

#### **OPPOSE – AGRI Committee Amendments 60 & 61 to Article 10, which state:**

*"(-1) The Commission shall carry out an animal welfare assessment and a feasibility evaluation of implementation of the requirements set out in paragraph 2, five years after the entry into force of this Directive."*

*"Where feasibility is established, as from the dates to be set in Annex III in light of the evaluation referred to in paragraph 1, Member States shall ensure that non-human primates listed in that Annex may only be used in procedures where they are from self sustaining colonies."*

#### **Why this amendment must be REJECTED**

These amendments delay indefinitely the implementation of the Commission's proposed phase out, over seven years, of the cruel and environmentally damaging trade in monkeys caught from the wild (see over). This briefing outlines the suffering and the environmental damage caused by wild capture, and shows that the Commission proposals are viable and humane. If there are concerns that the seven year target cannot be reached, then progress could be reviewed under thematic review under Article 8 (AGRI amendment 59) every two years, or after five years when the Directive is next reviewed under Article 53a (AGRI amendment 148). Or, a progress review could specifically be added to the phase out. It is not an option for Europe to do nothing. A vague "feasibility study" has the same effect as doing nothing. Europe must take responsibility for the part it is playing in the suffering and damage caused to wild monkey populations caused by the laboratory primate trade.

## Ending the trapping of wild monkeys for research and breeding farms

### Why this is important

When monkeys are taken from the wild there are considerable welfare and environmental impacts.

**Welfare impacts:** Violence, stress and fear during capture, and sudden confinement; indiscriminate tearing apart of family groups; broken social groups left behind – primates can be left without parents or siblings.

**Environmental impacts:** Damage to habitat; damage to the genetic diversity of wild populations, and even the eradication of whole populations; disruption of the natural population balance – removal of females, and animals of certain ages. 48% of primate species are now endangered or seriously endangered (IUCN).

**Scientific Impacts:** Scientifically, the use of purpose-bred animals whose genetic and health background is known is preferred; the benefits include reduction of variation, improved consistency and reproducibility of data.

As noted by the European Commission in Recital 16 of their proposals:

*"Furthermore, the use of non-human primates is of the highest concern to the public."*

Some wild-caught primates continue to be used in procedures in Europe. Significantly, breeding establishments, especially in Asia and Mauritius, freely take animals from the wild to supplement their breeding stock. The offspring of wild-caught animals are known as "F1" animals. Animals born of captive-bred parents are known as "F2", with following generations called F3, and so on.

The majority of macaque monkeys used in European laboratories are believed to be F1 animals, predominantly cynomolgus macaques, and smaller numbers of rhesus macaques. Marmosets, the second most commonly used primate species in Europe, are already bred to F2 and beyond.



## **The European Commission's Proposals:**

*Article 9.1. Animals taken from the wild shall not be used in procedures.*

*Article 9.2. Competent authorities may grant exemptions from paragraph 1 on the basis of scientific justification that the purpose of the procedure cannot be achieved by the use of an animal which has been bred for use in procedures.*

*Article 10.1. Member States shall ensure that animals belonging to the species listed in Annex II may only be used in procedures where those animals have been bred for use in procedures.*

*However, as from the dates set out in Annex III, Member States shall ensure that non-human primates listed in that Annex may only be used in procedures where they are the offspring of non-human primates which have been bred in captivity.*

*Article 10.2. Competent authorities may grant exemptions from paragraph 1 on the basis of a scientific justification.*

*Annex III: List of non-human primates and dates referred to ...in Article 10(1). Proposes that the use of F1 cynomolgus and rhesus macaques should be phased out in 7 years after transposition of the Directive; F1 marmosets to be phased out from the date of transposition; and other species of non-human primates after 10 years.*

## **The Commission's Justification**

*Recital 18: "The capture of non-human primates from the wild is highly stressful for the animals and increases the risk of injury and suffering during capture and transport. In order to gradually end the capturing of animals from the wild for breeding purposes, only animals that are the offspring of an animal which has been bred in captivity should be made available for use in scientific procedures as soon as possible. Establishments breeding and supplying non-human primates should therefore have a strategy in place to support and facilitate the progressive move towards that goal."*

## **ADI Position on these proposals**

We believe paragraphs 9.1, 10.1, and Annex III are the first credible step towards ending the European research community's responsibility for the wild capture of primates, with the consequential suffering and environmental damage this entails. These will receive widespread public support.

