

FRIENDS OF ANIMALS

Wildlife Law Program

2025 DIRECTOR'S REPORT



~~EXPLOITERS~~
FRIENDS
of ANIMALS

As we reflect on 2025, we are deeply grateful for your extraordinary support during a challenging year. In the face of growing threats to wildlife and the laws that protect them, your commitment has been a vital force behind our efforts. Your generosity has allowed our Wildlife Law Program to press forward with determination—advancing critical legal cases, influencing policy, and helping to shape a more compassionate and just world for animals. We are profoundly grateful for your belief in this work and for standing with us in the fight to protect animals.

Your contributions have been instrumental in creating a legal framework and a society that respects the complex lives of animals. Specifically, your support has propelled our Wildlife Law Program to achieve significant milestones in our legal battles, driving meaningful change for animals. In 2025, we've filed five new lawsuits and appeals, bringing our total number of active cases to 12—each one aimed at defending wildlife and holding government agencies accountable. This year Friends of Animals' attorneys have defended animals in hearings in the Ninth, Tenth, and D.C. Circuit Court of Appeals. Beyond the courtroom, we've submitted 40 detailed legal comments this year alone. These comments help shape policy, defend against rollbacks of environmental protections, and ensure that the voices of wild animals are considered in decisions about land use, permits, and federal funding.

What follows is an overview of the guiding principles that shape our legal efforts and an update on our progress this year. With you by our side, we are making lasting changes to benefit wildlife and the shared planet we all depend on.

I. GOAL: STAND UP FOR IMPERILED ANIMALS AND CREATE A PATH FOR A BETTER FUTURE.

Friends of Animals is pushing back against dangerous rollbacks of laws and policies to protect wildlife and our environment.

This year has seen alarming rollbacks of key environmental protections—threatening endangered species, accelerating the climate crisis, and undermining decades of progress. In response, Friends of Animals has taken a leading role, submitting nearly 40 formal comments to federal agencies to defend wildlife, uphold environmental laws, and oppose dangerous policy changes.

We've pushed back against efforts to weaken critical protections such as the Endangered Species Act (ESA), the National Environmental Policy Act (NEPA), and the Clean Air Act. For example, Friends of Animals formally opposed the current administration's proposal to rescind the definition of "harm" under the ESA—a move that would gut protections for species whose habitats are being destroyed. We made it clear: destruction of habitat that wildlife depends on is harm.

We also opposed the EPA's politically driven proposal to stop regulating greenhouse gas emissions from vehicles, a rollback that flies in the face of both scientific consensus and the urgency of the climate crisis, which is already pushing species toward extinction worldwide.

Additionally, Friends of Animals submitted comments opposing the administration's efforts to gut NEPA, emphasizing that public input and thorough environmental analysis in all major federal actions are essential. These processes often lead to more informed decisions and better outcomes for animals, habitats, and ecosystems.

These actions are about more than just making our voices heard. Submitting well-founded, science-backed comments establishes a legal record, which is essential for holding agencies accountable in court when they ignore the law or the facts.

Friends of Animals poised to sue to protect horseshoe crabs under the Endangered Species Act.

Horseshoe crabs, one of the oldest living species on Earth, are in danger of extinction. Despite their ecological significance and ancient lineage, these remarkable creatures are being exploited at alarming rates. Existing laws have proven inadequate to ensure their protection.

