

June 17, 2026

VIA EMAIL

Dr. Jayanta Bhattacharya
Acting Director

Dr. Darin Carroll
Director for the Division of Core Laboratory Services and Response

Dr. Reynolds Salerno
Director, Office of Laboratory Systems and Response

Ms. Jennifer Gartzke
Procurement Officer

Centers for Disease Control and Prevention
1600 Clifton Road
Atlanta, GA 30329

Dear Dr. Bhattacharya, Dr. Carroll, Dr. Salerno, and Ms. Gartzke,

The American Anti-Vivisection Society (AAVS) is writing in strong support of the decision by the US Centers for Disease Control and Prevention (CDC) to send 162 primates to permanent sanctuary at Born Free USA's facility in Texas. This milestone marks the end of the CDC's in-house primate experimentation and represents an evidence-based, welfare-focused placement decision grounded in accreditation, species expertise, available capacity, timely placement, and long-term sanctuary care.

But critics of the CDC's decision --the National Primate Research Centers (NPRCs) and their allies, as documented in a [May 27 letter](#) to the CDC and a [May 15 article](#) published in *Science* --do not seem to realize that the central question does not involve standards designed for animals held in laboratory settings, but instead, whether the CDC can place these primates with appropriate, accredited institutions for permanent sanctuary care.

Moreover, we believe that the critics rely on arguments that do not adequately address the central issue before the CDC: whether Born Free USA is an appropriate, accredited institution for permanent sanctuary care.

Background on GFAS and Born Free USA

Born Free USA took over management of the Texas Snow Monkey Sanctuary, which started in 1972, in 2007 and has been repeatedly accredited by the Global Federation of Animal Sanctuaries (GFAS), which is the only globally recognized organization enforcing the rigorous

GFAS Standards of Excellence. The GFAS executive director described Born Free as an “exemplary facility” in the May 15 article in *Science*.

According to the CDC’s [Notice of Intent](#), Born Free USA was selected because it met the agency’s requirements for accreditation, species expertise, available capacity, and the ability to provide timely placement for the animals. Those qualifications were central to the CDC’s decision-making process. Born Free USA has repeatedly demonstrated GFAS compliance with rigorous standards for animal welfare, veterinary care, safety, animal acquisition, transport, social housing, quarantine, behavioral management, emergency preparedness, long-term sustainability, and lifelong sanctuary care, including in primate-specific contexts. Born Free USA also has extensive experience caring for primates formerly in a research setting, in a sanctuary environment designed to support species-appropriate behaviors and lifelong well-being.

Critics such as the NPRCs and their allies, including officials from the University of Washington quoted in the May 15 *Science* article, have implied that the CDC’s monkeys will simply be thrown into existing groups, or that Born Free USA—which has operated a primate sanctuary for nearly 20 years—has not considered basics such as primate husbandry, veterinary care, and behavioral management of social groups.

Nothing could be further from the truth. Born Free USA has a long history of successfully caring for and rehabilitating primates—as mandated by the GFAS Standards of Excellence—which take into account these fundamentals.

GFAS holds [Charity Navigator’s highest possible rating of four stars](#). For years, AAVS presidents have been members of the GFAS Board of Directors, underscoring AAVS’s confidence in the quality of GFAS standards.

Moreover, Born Free USA also holds a [four-star Charity Navigator](#) rating for its accountability and other areas of excellence, a distinction not every primate sanctuary can claim. To date, AAVS’s Sanctuary Fund has contributed over \$5 million to support animals released from labs, including chimpanzees freed from invasive experimentation. Beginning as early as 1982, AAVS provided funding to the Texas Snow Monkey Sanctuary that would eventually become Born Free USA, and AAVS has continued to provide consistent grants in the years since Born Free USA took over management. AAVS’s confidence in Born Free USA is not new; it is grounded in many years of direct experience with the sanctuary and its work.

GFAS Is the Relevant Standard for Sanctuary Placement

With all of this talk about accreditation, we believe it is important to describe the similarities, and fundamental differences, between GFAS and the Association for Assessment and Accreditation of Laboratory Animal Care (AAALAC), an experimentation-focused body. Similarities include the fact that both are private, voluntary accrediting bodies that conduct site visits to determine accreditation every three years. Both rely on a collegial process, and both state their respective accreditations are the “gold standard” for animal care at accredited facilities, as well as evidence of a [“commitment to excellence”](#) and [“promot\[ing\] excellence.”](#)

That said, there are significant differences. For example, GFAS annual fees from sanctuaries cover only about [20 percent of its annual expenses](#). AAALAC, by contrast, depends on the labs it accredits to pay annual and application fees that cover [nearly 100 percent of its annual expenses](#)—raising significant concerns about conflicts of interest. We have long been skeptical of AAALAC for this and other reasons, such as [Science’s reporting in August 2025](#) that AAALAC-accredited facilities earned 73 percent of the most serious USDA inspection report citations since 2014 and have paid 78 percent of USDA fines levied against research facilities since 2020.

