

His Excellency Narendra Modi
Prime Minister of India
Prime Minister's Office
South Block, Raisina Hill
New Delhi-110011

30 June 2023

Your Excellency:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) India and our more than 2 million members and supporters to humbly request your help and to express our grave concern over the removal of protection that was afforded to rhesus macaque (*Macaca mulatta*) monkeys under the Wild Life (Protection) Act, 1972, (WPA) through the passage of the Wild Life (Protection) Amendment Act, 2022.

We fear this will result in the capture, caging, torment, and killing of these earthly representatives of Lord Hanuman. They could be used in painful, archaic experiments; kept as "pets"; slaughtered for meat; forced to perform; or even just killed for no good reason. **Therefore, we request that your good office direct the concerned ministry to reinstate the rhesus macaques as a species protected under the WPA** and grant them the highest protection afforded to numerous other indigenous species under Schedule I.

Dangerous Ecological Consequences and a Public Outcry

Several decades ago, the Indian rhesus macaque population saw a staggering 90% decline, and we worry India may face a similar loss again if protection of this species is not reinstated.¹

Not only do the rhesus macaques hold a special religious significance in our country, the removal of this species from natural habitats would also have serious ecological consequences. Due to their fruit-based diet, large group sizes and home ranges, and resilience, these monkeys are considered effective and necessary seed dispersers.² Researchers found that rhesus macaques dispersed 84% of the 49 plant species they fed on, either through spitting or defecation. These monkeys are especially crucial in altered habitats, where other seed dispersers have difficulty surviving.

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- PETA Asia
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- PETA Foundation (UK)
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¹Southwick CH, Siddiqi MF. "Partial recovery and a new population estimate of rhesus monkey populations in India." *Am J Primatol*. 1988;16(3):187-197.

²Sengupta A, McConkey KR, Radhakrishna S. "Seed dispersal by rhesus macaques *Macaca mulatta* in Northern India." *Am J Primatol*. 2014 Dec;76(12):1175-84.

The macaque population sharply declined when hundreds of thousands of monkeys were trapped, crated, and shipped to laboratories in the United States for use in experiments.³ Disturbing reports published in both British and American newspapers revealed that the US violated its agreement about how the monkeys were to be used. In 1955, the US promised the Indian government to use monkeys imported from India only for medical research and vaccine production and to refrain from using them in weapons testing, atomic blast experiments, and space research.⁴ However, the International Primate Protection League launched a global information campaign in 1975 when it discovered that the US was, in fact, using these monkeys in radiation experiments as well as other apparent breaches of the agreement. Monkeys were reportedly being shot in the face with rifles, dunked in boiling water, and subjected to high-impact blows to simulate car crashes.⁵ As a result, in 1978, a ban on the export of live monkeys for biomedical experimentation was implemented.^{6,7} This significant step forward was led by then Prime Minister Moraraji Desai, demonstrating India's commitment to safeguarding these primates and preserving India's ecological balance.

There is some evidence that unscrupulous British, European, and American monkey importers are hoping to pillage India's rhesus macaque population. An office memorandum published by the Wildlife Crime Control Bureau (WCCB) on 11 May 2022 (**Annexure A**), highlights possible attempts by the Laboratory Corporation of America to export vulnerable live monkeys from India. In response, the WCCB alerted field formations to prevent the illegal export of non-human primates from India. It's obvious Indian rhesus macaques face an imminent threat.⁸

Risks to Public Health and Scientific Integrity

Exporting wild-caught primates would increase the risks associated with zoonotic disease. Scientists who have studied the spread of disease in the international wildlife trade recently determined that two primate species – *Macaca fascicularis* (long-tailed macaque) and *Macaca mulatta* (rhesus macaque) – carry the greatest potential for dangerous pathogens to spill over to humans.⁹ Relaxing the wildlife protection law, thereby opening the

³National Research Council (US) Institute for Laboratory Animal Research.

“International perspectives: the future of nonhuman primate resources.” 2003. Session 1.

