

September 23, 2020

Tracy M. Heenan, DVM, CPIA
Director, Office of Animal Care & Use
University of North Carolina at Chapel Hill
Campus Box 7193
Chapel Hill, NC 27599-7193

Sent via email

To: tracy_heelan@med.unc.edu

CC: iacuc@med.unc.edu

Dr. Heenan,

The Rise for Animals research team recently discovered that two 13-year-old female rhesus macaques, Bertha and Gertrude, remain at Chapel Hill despite evidence of previous consideration of their possible retirement and relocation. I am writing to offer guidance on progressing with a plan to efficiently provide Bertha and Gertrude with a successful transition to a sanctuary.

Through the North Carolina Public Records Law, Rise for Animals obtained two semi-annual program reviews and a non-human primate census. The April 2019 semi-annual program review reveals that Bertha and Gertrude reside at Chapel Hill. The Program Review Subcommittee discussed their retirement and relocation, focusing on the associated costs of time, money, and reputation.¹ Also, the October 2019 semi-annual program review acknowledges that Bertha and Gertrude remain as research subjects, albeit non-invasive, at Chapel Hill.² Lastly, the February 2020 census confirms that Bertha and Gertrude still resided at Chapel Hill as of early this year.³

¹ University of North Carolina - Chapel Hill, IACUC Semi-Annual Program Review Subcommittee Meeting, April 24, 2019. Retrieved from Animal Research Laboratory Overview (ARLO), Boston: Rise for Animals, July 5, 2020, <https://arlow.riseforanimals.org/entity/university-of-north-carolina-chapel-hill-1763/records/2178>.

² University of North Carolina - Chapel Hill, IACUC Semi-Annual Program Review Subcommittee Meeting, October 23, 2019. Retrieved from Animal Research Laboratory Overview (ARLO), Boston: Rise for Animals, July 5, 2020, <https://arlow.riseforanimals.org/entity/university-of-north-carolina-chapel-hill-1763/records/2184>.

³ University of North Carolina - Chapel Hill, Primate Census, February 24, 2020. Retrieved from Animal Research Laboratory Overview (ARLO), Boston: Rise for Animals, July 5, 2020, <https://arlow.riseforanimals.org/entity/university-of-north-carolina-chapel-hill-1763/records/2146>.

In June of 2020, I attended the annual PRIM&R IACUC Conference. Joyce Cohen, Associate Director of the Division of Animal Resources at the Yerkes National Primate Research Center at Emory, gave a presentation titled *Considerations for Reuse and Retirement/Relocation*.⁴ I want to inform you of this presentation to aid Bertha and Gertrude's retirement and relocation. Unfortunately, there were no handouts, but I did take some notes that I have included below.

Developing a Process to Review Retirement

- Decide on the retirement eligibility bases
 - Experimental history
 - Infectious disease status
 - Age
 - Health
- Create a committee to evaluate the receiving facility

Selection of Prospective Retirement Facility

- A formal evaluation process
 - Written questions sent to the facility initially
 - A site visit is a must
- Each facility should be evaluated based on the following:
 - Veterinary care
 - Employee experience
 - Use of Personal Protective Equipment
 - Regulatory reports
 - Accreditation reports
 - Facilities and housing
 - Finances and long term sustainability
 - Safety, security, and disaster plans
 - Community relations

Accreditation Status of Sanctuaries

- Make sure to review
 - Accreditation program websites for sanctuary standards
 - Each facility's specific accreditation reports
- Accreditation programs to look for
 - Assessment and Accreditation of Laboratory Animal Care (AAALAC)
 - Global Federation of Animal Sanctuaries (GFAS)
 - American Sanctuary Association (ASA)
 - North American Primate Sanctuary Alliance (NAPSA)

⁴ Cohen, Joyce (June 16, 2020). *Considerations for Reuse and Retirement/Relocation*. Presented at the 2020 PRIM&R's IACUC Virtual Conference.

Logistics of Agreement

- Need to have a legal agreement with sanctuary
 - Letter of Intent at first to make sure all are on the same page
 - The final agreement is a contract
- Agreement terms should include
 - Transfer of ownership
 - Commitment to lifetime care
 - Restriction on breeding
 - Restrictions on transferring the animal to another facility
 - Notification requirements
 - Public relations restrictions

Preparation of the Animal

- Medical evaluation of the animal before relocation
 - Note any geriatric conditions
 - Compile medical records and remove anything confidential
 - Ensure removal of any instrumentation
- Behavioral evaluation to note any special considerations
- Sterilization if needed
- Considerations of transport
 - Training the animal for crates or boxes

Transport

- Review the various regulatory requirements
 - United States Department of Agriculture (USDA)
 - Department of Natural Resources (DNR)
 - United States Fish and Wildlife Service (USFWS)
 - International Air Transport Association (IATA)
- Thoroughly investigate the transporter
 - The driver
 - Crates or boxes to be used
 - The vehicle
 - Planned route
 - Any stopping locations
 - Emergency contacts along the way

I hope the above notes provide Chapel Hill with useful information. For additional resources, directly contacting Joyce Cohen at Emory University may prove beneficial. As another resources option, Rise for Animals works with several accredited sanctuaries and would be happy to help Bertha and Gertrude transition to a sanctuary.

It may be that you are already in the process of planning a relocation for Bertha and Gertrude. If so, I would like to know about the steps you are taking. No matter where you are in the planning or implementation process of relocation to retirement, Rise for Animals can offer assistance.

Please let me know if you have any questions or you would like assistance from Rise for Animals. Please also include the status of Bertha and Gertrude's retirement if relocation planning is already in process. I look forward to receiving your response.

Sincerely,

Casey E. Webster

Casey E. Webster, J.D., CIP
Laboratory Records Analyst