

## Friends of Animals' overall position on wild horse protection in the United States

The U.S. Bureau of Land Management's approach to managing public lands—with its primary emphasis on catering to the cattle and sheep ranchers—is detrimental to the survival of wild horses. Despite years of seeking to get BLM to better protect these animals under the Wild Free-roaming Wild Horses and Burro Act (WHBA), America's wild horses are more endangered today than they were when that law was passed in 1971.

Friends of Animals has initiated an aggressive agenda to protect wild horses that relies upon many approaches not previously considered by wild horse advocates. Yes, we still intend to bring legal challenges under the WHBA and National Environmental Policy Act. In fact, FoA achieved a rare injunction in 2015 prohibiting the roundup of the famed Pine Nut herd in Nevada. To complement these efforts, our activists have commenced live protests of individual BLM roundups, and our legal advocates have come up with new approaches under other federal and state laws.



We filed the first ever petition to protect wild horses under the Endangered Species Act (ESA) and filed a legal petition with the U.S. Environmental Protection Agency requesting the agency consider new scientific evidence demonstrating the need to cancel the registration of the pesticide *porcine zona pellucida* (PZP) for population control of America's wild horses and burros based upon new information that shows PZP may be detrimental to horses' health and long-term genetic viability as a population.

Friends of Animals (FoA) is a non-profit, international animal advocacy organization, incorporated in the state of New York since 1957. Friends of Animals advocates for the rights of nonhuman animals, free-living and domestic. Our goal is to free animals from cruelty and institutionalized exploitation around the world.

The organization has evolved from its beginnings as the most comprehensive low-cost spay neuter program for cats and dogs in the country. Friends of Animals now places critical habitat, wildlife protection and veganism at the core of animal advocacy.



In 2015, FoA's sanctuary for primates in Texas welcomed three wild horses, Comanche, Bindi and Moxie, who unfortunately had been ripped from their families on the range in Nevada and Colorado. Moxie, the foal, has even grown 1.5 feet since she arrived!

Please consider donating to Friends of Animals to support our wild horse advocacy and the three wild horses in our care.



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# THE FACTS

## ABOUT THE WILD HORSE CONTROVERSY IN THE U.S.



**A** driving principle behind FoA's mission is that we must reestablish meaning with regards to the word "wild." FoA's definition of wild means humans should not be managing any wild animal by keeping them in small "herd areas," or limiting their population through culling, relocation or forcibly drugging them with the fertility control drugs. It is a dream we cannot give up on; if we continue to push, maybe we can someday soon see a real push for true ecological zones on public lands; zones where the landscape and animals are free from exploitation and management.

### **FOA'S POSITION REGARDING THE BLM'S WILD HORSE AND BURRO PROGRAM?**

The Bureau of Land Management's (BLM) claim that there are excess wild horses ignores science and instead represents its resentment of wild horses because it is wedded to corporate ranchers, whose cattle and sheep are responsible for range degradation. The Equid Specialist Group of the International Union for Conservation of Nature Species Survival Commission recommends minimum populations of 2,500 individuals in a connected area for the conservation of genetic diversity. Others have warned that populations managed with a target size of fewer than 500 horses are at some risk of losing more than 90 percent of selective neutral genetic variation over a long period of 200 years. A loss of genetic variability can lead to a reduction in fertility or viability of the population. FoA is adamant that domestic cattle and sheep be removed from Herd Management Areas on public lands. We need to begin by designating a western U.S. ecological zone that is free from all human exploitation and management.

### **WHY DOES FOA WANT WILD HORSES ON PUBLIC LANDS DESIGNATED AS AN ENDANGERED SPECIES?**

Wild horses live and behave far differently than do domesticated horses. Most notably, to survive in their ecological setting, natural selection among wild horses increases the chance of the populations survival by ensuring that those traits best suited for living in the arid, harsh American west are passed on to future generations. In other words, wild horses better mirror their prehistoric ancestors' natural tendency, as Darwin identified, in that animals that are able to survive and reproduce in the wild will pass their genes to surviving offspring, which can improve the fitness of the population. Breeding of domesticated horses, on the other hand, is generally controlled through human-directed, selective breeding.

