

Congress of the United States
Washington, DC 20515

February 8, 2024

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Secretary Haaland,

We were pleased to see the Bureau of Land Management's (BLM's) recent decision to end the use of M-44 devices, commonly known as cyanide bombs, on the land it manages. In light of this decision to prevent harm to people, pets, and wildlife, we respectfully ask the Department of the Interior (DOI) to prohibit the U.S Department of Agriculture's Animal Plant and Health Inspection Service's Wildlife Services (WS) program from using body-gripping traps on all DOI lands.

As you are aware, the decision to ban M-44 devices builds on existing limitations in several states where these devices are either partially or entirely banned and will extend across all land managed by BLM. We know this land provides vitally important habitat for thousands of species and recreational opportunities for millions of Americans, and banning M-44s is an important step towards humanely managing wildlife and improving visitor safety across some of our country's most cherished landscapes.

As we celebrate this new BLM policy, we also remain concerned that using body-gripping traps for wildlife management is just as inhumane and poses similarly significant safety risks to unintended targets, including both wild animals and companion animals. Much like M-44 devices, body-gripping traps are proven to be cruel and dangerous. Body-gripping traps, which include steel-jaw leghold traps, snares, and body-crushing traps, such as Conibear traps, are inhumane and inherently nonselective. They indiscriminately injure and kill nontarget animals, including endangered and threatened species and even pets.¹ Continuing to allow these traps on public lands puts wildlife and millions of visitors and their pets at risk of severe injury from stepping into a trap.

Steel-jaw leghold traps have jaws that slam together with bone-crushing force to catch the animal's limb and prevent the animal from pulling free. This causes injuries such as severe damage to the captured limb in the form of lacerations, strained and torn tendons and ligaments, extreme swelling, broken bones, and even self-amputation of the limb.² This basic operating principle makes such traps brutal, regardless of any modifications made to the trap. They have

¹ U.S. Dep't of Agriculture, Wildlife Services, Program Data Report G – 2020 Animals Dispersed/Killed or Euthanized/Removed or Destroyed/Freed.

been condemned as inhumane by both the National Animal Care and Control Association³ and the American Animal Hospital Association.⁴

Neck snares, which are nooses that go around an animal's neck, are designed to either kill a captured animal or restrain an animal until the trapper arrives to kill them. Neck snares designed to kill the animal tighten continuously as the animal struggles until strangulation occurs. However, this can take hours, if not days, causing extreme and prolonged agony for the captured animal, including grotesque swelling of the neck, head, and eyes.⁵

Body-crushing traps, such as Conibear traps, consist of two hinged rectangular metal frames and a trigger that, when activated slam shut on the body. In theory, they are designed to kill animals instantly by crushing their necks or torsos. However, multiple studies have documented the frequent failure of these traps to kill instantly, instead leaving animals conscious in the jaws while suffering from agonizing injuries.⁶ As with leghold traps and neck snares, body-crushing traps are non-selective, and many species are unintentionally caught.

With all body-gripping traps, animals left languishing alive may succumb due to injuries caused by the trap, exposure to the elements, dehydration, stress, or predation. Any trapped animals, if they are able to, will violently fight to free themselves of the trap and of the excruciating pain they cause, commonly resulting in broken teeth and gum damage from biting at the trap and their own limbs.

The risks posed to unintended targets, including wildlife, pets, and humans, by body-gripping traps have led to over 100 countries banning them.

Research has shown that alternative, effective, and far safer wildlife management methods can be utilized in place of body-gripping traps. Specifically, WS should employ non-lethal husbandry practices, such as electric fences, fladry, night pens, guard animals, repellants, scare tactics, and removing dead livestock. If traps are needed, WS should use more humane cage or box traps, which are available in a variety of designs and sizes to live-capture different animals.⁷ Wildlife Services has used cage traps to successfully capture over 200 species of animals.

Considering DOI's concern for devices that pose a safety risk to unintended targets, and the recent decision by BLM to ban the use of M-44 devices, we respectfully urge DOI to take swift

² See, e.g., G. Iossa et al., Mammal Trapping: A Review of Animal Welfare Standards of Killing and Restraining Traps, 16 ANIMAL WELFARE 335, Table 2 (2007).

³ https://www.nacanet.org/wp-content/uploads/2019/03/NACA_Guidelines.pdf

⁴ <https://www.aaha.org/about-aaha/aaha-position-statements/leghold-traps/>

⁵ GILBERT PROULX, INTOLERABLE CRUELTY: THE TRUTH BEHIND KILLING NECK SNARES AND STRYCHNINE 28 (Alpha Wildlife Productions 2017).

⁶ *Id.*

⁷ USDA-APHIS, Human Health and Ecological Risk Assessment for the Use of Wildlife Damage Management Methods by USDA-APHIS-Wildlife Services, Chapter II, The Use of Cage Traps in Wildlife Damage Management at 1 (May 2017). Available at: https://www.aphis.usda.gov/wildlife_damage/nepa/risk_assessment/2-cage-trap-peer-reviewed.pdf.

action to prohibit Wildlife Services from using body-gripping traps on all DOI lands. Thank you for your leadership in managing public lands and ensuring they are safe and accessible.

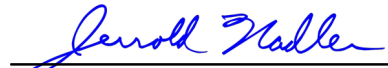
Sincerely,



Steve Cohen
Member of Congress



Jared Huffman
Member of Congress



Jerrold Nadler
Member of Congress



Eleanor Holmes Norton
Member of Congress



Betty McCollum
Member of Congress



Barbara Lee
Member of Congress



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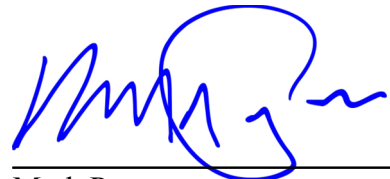
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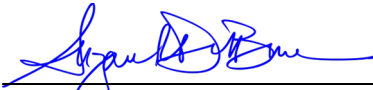
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Member of Congress



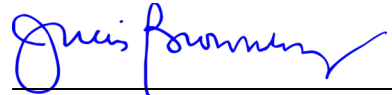
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