

Supporting Wildlife Services

Rebuttal to War on Wildlife Report

Wildlife Services' (WS) vision is to improve the coexistence of people and wildlife while considering a wide range of public interests that can include wildlife conservation, biological diversity and the welfare of animals as well the management of wildlife for purposes of enjoyment, recreation and long-term survival. This program provides valuable wildlife management assistance that benefits all U.S. citizens, for example, it protects wildlife and people from wildlife-aircraft collisions; reduces conflicts in situations where wildlife have learned to live in close proximity to humans; diminishes incidence and spread of rabies; aids in the management and monitoring of other diseases transmissible among wildlife, humans, pets and livestock; and protects natural resources from adverse impact of non-native invasive species.

This valuable U.S. Department of Agriculture agency has been under attack numerous times by animal rights' extremists groups. Most recently, in 2007, these groups attempted to cancel WS' registration of M-44 sodium cyanide capsules and Compound 1080. This attempt was quickly halted when the Environmental Protection Agency (EPA) and the Department of Homeland Security (DHS) both concurred that the petition was unwarranted and that WS administers both chemicals safely and effectively as part of its wildlife damage management program. And again in February, WildEarth Guardians (WEG) released a report titled, "War on Wildlife," requesting the U.S. Congress and President Barack Obama to abolish this agency. This report is full of fallacies and unsupportive statements.

The American Sheep Industry Association (ASI) is working to protect WS and its funding. Below are four of the many outrageous claims made by WEG and the information that supports the activities of WS.

WEG Claim: In 2007, WS spent \$117 million to kill 2.2 million animals.

WS provides a financial breakdown each fiscal year by resource category as part of the Program Data Reports published on the WS Web site (www.aphis.usda.gov/wildlife_damage). The financial breakdown

includes both federally appropriated and cooperative funding. WS reported \$117,337,662 in combined appropriated (52 percent) and cooperative (48 percent) funding in FY2007. This combined funding supports all activities of the WS Operations including the non-lethal dispersal activities, wildlife rabies management, control of highly pathogenic avian influenza and wildlife disease surveillance and monitoring.

Of the \$117 million budget for 2007, 43.29 percent was spent on human health and safety, 33.41 percent on agriculture, 12.02 percent on property and 11.28 percent on natural resources.

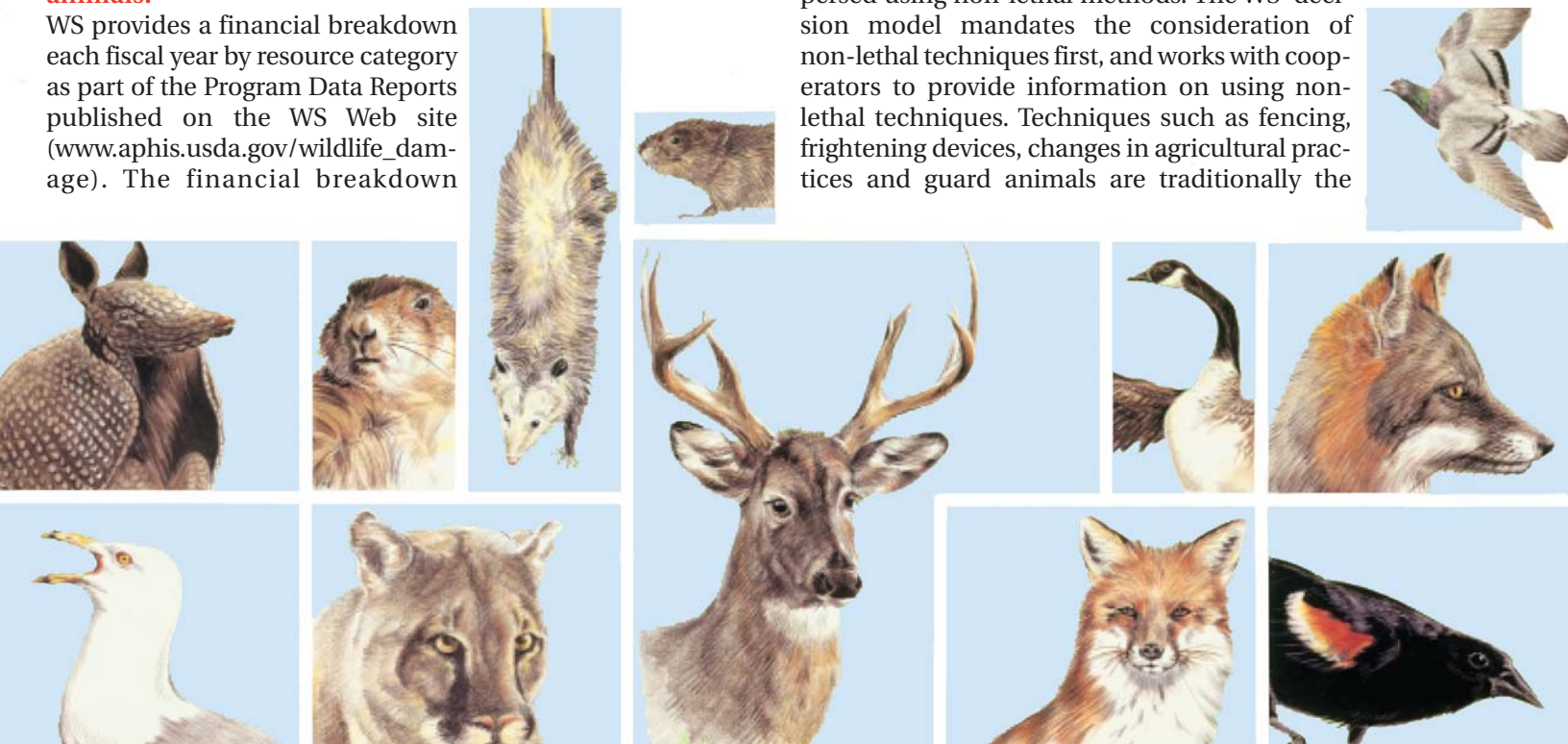
In FY2007, 86.4 percent of the animals taken by WS were dispersed or freed in comparison to 13.6 percent which were killed.

