

August 31, 2015

Dr. Carol Clarke, DVM, Research Program Manager
Regulatory Analysis and Development, PPD, APHIS
U.S. Department of Agriculture ("USDA")



Via electronic submission

RE: Docket No. APHIS-2014-0098; Petition for Rulemaking to Establish Ethologically Appropriate Standards for Nonhuman Primates Used in Research

Dear Dr. Clarke:

On behalf of the Animal Legal Defense Fund (ALDF) and its hundreds of thousands of members and supporters, and further to the detailed petition for rulemaking that ALDF submitted with its co-petitioners to the U.S. Department of Agriculture (USDA) on May 7, 2014, we are writing to urge the USDA to better ensure fulfillment of the intent of the federal Animal Welfare Act (AWA) by promulgating specific, enforceable, ethologically appropriate standards for nonhuman primates used in research. The complex nature and needs of nonhuman primates are widely recognized and accepted not only by the scientific and veterinary communities, but by the public at large. Indeed, the petition for rulemaking that ALDF and its co-petitioners submitted has garnered widespread support from primatologists, members of the scientific community, animal protection organizations, and the general public. As of the date that these comments are being submitted, over 7,000 comments have already been submitted—virtually all of which support the petition. Fulfillment of the AWA’s intended purpose of providing for the “humane care and treatment” of animals requires the USDA to promulgate rules that will give licensees explicit guidance about minimum standards of care for primates who are housed and used in research facilities. *See* 7 U.S.C. § 2131 (1).

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While ALDF already provided detailed analysis and scientific literature with the petition for rulemaking, we are submitting additional comments underscoring the urgency for the USDA to promulgate rules without delay. The petition for rulemaking that ALDF and its co-petitioners submitted on May 7, 2014, along with all cited scientific literature, are incorporated herein by reference in their totality, as if set forth fully within the comments that follow.

Very truly yours,

A handwritten signature in blue ink that reads "Carney".

Carney Anne Nasser, Esq.
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Attachment and Exhibits