

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

In Reply Refer To:
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EMS TRANSMISSION
Instruction Memorandum No.
Expires: 09/30/2008

To: All Field Officials (except Alaska)
From: Assistant Director, Renewable Resources and Planning
Subject: Euthanasia of Wild Horses and Burros

Program Area: Wild Horses and Burros

Purpose: This policy identifies requirements for euthanasia of wild horses and burros.

Policy/Action: A Bureau of Land Management (BLM) authorized officer will euthanize or authorize the euthanasia of a wild horse or burro when any of the following conditions exist:

- (1) Displays a hopeless prognosis for life;
- (2) Is affected by a chronic or incurable disease, injury or serious physical defect (includes severe tooth loss or wear, club foot, and other severe acquired or congenital abnormalities);
- (3) Would require continuous treatment for the relief of pain and suffering in a domestic setting;
- (4) Is incapable of maintaining a Henneke body condition score (see Attachment 1) greater than or equal to 3, in its present environment;
- (5) Has an acute or chronic illness, injury, physical condition or lameness that would not allow the animal to live and interact with other horses, keep up with its peers or exhibit behaviors which may be considered essential for an acceptable quality of life constantly or for the foreseeable future;
- (6) Where a State or Federal animal health official orders the humane destruction of the animal(s) as a disease control measure;
- (7) Exhibits dangerous characteristics beyond those inherently associated with the wild characteristics of wild horses and burros.

Euthanasia in field situations (includes on-the-range and during gathers):

(A) As an act of mercy, the authorized officer has the authority and the obligation to promptly euthanize an animal if it is affected by any acute or chronic condition described in criteria 1-7 above.

(B) The authorized officer will report action(s) taken during gather operations in the comment section of the daily gather report (Attachment 2). Documentation will include a brief description of the animal's condition and reference the applicable criteria (including 1-7 above or other provisions of this policy). The authorized officer will release or euthanize wild horses and burros that will not tolerate the handling stress associated with transportation, adoption preparation or holding. However, the authorized officer should, as an act of mercy, euthanize any animal which exhibits significant tooth loss or wear to the extent their quality of life would suffer.

(C) If the euthanasia is performed during routine monitoring, the Field Manager will be notified of the incident as soon as practical after returning from the field.

Euthanasia at short-term holding facilities:

Under ideal circumstances horses and/or burros would not arrive at preparation or other facilities that hold animals for any length of time with conditions that require euthanasia. However, problems can develop during or be exacerbated by handling, transportation or captivity. In these situations the authority for euthanasia would be applied:

- (A) If an animal is affected by a condition as described in 1-7 above that causes acute pain or suffering and immediate euthanasia would be an act of mercy, the authorized officer has the authority and the obligation to promptly euthanize the animal. A veterinarian should be consulted if possible.
- (B) If in the opinion of the authorized officer and a veterinarian, wild horses and burros in short-term holding facilities cannot tolerate the stress of transportation, adoption preparation, or long-term holding they should be euthanized.
- (C) If an animal suffers from any of the conditions listed in 1-7 above, but is not in acute pain, the authorized officer has the authority to euthanize the animal in a humane manner, but it is recommended that consultation with a veterinarian is obtained prior to euthanasia. Situations where acute suffering of the animal is not involved could include a physical defect or deformity that would adversely impact the quality of life of the animal if placed in the adoption program or on long-term holding. The authorized officer will ensure that there is a report from a veterinarian describing the condition of the animal that was euthanized. These records will be maintained by the holding facility.

Euthanasia at long-term holding facilities:

This portion of the policy covers additional euthanasia conditions that are related to long-term holding (LTH) facilities and includes existing facilities and any that may be added in the future.

The following action plan will be followed for animals at long-term holding facilities:

The LTH facility's Project Inspector (BLM WH&B Specialist) and the LTH contractor will evaluate all horses and their body condition throughout the year. During the year if any animal is affected by any of the conditions listed in 1-7 above, the contractor or other person authorized by the Project Inspector is authorized and obligated to euthanize that animal. Once a year a formal body condition evaluation as well as a formal count of all horses at long-term holding facilities will be conducted. The action plan for the formal evaluation is as follows:

