HARVARD LAW SCHOOL BROOKS MCCORMICK JR. ANIMAL LAW & POLICY PROGRAM

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October 26, 2022

Arlene Santos-Diaz Director, Office of the IACUC Harvard Medical School

Via e-mail: arlene_santos-diaz@hms.harvard.edu

Dear Director Santos-Diaz:

We are writing to you in advance of the Harvard Medical School's Institutional Animal Care and Use Committee's (IACUC) planned meeting on Thursday, October 27, 2022. We note that you are listed as a contact person to report animal welfare concerns, and we are doing so with this letter. We urge the IACUC to allocate time at the upcoming meeting to discuss an important issue that has been brought to our attention regarding experimentation on non-human primates taking place in a Harvard Medical School laboratory. We further ask the IACUC to seriously consider reviewing its standards for assessing the protocols that have allowed these experiments to go on for over twenty years.

Earlier this month, we learned that experiments occurring in the laboratory of Dr. Margaret S. Livingstone involve separating baby monkeys from their mothers and studying the distressed and grieving mother monkeys' attachment to inanimate "surrogate infants."¹ Other studies from the laboratory describe subjecting baby monkeys to "abnormal visual experiences of faces." This was achieved by having laboratory staff wear "welders' masks that prevented the monkey from seeing the staff member's face" or raising monkeys "under conditions of binocular-visual-form deprivation via eye lid suturing for the first year." In other words, experimenters sewed shut the eyes of baby monkeys, or otherwise prevented them from ever seeing another primate's face, and then implanted electrode arrays into their brains to study their reactions to seeing faces and other images for the first time. Publications from the laboratory describe these methods explicitly and claim to have received approval from the Harvard Medical School IACUC.

In our opinion, the experiments occurring in Dr. Livingstone's laboratory raise significant animal welfare concerns. Peer-reviewed scientific studies demonstrate that removing non-human primate infants from their mothers <u>increases stress and abnormal behavior patterns</u> in the infants (such as pacing, finger sucking, and self-grasping), causes <u>depression</u>, increases distress, and has a <u>negative</u>



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¹ See Letter from Katherine V. Roe, People for the Ethical Treatment of Animals, to President Lawrence S. Bacow et al., Harvard University (Oct. 12, 2022).

impact on social behaviors (such as play and proximity to other non-human primates). These understandings of the negative impacts on non-human primates date back many years and cut against the requirements of the Animal Welfare Act to "promote the psychological wellbeing" of non-human primates used in research and to provide special considerations for infants showing signs of psychological distress. 7 U.S.C. § 2143 (a)(2)(B). Nevertheless, this non-human primate experimentation is ongoing at Harvard Medical School and has been undertaken for over twenty years.

Contrary to the Medical School's <u>statement</u> that these experiments have implications for understanding maternal bonding in humans, the relevant <u>publication</u> itself makes no mention of any manner in which this work can inform understanding of human behavior, and instead cabins itself to observations about non-human primate imprinting. Specifically, the publication states "there is no way of knowing the extent to which these observations bear on human maternal bonding, or on other kinds of bonding."

We are concerned that these experiments have been allowed to occur within the Harvard and urge the IACUC to take action to review the necessity and protocols for these experiments. Specifically, we ask the IACUC to discuss this issue at the upcoming October 27 meeting, re-review the previously approved protocols for non-human primate experimentation within the Livingstone laboratory, and consider terminating these experiments.

We are deeply concerned about these experiments, when they appear to be directly antithetical to the Medical School's <u>mission</u> to alleviate suffering and improve health and well-being. Our Program and Clinic are committed to improving the treatment of animals, including non-human primates used in research.

We would be happy to discuss this issue further with members of the IACUC or other authorized representatives of Harvard Medical School.

Sincerely,

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