



## THE WILDLIFE SOCIETY

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The Wildlife Society (TWS) appreciates the opportunity to provide comments on the 2000 American Veterinary Medical Association (AVMA) guidelines on euthanasia. The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association representing over 9,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve wildlife professionals—the scientists, technicians, and practitioners actively working to study, manage, and conserve native and desired non-native wildlife and their habitats worldwide.

Working with our extensive network of wildlife professionals, TWS has assembled a committee of wildlife experts who were able to provide comments on euthanasia for wildlife in the AVMA guidelines. The TWS committee that prepared these comments was comprised of wildlife biologists and wildlife veterinarians from university and state and federal agency settings, representing a broad base of knowledge and experience on euthanasia methods for wildlife.

Below, we have listed concerns with the 2007 AVMA guidelines and followed each with a recommendation for improvement:

### **Concern 1: Definition of euthanasia**

The AVMA Guidelines state that the document was developed for veterinarians, yet many state universities and regulatory agencies also use the guidelines for a broad group of people who work with wildlife in field settings. However, many of the approved and required methods of euthanasia are not practical in field settings. These regulations have a significant impact on the wildlife veterinarians, wildlife biologists, wildlife damage control operators, and wildlife researchers who must abide by them. While the Guidelines do include sections in which wildlife is addressed directly, and disclaimers are provided relative to the applicability of approved methods of euthanasia, they lack a clear definition of what euthanasia means in a field setting.

The last several revisions of the AVMA guidelines have struggled to reconcile the definition of euthanasia for domestic and captive animals with that for free-ranging wildlife. This struggle has led to an increasingly larger treatise on euthanasia in wildlife that is increasingly disparate with the official definition of the term. The guidelines acknowledge this disparity, recognizing that there are situations involving free-ranging wildlife when euthanasia is not possible from a safety standpoint, and killing may be necessary. However, the reality is that in free-ranging wildlife, euthanasia, as defined, is rarely achieved. When wildlife professionals directly kill animals for conservation, wildlife management, and other legitimate purposes, they strive to do

so humanely. However, given the environment in which they work, and the nature of the species they work with, wildlife professionals can rarely achieve the level of painless death that is achieved in the more controlled environs of clinics and zoos. These guidelines could therefore constrain legitimate wildlife management activities that require the humane killing of wildlife but do not meet the standards of euthanasia, as defined by the AVMA.

**Recommendation:** A more explicit treatise of what euthanasia and/or human killing means in field settings would provide the wildlife community with more reasonable, practical, and cost-effective options to use.

### **Concern 2: Recognize alternatives**

There are many instances where acceptable clinical methods of euthanasia are not possible, practical, or appropriate for dealing with wildlife depending on the nature, urgency, or desired results of the situation. For example, there are some techniques, such as exsanguinations, that are inappropriate for euthanasia, but that may be the only available means to humanely kill an animal in an emergency. Additionally, methods of euthanasia that require significant handling time by wildlife personnel may actually increase distress for wild animals unfamiliar with human contact. Another example is the legal trapping of furbearing mammals using body-gripping traps; this technique often does not provide adequately humane euthanasia. Nonetheless, such traps are necessary for wildlife managers and biologists who need to be able to conduct research and evaluate management of these species using these legal methods of take. Finally, in many cases, animals that are euthanized provide important specimens for research and methods of killing should take into account the importance retaining of valuable research specimens. Overall, flexibility is needed in to address the unique challenges to euthanasia encountered by wildlife biologists.

**Recommendation:** The guidelines need to clearly state that procedures deemed unacceptable in the lab or clinic may actually decrease distress, suffering, and pain when imposed on wildlife in field settings. The language must therefore emphasize flexibility when applying any methods of euthanasia to wildlife. Language must also clearly emphasize the need for alternative methods of humane killing, for research and management purposes, when acceptable euthanasia might not be a viable alternative.

### **Concern 3: Commonplace nature of wildlife issues**

The guidelines need to recognize the fact that when dealing with wildlife-related issues, unusual and unpredictable circumstances may actually be very common. For example, the second full paragraph on page 4 begins “The panel was aware that circumstances may arise that are not clearly covered by its report.” Indeed, such circumstances arise on a common basis. Likewise, the topic sentence under Mass Euthanasia (p 22) states that “under unusual conditions...” While some conditions might seem quite unusual to laboratory animal personnel, they occur commonly in the field of wildlife management/conservation. Challenges presented by environmental constraints, safety, scene control, and equipment limitations are present in the field, but are often never encountered in a clinical setting.

