

March 14, 2005

Department of Health and Human Services
National Institutes of Health
42 CFR Part 9
RIN 0925-AA31

Proposed Rules on Standards of Care for Chimpanzees Held in the Federally Supported Chimpanzee Sanctuary System

These comments are submitted as the collaborative work of the New England Anti-Vivisection Society, Fauna Sanctuary, Save The Chimps (formerly Center for Captive Chimpanzee Care), Center for Great Apes, Laboratory Primate Advocacy Group, Primate Rescue Center, Chimpanzee and Human Communication Institute, The Humane Society of the United States, and In Defense of Animals in response to the National Institutes of Health's notice of proposed rulemaking regarding the standards of care for chimpanzees in the federal sanctuary system. The above organizations collectively represent more than 8.7 million Americans.

We are aware that in most cases the federal sanctuary system will be receiving chimpanzees bearing psychological and emotional scars from years in a laboratory. In addition, many will likely be in poor health or at least somewhat compromised from previous use in multiple and varied research. Many of our comments are made with this in mind.

I. Opening Statements

A. We support language in **Sec. 9.6 Animal Care, Well-being, Husbandry, Veterinary Care, and Euthanasia**, which consider the psychological and behavioral well-being and social needs of all chimpanzees transferred from laboratories. Any sanctuary for chimpanzees formerly housed in laboratories must, wherever feasible, prioritize the needs of the individuals over those of the institution in order to fully promote health and well-being. A sanctuary must be more than just an enriched laboratory environment and allow, as well as encourage, chimpanzees to express their individual and innate behaviors to the greatest degree possible. Years of institutionalization coupled with the continual threat of discomfort and fear or suffering from biomedical or intrusive behavioral research has taken a toll on chimpanzees not unlike the toll that prolonged institutionalization takes on humans. Retirement facilities must be prepared to deal with this aspect of care and must be required to have a program for the re-socialization of the chimpanzees.

B. We support the proposed regulations which recognize that social interactions and group dynamics are a key aspect of chimpanzee quality of life. Every effort should be made to minimize disruptions in social or family groups. This regulation should include