October 28, 2019

The Honorable David Bernhardt
Secretary, U.S. Department of Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Bernhardt,

We, the undersigned veterinarians, write today to express our concern with the Bureau of Land Management's (BLM) continued interest in pursuing the study of the surgical sterilization procedure known as "ovariectomy via colpotomy" on wild horses. While we understand the BLM's need to manage populations of wild horses, we are concerned about the agency's chosen method for study when more humane methods are already available. As such, we urge the BLM to abandon any future plans to pursue the experimental study of this procedure on wild mares.

Not only is ovariectomy via colpotomy far more invasive, inhumane, and risky than other non-surgical methods of fertility control, it is also more invasive and inhumane than the techniques that veterinarians use on domestic horses in the rare circumstances where some form of ovariectomy is clinically necessary.

The BLM's continued focus on conducting experiments studying ovariectomy via colpotomy raises serious concerns. Ovariectomy via colpotomy is a painful surgical procedure done blindly through an incision in the vagina, allowing access into the abdominal cavity for a rod-like tool, called an ecrasure, to sever and remove the ovaries. This procedure can be dangerous when performed on domestic horses, let alone wild horses whose response to sedatives and analgesics is much less predictable. Even in a controlled setting, this procedure can be accompanied by a high rate of complications, sometimes as high as 4 percent, including risks of infection, trauma, post-operative pain, hemorrhage, abdominal adhesions, evisceration, abscess formation, abortion, neuropathies, and even death. Indeed, part of BLM's own experimental goals include seeking to quantify morbidity and mortality.

The use of this procedure, in the manner that the BLM has proposed to study its efficacy and safety since 2016, is especially disconcerting given that the BLM does not intend to provide postoperative antibiotics and has stated that no veterinary interventions will be undertaken for any recovering horses once returned to the range. The associated risks are exacerbated by the fact that, by the agency's own admission, the surgeries will be conducted in an operating space that "may not be entirely sterile" at the agency's corrals. Following the experiments, the BLM intends to conduct the procedure on mares held in trap sites on the range, under conditions that are even less controlled and sterile than in the holding pens.

The National Academy of Sciences (NAS), in a 2013 report commissioned by the BLM, explicitly warned the agency against employing ovariectomy via colpotomy on wild horses. As stated in the report, "the possibility that ovariectomy may be followed by prolonged bleeding or

peritoneal infection makes it inadvisable for field application." Similarly, in 2015, an NAS research review panel warned that conducting the procedure on wild (vs. domestic) horses could cause the "mortality rate to be higher than the 1% reported in the published literature" and stated that proposals for less invasive sterilization methods "would be safer – with less risk of hemorrhage and evisceration – and probably less painful."

Further, the American College of Veterinary Surgeons (ACVS) describes laparoscopic surgery as the best method for ovariectomy, noting that "with the advent of laparoscopic (keyhole) surgery, all other techniques have become relatively dated." The ACVS explains that laparoscopic surgery provides far greater "visualization and access" and is "minimally invasive," especially in comparison to ovariectomy via colpotomy, which involves removing the ovaries "with a crushing-type instrument." Put plainly, more humane surgical options exist (to say nothing of non-invasive immunocontraceptive vaccines or new research into intrauterine devices) that the BLM could consider for study.

Finally, two major academic institutions, Oregon State University (OSU) and Colorado State University (CSU), terminated partnerships with the BLM to provide veterinary observation and minimal welfare oversight for past iterations of the ovariectomy experiments. Yet, the BLM continues to pursue research proposals to study this procedure even in the absence of such outside veterinary and behavioral expertise. As federal lawmakers noted earlier this year when criticizing the BLM's aggressive plan to move forward with the ovariectomy experiments, "at an absolute minimum, independent veterinary and welfare oversight (not unlike what we presume the BLM was hoping to achieve through partnerships with CSU, and before that, OSU) is necessary if a project of this type is to move forward in any respect."

We hope the BLM will reconsider this misguided plan and ultimately stop any future pursuit of this archaic and inhumane procedure. As veterinarians, we swore an oath to uphold the welfare of all animals and work to prevent needless suffering. For the reasons discussed above, we call upon you to reevaluate the proposed surgery in light of the inability to provide wild horses with the required aftercare, pain management, and sterile conditions necessary to ensure their health and wellbeing. We urge you to direct the BLM to drop any further consideration of ovariectomy via colpotomy procedures for wild horses on the range.

Thank you for your consideration.

Sincerely,

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