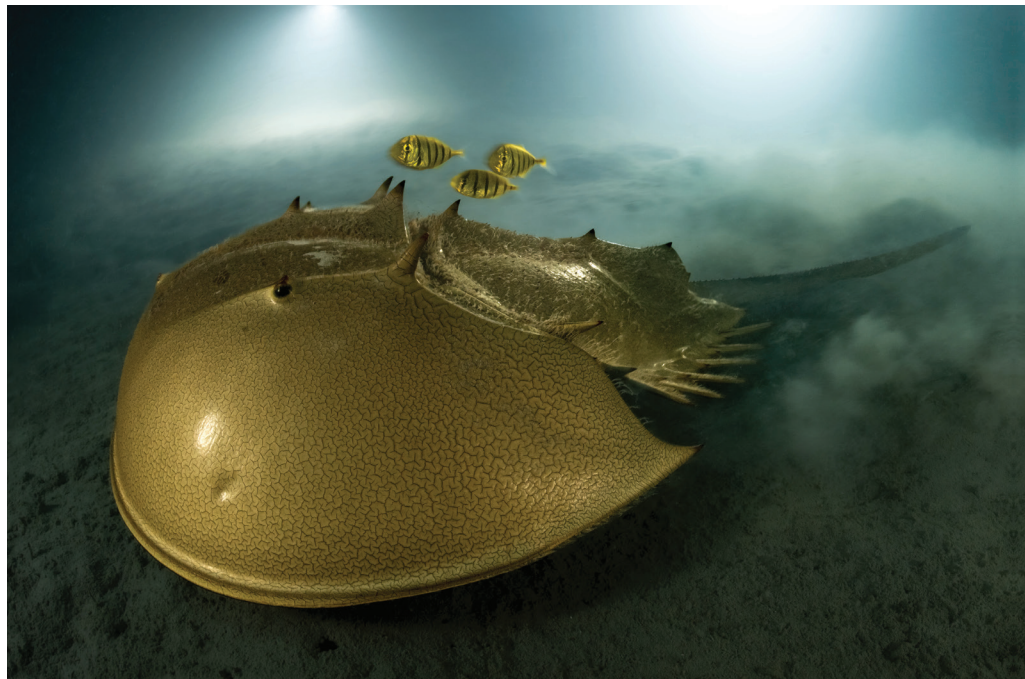
Pharmaceutical companies continue to capture and bleed horseshoe crabs for their unique blue blood, which is used to produce limulus amoebocyte lysate (LAL)—a substance vital in testing for bacterial contamination in injectable drugs and medical devices. Although an approved, animal-free alternative exists, many companies have yet to transition away from using LAL, needlessly harming horseshoe crabs and placing them at risk of extinction.

Beyond pharmaceutical use, commercial fishers also kill horseshoe crabs to use as bait for eel and whelk fisheries. Their coastal spawning habitats face additional threats from climate change and sea level rise, making their survival even more precarious.

Recognizing the urgency of the situation, over a year ago, Friends of Animals submitted a petition to list horseshoe crabs under the ESA. Despite a legal deadline to respond, the agency has failed to act.

Time is critical. Each delay puts horseshoe crabs in harms way. That's why Friends of Animals is prepared to file a lawsuit to compel the agency to respond to our ESA petition.

If successful, and horseshoe crabs are granted ESA protection, it would become illegal to capture or kill any horseshoe crab without a permit, providing a much-needed safeguard for their survival.



Friends of Animals sues to protect a vanishing subspecies of butterfly in the West.

Friends of Animals recently filed a lawsuit to force U.S. Fish and Wildlife Service (FWS) to do more to conserve a rare butterfly subspecies that is disappearing from its sensitive habitats in Colorado, Utah, and New Mexico. *Speyeria nokomis nokomis*, referred to by FWS as silverspot butterflies, are vitally important pollinators. These remarkable creatures complete their entire life cycle in one year but live for only about 45 days as butterflies.

They inhabit moist meadows at elevations between 5,200 and 8,300 feet and require the presence of a particular plant, the bog violet, for their larvae. Human development and hydrological alteration, cattle and sheep grazing, and climate change are threatening the shrinking number of silverspot populations remaining. Recognizing this perilous situation, FWS listed silverspot butterflies as threatened under the ESA in 2024.

But FWS resisted taking necessary steps to better conserve the subspecies. The agency failed to list silverspots as endangered, refused to designate critical habitat, and continued to allow many agricultural and grazing practices that imperil silverspots. In doing so, it ignored science and violated the law. Joining with other conservation organizations in the West, Friends of Animals sued FWS in the District of Colorado. Friends of Animals intends to ensure that silverspot butterflies get the protections they require.

Friends of Animals files appeal to protect Utah prairie dogs and their habitat from development.

Utah prairie dogs are a keystone species vital to the health of Western grasslands and are protected under the ESA because they are threatened with extinction. Yet, the U.S. FWS issued a range-wide plan that authorizes permanent habitat destruction, further jeopardizing the population.

FWS, bowing to pressure from local developers, issued a sweeping “general conservation plan” that allows Utah counties to remove and kill prairie dogs across their entire range. The plan only requires translocation when “feasible”—a vague standard that offers no real protection.

