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COGR Letter to Fish and Wildlife Service on Chimpanzees

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January 30, 2012

Janine Van Norman, Chief
Branch of Foreign Species
Endangered Species Program
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, MS 2042-PDM;
Arlington, VA 22203

Subject: Status Review to List All Chimpanzees (Pan Troglodytes) as Endangered
Docket No. FWS-R9-ES-2010-0086

Dear Ms. Van Norman

The Council on Governmental Relations (COGR) is an association of over 188 research universities and affiliated academic medical centers and research institutes. COGR concerns itself with the impact of federal regulations, policies, and practices on the performance of research conducted at its member institutions. We appreciate the opportunity to provide comments regarding the Fish and Wildlife Service's (FWS) status review to determine if changing the listing status of captive chimpanzees from threatened to endangered is warranted.

As you know, chimpanzees have made significant contributions to science and medicine. The recently released National Academies' Institute of Medicine (IOM) report, *Chimpanzees in Biomedical and Behavioral Research: Assessing the Necessity* (NAS Press 2011) highlights those contributions, many of which might not have been possible if captive chimpanzees had been listed as "endangered" under the Endangered Species Act (ESA). Therefore, COGR supports the continued regulation of chimpanzees and their progeny currently residing at U.S. research facilities under the special rule establish by FWS in 1990.

We recommend to you the extensive comments provided by our colleagues at the National Association for Biomedical Research (NABR). NABR has consistently and competently represented the perspective of our membership concerning public policies as they address the humane care and use of animals in biomedical research.

Thank you for this opportunity to offer comment for your consideration.

Sincerely,

Anthony P. DeCrappeo
President