Comprehensive Animal Welfare Program Team Assessment Report

August 25, 2021

Gather Name: Antelope Complex Emergency Wild Horse Gather
State: Nevada
District/Field Office: Elko District/Wells Field Office – Ely District/Bristlecone Field Office
Incident Commander: Ben Noyes
Lead COR: Bruce Thompson
Contractor: Cattoor Livestock Roundup, Inc.
Gather Method: Helicopter Drive Trapping
Gather Reason: Emergency – lack of water/forage
CAWP Assessment Team Members: Jerrie Bertola, Doug Satica, Jason Lutterman and Dr. Al Kane
Assessment Dates: August 4-5, 2021
Number of Applicable CAWP Gather Standards: 130 out of 188 total
Compliance with Applicable CAWP Standards: 118/130 = 91%

General Notes and Comments from the CAWP Team: High temperatures were expected and monitored closely by the Lead COR and IC at the trap site and public viewing location. BLM Nevada was ready to do the best job possible to adhere to the CAWP standards and place animal welfare as a priority. They requested feedback so issues could be addressed as soon as possible. The CAWP team was provided with ample access to each aspect of the gather to complete the assessment.

The contractor was observed to be disagreeable and argumentative at every opportunity for discussion with the COR, the contractor offered more excuses than demonstrated interest in complying with the CAWP standards. Specific standards where this was very apparent included when foals were separated from the mares greater than 4 hours, crowding in the mare and foal pen, the amount of hay being given to the wild horses, keeping foals in the single-file alleys longer than 30 minutes. The contractor stated that they had 3 days to mobilize to be ready for the gather and that some of their crew would be joining in a few days, the contractor appeared to be shorthanded.

Most CAWP standards were satisfied at the gather. All observed deficiencies are noted below.

CAWP Trained BLM staff: The majority of the BLM staff on the Antelope Complex Emergency gather were current with CAWP training; however, some law enforcement officers, and public affairs specialists were not current with the CAWP training. All BLM staff associated with gather operations are required to complete annual CAWP training. This requirement applies to all personnel present at the trap, viewing locations and holding corrals and BLM Nevada was deficient in successfully fulfilling this requirement.

CAWP Trained Contractor: The Lead COR stated that the contractor and key personnel were current with CAWP training. It was noticed that a “new employee” showed up at the trap on August 5, 2021, and helped work wild horses at the trap, then left within a few hours. It was unclear if he had taken the CAWP training. This requirement applies to all contractor personnel
on site, since “new employees” actively worked wild horses, the contractor was deficient in successfully fulfilling this requirement.

Conditions found to be in non-compliance with the CAWP Standards for Wild Horse and Burro Gathers:

Documentation

Standard IV.C.2.h Any electric prod use that may be necessary must be documented daily by the Lead COR/COR/PI including time of day, circumstances, handler, location (trap site or temporary holding facility), and any injuries (to WH&B or human).

Non-Compliance: The use of an electric prod was not documented in the Daily Gather Report on August 5, 2021. The use of an electric prod is acceptable if not used routinely as a driving aid or handling tool in limited circumstances, but the use must be documented in the Daily Gather Report.

Trap Site: Facility

Standard I.A.13 All gates and panels in the animal holding and handling pens and alleys of the trap site must be covered with materials such as plywood, snow fence, tarps, burlap, etc. approximately 48” in height to provide a visual barrier for the animals. All materials must be secured in place.

Non-Compliance: Visual barriers were missing or partially missing on the first and third bow gate in the trap.

Trap Site: Animals

Standard IIIB.3.a Dependent foals or weak/debilitated animals must be separated from other WH&Bs at the trap site to avoid injuries during transportation to the temporary holding facility. Separation of dependent foals from mares must not exceed four hours unless the Lead COR/COR/PI authorizes a longer time or a decision is made to wean the foals.

Non-Compliance: Foals were separated for at least 6 hours on August 4, 2021, and over 4 hours on August 5, 2021. This was not approved by the COR.

Standard II.C.9 Animals captured by roping must be evaluated by the on-site/on-call veterinarian within four hours after capture, marked for identification at the trap site, and be re-evaluated periodically as deemed necessary by the on-site/on-call veterinarian.

Non-Compliance: Roped foals on August 4, 2021, were not marked at the trap for re-evaluation.
Temporary Holding: Facility

**Standard**
**I.A.8** Padding must be installed on the overhead bars of all gates and chutes used in single file alleys.

**Non-Compliance:** Some padding on overhead alleys and loading chute were either worn out or not thick enough to function properly.

**Standard**
**III.B.1.a** Good quality hay must be fed at a minimum rate of 20 pounds per 1000 pound adult animal per day, adjusted accordingly for larger or smaller horses, burros and foals.

**Non-Compliance:** Hay was not fed at a rate of 20 pounds per 1000 pound adjusted for smaller horses. Additionally, the strings were not opened on the hay bales that were fed to allow for access to the hay that was placed along the panels as “fed”.

**Standard**
**III.b.1.c.ii** Hay placement must allow all WH&Bs to eat simultaneously.

**Non-Compliance:** Hay was not spread out so that all wild horses could eat simultaneously. Bale strings were not cut open and the mare/foal pen was overcrowded the night of August 4, 2021.

**Standard**
**III.B.4.f** WH&Bs in pens at the temporary holding facility should be maintained at a proper stocking density such that when at rest all WH&Bs occupy no more than half the pen area.

**Non-Compliance:** The mare and foal pen were overcrowded and when at rest more than half the pen was full.

Temporary Holding: Animals

**Standard**
**IV.B.3** WH&Bs should not remain in single-file alleyways, runways, or chutes longer than 30 minutes.

**Non-Compliance:** Foals were kept in the single-file alleyways longer than 30 minutes on August 5, 2021.

**Standard**
**III.B.4.b** Foals must be reunited with their mares/jennies at the temporary holding facility within four hours of capture unless the Lead COR/COR/PI authorizes a longer time or foals are old enough to be weaned during the gather.

**Non-Compliance:** Foals were separated for at least 6 hours on August 4, 2021, and over 4 hours on August 5, 2021. This was not approved by the COR.
**Transport: Design and Facilities**

**Standard**

**I.B.2** The side panels of the loading chute must be a minimum of 6 feet high and fully covered with materials such as plywood or metal without holes that may cause injury.

**Non-Compliance:** The loading chutes were not covered a minimum of 6 feet high. One chute was 4 feet high and two were 5 feet high.

**Standard**

**V.B.11** Surfaces and floors of trailers must be cleaned of dirt, manure and other organic matter prior to the beginning of a gather.

**Non-Compliance:** The semi-trailers were cleaned however the stock trailers were not cleaned before the beginning of the gather - there was dirt, a large amount of manure, organic matter, and trash in the trailers.

**Transport: Animals**

**Standard**

**V.A.3** Shipping should occur in the following order of priority; 1) debilitated animals, 2) pairs, 3) weanlings, 4) dry mares and 5) studs.

**Non-Compliance:** Pairs were not prioritized to be shipped on August 5, 2021; instead, studs were shipped with dry mares.

**Final CAWP Assessment Rating:** Good. 91% of CAWP standards were met.