Article 7.3 of the current EC Directive 86/609 states: "Experiments on animals taken from the wild may not be carried out unless experiments on other animals would not suffice for the aims of the experiment."

Yet 23 years after this Directive came into force, Europe continues to sanction the taking of monkeys from the wild for laboratory breeding farms.

Self-regulation has failed to make the necessary impact to preserve the world's heritage of wild populations of primates and their environment, so a deadline is vital.

ADI supports reducing the F1 phase-out to 5 years, which we believe is achievable, would provide the appropriate sense of urgency and reflect the public desire to see progress. The welfare and environmental impacts of wild capture are, as we shall show, significant.

We believe that Articles 9.2 and 10.2 of the Commission's proposals seriously weaken the proposed Directive and should be deleted as they allow the restrictions to be too easily sidestepped.

**Amendments that weaken or undermine the Commission proposals should be opposed.**

## The Commission's Impact Assessment

The European Commission's Impact Assessment (IA) was undertaken by Prognos AG in co-operation with researchers at Utrecht University. The IA concludes that the 7-year phase out is feasible, if carefully planned.

The phase out is based on the reproductive cycles of the various species, and knowledge of existing production levels. For example, Europe is already self-sustaining in F2 marmoset monkeys and therefore no transitional period is needed. The seven-year phase out was deemed "reasonable" for macaques.

## The facts about the phasing out the use of wild-caught monkeys

### The scale of the problem

Approximately 7 000 macaque monkeys (cynomolgus and rhesus) for research enter Europe each year. The exact numbers of F1, F2 or F3 are unclear – but the majority are believed to be F1. Some breeders outside Europe are already supplying F2 primates, as are some sources in Europe, so the transition is already underway, even if slowly.

However as yet, there is no real incentive to make the change in a reasonable timeframe in order to end unnecessary suffering and preserve the world's primate populations. Therefore the European Parliament needs to set out a road map for the industry.

Chinese export quotas for 2009 are set at almost 40 000 primates<sup>18</sup>. Estimates for Vietnam, Mauritius, Philippines, Indonesia, and Cambodia bring this total up to almost 78 000<sup>19</sup>. It should be noted that complete global production (eg including macaques produced in the USA or that remain in China) is probably double this figure.

**Thus, the Commission proposal calls for major European suppliers to move less than 8% of their production to F2, in seven years (approximately 4% of global output).**

It is disappointing that European primate trade and user industries are presenting this reasonable and necessary proposal as if it will cause the entire collapse of primate supply. Such statements are inaccurate and inflammatory, causing unnecessary confusion – it is clear that the Commission's proposal is for wild-caught animals to be phased out over seven years.

### Macaque monkeys can be successfully bred in captivity

Following India's export ban on macaques, the United States expanded its own breeding programme. In 1978, 5 093 primates were produced, including 3 518 rhesus macaques. Five years later, captive breeding for all species, and rhesus macaques in particular, increased by 78% and 96% respectively (an annual growth of 19% for macaques)<sup>5</sup>. Today the US has eight National Primate Research Centres, with 20 000 animals<sup>7</sup> and the American Society of Primatologists claim the majority of primates used in US laboratories are born in the USA<sup>6</sup>.

China has been exporting cynomolgus macaques since 1990 and claims to be breeding them "very successfully" with "several self-sustaining populations with more than 47 000 individuals". Similar success is claimed for captive-bred rhesus macaques, which China has exported since 1984.







Laboratory primate supplier Nafovanny, of Vietnam, plans to replace 10% of their F1 breeding capacity per annum, using animals they might not otherwise sell, for example those showing signs of certain viruses <sup>19</sup>.

There are serious welfare questions about monkey farms in Asia, as well as environmental standards, and the taking of animals from the wild to supplement breeding stocks.



**For too long Europe has looked the other way when it comes to the wild capture policies and welfare standards of the establishments that supply laboratory monkeys.**

It is hoped the new Directive will provide a framework for monkey imports which will require those who supply primates to Europe to maintain standards of welfare, environmental enrichment, health and genetic background.

### **Welfare and issues**

The Commission has estimated that to satisfy current European laboratory demand for macaques with F2 rather than F1 animals will require an increase of 10 000 animals to the current breeding populations. It is estimated that this would leave 800 surplus males because a larger number of females are used for intensive breeding strategies <sup>1</sup>.