The behaviors of wild and domestic horses also differ—wild horses live in highly structured, hard-won family groups and are acutely attuned to dangers in their environment, and wary of humans. They have developed ways to protect their herds from other animals (including other wild horses) through communication and aggressive behaviors. Domestic horses are accustomed to and dependent on human contact. Although domestic horses may exhibit social stratification, they do not exhibit the full complement of associations (e.g., harem bands, multiple male and female bands, and bachelor groups) observed in free-roaming horses. Overall, wild horses on federal public lands face the threat of extinction due to at least four factors identified in the ESA. First, habitat loss endangers the distinct population segment ("DPS"). Second, human utilization threatens the species, specifically removal and sterilization. Third, existing regulatory mechanisms are inadequate to manage the threats that face wild horses and may, in fact, constitute an independent threat to their survival. Finally, other natural and manmade factors also threaten their existence, including their artificially fragmented range and small population size.

### **ARE WILD HORSES NATIVE?**

Critics claim that modern wild horses are an exotic species introduced by the Spanish to North America some 400-500 years ago. However, the fossil record today refutes the modern horse in North America is non-native. There is no dispute that the ancestor of the modern horses originated in North America, and evolved with the habitat here approximately one- two million years. Moreover, the last species of horses believed to be in North America before extinction has been shown to not be genetically distinct from the modern wild horse we know today. Spaniards returned horses near the end of the 16th Century to the birthplace of their ancestors.

### **WHAT EXACTLY IS PZP?**

Porcine zona pellucida (PZP), a fertility control pesticide, is extracted from pig ovaries. PZP is administered by hand injection or via a dart fired from a dart rifle. The BLM admits in most cases they will still have to conduct roundups to administer the PZP by hand injection. So despite what PZP proponents say, PZP will never replace roundups.

### **WHY IS FOA OPPOSED TO PZP?**

Humans should not be managing any animals by keeping their population numbers suppressed

### **WHAT EVIDENCE IS THERE TODAY THAT WARRANTS PULLING THE REGISTRATION OF PZP?**

When the Humane Society obtained Environmental Protection Agency registration for PZP in 2012, the organization never provided evidence that PZP doesn't have negative side effects...it only provided information about the efficacy of PZP and actually requested waivers for most of the studies ordinarily required from an applicant seeking pesticide registration—including a toxicity study, ecological effects and environmental fate guideline study. The majority of research submitted by HSUS was published by the late Dr. Jay Kirkpatrick, a veterinarian who manufactures PZP, and did not consider the biological, social and behavioral effects the drug can have on wild horses. More recent research has demonstrated repeated applications of PZP can cause physical damage to treated mares; it is not completely reversible; it can increase mortality in foals post-PZP effectiveness; and it interferes with herd cohesion, which is critical to the overall health of wild horses. In addition, preventing mares from producing foals can create a genetic bottleneck that may ultimately extinguish the species as a whole.

### **HOW DOES THE USE OF PZP VIOLATE THE WILD FREE ROAMING HORSE AND BURRO ACT OF 1971?**

New studies indicate that PZP use is harassing, and even killing, wild horses in ways not considered as part of the initial registration process. While it is true that the WHBA provides for an exception from these general mandates to protect wild horses to control their populations, this exception is both narrow (the animal must be deemed "excess") and can only be applied if the implementing agency (BLM or USFS) first completes certain statutory requirements. It may be that with regard to the decision to dose a particular mare the implementing agency can comply with the WHBA. However, the other horses in the herd that are not dosed with PZP (as well as the unborn foals) cannot be legally defined as "excessive" and, thus, the harassment or death to these animals caused by PZP violates the WHBA.

