



## Comprehensive Animal Welfare Program Team Assessment Report

May 11, 2022

**Gather Name:** 2022 Black Mountain Wild Burro Gather

**State:** Arizona

**District/Field Office:** Colorado River District/Kingman Field Office

**Incident Commander:** John Hall

**Lead COR:** Chad Benson

**Contractor:** Cattoor Livestock Roundup, Inc.

**Gather Method:** Helicopter Dive Trapping

**Gather Reason:** AML, outside HMA, and private land issues

**CAWP Assessment Team Members:** Jerrie Bertola, Ryan Bradshaw, Crystal Cowan, and Preston Rushing

**Assessment Dates:** May 4-6, 2022

**Total Number of CAWP Gather Standards:** 189

**Number of Applicable CAWP Gather Standards:** 125

**Compliance with Applicable CAWP Standards:** 120

**Compliance with Applicable CAWP Standards:** 120/125 = 96%

**General Notes and Comments from the CAWP Team:** Coordination and access to this gather was excellent. Both BLM and the contractor were willing to ask and answer questions. The handling and knowledge of burros exhibited by BLM employees was outstanding and most of the contract employees also exhibited good knowledge and handling. The on-the-ground knowledge of the area by the BLM COR was excellent and he was observed checking distances that animals were being brought as well as checking the temperatures to ensure that activities were compliant with the Comprehensive Animal Welfare Program standards. The contractor was receptive to using new handling aids and asked how they could improve regarding the standards in the Comprehensive Animal Welfare Program.

Due to some of the differences in wild horse and burros handling behavior, there were some modifications made in consultation with the BLM IC, COR, and contractor. One specific modification was at the unloading location in the temporary holding corral. Initially the entire pen was covered with black snow fence, which created a "dark hole" for the burros and caused issues unloading. This was changed to include a dirt ramp that was level with the bumper of the stock trailers used for unloading, and the removal of the black snow fence in this portion of the temporary holding corral. This change allowed for the burros to trail out of the trailers with minimal pressure from the outside.

The only time that the CAWP Team observed use of the electric prod was during loading of the semi-trailer. After more than three attempts were made with other handling aids, and after approval by BLM, the electric prod that was to be used was found to not be adequately charged. Electric prods should be fully charged at all times. Prods should be checked to see if

they are charged before use on an animal, and they should never be applied to an animal just to check if it is charged.

**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 Wild Horse and Burro Gathers.
- All personnel, including contractor and partners involved in the care, handling, and transportation of wild horses and burros at wild horse and burro gathers 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.A.11** Water must be provided at a minimum rate of ten gallons per 1000 pound animal per day, adjusted accordingly for larger or smaller horses, burros and foals, and environmental conditions, with each trough placed in a separate location of the pen (i.e. troughs at opposite ends of the pen). Water must be refilled at least every morning and evening. (major)
- III.B.1.b** Water must be provided at a minimum rate of ten gallons per 1000 pound animal per day, adjusted accordingly for larger or smaller horses, burros and foals, and environmental conditions, with each trough placed in a separate location of the pen (i.e. troughs at opposite ends of the pen). (major)

**Non-Compliance:** In several of the smaller pens there were multiple water troughs placed in the same location instead of being placed in separate locations.

**Facility Design: Loading and Unloading Areas**

**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. (major)

**Non-Compliance:** The loading chute was not covered a minimum of 6 feet high.

**Standard**

- I.B.7** Stock trailers should be positioned for loading or unloading such that there is no more than 12" clearance between the ground and floor of the trailer for burros and 18" for horses. (minor)

**Non-Compliance:** At the trap, the clearance between the ground and the floor of the trailer was greater than 12”.

### **Transport Animals Handling Performance**

#### **Standard**

**IV.A.1** Hitting, kicking, striking, or beating any WH&B in an abusive manner is prohibited. (major)

**Non-Compliance:** During the process of loading the semi-trailer, one individual on the contractor’s crew appeared to be frustrated and angry. The individual used a shaker paddle in an abusive manner, including aggressively hitting and jabbing the paddle into the sides and sensitive areas of burros, and eventually using the handle end to aggressively poke and prod the burros.

**Corrective Action Completed:** The BLM IC noticed the individual’s difficulties and non-compliant handling when loading the wild burros. He stepped in to help load the burros and addressed the improper handling with the individual and the contractor’s onsite representative. Both the BLM IC and the contractor’s onsite representative were observed actively showing and teaching the individual how to appropriately handle burros. An additional handling aid (a blanket) was successfully used to load the burros. When we observed loading on a second morning, the individual was not aggressively hitting or jabbing burros with the shaker paddle. The BLM IC ultimately did talk with the contractor’s onsite representative to direct that the individual should not be involved in loading and animal handling from that point forward. On the third day of observation, the only people observed loading the semi-trailer were the BLM IC and the contractor’s onsite representative. Loading of the semi-trailer was smooth and without incident.

#### **Standard**

**IV.A.5** There should be no excessive noise (e.g., constant yelling) or sudden activity causing WH&Bs to become unnecessarily flighty, disturbed or agitated. (minor)

**Non-Compliance:** During the second day of loading the burros on the semi-trailer, an individual used the shaker paddle to beat against the panels and solid side portions of the panels, creating excessive noise along with constant yelling.

**Corrective Action Completed:** The BLM IC talked with the contractor’s onsite representative to direct that the individual should not be involved in loading and animal handling from that point forward. On the third day of observation, the only people observed loading were the BLM IC and the contractor’s onsite representative. Loading of the semi-trailer was smooth and without incident.

**Table 1: Standards and Overall Assessment Rating**

<b>CAWP Standards and Policy Requirements</b>	<b>Compliant</b>	<b>Partially Compliant</b>	<b>Non-Compliant</b>	<b>N/A</b>
<b>CAWP Trained BLM Staff</b>	✓			
<b>CAWP Contract Trained Staff</b>	✓			
<b>Required Documentation</b>	✓			
<b>Trap Site Facility</b>	✓			
<b>Trap Site Animals</b>	✓			
<b>Temporary Holding Facility</b>		✓		
<b>Temporary Holding Animals</b>	✓			
<b>Transport Design and Facilities</b>		✓		
<b>Transport Animals</b>		✓		
<i>Compliant – all the activities were compliant with the standards or policy requirements. Partially compliant – one or more of the activities were non-compliant with the standards or policy requirements. Non-Compliant – all standards were non-compliant with the standards or policy requirements. N/A – standards that are not assessed during an assessment.</i>				

Non-compliance with CAWP standards IV.A.1 and IV.A.5 described above is considered “willful acts of abuse.” Had they not been immediately corrected by the BLM and contractor; the final rating of this assessment would have been “failure to comply.” Since immediate corrective action was taken by BLM and the contractor’s representative, the final rating of the 2022 Black Mountain Wild Burro Gather is “excellent.” The CAWP Assessment Team feels this best represents the overall assessment of the gather as observed. It is further recommended that the individual mentioned be removed from all animal handling tasks on this and future BLM jobs until such time as they have successfully repeated the CAWP training, been observed in the performance of their duties by a BLM COR or authorized officer’s representative and found to be performing animal handling in compliance with the CAWP standards.

**Final CAWP Assessment Rating:** Excellent. 96% of applicable CAWP standards were met.