But our skepticism of AAALAC is based on official U.S. government data—e.g., USDA enforcement records and financial filings from the IRS. We do not believe that there is comparable hard evidence to support the skepticism of GFAS accreditation or Born Free USA displayed by the NPRCs and their allies. Their criticism has included supposition—“the sanctuary also appears understaffed” (May 27)—and alarmist, inflammatory conjecture—“If they’re just going to throw all of these monkeys together, half of them could die” (May 15). Despite this, in their May 27 letter, the NPRCs and their allies claim that the situation “call[s] into question the completeness, honesty, and scientific rigor” of the CDC’s decision-making process. Yet a few years ago, the NIH’s Office of Research Integrity found that the [director of the Southwest NPRC had engaged in research misconduct](#) by falsifying data in a retracted paper and two federal grant applications.

Moreover, in that same August 2025 *Science* article regarding the Animal Welfare Act records of AAALAC-accredited facilities, Americans for Medical Progress—a signatory to the May 27 letter criticizing the CDC’s decision regarding Born Free—said that AAALAC accreditation is “not a magic guarantee that nothing will ever go wrong.” Where is that same forbearance regarding GFAS?

That said, we believe that the most significant difference between GFAS and AAALAC lies in the standards and goals for retirement vs. experimentation. As Stacy Lopresti-Goodman and Brandon Villatoro-Sotto write in the peer-reviewed article [“The Benefits and Challenges of Conducting Primate Research in Different Settings”](#): “While laboratories and zoos breed or acquire primates for the purpose of using them for research or to keep on display, sanctuaries play a critically important role in housing primates who are no longer wanted or needed from other settings.”

They continue: “Sanctuaries also differ from laboratories and zoos in that they do not buy, sell, trade, or breed primates. They are environments that prioritize the well-being of their residents above other potential interests, including research.”

And as Stephen Ross and Jesse Leinwand of the Lincoln Park Zoo write in their [peer-reviewed article discussing behavioral and other research conducted at sanctuaries](#), “the primary mission of these sanctuaries is to rescue and rehabilitate residents.”

This is the key difference, not only with GFAS vs. AAALAC accreditation, but also the debate surrounding standards for retirement of the monkeys from CDC—or, for that matter, any other lab wanting to retire animals to sanctuary. The Office of Laboratory Animal Welfare (OLAW)

and AAALAC address animals held in research settings. GFAS and its accredited sanctuaries operate with a focus on, and relevance to, “prioritiz[ing] the well-being of their residents above other potential interests, including research,” and a “primary mission” to “rescue and rehabilitate residents.”

AAVS understands why the government would desire GFAS accreditation for sanctuaries where it will send animals, since it provides an extra layer of oversight and security relating to the proper use of government funds, as well as an additional benchmark to help ensure proper animal welfare. Is this not reminiscent of arguments made by AAALAC?

That is why GFAS accreditation is the most relevant standard for this purpose. The question is not whether an institution is accredited for a laboratory environment in which animals are held for research, but instead, if that facility is accredited for permanent sanctuary care. As stated above, GFAS is dedicated exclusively to animal sanctuaries and rescue centers, and GFAS accreditation is awarded to organizations that meet rigorous standards of animal care, ethics, safety, governance, and operational excellence that are the most relevant to the CDC’s decision-making process. Accreditation exists because animal welfare requires more than available space. It requires demonstrated expertise, operational readiness, veterinary oversight, financial sustainability, and a long-term commitment to the animals in a facility’s care. The transition of a large group of nonhuman primates from laboratory settings into sanctuary care is inherently complex, requiring careful planning, behavioral expertise, veterinary oversight, and ongoing monitoring. These are the reasons why independent standards and accreditation matter.

Again, GFAS accreditation—not AAALAC accreditation or OLAW oversight—speaks directly to the CDC’s decision.

Oversight by OLAW and AAALAC Is Not the Relevant Framework for Sanctuary Placement

Oversight by bodies such as OLAW and AAALAC addresses animals held in a laboratory environment for research. These are therefore not the most relevant frameworks for evaluating the sanctuary experience, which is focused on “prioritiz[ing] the well-being of their residents above other potential interests, including research.” The May 27 letter from the NPRCs and their allies positively cites OLAW and its oversight of the CDC, and states that documentation regarding this oversight is publicly available.

OLAW operates within a framework designed for research facilities and depends heavily on internal institutional systems. Its oversight is based on the PHS Policy on Humane Care and Use of Laboratory Animals, which depends in significant part on institutional compliance, reporting, and corrective action. OLAW has described its relationship with assured institutions as a trust relationship.