1. All animals will be inspected by field observation to evaluate body condition and identify animals that may need to be euthanized to prevent a slow death due to deterioration of condition as a result of aging. This evaluation will be based on the Henneke body condition scoring system. The evaluation team should consist of a BLM WH&B Specialist and an APHIS or other veterinarian acceptable to BLM. The evaluations should be conducted in the fall (September through November) to identify horses with body condition scores of 3 or less.
2. Animals that are rated less than a body condition score of 3 will be euthanized in the field soon after the evaluation by the authorized officer or their designated representative, this can be the contractor. The horses that rate a score of 3 will remain in the field and will be re-evaluated by the contractor and the Project Inspector for that contract in 60 days to see if their condition is improving, staying the same or declining. Those that are declining in condition will be euthanized soon after the second evaluation.
3. Euthanasia will be carried out with a firearm by the authorized officer or their designated representative. Field euthanasia does not require the gathering of the animals which would result in increased stress and may cause unnecessary injury to other horses on the facility.
4. Documentation for each animal euthanized will include sex, color, and freeze/hip brand (if readable). Copies of all documentation will be given to the contractor and retained by BLM.
5. Arrangements for carcass disposal for euthanized animal(s) will be in accordance with applicable state and county regulations.

Euthanasia of Dangerous Animals:

Unusually aggressive behavior can pose an unacceptable risk of injury to persons when wild horses or burros are maintained in enclosed spaces where some level of handling is required.

When a horse or burro is violently dangerous, it is reasonable to conclude that an average adopter could not "humanely care" for the animal as stated in the regulations (e.g., provide proper transportation, feeding, medical care, and handling 43 CFR 4750.1). The BLM cannot solve the problem by removing unusually dangerous animals from the adoption system and placing them in a LTH facility because this resolution also poses significant risk of injury, both to the animals in transport, and to BLM personnel and LTH operators.

In making the determination to euthanize an animal solely on the grounds that it is unusually dangerous, the authorized officer, in consultation with a veterinarian, extension agent, local humane official, or other individual acceptable to the authorized officer, must determine that the animal poses a significant and unusual danger beyond that normally associated with wild horses and burros. The authorized officer must document the aspects of behavior that make the animal unusually dangerous.

Euthanasia of a Large Number of Animals

If the need for euthanasia of an unusually large number of animals is anticipated, these actions should be identified and outlined in advance whenever possible. When field monitoring and pre-gather planning identify an increased likelihood that animals may need to be euthanized during a gather, this should be addressed in the gather plan. In an on-the-range or facility situation where a gather is not involved, advanced planning should also be done whenever possible.

Arrangements should be made for an APHIS or other veterinarian to visit the site and consult with the authorized officer on the euthanasia decisions. This consultation should be based on an examination of the animals. It should include a detailed, written evaluation of the conditions, circumstances or history of the situation and the number of animals involved. Where appropriate, this information should be specific for each animal affected. It is critical that the Authorized Officer include contractors that may be involved; the State Office Wild Horse and Burro Program Lead; appropriate Field Office, District and Resource Managers and the NPO in their planning.

Any plan of action will include practical considerations including: (1) who will destroy the affected animals, (2) what method of euthanasia will be used and (3) how carcasses will be disposed of in accordance with the 4730 manual; this euthanasia policy; and local, State or Federal regulations that may apply. A communications plan for internal and external contacts (including early alerts to State, National Program and Washington Offices) should be developed in advance or concurrently while addressing the situation at hand. The communications plan should address the need for the action, as well as the appropriate messages to the public and the media. This will include why animals are being euthanized and how this fits BLM policy.

In all cases, the final decisions regarding euthanasia of a wild horse or burro rests solely with the authorized officer (43 CFR 4730). Euthanasia will be carried out following the procedures described in the 4730 Manual.

Timeframe: This policy is effective upon issuance.

Budget Impact: Implementation of these actions would not result in additional expenditures over present policies.

Manual/Handbook Sections Affected: No manual or handbook sections are affected.

Background: The authority for euthanasia of wild horses or burros is provided by the Wild Free-Roaming Horses and Burros Act of 1971, Section 3(b)(2)(A) 43 CFR 4730.1 and BLM Manual 4730-Destruction of Wild Horses and Burros and Disposal of their Remains.

Decisions to euthanize require an evaluation of individual horses or burros affected by injury, physical defect, chronic or incurable disease, severe tooth loss, poor condition or old age. The animal's ability to survive the stress of removal and/or their probability of surviving on the range if released, transportation to a BLM facility and to adoption or long-term holding should be considered. Humane, long-term care of these animals requires periodic evaluation of their condition to provide for their well being. These evaluations will, at times, result in decisions that will require the euthanasia of horses or burros.

Coordination: This document was coordinated with the Wild Horse and Burro Specialists in each affected state, the National Program Office and Wild Horse and Burro Advisory Board.

Contact: Questions regarding this memorandum should be directed to Lili Thomas, Wild Horse and Burro Specialist, Wild Horse and Burro National Program Office, at (775) 861-6457.

Signed by:

Authenticated by:

Policy and Records Group, WO-560

Deputy Assistant Director

2 Attachments

1 — Henneke body condition

2 - Gather Summary Report (2 pp)