⁴International Primate Protection League. “India bans export of rhesus monkeys.” *IPPL Newsletter*, April 1978, p 2.

⁵International Primate Protection League. “India bans export of rhesus monkeys.” *IPPL Newsletter*, April 1978, p 3.

⁶Government of India, Prime Minister's Office. Export of Monkeys From India. File No 44/53/77, 1977. National Archives of India, indianculture.gov.in/archives/export-monkeys-india-0.

⁷Rensberger, Boyce. “Export ban on monkeys poses threat to research.” *The New York Times* 23 (1978).

⁸National Research Council (US) Institute for Laboratory Animal Research.

“International perspectives: the future of nonhuman primate resources.” 2003. Session 2.

⁹Borsky S, Hennighausen H, Leiter A, et al. “CITES and the zoonotic disease content in international wildlife trade.” *Environ Res Econ*. 2020;76:1001–1017.

door to capturing rhesus macaques and satiating foreign experimenters' demand for them, would increase incidences of human-primate interaction and place India's public health at risk.

To make matters worse, macaques caught up in the international primate experimentation pipeline are often immunocompromised. The stress of capture and transport makes them vulnerable to unintended zoonotic pathogens, such as *Campylobacter*, cholera, cryptosporidium, salmonella, *Shigella*, Yersina measles, hepatitis A, tuberculosis, flaviviruses, and malaria as well as to opportunistic zoonotic infections, including alpha, beta, and gamma herpesviruses, simian type D retroviruses, simian foamy viruses, simian immunodeficiency viruses, adenoviruses, parvoviruses, fungal infections, and *Burkholderia pseudomallei*.^{10,11,12,13,14,15} Immunocompromised monkeys may be more likely to shed these pathogens in their faeces, saliva, urine, or blood. Not only do these uncontrolled and undetected infections pose a threat to worker safety, they also undermine and confound research integrity.¹⁶

Significant and Unnecessary Suffering

The majority of monkeys captured or bred to be used in experiments are shipped to the US, where no experiments on animals are banned. Monkeys are crammed into small wooden crates and transported in the dark, terrifying cargo holds of planes for as long as 30 hours. Once they arrive in the US, these sensitive primates wait in fear until they're loaded onto trucks and transported to laboratories to be used in painful and deadly experiments. Monkeys imprisoned in laboratories are denied everything that's natural and important to them. They never feel the warmth of the sun, climb trees, or raise their children. Instead, they're confined to small metal cages, often completely alone, and tormented in experiments in

doi:10.1007/s10640-020-00456-7 (“[E]ither macaca fascicularis or macaca mulatta show the highest average volume of potential zoonotic disease traded.”)

¹⁰Yee JL, Prongay K, Van Rompay KKA, et al. “Tuberculosis detection in nonhuman primates is enhanced by use of testing algorithms that include an interferon- γ release assay.” *Am J Vet Res.* 2022;83(1):15-22.

¹¹Eberle R, Jones-Engel L. “Understanding primate herpesviruses.” *J Emerg Dis Virol.* 2017;3(1):10.16966/2473-1846.127.

¹²Balansard I, Cleverley L, Cutler KL, Spångberg MG, Thibault-Duprey K, Langermans JA. “Revised recommendations for health monitoring of non-human primate colonies 2018: FELASA Working Group Report.” *Lab Anim.* 2019;53(5):429-446.

¹³Wachtman LM, Mansfield KG. “Opportunistic infections in immunologically compromised nonhuman primates.” *ILAR J.* 2008;49(2):191-208.

¹⁴Sasseville VG, Mansfield KG. “Overview of known non-human primate pathogens with potential to affect colonies used for toxicity testing.” *J Immunotoxicol.* 2010;7(2):79-92.

¹⁵US Centers for Disease Control and Prevention. “Conclusion of select agent inquiry into *Burkholderia pseudomallei* release at Tulane National Primate Research Center.” CDC Online Newsroom. 13 March 2015. Accessed 25 March 2022. <https://www.cdc.gov/media/releases/2015/s0313-burkholderia-pseudomallei.html>.