WEG Claim: WS utilizes large-scale predator eradication methods and rarely uses non-lethal methods of predator control.

WS remains the world leader in the development of selective and non-lethal methods of controlling nuisance wildlife and agrees that large-scale predator eradications are not desirable for native species.

WS predator management activities are not directed at predator eradication. When predator management is conducted to resolve human-wildlife conflicts, it is conducted on specific properties and allotments where the damage occurs with a specific target. The only part of the program that is "broad-scale" is that it deals with numerous different predators. By selectively targeting wildlife or groups of wildlife identified as responsible for causing damage or posing a threat to human safety, wildlife damage management can be compatible with biological and sociological needs.

WS' commitment to the public and environment can be seen in the fact that 86 percent of all wildlife encountered by agents is dispersed using non-lethal methods. The WS' decision model mandates the consideration of non-lethal techniques first, and works with cooperators to provide information on using non-lethal techniques. Techniques such as fencing, frightening devices, changes in agricultural practices and guard animals are traditionally the



purview of the livestock producer. These methods are used widely and when they are effective, there is little need for additional assistance from WS. It is when these methods fail that WS is called upon. Thus, the criticism erroneously implies that non-lethal methods are not used or considered, when in fact they are implemented before any lethal methods. Furthermore, 75 percent of the WS' National Wildlife Research Center's (NWRC) budget is dedicated toward the development of non-lethal methods, and the most current review of state-of-the-art non-lethal and new tools for predation management was written by a NWRC scientist. NWRC welcomes new innovative non-lethal ideas to test in actual field trials, and frequently works with agricultural producers, special interest groups and interested publics on such projects.

WEG Claim: Over the past ten years, WS has killed an increasing number of endangered species (2,482 individuals), especially wolves.

It is important to note that WS' total number of endangered species taken is less than the number that WEG presented in this document. In all likelihood, WEG inappropriately included American alligators and gray wolves that were delisted in the count. While the take of endangered species may have increased in part due to the increase in healthy gray wolf populations, WS also has continually increased its expenditures to protect threatened and endangered species during this same timeframe. In FY2008, almost \$7 million was spent on threatened and endangered species' protection.

Any take of gray wolves and Mexican wolves must be requested, authorized and permitted by the managing authority – primarily U.S. Fish and Wildlife Service (USFWS) – in accordance with the Endangered Species Act. The increase in the number of threatened and endangered species taken in the last several years correlates with the increase in the wolf population and the collaborative predator management of wolves as agreed upon by WS, state Department of Natural Resources/Fish and Wildlife and USFWS. Only those methods of management that are approved by the USFWS are used to take these two species. When wolves are known to occupy an area, other management activities are reviewed with the USFWS to reduce the risk of negatively impacting wolves. M-44's and livestock protection collars (LPC) are not allowed to be used in these areas. Any accidental take of wolves (e.g. capturing a wolf in an area where their presence was not known) automatically halts all management activities until the USFWS is consulted as required by the threatened and endangered animal

act. All takes under these circumstances is covered by an incidental permit issued by the USFWS.

WS has failed numerous federal audits for its failure to safely inventory, store and control access to harmful biological agents.

WS utilizes pesticides and other hazardous materials to conduct operations. WS acknowledges that the Office of Inspector General, as well as other agencies, has conducted audits of program functions involving hazardous materials. WS also acknowledges these audits identified deficiencies in some program functions. However, what the report from WEG fails to point out is WS' response to those audits to rectify the issues or the programs put into place to ensure the identified problems do not reoccur. In addition, the fact that WS voluntarily invited nine outside subject area experts to conduct a review of its activities highlights WS' commitment to safety. A copy of these reports can be found on the WS' Web site (www.aphis.usda.gov/wildlife_damage).

Regarding the use of pesticides, these products are used by WS to mitigate wildlife damage situations where non-lethal alternatives are unsuccessful. All of the products used by WS in managing wildlife damage situations have undergone EPA's rigorous review and are registered products; compared to insecticides, fungicides and herbicides, only a low volume of vertebrate pesticides are used by WS; application of vertebrate pesticides is targeted by employing site-specific application techniques, significantly reducing environmental exposure; and can only be used by applicators certified by states under the pesticide applicator training program.

Two pesticides used to protect sheep from predators are sodium cyanide in M-44s and Compound 1080 in LPCs. WS' non-target take of animals with M-44s and 1080 LPCs is less than 5 percent and 1 percent of total animals taken with each of these methods. In fact, the LPC is one of the most target-specific and lowest environmental-risk pesticide products available for any use. EPA and DHS both recognize that WS' use of these chemicals in the M-44 and LPC are safely and effectively utilized and do not pose a potential bioterrorism threat that would warrant cancellation or suspension of these techniques. This report can be viewed in detail at http://www.epa.gov/pesticides/reregistration/sodium_fluoroacetate/.

ASI is working in support of WS. More information to clarify the need for predator management and effective predator control tools can be found at www.sheepusa.org and clicking on "In Support of Wildlife Services."



American Sheep Industry Association Supporting Wildlife Services

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