AMERICAN SOCIETY OF PRIMATOLOGISTS

President
Marilyn A. Norconk, Ph.D.
Department of Anthropology
Kent State University
Kent, OH, USA 44242
mnorconk@kent.edu

President-Elect
Kimberley A. Phillips, Ph.D.
Department of Psychology,
Trinity University
One Trinity Place
San Antonio, TX, USA 78212
kimberley.phillips@trinity.edu

Past President
Karen L. Bales, Ph.D.
Department of Psychology
University of California
Davis, CA 95616
klbales@ucdavis.edu

Treasurer
Corinna N. Ross, Ph.D.
Department of Biology
Texas A&M University
One University Way
San Antonio, TX 78224
cnross@tamusa.tamus.edu

Executive Secretary
Justin A. McNulty, MLAS, CPIA
Office of Research Support
The University of Texas at Austin
PO Box 7426
Austin, TX 78713-7426
justinmcnulty@gmail.com

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The Honorable Lucille Roybal-Allard
Room #2330 Rayburn House Office Building
United States House of Representatives
Washington, DC 20515

Dear Representative Roybal-Allard:

The members of the Board of Directors of the American Society of Primatologists would like to add our comments to the discussion of the validity and effectiveness of non-human primate research as it pertains to human behavior and medicine. Non-human primate research (on monkeys and apes) has had widespread effect on improving the diagnosis and treatment of many adult and childhood diseases. Studies that have employed the judicious use of non-human primates as models for human illness have improved our understanding of such disorders as autism, childhood leukemia, cerebral palsy, and mental health.[1] The long-term research of one scientist, Dr. Stephen Suomi, has been called into question as a result of inaccurate, misguided and inflammatory media accounts. Our comments will address Dr. Suomi's work and the value of non-human primates in understanding human biology, illness and behavior.

Dr. Suomi's research has focused on the influence of variable environments and genetics on infant development, and by extension variation in adult behavior[2]. He and his colleagues found that early changes in the degree of attachment between mother and infant have real biological, not only behavioral influences on adult social behavior[3]. If this finding seems intuitive, it is evidence that the benefits of research have permeated not only the scientific, but also mainstream media[4] and literature. Infant subjects are either mother-reared or reared in same-aged groups of monkeys. Infants may undergo temporary isolation during the study[5] to facilitate comparison among groups that are reared differently. The goal of much of this research is to mimic separation that every social animal, including humans, undergo during their lifetimes and to understand why individuals respond differently to separation. One such research focus is the development of risk factors leading to mental illness in humans.

[1] http://speakingofresearch.com/2014/10/09/part-1-child-health-benefits-from-studies-of-infant-monkeys/
[2] For example, Bennett AJ, et al. 2002. Early experience and serotonin transporter gene variation interact to influence primate CNS function. *Molecular Psychiatry* 7:118-122;
[3] Suomi, SJ. 1997. Early determinants of behavior: evidence from primate studies. *British Medical Bulletin* 53: 170-184.
[4] For example, Nagourney, E. 2004. Behavior: Stress lessons from monkeys. *New York Times*, October 26, 2004.
[5] For example, Barr CS, et al. 2004. Rearing condition and rh5-HTTLPR interact to influence limbic-hypothalmic-pituitary-adrenal axis response to stress in infant macaques. *Biological Psychiatry* 55:733-738.

The American Society of Primatologists supports research on non-human primates that is carefully designed and employs rigorous research protocols. Dr. Suomi's research and consistent funding by the NIH attests to his adherence to prescribed protocols and regulations.

Before research can begin, proposals are thoroughly vetted by both their institutional ethical oversight board (in the United States these are called Institutional Animal Care and Use Committees or IACUCs) and by the review boards of granting agencies (e.g., NIH, NIMH, NSF). This very extensive process requires prospective researchers to respond to questions such as those raised in your letter, e.g., your concern about redundant research. Per both the Animal Welfare Act and Regulations (AWARs) and the Public Health Service Policy on the Humane Care and Use of Laboratory Animals (PHS Policy), research funded by federal and state governments, as well as private foundations, must demonstrate that the project they propose will advance knowledge in the field, be relevant to human biology or behavior, and will not duplicate the efforts of previous research. The number of animals used in experiments must also be justified as well as the conditions in which the animals are housed, the duration of the project, and the protocols implemented during experiments. The scientists employed by the NIH have been leaders in the development of safe, effective, and reliable research protocols whether the research is done on mice or monkeys.

Because of the close genetic relationship between humans and non-human primates, monkeys are important models for studying particular biological phenomena, including the research conduct by Dr. Suomi. Nevertheless, non-human primates are rare in laboratory populations making up < 1% of the laboratory animals used in research (Government statistics from 2010, cited in Phillips et al., 2014[6]). Furthermore, species are carefully matched to proposed studies.

We appreciate your attention to this matter, and ask that you please send us a response letting us know the charge to the NIH Bioethics Review Board.

Respectfully submitted,

Marilyn A. Norconk

Justin A. McNulty

Kimberley A. Phillips

Corinna N. Ross

Karen L. Bales

[6] Phillips KA, et al., 2014. Why primate models matter. *American Journal of Primatology* 76:801-827.