¹⁶Soge OO, No D, Michael KE, et al. “Transmission of MDR MRSA between primates, their environment and personnel at a United States primate centre.” *J Antimicrob Chemother.* 2016;71(10):2798-2803.

which they're cut open, poisoned, crippled, addicted to drugs, shocked, and killed.

Animal Experiments Fail to Lead to Human Treatments

Not only are these experiments cruel, they also fail to yield treatments and cures for humans. Fully 95% of new drugs that appear safe and effective in animals don't work or cause adverse reactions in human clinical trials.¹⁷ Even the former director of the US National Institutes of Health (NIH) admitted that testing on animals hasn't worked and that we need to adopt new methodologies for use in humans.¹⁸ Another NIH director emphasised the promise of new alternative technology, stating "new alternatives like tissue chips, that reproduce human biology in a much more physiologically complex way, remove this requirement for animal testing data."¹⁹ Recognising this, the US Congress passed the FDA Modernization Act 2.0, which eliminates the requirement for testing new drugs on animals.²⁰

Conclusion

It has been evident for decades that the primate "model" fails to provide meaningful treatments and vaccines for humans. In addition, the potential devastation wreaked on India's wild macaque populations and entire ecosystems, the suffering of animals inside laboratories, and the zoonotic disease threat that confined primates pose to humans are among the factors that make it clear that the harms outweigh any possible benefits of removing protection for these monkeys.

We therefore beseech the help of your good office in reinstating the protection for rhesus macaques. Thank you for your time and attention to this important matter. We kindly request that you share any action taken in this regard. I can be reached at ankitap@petaindia.org or on 9910317382.

Sincerely,



Dr. Ankita Pandey
Science Policy Advisor
PETA India

¹⁷National Center for Advancing Translational Sciences (NCATS). Transforming Translational Science. <https://ncats.nih.gov/files/NCATS-factsheet.pdf>. Updated Winter 2019. Accessed 30 June 2023.

¹⁸Dr Elias Zerhouni, Former NIH director, 2002–2008, NIH Record, 4 June 2013, http://nihrecord.od.nih.gov/newsletters/2013/06_21_2013/story1.htm

¹⁹Moutinho, S. "Researchers and regulators plan for a future without lab animals." *Nat Med*. 2023. <https://doi.org/10.1038/s41591-023-02362-z>

²⁰Han JJ. FDA Modernization Act 2.0 allows for alternatives to animal testing. *Artif Organs*. 2023;47(3):449-450.

Annexure A



Wildlife Crime Control Bureau
वन्यजीव अपराध नियंत्रण ब्यूरो

GOVERNMENT OF INDIA
भारत सरकार
MINISTRY OF ENVIRONMENT
FORESTS AND CLIMATE CHANGE
पर्यावरण वन एवं जलवायु परिवर्तन मंत्रालय

File No.3-10/WCCB/TRADE/2021-2022 / 3171


Dated: 11, May, 2022

OFFICE MEMORANDUM

Sub.: Issuance of Alert on smuggling of monkeys – reg.

Input has been received from a reliable source that Laboratory Corporation of America is making effort to export live monkeys from India some of which are protected under the Wildlife (Protection) Act, 1972.

2. It may be mentioned that export of all wild animals is prohibited from India as per Foreign Trade Policy (FTP) of Government of India. As per intelligence input there has been a surge in the demand of monkeys due to surge in the price of monkeys.
3. In view of the above, it is requested to Alert the field formations under your control for prevention of export of non-human primates including monkeys from India.


(Tilotama Varma)
Additional Director
WCCB, BHQ, New Delhi

Distribution

1. Chief Wildlife Wardens of all States.
2. Member of Customs, CBIC of India, New Delhi,
3. Joint Director(I&C), WCCB, BHQ, New Delhi
4. All Regional Deputy Directors of WCCB Regional offices, NR/ER/WR/SR/CR