Comprehensive Animal Welfare Program Team Assessment Report

July 6, 2022

Off-Range Corral: Delta Off-Range Corral
State: Utah
Facility Manager and COR: Cary Frost, Facility Manager
CAWP Assessment Team Members: Jerrie Bertola, Dr. Al Kane, Jake Benson, Ben Noyes, and Doug Satica
Assessment Dates: June 29, 2022
Total Number of CAWP Off-Range Corral Standards: 117
Number of Applicable CAWP Standards: 104
Compliance with Applicable CAWP Standards: 88/104 = 85%

General Notes and Comments from the CAWP Team: Assessments of Off-Range Corrals includes the Comprehensive Animal Welfare Program standards for Off-Range Corrals and Transportation as applicable.

Coordination with the Delta Off-Range Corrals was good. The CAWP team was well received and was provided access to the entire facility. The team was able to observe wild horses being received. All BLM and contract personnel were current with CAWP training.

Requirements of Permanent Instruction Memorandum (PIM) 2021-002, Wild Horse and Burro Comprehensive Animal Welfare Program (CAWP):

- All state, district, and field offices will continue to comply with the WHB CAWP policy within their jurisdictions at all times. This includes the CAWP Standards for Off-Range Corral Facilities, Transportation, and Adoption/Sale Events.
- All personnel, including contractor and partners involved in the care, handling, and transportation of wild horses and burros at off-range corrals and adoption/sale events are required to complete training annually.

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

Facility Design
Standard
1.II.E Facility fences, gates, alleys, tubs, and working chutes must be constructed of stout materials and must be maintained in proper working condition. (major)

Non-Compliance: Many gates were not maintained in proper working condition including gates in the main alley and in the alley to the working chutes.
Standard 1.II.F  Fences in pens, alleys, and working chute systems must be not less than 6 feet high for horses, 5 feet high for burros, and the bottom rail must not be more than 12 inches from ground level. (major)

Non-Compliance: The height of the fencing in some of the pens was less than 6 feet due to the accumulation of manure or dirt along the interior fence lines.

Standard 1.II.G  Fences must be of stout design and be maintained in proper condition with no holes, gaps, or sharp edges which could result in WH&Bs being injured. (major)

Non-Compliance: There were numerous locations with gaps that could allow for animals to be injured.

Standard 1.II.I  Ground surfaces in pens must be maintained to promote drainage, reduce wet ground conditions, and allow for routine manure removal. (major)

Non-Compliance: The facility is built on flat ground; the pens do not promote drainage.

Standard 1.II.N  Shelter structures should be designed or constructed to reduce the risk for injury of the WH&Bs and maintained to avoid excessive manure and mud. (minor)

Non-Compliance: Pens are not designed to be cleaned out easily and avoid excessive manure and mud buildup.

**Loading and Unloading Facilities**

Standard 1.III.A.1  Facilities in areas for loading and unloading WH&Bs must be maintained in a safe and proper working condition, including gates and doors that swing freely and latch or tie easily as designed. (major)

Non-Compliance: There were gates that did not latch as designed.

Standard 1.III.A.3  There must be no holes, gaps or openings, protruding surfaces, or sharp edges present in fence panels or other structures that may cause escape or possible injury. (major)

Non-Compliance: There were gaps that may cause escape or injury.
Receiving Procedures
Standard
1.III.B.6 Reporting of animals received from gather operations or from another BLM facility must be done in compliance with BLM policy. (major)

Non-Compliance: There were animals received from another BLM facility without paperwork.

Veterinarian
Standard
1.IV.A.1 Routine presence by an on-site or on-call veterinarian must be provided at each facility with records of those visits maintained at the facility. (major)

Non-Compliance: The only records maintained at the facility are billing records. Records of the veterinary visits that describe what was observed, the treatments that were done or prescribed etc. are not maintained at the facility.

Biosecurity
Standard
1.IV.B.3 Pens should be provided to segregate sick, infectious, injured, or weak WH&BS from other healthy individuals in the facility when possible. (minor)

Non-Compliance: Sick pens were being used for saddle horses.

Feed and Water
Standard
1.IV.C.2 Fresh, clean water appropriate for livestock must be accessible to WH&BS located in holding pens at all times. (major)

Non-Compliance: Erosion around water tanks would prevent foals from reaching water.

Standard
1.IV.C.6 Salt and/or mineral blocks should be provided in holding pens at all times. (minor)

Non-Compliance: Salt and/or mineral blocks were not observed in any of the pens.

Preparation Procedures
Standard
1.IV.D.2 Facilities must conduct Equine Infectious Anemia (EIA) testing and apply freeze-marks within 30 days of receiving WH&BS, unless directed by the facility veterinarian when age or physical condition requires a delay. (major)

Non-Compliance: Not all EIA testing was completed within 30 days.
Standard 1.IV.D.4  Foals born in the facility should be freeze-marked no earlier than 3 months of age. (minor)

Non-Compliance: Foals born in the facility are freeze marked prior to 3 months of age.

Standard 1.IV.D.6  Facilities must adhere to the current BLM vaccination policy. (major)

Non-Compliance: The 6-month booster vaccinations were not administered timely and some of the annual vaccinations were not completed timely according to a random paperwork inspection.

Euthanasia Procedures
Standard 1.IV.E.2  Euthanasia must be done in compliance with BLM Euthanasia policy. (major)

Non-Compliance: There were horses present with severe chronic deformities and a poor prognosis for improvement that meet the criteria for humane euthanasia.
### Table 1: Overall Summary Rating

<table>
<thead>
<tr>
<th>CAWP Standards and Policy Requirements</th>
<th>Compliant</th>
<th>Partially Compliant</th>
<th>Non-Compliant</th>
<th>N/A</th>
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</thead>
<tbody>
<tr>
<td>CAWP Trained BLM Staff</td>
<td>✓</td>
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<tr>
<td>CAWP Contract Trained Staff</td>
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<tr>
<td>Facility Personnel</td>
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<tr>
<td>Facility Design</td>
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<td>Loading and Unloading Facilities</td>
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<tr>
<td>Receiving Procedures</td>
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<tr>
<td>Veterinarian</td>
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<tr>
<td>Biosecurity</td>
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<td>Feed and Water</td>
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<td>Preparation Procedures</td>
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<td>Euthanasia Procedures</td>
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<td>Carcass Disposal</td>
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<td>Care of WHBs During Transport Preparation Procedures</td>
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<tr>
<td>Transport Procedures</td>
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</table>

Compliant – all the activities of the section were compliant with the standards or policy requirements.
Partially compliant – one or more activities of the section were non-compliant with the standards or policy requirements.
Non-Compliant – all activities of the section were non-compliant with the standards or policy requirements.
N/A – activities were not observed during the assessment.

Rating scale for CAWP Assessments: 96-100% - Excellent, 86-95% - Good, 70-85% - Complies, and 0-69% - Failure to Comply.

**Final CAWP Assessment Rating:** Complies. 85% of applicable CAWP standards were met.