available if the animal is not easily returned to			



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enclosure. Employees are trained for several weeks and are observed by staff trainers for skills assessment prior to handling any animals. Each employee has electronic and hard copy training records to document training received, certification courses, and any re-training when needed. 5/6/7) Concerns AWA non-regulated species.

8) There are PPE cabinets and signs located near the entry into the animal areas. Some of these cabinets were located near specific animal rooms. The signs posted show the appropriate PPE to be worn for specific things and included a picture of an individual wearing the appropriate PPE. For example, for the NHP rooms, shoe covers, gloves, tyvek suit, hair cover, safety goggles, face mask, and face shield should be worn. Dirty cages are transported to the cage wash area in a manner to reduce waste and allergen shedding in the environment. No transportation of NHPs was observed during the inspection, however, the ante-room location and proximity to the housing areas would provide for minimal transportation of animals outside of this closed area.

9) No animals were observed to be lacking food or water. Incidences and animal welfare is reported and checked upon discovery.

10) Employee training is documented in both electronic and hard copy records to document trainings received, certification courses, and any re-training when needed.

Application Kit Provided:

Yes: ☐

No: ☒

Inspector:

Dr. Rebecca Nanney, Veterinary Medical Officer

Date:

24-Jul-19

Reviewed By:

Margaret A Shaver, VMO

Date:

24 July 2019

**From:** [noreply@aphis.usda.gov](mailto:noreply@aphis.usda.gov)  
**To:** [ACEAST](#)  
**Subject:** USDA APHIS ANIMAL CARE - Animal Welfare Complaint Submission  
**Date:** Sunday, June 23, 2019 8:00:48 PM

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### Details of complaint:

- Name of USDA licensee/registrant:
- USDA license/registration number:
- City/State: Greenfield, IN
- Complaint details: Company: Covance  
City: Greenfield, Indiana

This submission follows one which was made for the same site (Covance; Greenfield, Indiana) in April this year (2019).

- 1) Cagewash is broken and dirty cages are lined up in the hallway. Both humans and animals are surrounded by the smell and overcrowding from dirty cages. These cages are predominantly in an area housing USDA species.
- 2) Cages are blocking entry and egress from animal rooms (including rooms housing NHPs). Blocking doors increases the risk of animals that may need to be transported to and from rooms. Additionally, blocking doors increases the risks to humans if they need to make a quick exit (e.g. escaped animal).
- 3) Animals (USDA and non-USDA) are being placed into rooms where the animal number exceeds the space allotted by the room. Technicians working within the area have barely enough room to conduct study tasks which put themselves and the animals they work with at risk. Though technicians, Study Directors, and other staff that work within the vivarium and with the animals have communicated this information to management, a change has not been made to find a solution to the issue. In meetings in several departments, management communicates the need to have more studies scheduled within a month, that we have sufficient technicians to run the increased number of studies, and applauds the company as we are making a lot of money.
- 4) NHPs are escaping animal rooms due to over burdening technicians with studies. Technicians with years of experience are making mistakes due to stress levels and minimal time provided for study tasks. Technicians that are new are not receiving adequate training and are left to conduct study tasks with minimal to no mentorship or oversight. Management is aware lack of technicians and the correlation between minimal trained technicians, high volume of studies, and increased animal and human welfare incidences (animal welfare incidences may impact up to 100 animals in one day).
- 5) Rodents in necropsy found alive due to secondary euthanasia measures not being complete.
- 6) Rodent found in a freezer alive has no secondary measure was used for euthanasia.
- 7) Two rodents died during water maze task due to drowning. In one incident, the animal may not have been watched due to managements continual

overburdening of technicians with more studies and little time to devote to study tasks.

8) People are exposed to monkeys and dirty monkey cages without wearing correct PPE. Appropriate parties (including EHS) have been notified multiple times as these incidences have occurred multiple times. There are no proper procedures in place for transporting NHPs or empty dirty cages within the small animal vivarium which leaves NHPs and humans at risk.

9) Animals (USDA and non-USDA) are continually found without access to food and water. Incidences are being reported that do not accurately reflect actual number of animals impacted.

10) Biosafety studies are conducted but people do not have access to correct information, including a biosafety manual and appropriate training. Risks are not clearly outlined and best practices are not followed. People outside of EHS provide main support to try and mitigate risks. Right to know and the opportunity to either receive hepatitis B vaccine are two items that have not been communicated in the past by a Study Director working with human products and the EHS department. These risks to humans can directly impact risks to animals depending on what substances are being studied or by technicians not working on studies due to feeling uncomfortable within the working environment.

Not all these incidences captured above are covered by the USDA. The information is being disclosed at this site as this is one in which anonymity may be maintained – there is minimal trust within the working environment as issues within the work space have been known since 2017. I am hoping that information may be shared between agencies (e.g. OSHA, AAALAC, etc) to make sure that all incidences (USDA and non-USDA) are reviewed. I also want to note that our USDA inspector arrived onsite May 30th. At this time, not all investigations were completed and she may not have had access to all information (e.g. monkey with necrotic tissue). I am unsure as to how many individuals she talked with during her visit; however, I would encourage speaking with multiple veterinarians and other individuals onsite (e.g. technicians, vet technicians, Study Directors, etc).

Submitted To: [aceast@aphis.usda.gov](mailto:aceast@aphis.usda.gov)

**Complaint Contact Information:**

Can Contact Complainer: No, I would like to remain anonymous.

Name:

Organization:

Street Address:

Apt/Suite:

City / State / Zip: , ,

Phone Number:

Email:

Submitted on: Jun 24, 2019 2:00:13 AM UTC