

Appendix 2
UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
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To: All Field Officials (except Alaska)

From: Assistant Director, Renewable Resources and Planning

Subject: Euthanasia of Wild Horses and Burros for Reasons Related to Health, Handling and Acts of Mercy

Program Area: Wild Horses and Burros

Purpose: This policy identifies requirements for euthanasia of wild horses and burros for reasons related to health, handling, and acts of mercy.

Policy/Action: Final decisions regarding euthanasia of a wild horse or burro rest solely with the Authorized Officer (43 CFR 4730). It is understood that there will be cases where this decision must be made in the field and cannot always be anticipated. Appropriate wild horse and burro personnel at facilities and in the field should be delegated as the Authorized Officer regarding euthanasia of wild horses and burros. Euthanasia will be carried out following the procedures described in the 4730 Manual. The death record should specify that euthanasia was performed and the reason that it was performed in the appropriate Wild Horse and Burro automated data system. These systems are the Wild Horse and Burro Information System (WHBIS) or the Wild Horse and Burro Program System (WHBPS).

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, lameness, 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 maintain 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.

When euthanasia will be performed and how decisions will be made and recorded in a variety of circumstances is described below.

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

- 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 must promptly euthanize the animal.
- B. The Authorized Officer will report actions 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, not release, any animal which exhibits significant tooth loss or wear to the extent their quality of life would suffer.
- C. If 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:

Ideally, no horse or burro would arrive at preparation or other facilities 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 will be applied as follows:

- 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 must promptly euthanize the animal.
- B. If an animal is affected by a condition as described in 1-7 above, but is not in acute pain, the Authorized Officer has the authority to euthanize the animal, but should first consult a veterinarian. As an example, if the animal has a physical defect or deformity that would adversely impact its quality of life if it were placed in the adoption program or on long-term holding, but acute suffering is not apparent, a veterinarian should be consulted prior to euthanasia.

C. If the Authorized Officer concludes, after consulting with a veterinarian, that a wild horse or burro in a short-term holding facility cannot tolerate the stress of transportation, adoption preparation, or long-term holding then the animal should be euthanized.

Euthanasia at long-term holding facilities:

This section sets euthanasia policy for the BLM at long-term holding (LTH) facilities including those that may be added in the future.

The BLM Wild Horse and Burro (WH&B) Specialist responsible for oversight of the LTH facility (the Project Inspector) 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 must 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. This evaluation will be based on the Henneke body condition scoring system. The evaluation team will consist of a BLM WH&B Specialist and a 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 with a body condition score less than 3 will be euthanized in the field soon after the evaluation by the Authorized Officer or a designated representative such as the contractor. Horses with 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 as soon as possible after the second evaluation.
3. Euthanasia will be carried out with a firearm by the Authorized Officer or a designated representative. Field euthanasia does not require that the animals are gathered which would result in increased stress and could cause injury to the horse being euthanized or 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 the BLM.
5. Arrangements for carcass disposal for euthanized animals will be in accordance with applicable State and County regulations.

Euthanasia of Unusually Dangerous Animals:

Unusually aggressive wild horses or burros can pose an unacceptable risk of injury when maintained in enclosed spaces where some level of handling is required. When a horse or burro is unusually dangerous, it is reasonable to conclude that an average adopter could not humanely care for the animal as required by 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 animals in transport, and to BLM personnel and LTH operators.

When deciding to euthanize an animal because it is unusually dangerous, the Authorized Officer, in consultation with a veterinarian, extension agent, humane official, or other individual acceptable to the

Authorized Officer, must determine that the animal poses a significant and unusual danger to people or other animals beyond that normally associated with wild horses and burros. The Authorized Officer must document the aspects of the animal's behavior that make it unusually dangerous.

Euthanasia of a Large Number of Animals for Reasons Related to Health, Handling and Acts of Mercy:

When the need for euthanasia of an unusually large number of animals is anticipated, the likely course of action 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 a USDA Animal and Plant Health Inspection Service (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 by the veterinarian. 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. During this planning stage, it is critical that the Authorized Officer include the State Office WH&B Program Lead; appropriate State Office, District Office, and Field Office Managers; the WH&B National Program Office (NPO); and any contractors that may be involved.

A euthanasia 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. 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 the action is consistent with BLM's responsibilities and policy.

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 that BLM evaluate individual horses or burros affected by injury, physical defect, chronic or incurable disease, severe tooth loss, poor condition or old age. BLM should consider the animal's ability to survive the stress of removal and/or its probability of surviving on the range if released or transported to a BLM facility, adoption or long-term holding. 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 euthanasia.

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

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:
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Renewable Resources and Planning

Authenticated by:
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Division of IRM Governance, WO-560

2 Attachments:
1 – Henneke body condition (1 p)
2 – Gather Summary Report (2 pp)