



February 25, 2025

Community Review Board

Via e-mail: Hcmo.info@oha.oregon.gov

Subject: OHSU/Legacy Merger Condition

Dear Members of the Community Review Board:

I'm writing as a primate scientist and Fulbright scholar alumna who spent 30+ years in the primate biomedical industry where my team, including scientists at OHSU's primate center, examined how pathogens are transmitted at the human-primate interface. I'm also contacting you on behalf of People for the Ethical Treatment of Animals, which has 91,000 supporters in Oregon.

As you review the proposed merger between Oregon Health & Science University (OHSU) and Legacy Health, it is critical to consider a major liability: Oregon National Primate Research Center (Oregon NPRC), one of the most problem-ridden primate facilities in the country. OHSU's control of this facility poses serious financial, reputational, and ethical risks. Based on an abundance of evidence, and to protect the integrity and future of the new health system, we recommend you set a sensible merger condition: The phase-out of the primate center.

Decades long history of violations of federal animal welfare and state laws

OHSU's Oregon National Primate Research Center is one of the largest primate research facilities in the country, with 1,286 primates subjected to experiments in 2023 (the most recent year for which statistics are available) and another 4,117 confined for breeding and other purposes. Many of these are macaque monkeys listed as Endangered. Federal veterinary inspectors have documented dozens of serious violations of the federal Animal Welfare Act (AWA) at the primate center recent years. In 2023, OHSU received a critical violation from the U.S. Department of Agriculture (USDA) after an infant monkey was crushed to death by a heavy steel guillotine-style door in front of her frantic mother. In 2022, it was [fined](#) \$37,900 for nine serious AWA violations spanning four years, from February 2018 to February 2022. These included two monkeys scalded to death after workers failed to remove them from a cage that was put through the high-temperature cage washer.

These issues at ONPRC stretch back decades. PETA released an undercover investigation of the primate center in 2008, which documented numerous animal welfare issues, including employees using high pressure hoses to clean cages while monkeys were still in them, inadequate veterinary care, and monkeys forced to pick their food out of waste trays beneath the cages. See the video [here](#).

The ONPRC's long history of negligence makes it a reputational and legal liability. In 2022, the Multnomah County Circuit Court [ruled](#) that OHSU police

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- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

illegally surveilled PETA, and the university was ordered to pay costs and fees incurred by PETA. In 2020, the same court [ruled](#) that OHSU had violated public records laws by refusing to release primate center video of Japanese macaques, an endangered species, who were used in junk food experiments. See excerpts from the 74 videos the university was ordered to release [here](#).

Zoonotic disease risk poses threat to humans and research results

Macaques in laboratories—whether or not they are infected with experimental diseases—can shed dangerous bacteria, viruses, mycobacteria, and parasites that pose a serious risk to humans. This concern is especially urgent given the potential for staff movement between the Oregon primate center and OHSU’s hospitals, as well as the possible shared use of major equipment.

A [2022 published study](#) identified up to three potential cases in which primate center staff may have been accidentally infected with toxigenic *Corynebacterium ulcerans*, a zoonotic agent of diphtheria, in the course of their work. Serological studies concluded that this pathogen had been circulating, undetected, among the Oregon primate colony for nearly four decades. In [2019](#), the primate center imported 20 monkeys from Mauritius, reportedly healthy and captive-bred, only to discover at least one case of latent tuberculosis among them. Similarly, in 2011, an unexpected tuberculosis outbreak at the Oregon primate center affected 11 rhesus macaques—some born at the facility and others imported from China two years earlier.

Careless handling of the monkeys, inadequate veterinary care, and worker consumption of alcohol on the job, all of which have been documented at the primate center, may increase the risk of zoonotic transmission. Additionally, the presence of [undetected pathogens has also been shown to impact the validity](#) of data from many experiments.

Inability to keep the primate center sufficiently staffed

Public records requests by Oregon state Representative David Gomberg have uncovered serious staffing issues at the primate center, as well as low morale, reports of on-the-job drinking, and numerous complaints about dysfunctional leadership. Chronic staff shortages have been so severe that employees have [staged](#) protests and warned that burnout and overextension lead to animal harm and deaths. Given these ongoing problems, the primate center’s instability could have serious implications for OHSU’s workforce if the merger proceeds.

Funding is in imminent jeopardy

On February 7, the National Institutes of Health (NIH) announced that it was lowering the maximum indirect cost rate to 15 percent. As you know, indirect costs cover expenses such as housing, equipment, and infrastructure. Several states, including Oregon as a plaintiff, filed a [lawsuit](#) in response. While there is a temporary restraining order preventing the cut immediately, it’s clear that the current administration is on a mission to reduce NIH indirect cost funding to institutions. This is particularly relevant for OHSU’s primate center. The lawsuit states that OHSU’s negotiated overall indirect rate agreement with the NIH is 56 percent for on-campus organized research. But the negotiated [indirect cost](#) for the primate center is 75.5 percent.

The primate center relies heavily on federal funding, primarily from NIH. Rising costs for animal care, housing, and veterinary oversight have strained budgets. At the same time, legal challenges, public opposition, and ethical concerns have led to increased scrutiny, which could impact future funding allocations. Additionally, aging infrastructure and the need for costly facility upgrades further exacerbate financial pressures, raising questions about the long-term sustainability of taxpayer funded primate facilities.

Primate Center research is not benefiting humans

About 100 HIV vaccines have been [tested successfully in animals, but not one](#) of them has been shown in clinical trials to give humans sufficient protection from the virus. One experimenter at WaNPRC admitted twenty years ago that “[because of the complexity and limitations of the nonhuman primate models, it remains difficult to extrapolate data from these models to inform the development of HIV vaccines.](#)”

Despite strong and growing public opposition to the continued use of monkeys as surrogates for humans, experimenters claim they cause minimal harm and provide significant human benefits. However, these claims rely on assumptions rather than robust evidence. The relevance and necessity of primate research are often overstated, while the potential of non-animal methods is largely underestimated. Additionally, key confounding factors—such as species differences and the effects of stress and anesthesia—are frequently overlooked, further undermining the reliability, translatability and utility of primate studies.

Merger condition: Phase out the primate center

The decision you have before you is complicated and impactful, and we hope you will consider the information we provided as you navigate the merger for OHSU and Legacy Health. Evidence indicates it would be in the best interest of both organizations to condition the merger on a phase out of the Oregon National Primate Research Center.

Thank you for your commitment to the community. I am available for any questions regarding this information or about the use of monkeys in research.

Sincerely,



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