Friends of Animals challenged this plan in federal court. If left unopposed, it would allow permanent destruction of Utah prairie dogs’ habitat, killing around 7,000 prairie dogs over 10 years due to development. Although the District Court in Utah initially ruled against us, Friends of Animals promptly appealed the decision to the Tenth Circuit Court of Appeals. Our legal challenge details how FWS’ plan violates multiple provisions of the ESA, including its failure to minimize and mitigate harm to the maximum extent practicable, and its unfounded conclusion that the plan would not jeopardize the species’ survival. That conclusion, we argue, is arbitrary and contradicts the best available science.

This case matters for Utah prairie dogs and other imperiled animals. Despite ESA protections, Utah prairie dog populations are steadily declining. Development cannot disregard the lives of wild animals who depend on the land for their habitat and survival. Our lawsuit seeks to change the path forward for Utah prairie dogs and give them a real chance to recover and thrive.

Friends of Animals continues its longstanding work to secure stronger protections for scarlet macaws under the Endangered Species Act.

Parrots are notably intelligent, social beings who, in the wild, can live up to 50 years. In response to a petition from Friends of Animals, in 2012, the U.S. FWS proposed to list scarlet macaws as endangered. This species is especially at risk due to habitat destruction and poaching, including for the exotic pet trade. However, FWS reversed course in 2019 and listed the southern subspecies only as threatened with a special rule that allows continued trade of the subspecies without a permit under the ESA.

Since then, Friends of Animals remains driven to get these macaws the protection they deserve and filed a lawsuit challenging FWS's decision to list the southern subspecies as threatened rather than endangered. Friends of Animals also challenged the agency's conclusion that the birds are not endangered in a significant

portion of their range. The lawsuit also argues that that listing only the northern subspecies as endangered is arbitrary and creates a loophole that allows smugglers to take birds from the northern subspecies and falsely claim that they belong to the southern subspecies, avoiding ESA protections.

In July 2024, the Court sided with Friends of Animals, in part, finding that the FWS had not adequately justified its decision regarding the listing of scarlet macaws and remanded the decision back to the agency.

The Court ordered the agency to take comment on and reconsider if the species is endangered in a significant portion of its range and whether the subspecies should be listed as endangered due to its similarity of appearance with endangered subspecies.

Friends of Animals submitted a detailed comment, presenting the agency with irrefutable evidence that these macaws are endangered in a significant portion



of their range. Despite this, the agency persists in refusing to list them as endangered, presumably in an effort to appease commercial breeders and the exotic pet trade. Friends of Animals intends to challenge this new decision in court and remains committed to holding the government accountable under the ESA to ensure that decisions are based on science, not economic interests.

Friends of Animals advocates for vegan meal options in the National School Lunch Program.

Friends of Animals remains steadfast in advocating for equitable access to vegan entrées for all students. In 2024, our Wildlife Law Program petitioned the U.S. Department of Agriculture (USDA) to remove regulatory barriers that restricted access to whole, nutritious vegan meals. While the USDA did not adopt all proposed regulatory reforms, USDA implemented key updates that make it easier for schools to include vegan options. Building on this progress, Friends of Animals continues to collaborate with school districts across the country to establish daily vegan entrées. In 2025, our Wildlife Law Program testified before the Dietary Guidelines Advisory Committee and submitted written comments urging the inclusion of vegan options in the 2025–2030 Dietary Guidelines for Americans —the foundation for the National School Lunch Program and other critical federal nutrition programs. Complementing this advocacy, our Wildlife Law Program engaged the community at VegFest Colorado, fostering a shared commitment to equitable vegan nutrition.

Expanding vegan meal access supports diverse dietary needs, addresses public health concerns, and advances ethical considerations for animals and the environment. This work is increasingly urgent against a backdrop of accelerating biodiversity loss and climate change linked to animal agriculture. Through legal advocacy and community engagement, Friends of Animals is advancing a transformative vision: harnessing vegan nutrition to build healthier communities, protect wildlife, and secure a sustainable, compassionate future for all life on Earth.

II. GOAL: END THE EXPLOITATION OF WILD HORSES AND RESHAPE THE MANAGEMENT OF PUBLIC LANDS.

Friends of Animals has reached new milestones in the fight to keep wild horses wild. While the U.S. Bureau of Land Management (BLM) regularly prioritizes the interests of the meat industry over wild horses and other wildlife on our public lands, Friends of Animals continues to work tirelessly to expose the truth about the mismanagement of our public lands and hold the agency accountable to its obligations under the law.