Some industry lobbyists have claimed that they are concerned that these surplus male monkeys will be humanely killed on the farms. On the other hand, they appear comfortable with ongoing wild capture, with the accompanying suffering, deaths and environmental destruction it causes. They also appear content with the animals being sold for research and testing.

The reality is that these surplus males are more likely to be sold for research or to others in the industry.

It is important to properly consider the key factors of any breeding programme, and how they fit into the Commission's proposal:

Macaques have an average life span of 25 years<sup>10</sup>, but many captive animals live to 30 years<sup>16</sup>, reaching sexual maturity aged 3-5 years<sup>17</sup>. The macaque gestation period is about 164 days<sup>16</sup>. A female has a minimum 15 year reproduction period, (allowing for a later sexual maturity and first pregnancy and compensating for lower fertility in older age.)

**Therefore if we assume that a breeding farm would replace females as they become less productive, it is possible that over a period of 7 years as many as 50% of a breeding population would be replaced anyway. The same time period as the Commission's proposed phase-out. The real question is, whether those animals will be snatched from the wild, or captive-bred.**

This means that over 5 years the estimated 800 surplus males would be made up of 160 males per year, spread across the whole industry. Some would argue that being humanely killed would be better than life on a breeding farm or death in European laboratory. However, it is unlikely that there would be no customers for these animals.

**If the females are to be wild caught there is the potential for the social balance of wild populations to be disastrously disrupted or for both sexes to be caught by trappers and for the males to be killed once they have been sexed.**

## Environmental impacts

This year MEPs were sent the ADI Save the Primates DVD, which features recent footage of monkeys being trapped for experiments in South America. This reveals the horror of animals being torn from their homes and families and being thrust into sacks and taken away for experimentation.

Wild capture such as this means that there is no regard for the genetic background of the animals, nor for the impact of removing them will have on a wild population. In Colombia there is evidence of trappers actually chopping down trees to get to owl monkeys. Footage from elsewhere indicates that there is a similar lack of concern for welfare or environmental damage amongst trappers, who are mainly poorly paid, subsistence level workers.

Due to devastation of wild populations, India banned the export of primates in 1978<sup>5</sup>. *"Excessive trapping, particularly of juveniles, was a major contributor toward a 90% reduction in the rhesus macaque population of India in the 1960s and 1970s"*<sup>10</sup>. In 1996 a paper by Crocket et al reported how "the population of rhesus macaques in northern India has recovered by only 50% since 1978"<sup>10</sup>.

It has been claimed that trapping increases the genetic diversity of captive populations, but other measures such as reducing the female to male ratios on farms would surely be more effective.

It is likely that trappers are steadily depleting the genetic diversity of the wild populations, and their activities have the potential to eradicate animals from an area. Animals are trapped on the basis of availability, not to ensure genetic diversity. There are obviously potentially disastrous consequences if the breeders continue to remove more females than males from areas. It is much more likely that animals are trapped indiscriminately and the unwanted killed.

In 2002 the EC's Scientific Committee on animal health and welfare reported, *"all primate species are endangered to some extent and many listed as such...there is a position that no wild-caught animals should be used, not even for breeding purposes"*<sup>3</sup>.

The IUCN has announced that 48% of primate species are now either endangered, or critically endangered<sup>20</sup>.

If Europe does not take a stand on this issue it cannot maintain credibility when speaking on other conservation messages to poor countries, where the hungry are being called upon not to eat certain primate species to extinction. Europe has a responsibility on this issue.

There is an alternative, and Europe is in a position to make the change.

## Economic and Research Impacts

The cost of research primates is expected to rise. There are no accurate figures available, but government officials in the UK have estimated that the increase could be from about £4 000 (€4 288) to £6 000 (€6 432) per animal. However, this is a multi-billion industry that can afford to spend a little on good welfare and protection of the environment and the world's heritage.

**Opposition to the Commission proposals to end the use of wild caught animals by the research industry is ill-founded. There is no evidence that the European Commission's proposed phase-out will impact negatively on research.**

**In fact it should have a positive impact, and the benefits include:**

- **Improved scientific standards – captive bred animals are preferred, because of their known health and genetic background**
- **It would help to stimulate development and adoption of advanced alternative methods, thus benefiting European science and technology industries as a whole.**
- **Prevention of unnecessary suffering to highly developed, intelligent and emotional species.**
- **Preservation of the world's natural heritage – ending the destruction of wild populations and habitats.**

**MEPs should be seeking to strengthen and accelerate these sensible, practical and proportionate measures.**

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