In addition, OLAW does not conduct routine inspections of research facilities. Site visits are generally announced in advance and described on the OLAW website as rare and conducted only when needed.

We believe it is important to note that the USDA, which enforces the Animal Welfare Act (AWA), has no jurisdiction at federal research facilities such as the CDC. Instead, the agency conducting the research is responsible for enforcing the AWA there. That distinction matters because it also underscores that oversight of animals in federal research settings already depends heavily on internal institutional systems.

Indeed, *Science* reported last August that the USDA has been severely impacted by the advent of the bird regulations, a dearth of inspectors, and its interpretation that the Supreme Court's decision in *SEC v. Jarkesy* prohibits the issuing of fines—which had been the USDA's primary enforcement tool with research facilities. *Science* also cited the agency's spotty enforcement history.

We believe that the issues referenced above regarding OLAW, AAALAC, and the USDA reinforce the importance and viability of GFAS accreditation. If the NPRCs and their allies hold OLAW and AAALAC as meaningful indicators of animal care in research settings, then GFAS accreditation should receive at least the same serious consideration in the sanctuary setting. And, again, the relevant question is sanctuary care—not experimentation.

Moreover, oversight of the CDC as a research facility is not the question before the agency; placing the 162 primates into permanent sanctuary care is. A laboratory environment is fundamentally different from that of a GFAS-accredited sanctuary, which is focused first and foremost on the welfare of the animals under its charge, including the unique needs of animals formerly in research.

Peer-Reviewed Article Cites GFAS and Born Free USA

In their [2020 review of research conducted at sanctuaries](#), Ross and Leinwand noted they almost exclusively restricted their review to captive research conducted in accredited sanctuary organizations: “those that have met some particular set of guidelines for administrative functioning and are part of a community of like-minded organizations.” There is only one accrediting body they mention by name that operates in the United States: “the Global Federation of Animal Sanctuaries (GFAS) which accredits sanctuaries for a range of taxa around the world.”

The authors go on to note that primate sanctuaries are “typically the most restrictive in terms of allowable research,” which again underscores that the priority for GFAS-accredited sanctuaries is the welfare of the animals under their charge. The authors cite one of GFAS's standards—regarding research: “For instance, the Global Federation of Animal Sanctuaries' Operations Standards only allows research that does not negatively impact animal welfare, interfere with normal daily activities, or cause pain or distress.” Finally, Ross and Leinwand include a table listing the sanctuaries where the research included in their review was conducted.

Born Free USA is among those sanctuaries.

The University of Washington’s Problematic AWA Record

As evidenced by the May 15 article in *Science* and the May 27 letter from the NPRCs and their allies, the University of Washington, which operates the Washington National Biomedical Research Center, has been the loudest voice criticizing both the CDC and Born Free USA. Given that, we believe that UW’s record of failing to comply with the minimal standards of the AWA merits discussion.

The university has paid four animal welfare–related fines since 1995. Since its most recent USDA penalty in [October 2022](#)—for multiple primate deaths and injuries—it has received five critical citations, the designation the USDA reserves for [noncompliances with a “serious or severe adverse effect” on animals’ well-being](#). In 2024, the director of UW’s National Primate Research Center was [removed because of significant animal welfare concerns](#), but remains on the faculty. This did not halt the noncompliances. An AAVS analysis found that since January 2023, UW is one of only 10 labs in the U.S. with critical citations in three separate USDA inspections, each involving an animal death. In UW’s case, all three animals were primates. The most recent, documented in [January 2026](#), recorded UW staff taking a still-living infant monkey to necropsy before discovering she was alive.

For a [July 8, 2025, citation](#) that mentioned the death of a geriatric monkey, the USDA found that UW had failed to provide the attending veterinarian with appropriate authority to provide adequate veterinary care. The AWA regulations place enormous authority in the attending veterinarian, who is responsible for providing adequate veterinary care at research facilities. That is why this citation is so grave: the USDA has issued it [fewer than 20 times since 2014](#), across more than [15,000 research facility inspections](#).

But it gets worse. Out of over 15,000 research inspections since 2014, and the 18 that cited facilities for failing to give their attending veterinarians appropriate authority, UW’s Institutional Animal Care and Use Committee (IACUC)—the body meant to safeguard animal welfare—*was the only one directly implicated by the USDA in undercutting the authority of the attending veterinarian*.

Yet just five weeks later, in the above-referenced August 2025 *Science* article, the UW official responsible for the university’s animal care program praised the very IACUC the USDA had just cited—while another UW official told *Science* on May 15 that “no one who cares about monkeys” would send them to Born Free USA. Since 2014, the USDA has documented noncompliances with UW’s IACUC in six separate inspections ([February 2014](#), [July 2015](#), [April 2017](#), [September 2023](#), [October 2024](#), and [July 2025](#)).

