



United States Department of Agriculture
Animal and Plant Health Inspection Service
Animal Care

INSPECTION REPORT

Emory University

1440 Clifton Road
Atlanta, GA 30322

Site 001 + 2
Emory University & Yerkes Regional
Primate Center
Same

57 - R - 0003
3/28 - 3/30/00
Routine

NARRATIVE

I was accompanied on this inspection by Dr. Lisa Bellamy, VMO-MD. Number of Animals Inspected: (See Inventory Sheet)

Non-compliant item(s) previously identified that have been corrected.

Section 2.35(3)(b) Records
Section 3.56(b) Sanitation of primary enclosures
Section 2.38(g) Identification
Section 3.75© General Requirements - Surfaces

Non-compliant item(s) identified this inspection
Section 3.80(a)(xi) Minimum space requirements

The baboons in Yerkes Main Station Rooms 243 A&B are apparently being housed entirely according to their weights and placed in cages providing the USDA minimum floor space according to that weight. Nineteen sub-adults are in cages which have either 6 sq ft or 8.6 sq ft of floor space and are only 30" or 32" high. A small number of baboons are in 4.3 sq ft of floor space with 30" high. Consideration needs to be made for the primates to make normal postural adjustments with freedom of movement.

To be corrected by: 8-1-00

Section 3.81(a)(b)(c) The Emory University Policy on Environmental Enrichment for Non-Human Primates (EE Plan) states the program is to optimize opportunities for species-typical, non-injurious behaviors, including social, locomotor, and foraging behavior. Although the written plan is excellent and comprehensive, implementation of this plan in the following areas is needed to more adequately provide "optimized opportunities".

1) Although the EE Plan states "the majority of animals at Yerkes are housed with companion animals, actually over 70% of the non-human primates (NHP's) at the Yerkes Main Station are

Prepared By:

Title:

Michael Guedron, Veterinary Medical Officer, USDA, APHIS, Animal Care

Copy Received By:

Title:

(b)(6), (b)(7)c

LARIS ID NO. 2016

Date: 3/31/00

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single-housed. The plan also states "social housing is the primary strategy for the NHP's at Yerkes/Emory and will continue to be promoted....", but some of the Principal Investigator justifications for exceptions to social housing do not seem to provide adequate justification. Examples include baboons on protocol 079-97Y which states they are "housed single caged to allow for observations, ready access for treatments and restraint, and to protect incisions." Squirrel monkeys on protocol 054-2000Y are single housed "due to need to use a collar and leash and need to schedule access to food". There are other reasons some of these NHP's may need single housing and these should have been stated. The IACUC, along with the Environmental Coordinator, need to promote housing and restraint methods which allow social housing.

3.81(c)(4) On the Emory Campus, one rhesus in a gene therapy study has been isolated from all other NHP contact for almost two weeks. None of the special considerations listed in the EE Plan to be provided isolated NHP's has been given.

2) The Emory EE Plan states "Group housed animals and all Great Apes have various items to increase usable space and stimulate natural locomotion as well as provide escape routes and visual barriers. The majority of NHP's at the Yerkes Field Station are housed in large outdoor compounds with indoor shelter areas. Numbers of NHP's in these compounds are around 100. These compounds have limited climbing/vertical structures (2 or 3 metal playground climbing structures and fire hoses) and only concrete culverts for visual barriers.

Besides more permanent climbing structures, temporary climbing/hiding structures can be created with the use of "planted" dead trees, logs, limbs, brush and other natural structures and substrates. Wood items would only need to be replaced if they became excessively dirty. Indoor housed squirrel monkeys should also be provided with wooden structures in order to scent mark. NOTE: Past USDA correspondence indicated wood could not be used as it was not sanitizable. Substrates which can not be readily sanitized are to be replaced when worn or soiled.

3) The Emory EE Plan states physical appearance will be one of the criteria in evaluating the NHP's, yet although a significant percentage of the macaques at the Yerkes Field Station are partially or entirely bald, this condition has not been noted as not normal, assessed for the extent of the condition, nor possible reasons or solutions investigated. The baldness appears to be due to overgrooming, and may indicate a need for the opportunity to express other normal behaviors (climbing, exploring) more frequently.

Although foraging strategies are employed - primarily in the form of scattered produce or scratch feed - more time consuming activities may be needed. One method of doing this could be to create foraging devices or methods to provide part of the twice daily primate biscuits.

Prepared By: Michael Guedron Lisa K Bellamy/DM Date: 3/31/00
Title: Michael Guedron, Veterinary Medical Officer, USDA, APHIS, Animal Care LARIS ID NO. 2018
Copy Received By: (b)(6), (b)(7)c Date: 3/21/00
Title: [Redacted]

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EMORY UNIVERSITY

Office of the Vice President and General Counsel

401 Administration Building
Atlanta, Georgia 30322
404/727-6011

Emory University Hospital
1364 Clifton Road, N.E.
Atlanta, Georgia 30322
404/712-5627

Crawford Long Hospital
550 Peachtree Street, N.E.
Atlanta, Georgia 30365
404/686-2457

114 Administration Building
Atlanta, Georgia 30322
404/727-1730

Reply to:

114 Administration Bldg.
Atlanta, GA 30322

July 14, 2000

VIA FEDERAL EXPRESS

F. Miava Binkley, DVM
Supervisory Animal Care Specialist, Eastern Region
USDA, Animal & Plant Health Inspection Service
920 Main Campus Dr., Suite 200
Raleigh NC 27606-5202

RE: Inspection of Yerkes Regional Primate Research Center Field Station and Main Station and Follow-Up Meeting of June 8, 2000

Dear Dr. Binkley:

Our thanks again to you and Dr. Guedron for taking the time to visit the Yerkes' facilities and discuss with us our March 28 - March 30, 2000 inspection and USDA's current regulatory interpretations/policy direction. We found this to be a very informative and productive meeting and hope that you did as well.

As we discussed during the meeting, we have prepared a summary of our responses to the items noted in the March, 2000, Inspection Report. This summary is attached to this letter. We regret that it has taken us longer than expected to get this to you, but we wanted to provide you with well-prepared, thoroughly considered responses that were reviewed by all appropriate Yerkes and IACUC personnel. Within the summary, I have included, for your consideration, a statement of any inspection items to which we object and the reasons for our objections; our plans for addressing items noted; and our proposals regarding alternate means for handling some of the items. The summary follows the sequence of items noted in the Inspection Report.

We would appreciate it if you would review this summary, and provide us with your responses to our requests and comments on our proposals. We hope that through this dialog, we will develop a clearer understanding of the USDA's current interpretations of

Miava Binkley, DVM
July 14, 2000
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the off times confusing AWA regulations, in order to ensure that all of our planned program enhancements are on the right track.

You may address your comments/responses to me, and I will circulate them to all of the folks at Yerkes upon receipt.

Thank you once again for your cooperation and assistance in helping Yerkes ensure the continued excellence of its animal care program.

Sincerely, A

(b)(6)

cc: Dr. Betty Goldentyre
Mr. Tom Gordon
Dr. Michael Guedron

(b)(6)