The Fish and Wildlife Service Gone Wild: Examining Operations Long Tail Liberation

September 10, 2024

Donna Clemons, DVM, DACLAM

Global Director, Comparative Medicine (retired)

I wish to say thank you to the committee for having this hearing and for inviting me to provide information that I hope will be helpful to the discussion.

As a career research veterinarian, I have been motivated by my deep love and respect for animals and by a desire to support the advancement of science and medicine to improve human and animal health. Most of my work has been in the private sector, supporting drug development in research areas with high and immediate applicability.

The pharmaceutical and biotechnology sectors rely on nonhuman primate models for medical research, particularly for the later stage evaluation of potential medicines. In the earlier stages, efforts focus on computer modeling, in vitro (non-animal) methods, and typically other animal models such as rats and mice.

Once a potential medicine has reached a key stage of development, it is usually necessary to evaluate the safety and efficacy of it in a species with systems similar to humans. Drug development is a long and costly process, taking many years from concept until a medicine is available for patient use. Many medicines don't make it to the patient over safety concerns or lack of adequate effectiveness. It's just as important that an undereffective or unsafe product be identified and NOT enter the market as it is to have an effective drug. And yes, there is a sense of urgency- patients with serious illness are waiting and hoping for that next treatment for cancer, for autoimmune disease, for neurodegenerative disease.

Non-human primates, the long tail macaque being the most used, have immune, reproductive, neurologic, digestive, and cardiovascular systems with tremendous similarity to human system functions and provide predictability regarding human response to medications. These animals have been instrumental in the creation of many of today's medicines and treatments and as a result the pharmaceutical industry relies on a consistent, reliable supply chain from both domestic and foreign breeders to meet research needs. Imported animals are a critical component of this supply chain and have been for many years.

A brief explanation of why importation and large breeding facilities exist: the long tail macaque has only one birth per year of a single infant. In a well-managed facility, one can expect 70-80 births per 100 females/10-15 males. This will cover approximately 2 late-stage pharmaceutical studies.

Breeding and rearing healthy, research-appropriate animals has been done in large numbers in countries with a climate suitable for these semi-tropical species. As a research veterinarian, it was part of my job to evaluate the health and general condition of animals (including the non-human primates) being purchased. My evaluation of animal supply included a review of suppliers, auditing their animal care programs, and in many cases conducting on-site inspections of the facilities themselves. These audits focused on facilities, sanitation, medical care, nutrition, welfare, staff

training, and animal behavior. In general, I found earnest, knowledgeable staff with a genuine concern that the animals in their care were being well treated. I saw breeding facilities with healthy offspring and family units, adolescent animals in group settings, and adult animals being prepared for transport. Over the course of my decades-long career, the general health of these animals has only improved as the breeding facilities have become more sophisticated in general management, facility design, medical care, nutrition, and behavior management (handling).

From my perspective having worked in the above capacity, I am aware of the view in the research community that it is being discriminated against by federal agencies that regulate these activities whereby individuals who may personally disapprove of animal research are potentially abusing the power of their positions to influence policy, including for example treating research organizations differently from other animal enterprises by slow walking importation or exportation applications and other actions including those discussed here today. These behaviors have had a negative impact on medical research in the United States.

Thank you and I am happy to answer any questions that the Subcommittee may have.