A Study in Contrasts: Oregon’s Different Path

OHSU has taken a notably different approach. Oregon Health & Science University, which operates the Oregon National Primate Research Center, has begun discussions with NIH about a possible sanctuary-oriented future for the Oregon NPRC. It is also notable that OHSU is not listed as a signatory on the May 27 letter. We applaud OHSU’s willingness to engage constructively with the possibility of a different path.

A Broader Debate About Primate Retirement

In [2019](#), [David Grimm at *Science* filed a report](#) about the sanctuary vs. research debate that has significant relevance today regarding the CDC's plans to send the monkeys to Born Free USA. It also underscores the connection between the current questions about the CDC monkeys and Born Free, and the earlier debate over chimpanzee experimentation, including sending chimpanzees to sanctuary.

A researcher at Yale University, and a writer for the pro-animal-experimentation blog Speaking of Research, told *Science*, “I don't know of any monkeys that are not needed in biomedical research,” and “There's no such thing as a surplus monkey.” She is representative of a mindset, reported by Mr. Grimm, where researchers “also fear that even talking about retirement could eventually lead to all monkeys disappearing from biomedical studies, as happened with chimpanzees.” She further stated that “the decision to retire chimpanzees to sanctuaries was a mistake,” which she fears “is being repeated with monkeys.”

But another researcher's revealing statement to *Science* has direct relevance to UW, and that university's criticism of the CDC and Born Free: “When you send an animal to a sanctuary, you're putting them in a situation full of question marks.”

The person who said that is currently Director of Operations at UW's National Biomedical Research Center (formerly known as the UW National Primate Research Center) and has a long history of advocating against retirement of animals from labs to sanctuaries. She criticized the NIH for sending chimpanzees to Chimp Haven, in two letters published in *Lab Animal* in [June](#) and [September](#) 2016; is a former chair, and current board member, of [Americans for Medical Progress](#)—a signatory to the May 27 letter, and one of the loudest voices against retirement of animals from research as well as ending chimpanzee experimentation; and sits on the [board of the National Animal Interest Alliance](#)—another signatory to the May 27 letter. In [2020](#), [she criticized legislation](#) that would make it easier to retire animals from labs. And [just last month](#), [she publicly criticized](#) the CDC's decision to send the 162 monkeys to Born Free.

These comments show that some objections to sanctuary retirement arise from a broader debate about—and many researchers' objections to—primate retirement itself, not from a sanctuary-specific standard that Born Free USA clearly meets. In their May 27 letter, the NPRCs and their allies speak of helping to “ensur[e] that the animals retired from research at the CDC are provided the lifetime care they so richly deserve.” But many of these same constituencies have historically opposed broad retirement of primates and other animals from research settings, including in the context of chimpanzee retirement.

Indeed, several signatories to the May 27 letter to the CDC were also among the loudest voices opposing the end of chimpanzee experimentation, and the sending of chimpanzees to sanctuary. That absurdity reached its heights just a few months before the Institute of Medicine panel's groundbreaking December 2011 finding that essentially ended chimpanzee experimentation, when the director of the Southwest National Primate Research Center was [quoted by McClatchy Newspapers](#) saying that, if he were a chimp, he would prefer living in a lab rather than a forested sanctuary like Chimp Haven.

We are concerned that this history may reflect a reflexive bias against sending animals from research to sanctuaries—a bias that seems to color the criticism aimed at the CDC and Born Free. Importantly, we believe the arguments about research vs. retirement simply do not address the central question now before the CDC: whether Born Free USA is an appropriate, accredited institution for permanent sanctuary care.

A Wonderful Precedent

The retirement of animals from experimentation should be careful, transparent, and adequately funded. For the reasons cited herein, AAVS respectfully urges the CDC to proceed with this carefully considered placement, which is consistent with Born Free USA’s successful history, longstanding GFAS accreditation, and experience caring for, and rehabilitating, primates from a research setting into a new sanctuary environment designed to support species-appropriate behaviors and lifelong well-being.

Neither the May 27 letter nor UW’s criticism voiced in the May 15 *Science* article provides a more relevant standard for permanent sanctuary placement. Instead, they are based on an experimentation-focused framework that does not answer the central question now before the CDC: how to effectuate careful, credible placement to an accredited sanctuary. On this record, the CDC’s decision is well supported.

Contrary to what a UW official told *Science* on May 15, this is not a “horrible precedent.” It is a humane and compassionate one—and the next wave of necessary change. As the U.S. Department of Health and Human Services put it in [recent social media posts](#) about the CDC’s decision: “Compassion is making a comeback.”

We urge the CDC to fulfill that promise and proceed with sending all 162 monkeys to Born Free.

Thank you for your consideration.

Sincerely,



Luke Klein
President
American Anti-Vivisection Society



Eric Kleiman
Senior Policy Advisor
American Anti-Vivisection Society