For example, one common circumstance in the field that would not be encountered in a lab is when culling of large numbers of animals is required. This might occur for the purposes of wildlife management, containment of disease outbreaks, or conservation of threatened species or habitats impacted by feral domestics or other non-native species. The Guidelines do acknowledge this issue, but it should be clearly stated that this is a common problem for management and not an “unusual condition” as currently noted.

Public proximity poses another common concern for wildlife professionals. In some cases, proximity of the public may not allow use of all possible euthanasia methodologies. Decisions on appropriate methodology should take into account a range of ethical concerns including psychological impacts on humans, public safety, and impacts on the environment. While the guidelines acknowledge such issues, they fail to currently address the frequency of this problem.

**Recommendation:** Language should be added that acknowledges that situations that might be considered unusual in a laboratory or zoo setting are actually common in the field. Language should clearly emphasize the importance of flexibility in developing and applying methods of euthanasia in free-ranging wildlife. Language should also be added to clearly state that issues posed by public proximity are very commonly encountered by wildlife professionals, and the guidelines should be modified to address how these issues may affect how the appropriate method of euthanasia is chosen.

#### **Concern 4: Ethical perspectives**

The AVMA’s guidelines for euthanasia dictate policy at all levels of government and research. The guidelines should acknowledge that ethical concerns other than those prioritizing individual welfare above all else--such as ethical perspectives that prioritize conservation of native wildlife and ecosystem health--are indeed not only valid, but critical to the future of life on our planet. Undoubtedly, all animal handling including euthanasia should be performed humanely, and with a serious and thoughtful consideration of potential stress and suffering. However, these guidelines will be the only policy that international animal care and use committees (IACUCs) have available to guide research and management, no matter the ethical perspective of the participants or the importance of the conservation agenda. Having flexibility in the ethical standards will foster better wildlife conservation and management practices.

**Recommendation:** Policy setting language should be added that clearly allows for, and is accepting of, ethical perspectives that might differ from the perspectives of the individuals in the Panel. Language should recognize a need to support ethics that promote health and conservation of populations, species, and ecosystems as well as humane treatment of individual animals.

#### **Concern 5: Species categorization**

As currently written, the AVMA document lacks necessary detail and lumps taxa together, thereby missing the nuances of euthanasia when applied to the numerous wild and domestic vertebrate genera. Without in-depth discussions of why a certain method is recommended or discouraged, the reader is left guessing. This omission is particularly notable in ectothermic species, where methods of euthanasia can be particularly difficult to conduct humanely, and

where they can also depend upon the end use of the animal. Acceptable methods of euthanasia must be tailored to individual species and individual situations. Because of this, all wildlife cannot be lumped into one common category, nor can wildlife taxa necessarily be grouped with their domestic counterparts.

**Recommendation:** Language is needed that individually addresses appropriate methods of euthanasia in important and common *wildlife* taxa, such as deer, reptiles, and game birds. Appendix 1 should be modified so that it lists acceptable drugs and euthanasia methods by taxa of wildlife. Wildlife biologists and managers with field experience will need to be consulted in the development of those guidelines, not individuals whose expertise is limited to zoo or laboratory settings.

#### **Concern 6: Carcass disposal**

Safe carcass disposal in remote sites, especially of large carcasses such as those of bears, moose, and marine mammals often does not allow the use of narcotics or other pharmaceuticals. Similarly, use of lead bullets may not be considered appropriate if scavenging carcasses is a concern.

**Recommendation:** Add language detailing the concerns of safe carcass disposal in remote sites.

#### **Concern 7: Inconsistencies in acceptable methodologies**

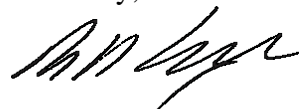
Appendix 2 and Appendix 3 are often inconsistent with standards noted in the text of the Wildlife section. For example, the Guidelines (pg19) state that: “alternatives to 2-stage euthanasia using anesthesia include a squeeze cage with intraperitoneal injection of sodium pentobarbital, inhalant agents (CO<sup>2</sup>, CO), and gunshot.” However, in Appendix 2, inhalant methods are not specifically listed as acceptable for wildlife species; instead these methods are listed in Appendix 3 as being conditionally acceptable. Several other such inconsistencies between the text and the appendices exist.

**Recommendation:** Clarify inconsistencies in acceptable, conditionally acceptable, and unacceptable methodologies between text in *Wildlife* section and corresponding appendices.

We also suggest that the references we have included in Appendix I be added to the Reference section.

Thank you for considering the views of wildlife professionals.

Sincerely,



Bruce D. Leopold, Ph.D.  
President

## Appendix I

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\*Change: Citation #18 in the AVMA guidelines needs to be updated to reflect the fact that the current edition of *the Handbook of Wildlife and Chemical Immobilization* is the 2007 edition.