



THE WILDLIFE SOCIETY

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Patricia A. Brown, V.M.D., M.S.
Director
Office of Laboratory Animal Welfare
National Institutes of Health
RKL 1, Suite 360, MSC 7982
6705 Rockledge Dr.
Bethesda, MD 20892-7982

Dear Dr. Brown,

The Wildlife Society supports the Office of Laboratory Animal Welfare's (OLAW) mission of safeguarding the humane treatment of research animals and applauds their efforts to ensure policy compliance. Strong adherence to consistent and stringent animal welfare protocols that can be effectively applied both in the lab and in the field is critical. However, we are writing to express some concerns about applying euthanasia guidelines developed by the American Veterinary Medical Association (AVMA) for veterinarians to wildlife professionals who work with free ranging wildlife.

The Wildlife Society (TWS) was founded in 1937 and is a non-profit scientific and educational association of nearly 11,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and its habitats worldwide.

During the euthanasia guidelines revision process, two TWS working groups, the Wildlife Disease Working Group and the Animal Damage Management Working Group, submitted comments to AVMA regarding our concerns over the applicability of these guidelines to field settings. The following are the primary concerns raised by our working groups:

- The guidelines should acknowledge that **veterinarians are often not present in the field or lack field experience**, and as such, wildlife professionals should be recognized as having the expertise to make species-specific recommendations under field conditions.
- **Better clarification is needed for what a "less-than-perfect" situation entails** where a practitioner should use the best possible method for the circumstance rather than a method that is classified as acceptable or acceptable with conditions.
- The guidelines should recognize that **when working with free-ranging wildlife, a one-stage euthanasia method may be the most appropriate** (e.g., when euthanizing large or dangerous wildlife such as large predator species, cornered animals, unapproachable or unhandleable animals, rabid mammals, etc.).

- Content in the guidelines pertaining to “animal control” is geared towards domestic species and shelters. **The guidelines, as currently written, are not appropriate for free-ranging wildlife control efforts** when dealing with individual pest or nuisance animals and as such need to be inclusive of methods appropriate for these efforts if wildlife control is to be held to the AVMA standards.
- The guidelines fail to recognize that **appropriate methods in captive settings are not practical in field settings** (e.g., CO₂ chambers, access to controlled substances or substances restricted by state licensing or other state controls, restrictions on off-site use of controlled substances under the Controlled Substances Act).
- **Instructions for calculating muzzle energy when using fire arms should not have been included** in the guidelines. This is as inappropriate as providing drug dosages and may encourage an untrained individual to use a fire arm as a method of euthanasia.
- **The guidelines misinterpret the purpose of kill traps. Kill traps were not designed as euthanasia tools (in the clinical sense) and their inclusion in these guidelines is peculiar.** We feel there is some confusion between euthanasia and capture techniques. The use of kill traps is considered humane killing, and as such, would not fall under the purview of these guidelines. Instead, we would direct OLAW and Institutional Animal Care and Use Committees (IACUC) to the Best Management Practices for Trapping in the United States established by the Association of Fish and Wildlife Agencies.
- **OLAW and the euthanasia guidelines should not oppose or prohibit techniques where data may not be readily available or that the AVMA is not as familiar with,** such as Thoracic Cardiopulmonary Compression (TCC).

TCC has been a vital euthanasia tool used by field researchers working with small birds and mammals for decades. Many of the alternative “acceptable” methods suggested by the guidelines (e.g., CO₂ and cervical dislocation) are not practical due to the remote location of field sites, the need to have intact specimens, or research requiring uncontaminated tissue specimens. Additionally, the suggested alternative methods often have longer time to loss of consciousness (up to 30 seconds) than reported for TCC (as quick as 5 seconds). While TWS recognizes that most of the current evidence supporting TCC is circumstantial, the Ornithological Council is currently sponsoring veterinary research to measure brain activity as an index of loss of consciousness to determine the effectiveness of TCC. TWS requests that OLAW refrain from removing an important and traditionally used tool until after scientific data is available.

TWS appreciates AVMA’s efforts to incorporate language on humane killing and the need for an additional set of guidelines to deal with free-ranging wildlife in the revision, such as adding verbiage regarding carcass disposal and recognition that special circumstances may occur in the field that require flexibility. However, the revised guidelines did not eliminate the confusion and may, in fact, impede the use of proper management techniques on free-ranging wildlife in the field. Just as AVMA acknowledges the need for separate guidelines pertaining to mass depopulation and humane slaughter, if AVMA specific guidelines are necessary we suggest the development of separate guidelines for research involving free-ranging wildlife and that those guidelines integrate current ethical euthanasia standards developed by other taxonomic professional societies.

We urge OLAW to issue guidance that states clearly that in the case of wildlife it is appropriate for the IACUC to approve research protocols that will be consistent with the guidelines published by the American Society of Mammalogists, the Ornithological Council, and the American Society of Ichthyologists and Herpetologists. The aforementioned organizations are comprised of taxonomic specific professionals that have the expertise and experience to make species-specific recommendations for euthanasia under field conditions.

TWS looks forward to the opportunity of working in partnership with AVMA and the American Association of Wildlife Veterinarians in the development of euthanasia guidelines appropriate for use with free-ranging wildlife, should specific AVMA guidelines be deemed necessary. We encourage OLAW to express the need for these types of guidelines to ensure the highest level of care for free-ranging wildlife. If you have any questions, please contact Laura Bies, TWS Director of Government Affairs at 301.897.9770 or laura@wildlife.org.

Sincerely,

A handwritten signature in cursive script that reads "W. B. Kessler".

Winifred B. Kessler
President