Friends of Animals stopped the roundup of thousands of wild horses from Southwestern Wyoming in 2025.

This year, Friends of Animals filed an appeal in the Tenth Circuit Court of Appeals to fight the Bureau of Land Management's (BLM) plan to eliminate wild horses from over a million acres of federal public lands in southwestern Wyoming. This area is commonly referred to as the "Checkerboard" because public lands are

interspersed with private land including some owned by Rock Springs Grazing Association. BLM amended existing resource management plans to allow BLM to remove thousands of wild horses, including completely eliminating wild horses in the Salt Wells Creek and Great Divide Basin herd management areas. At the same time, the plan does nothing to address a private grazing association's use of public land in the same area to graze domestic cows and sheep at an extremely reduced rate. BLM is essentially sacrificing the freedom and lives of wild horses on public lands to appease a private grazing association.

When the Wyoming District Court ruled in favor of BLM last year, Friends of Animals swiftly appealed to the Tenth Circuit where a panel of three judges sided with Friends of Animals in holding that BLM acted arbitrarily in issuing the wild horse resource management plan amendment without considering the requirements of the Wild Free-Roaming Horses and Burros Act, including the mandate to manage wild horses in a manner designed to maintain a thriving, natural ecological balance.

The Tenth Circuit remanded the case back to the Wyoming District Court to determine the appropriate remedy. Friends of Animals is currently preparing to show the District Court why the plan is a serious violation of the Wild Free-Roaming Horses and Burros Act and why it needs to be vacated. In the meantime, BLM issued a separate decision to round up and remove thousands of wild horses to implement the illegal resource management plan amendment. Friends of Animals acted quickly to protect wild horses in the area and filed a lawsuit challenging that decision in September 2025. Following Friends of Animals lawsuit, BLM cancelled the round-up of nearly 2,000 wild horses that was scheduled for this area in 2025.

Friends of Animals fights to prevent BLM from continually rounding up and removing wild horses and burros based on outdated information.

Friends of Animals was the first organization to challenge decisions by the BLM to continually round up and remove wild horses for as long as 10 years with little or no public oversight. Under these plans, BLM was rounding up a record number of wild horses and burros, usually through highspeed helicopter chases. Wild horses and burros were dying in the process and those who survived were sent to inhumane feedlots where their lives are dismal. This year we have made significant progress in reining in BLM's unchecked discretion in "managing" wild horses and burros.

Friends of Animals filed a lawsuit challenging BLM's decision to rely on a long-term plan to roundup and remove wild horses and burros from five home ranges in the Twin Peaks Herd Management Area on the California Nevada border. As a result of this lawsuit, we stopped BLM's scheduled roundup and removal of burros from the Twin Peaks Herd



Management Area and BLM has agreed to not to roundup and remove any additional wild horses and burros under the long-term plan.

Friends of Animals also challenged four long-term decisions regarding wild horses in Nevada and Utah, arguing that BLM cannot continually remove wild horses based on outdated information or pressure from the meat industry. In March 2024, a judge in D.C. District Court sided with Friends of Animals finding that “although Congress vested the Bureau with broad discretion, it also took steps to ensure that the Bureau based its decisions on accurate information and science, rather than pressure from interest groups or guesswork.” The Court held that if BLM achieves the “appropriate management levels” it cannot continue to conduct maintenance roundups and remove wild horses based on an earlier, outdated decision. However, BLM continues to rely on these long-term plans, removing wild horses based on outdated information because it had not reached its arbitrary low population targets.

Friends of Animals filed an appeal in the D.C. Circuit Court of Appeals to stop BLM from relying on long-term roundup plans any time it proposed to start a new roundup, and close any loophole that would allow BLM to conduct “maintenance” roundups to reach its low population targets.

In the lawsuit, Friends of Animals explains that BLM disregarded its statutory and regulatory obligations to undertake roundup-specific analysis of the wild horses and their habitat and ignored its responsibility to ensure public participation in such decisions. This is critical in a time when more studies are shedding light on the positive benefits of wild horses to other wildlife and the environment, including fire suppression, seed dispersal, and increased biodiversity. Friends of Animals continues with its case because we know it is crucial to hold BLM accountable and prevent them from making harmful decisions behind closed doors. The outcome of this case could upend BLM’s effort to minimize public involvement and pave the way toward a new future for wild horses.

Friends of Animals’ lawsuit fights massive wild horse and burro feedlot on private land.

In October 2025, Friends of Animals argued in front of the Ninth Circuit Court of Appeals, explaining how the BLM violated the law when it hastily awarded a multi-million dollar contract to Nevada-based JS Livestock to construct and operate a high-capacity off-range wild horse and burro corral near Winnemucca, Nevada.



BLM did not carefully consider the ill effects of imprisoning up to 4,000 wild horses and burros in 40 pens on less than 100 acres of private land. This reckless decision would mean more wild horses and burros will be removed from their homes and families in the wild to live in crowded, unsanitary and dangerous conditions at public expense.

Moreover, the Winnemucca off-range corral presents unique hazards. For example, it is located on silty clay soil that is prone to dust and flooding. Further, its location is subject to extreme heat and freezing temperatures that will cause unnecessary suffering for wild horses and burros, many of whom will not have access to shade or shelter. The Nevada District Court largely deferred to BLM, overlooking BLM's faulty process in approving the facility and serious harm it will inflict on wild horses and burros. However, Friends of Animals quickly appealed to the Ninth Circuit Court of Appeals.

With this appeal, Friends of Animals seeks to stop BLM from sending animals to this dangerous feedlot and to keep more wild horses and burros where they belong—in the wild. Friends of Animals' case could also set precedent for how wild horses and burros are managed in the future. We seek to clarify that BLM has an obligation to consider how its decisions impact the well-being of each wild horse. BLM's current reliance on vague "comprehensive welfare standards," do little to prevent unnecessary suffering of wild horses and burros, and Friends of Animals is demanding that BLM do more to protect these animals as required under the law.

III. GOAL: DISPEL THE MYTH THAT "CONSERVATION" MEANS KILLING, EXPLOITING, OR OBJECTIFYING OTHER LIVING BEINGS.

Friends of Animals files lawsuit challenging denial of petition to end import, export, and exploitation of cetaceans for entertainment.

This year, Friends of Animals filed a federal lawsuit challenging the denial of our petition to prohibit the import, export, and exploitation of cetaceans—whales, dolphins, and porpoises—for public display and entertainment in the U.S.

Captivity robs these intelligent, social marine mammals of the dynamic, complex, and expansive habitat and relationships they experience in the wild. It also deprives them of physical needs and harms their overall health. Scientific research shows cetaceans face a dramatic increase in mortality immediately following capture and each time they are transported. For bottlenose dolphins, the risk of death skyrockets—up to six times higher—within the first five days after capture, and similar risks follow every relocation between facilities. These findings make it painfully clear: each capture and transfer is a traumatic, life-threatening event. In 2021, Friends of Animals fought to stop the transfer of five beluga whales from Marineland in Canada to Mystic Aquarium in Connecticut. While a judge ruled against us in that case, we didn't back down. Instead, we took our advocacy to the next level.

We submitted a formal rulemaking petition to the National Marine Fisheries Service, also known as NOAA



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EDUCATION OR
RESEARCH.**

**UNLESS YOU'RE
RESEARCHING HOW TO
MAKE MORE MONEY.**

Fisheries, to end the import, export, breeding, and public exhibition of captive cetaceans in the U.S.

In 2024, NMFS denied our petition, claiming it lacked the authority to implement these protections. We believe NMFS is dead wrong. In 2025, we filed a lawsuit to challenge that decision because NMFS not only has the authority, but also the responsibility, to protect these animals from exploitation.

We remain steadfast in our commitment to prevent U.S. aquariums from acquiring any more cetaceans for entertainment and to expose the truth about what happened to the belugas brought to Mystic Aquarium in Connecticut. The premature deaths of belugas at Mystic Aquarium following their import underscore the urgency of our efforts and the serious harm captivity inflicts. With your support, we are standing up for whales and dolphins and working to ensure no more are treated as mere commodities.

Friends of Animals continues lawsuit to keep fish farming from encroaching on our oceans.

This year, the Environmental Protection Agency (EPA) issued a modified permit for a first of its kind industrial fish farm in federal waters. The permit authorizes the corporation Ocean Era to operate a deep-water fish farm in the Gulf of Mexico, 40 miles offshore from Florida's Sarasota County. Open ocean fish farms threaten marine life, pollute our oceans, spread disease, and contribute to ocean acidification. Ocean Era plans to operate its fish farm in one of the most sensitive and damaged areas of federal waters, where harmful algal blooms routinely kill fish, eels, dolphins, and sea turtles and represent a threat to human health.

Friends of Animals sued over the original permit that EPA issued in 2022. However, shortly after we filed our lawsuit, Ocean Era sought to change the species of fish it would raise and the type of net pen that it would construct. The new pen Ocean Era proposed would be made from Polyethylene Terephthalate (PET) monofilament, a type of plastic material, and would double the operational footprint. Despite objections from Friends of Animals and internal opposition, EPA approved the new modified permit. In June 2025, Friends of Animals filed a formal appeal of the modified permit to the EPA's Appeal Board, putting a stay on the permit until the appeal is complete.

In the permitting process, EPA's own Senior Permitting Specialist/Environmental Engineer documented scientific integrity concerns and indicated inappropriate political interference in approving the modified permit and removing draft requirements to monitor microplastic pollution. While EPA is attempting to scrub the record of important evidence, Friends of Animals has fought back seeking to keep scientific information and analysis in front of the Environmental Appeals Board and preserve evidence for future judicial review. Friends of Animals is also continuing its case in the D.C. Circuit Court of Appeals to preserve its challenge to aspects of the permit that have not changed with Ocean Era's more recent modifications. This facility would be the first of its kind in federal waters. Thus, Friends of Animals' lawsuit is integral to setting an important precedent for how this country treats the ocean and the animals who live there, many of which already face extinction. Friends of Animals remains committed to stopping Ocean Era from moving forward with the dangerous project, which threatens the health of animals and our oceans and could set precedent for the future of federal waters.

Friends of Animals challenges U.S. Fish and Wildlife Service's plan to kill hundreds of thousands of barred owls in a case that could shape the future of wildlife management.



For decades, spotted owl populations have been declining as the U.S. FWS failed to protect sufficient habitat or list the species as endangered.

Rather than focusing on preserving and restoring habitat as a path to recovery, FWS has turned its attention to another, similar, owl species—federally protected barred owls. Barred owls are more adaptable to a changing environment and seen as a competitor to spotted owls.

In September 2024, FWS approved an unprecedented management plan that calls for

killing approximately 450,000 barred owls in a misguided effort to help spotted owls.

Friends of Animals first sounded the alarm on the ill-conceived proposal to kill barred owls years ago, when FWS proposed to kill barred owls in limited areas as part of an “experiment” to see how it impacted northern spotted owls. When the controlled experiment showed that spotted owls did not increase despite killing of their competitors, Friends of Animals hoped that would be the end of this ill-thought-out plan. But instead, FWS amplified its efforts and proposed a management plan on a much larger scale, authorizing the killing of hundreds of thousands of barred owls over the next 30 years with no real end in sight. This plan demonstrates a complete disregard for the lives of owls and sets a dangerous precedent for wildlife management. Thus, Friends of Animals sued FWS to put an end to this cruel, lethal management plan. Since our lawsuit, additional agencies have signed onto the plan- the Bureau of Land Management and the Animal and Plant Health Inspection Service.

In addition, Friends of Animals has reviewed information from the agency in approving the plan, including additional information that demonstrates there was no legal authority to issue a Migratory Bird Treaty Act permit approving this massive killing of barred owls. As such, we have updated our lawsuit to include additional claims and the additional federal agencies that have signed on to the legal management plan as defendants.

Friends of Animals is not just fighting for the lives of hundreds of thousands of owls, we're also fighting for a future of wildlife management that values the lives of all animals. The lethal management plan is based on labeling animals that naturally adapt to a changing environment as “invasive” and killing them. In a world with a rapidly changing climate, we will see far more animals that adapt and adjust their habitat. FWS should focus on protecting animals, not killing those that are adapting.

THANK YOU

Your generosity is a powerful force in our mission to free animals from cruelty and institutionalized exploitation around the world. Thanks to your support, we're driving meaningful, lasting change through bold policy work and strategic legal action. There's still much to be done, and I'm deeply grateful to continue this work with you by our side.

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