



## Mandate Urgently Needed for Humane Care Standard in BLM Wild Horse and Burro Program

### **Request to mandate the Bureau of Land Management to create a standard of care in the Wild Horse and Burro Program**

In 40 years as the Agency tasked with the protection of wild horses and burros the Agency has failed to create any humane care standard for this protected species. This very serious omission has led to multiple instances of inappropriate conduct (admitted to) by the agency. This serious omission led to Federal Court Judge Howard McKibben ordering a Temporary Restraining order during the Triple B Roundup.

Further action in Court denied the ability to address the issue programmatically citing that as “The job of Congress” but left the door open to address the issue on a roundup by roundup basis.

It is absurd that the public need to press this issue in the Court system as BLM admits to: “poorly designed loading set up at the trap site, as well as unprofessional conduct by handlers at the trap site. Horses were observed being struck in the face, and often confused due to aggressive loading procedures and excessive pressure by multiple handlers. Several videos reveal that a few horses were repeatedly shocked with an electrical animal prod, sometimes in the face, and in one case, the use of this electrical prod led to a horse becoming stuck in a panel at the loading site. Some videos reveal horses being struck in more than one instance with the trailer gate to induce loading, and in one instance a horse appears to have been kicked in the head by a Sun J employee. In one video it appears that a horse was dragged into a trailer by a rope around its neck.” As well as incidents of inappropriate pilot conduct.

During the Court case BLM presented the Court with a “recommended practice document” that could easily be modified to become a policy that has consequence for violation.

*This is what was presented, suggested amendments in italics:*

To ensure safe and humane handling of all gathered wild horse or burros:

1. Helicopters will not contact or operate too closely to wild horse or burros being gathered.
2. Handling aids, including electric prods, paddles, and flags will not be used in a manner that is not consistent with domestic horse procedures.
3. Flagging will be used strategically to guard against desensitizing the wild horse or burros.
4. Kicking or hitting of wild horse or burros will not be tolerated.
5. Electric prods (hotshots) will not be used routinely on wild horses or burros. Electric prods are never to be applied to sensitive areas such as the face, head, genitals or anus. Electric prods may *(only)* be used when wild horse or burro, or human safety is in jeopardy. *(and never on an injured, young or pregnant animal)*
6. Gates and doors will not be deliberately slammed or shut on wild horse or burros.
7. A detailed discussion on the need to pursue single wild horse or burros needs to occur during pre-work. Pursuing single wild horse or burros should be a rare event and not a standard operating procedure. Only the COTR, with input from Gather Manager, will identify and request the contractor to pursue single wild horse or burros.
8. The contractor will ensure that foals are not left behind or orphaned in the field. The method of capture will be authorized or requested by the COTR and or Gather Manager.
9. The need to rope specific wild horse or burros will be determined by the COTR on a case

by case basis. The COTR will identify what wild horse or burros to be roped.

10. Groups of wild horse or burros that escape the trap site while being moved with the helicopter will not have numerous attempts to recapture and push to the trap site. (i.e. running wild horse or burros at the trap more than *two* times, running horses to a lather. *Or when distressed animals are noted*)
11. Any foals that are not weaned, and have been maintained with their mares at the gather temporary holding corral, will be transported to the BLM holding facilities on the same day.
12. A small trough of water will be provided within the foal pen at the trap site.
13. All sorting, loading, or unloading of wild horses and burros will be performed during daylight hours unless supplemental light is provided in the area to facilitate visibility.
14. Screening (*black screening that allows observation*) on panels will be provided where loading operations occur to eliminate holes, gaps, or openings where horses can be injured.
15. *Temperatures exceeding 82 degrees or below 28 degrees will halt operations.*
16. *Winds in excess of 25 mph create a safety hazard and suspend operations.*
17. *Injuries at the trap site will cause operations to halt until the injured animal has been appropriately transported from site.*
18. *Temporary Holding will supply at minimum 15 gallons of water per day per animal in a continuous supply as defined in the CFR.*
19. *Appropriate dust control will be done prior to running horses and throughout the day as noted in the CFR*
20. *Injuries and spontaneous abortions (not just deaths) will be noted in gather reports and statistics kept.*

This list could be adopted immediately at the operation site as policy. With the COTR responsible for the actions at the location and authority to give written warnings and stop work orders if conditions are not met.

A policy for short term facilities could be added at a later date.

Mandating this simple action could generate confidence in a program that is swiftly loosing any credibility as an agency following a mandate to protect a symbol of American heritage.

Time is of the essence.

Observations on the ground show the offensive conduct continues and is unacceptable conduct by our Nation.

The undersigned: