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SPOTLIGHT

Victory at Sea: US Bycatch Standards Applied to Imports

As of next year, the United States will be required to prohibit seafood imports from countries that fail to meet US standards for protecting marine mammals—a major victory for wildlife conservation and welfare. It was achieved in settlement of an August 2024 lawsuit filed in the US Court of International Trade by AWI, the Natural Resources Defense Council, and the Center for Biological Diversity against the US government. Represented by Anderson & Kreiger LLP, the groups challenged the government’s failure to enforce a provision of the Marine Mammal Protection Act mandating that US seafood imports must come from fisheries whose standards for avoiding marine mammal bycatch are comparable to those of domestic fisheries.

Implementation of the settlement involves four phases: The first two phases (already completed) required the US government to notify nations whose fisheries were denied a preliminary “finding of comparability” to US bycatch standards and gave each such nation an opportunity to refute this denial. The third phase directs the US government to review any supplemental information and issue final comparability findings for all foreign fisheries by September 1, 2025. In the final phase, the government—by January 1, 2026—must identify and prohibit seafood imports from all fisheries whose bycatch standards have not been deemed comparable to US standards. The National Marine Fisheries Service will also publish the final documents reflecting the agency’s rationale for its comparability findings.

Each year around the globe, more than 650,000 whales, dolphins, and other marine mammals drown or suffer serious injuries due to entanglement in commercial fishing gear. US enforcement of import restrictions will pressure foreign fisheries to implement stronger protections for these animals, thus reducing this staggering toll and promoting sustainable fishing abroad while leveling the playing field domestically. 🐾

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ABOUT THE COVER

A sandhill crane prepares to take flight from a frozen lake in New Mexico. Sandhill cranes are among more than 1,100 birds protected by the Migratory Bird Treaty Act of 1918. This venerable statute is among nine bedrock conservation and animal protection laws—originally enacted with strong bipartisan support—that the Trump administration and congressional leadership have taken extraordinary steps to erode or obliterate this year. Turn to page 14 for more on the vital importance of these laws and the threats they face—and why animal advocates of all stripes must rally to defend them. Photograph by Paul Souders.

AWI MOURNS REP. RAÚL GRIJALVA

On March 13, Rep. Raúl Grijalva passed away at the age of 77. The Arizona congressman, a stalwart advocate for animals and the environment who dedicated half a century to public service, will be greatly missed.

Grijalva was a staunch supporter of the Endangered Species Act, defending it time and again against attacks during his tenures as chairman and ranking member of the House Committee on Natural Resources and co-chair of the ESA Caucus. He sponsored important conservation bills such as the RESCUE Whales Act; Extinction Prevention Act; Ocean-Based Climate Solutions Act; and Tribal Heritage and American Bison, Grizzly Bear, and Wolf Restoration and Coexistence Act. Grijalva also led the Traveling Exotic Animal and Public Safety Protection Act to end the use of wild animals in circuses. He championed the Wild Free-Roaming Horses and Burros Protection Act and other efforts to humanely manage our nation's wild equines.

AWI deeply valued our partnership with Congressman Grijalva on these and other crucial issues over the years, and we are so grateful to have had the opportunity to work with such a principled and kind man. His compassion truly extended to all animals. We send our condolences to his family and staff, and we will honor his memory by carrying on his legacy of fierce and unyielding advocacy for all living beings.

FUR FARMS: CULTIVATING CRUELTY, COURTING DISASTER

This year, AWI is supporting federal, state, and local efforts to restrict fur farming and end the sale of new fur products. The extreme crowding and confinement on fur farms lead to serious physical and mental health problems for the animals, including infections, severe wounds, self-mutilation, cannibalism, and other stress-related stereotypical behaviors. Slaughter methods are similarly inhumane. When animals' pelts are at their peak quality (within the first

year of life), the animals are gassed, electrocuted, bludgeoned, or otherwise killed by breaking their necks.

Mink farms, in particular, are also a public health hazard. Mink and humans can become infected by some of the same serious respiratory viruses, such as those responsible for bird flu and COVID-19. Mink on such farms are potentially potent "mixing vessels" for generating novel strains of these viruses that could be transmitted to people.

In February in the Illinois House of Representatives, Rep. Joyce Mason (D-61) introduced the AWI-backed Mink Facility Disease Prevention Act (HB 2627) to require disease prevention and surveillance measures on farms that raise and slaughter mink for their fur. In March, AWI submitted testimony to the Chicago City Council in support of an ordinance to prohibit the sale of new fur products. Meanwhile in Congress, Rep. Adriano Espaillat (D-NY) reintroduced the Mink: Vectors for Infection Risk in the United States Act (Mink VIRUS Act, HR 2185), which would phase out US mink farms within one year and establish a grant program to reimburse farmers for the full value of their operations. This would help farmers transition away from an industry that has been in steep decline for many years, while also protecting public health and ending the cruel cycle of breeding and slaughtering mink for their fur.



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Animals on fur farms lead miserable lives. The grim, crowded conditions also make them vectors for diseases that pose a grave threat to humankind.

LEONARDO GONZALEZ



CAN'T SAVE SALMON BY SCAPEGOATING SEA LIONS

In February, the House Committee on Natural Resources held an oversight hearing on the Endangered Species Act (ESA) and the Marine Mammal Protection Act (MMPA). The discussion largely served as a platform for the committee's majority leadership to disparage these bedrock environmental laws and complain of "regulatory overreach."

Concomitant attacks at the state level are also on the rise. That same month, AWI submitted testimony urging the Washington State Legislature's House Agriculture & Natural Resources Committee to reject HJM 4004, a resolution calling for federal rollbacks to the MMPA. HJM 4004 seeks to encourage a weakening of MMPA protections under the guise of increasing the "flexibility" of adaptive management tools—which really means trying to give Columbia River Basin salmon a boost by killing more sea lions.

The resolution paints pinnipeds as a primary driver of salmon declines while ignoring far more significant

threats to salmon, such as non-native fish stocked for sport fishing (which eat young salmon, outcompete them for resources, and transmit disease), industrial fisheries (which remove far more salmon than pinnipeds ever could), and dams and culverts (which degrade spawning habitat and create fish migration bottlenecks). The MMPA already allows for targeted lethal removal of pinnipeds under specific circumstances. Rather than killing more pinnipeds, a focus on the actual drivers of salmon decline is needed.

AWI PRIORITY BILLS REINTRODUCED

Two of AWI's priority equine bills were reintroduced at the end of February in recognition of National Horse Protection Day on March 1. Reps. Vern Buchanan (R-FL) and Jan Schakowsky (D-IL) and Sens. Lindsey Graham (R-SC) and Ben Ray Lujan (D-NM) sponsored the Save America's Forgotten Equines (SAFE) Act (HR 1661/S 775) to permanently end the slaughter of American horses for human consumption. And the Prevent All Soring Tactics (PAST)

Act (HR 1684) was reintroduced in the House by Reps. Buchanan, Schakowsky, Brian Fitzpatrick (R-PA), and Steve Cohen (D-TN). The PAST Act would protect Tennessee walking horses and related breeds from soring, which involves inflicting pain on a horse's hooves and legs to elicit a high-stepping gait for competition. Both bills enjoy strong bipartisan support: The SAFE Act was introduced with over 100 original cosponsors, and the PAST Act was introduced with over 170 original cosponsors.

Reps. Jeff Van Drew (R-NJ) and Julia Brownley (D-CA) reintroduced another AWI priority bill in the House, the Child and Animal Abuse Detection and Reporting Act (CAADRA, HR 712). This legislation would amend the Child Abuse Prevention and Treatment Act to allow data collected by the federal government from state child protection agencies to include information about animal abuse as a risk factor for child abuse.

On February 5, AWI hosted a webinar to discuss how advocates can become more involved in defending against attempts to weaken or dismantle landmark conservation laws, while championing new gains for animal welfare. A recording of the webinar is available at awionline.org/roadmap2025. The article on page 14 contains additional information on how you can use AWI's online Action Center to contact your members of Congress and urge them to oppose efforts to weaken the ESA, MMPA, and other vital laws; urge them to support legislation to stop the slaughter of American horses; and more.

AWI DONATES CHILDREN'S BOOKS TO TEACH HUMANE EDUCATION IN PUERTO RICO

Beneath “a sliver of moon, no wider than a cat’s whisker,” Kamie the cat navigates frightening city streets, back alleys, and an animal shelter to find her way home. In the process, the orange tabby teaches young readers kindness and respect for their feline friends.

Kamie Cat’s Terrible Night, published by AWI through a collaboration with award-winning author and illustrator, Sheila Hamanaka, is one of two colorful children’s books (written in English and translated into Spanish) that AWI donated to help teachers in Puerto Rico bring humane education to the classroom. The other book, *Pablo Puppy’s Search for the Perfect Person*, also written and illustrated by Hamanaka, recounts the plight of a puppy and an older dog living in a shelter, teaching the importance of humane treatment of animals.

In total, AWI shipped 1,600 *Kamie* and *Pablo* books to Puerto Rico, in addition to donating about 400 copies each of two books for older students, *Roots of Human Behavior* and *The Magic of Touch*. The former, by Viktor Reinhardt, DVM, PhD (who now serves on AWI’s Scientific Committee), examines the parallels between animal and human expressions,

emotions, and psychology. The latter, by Viktor and Annie Reinhardt, explores the essential role of physical contact in the social lives of all animals.

FePA (Federación Protectora de Animales de Puerto Rico)—a nonprofit umbrella organization for the island’s animal protection groups, shelters, and advocates—approached AWI to provide resources for humane education workshops held during a conference in Caguas in October 2024. At that conference, 50 teachers representing disciplines from health to fine arts to early childhood development learned about the human-animal bond and its impact on educational outcomes, current challenges to animal welfare reform in Puerto Rico, and other topics related to our relationship with animals.

After Hurricane Maria pummeled the island in 2017, the stray animal population spiked to up to half a million stray dogs and 1 million cats, according to Yolanda Álvarez, PhD, FePA’s board president and an attorney who has studied stray animal overpopulation trends in Puerto Rico. The few municipal animal shelters that exist today are mostly crammed with companion animals who have been surrendered.

“The majority of Puerto Ricans really love their companion animals; it’s a problem of resources and education,” Álvarez hastens to explain. “If you don’t get to the root of the problem,

“The books provided by AWI are foundational tools for our teachers, and thereby our students, as they enrich discussions and foster empathy and understanding toward animals.”

you're going to have people who buy animals on impulse and then just throw them on the street." She adds, "The books provided by AWI are foundational tools for our teachers, and thereby our students, as they enrich discussions and foster empathy and understanding toward animals. By promoting humane values, such literature plays a key role in shaping a compassionate society and a peaceful country."

FePA is now working with the Puerto Rico Department of Education to expand the workshops across the island. Álvarez says the response among participants has been overwhelmingly positive, with teachers expressing genuine motivation to incorporate the animal-themed storylines into their lesson plans.

Since 2020, AWI has donated more than 87,000 books to literacy groups and humane education programs, reaching children of all ages throughout the country. For select titles, including *Kamie* and *Pablo*, AWI also offers free classroom activities and lesson plans that can be easily implemented.

Regina Terlau-Benford, director of AWI's Humane Education Program, says that *Kamie* and *Pablo* "teach basic care, compassion, and respect for companion animals, while helping children of all backgrounds improve their interpersonal and problem-solving skills."

"Since many children have a natural affection for animals, they readily engage with animal-centric storylines, which can ease them into confronting more complicated subjects—both at school and in the home." Last year, when Terlau-Benford read *Pablo* to a first-grade class in North Carolina, one of the students mentioned that her father had kicked their dog. This comment was relayed to the girl's teacher. AWI also offers a handout for educators, including a list of questions for students who disclose animal abuse and a summary of appropriate next steps if there is reason to believe that the animal and/or the child might be experiencing violence at home.

Currently, only nine states require or authorize humane education instruction, according to AWI's research. As more school districts recognize the field's benefits, such as fostering critical thinking, empathy, and responsibility, more children will develop a deeper connection with the natural world and their role in it.

"Our young people today will inherit no small amount of challenging global issues," notes Terlau-Benford. "Humane education seeks to empower them to improve the lives of animals and other vulnerable members of our society, preparing the next generation of compassionate citizens." 🐾



Top: A humane education workshop in Caguas. Photo courtesy of PR Animals. Bottom: A teacher reads the Spanish-language version of *Pablo Puppy's Search for the Perfect Person* with her class. The students started rescuing abandoned animals, prompting FePA to create a shelter at the school. Photo by Yolanda Álvarez.

The GAP certification program is requiring producers to phase out the use of breeds developed to experience abnormally rapid, exaggerated growth—a trait that often leads to physical breakdowns.

GAP UPDATES WELFARE CERTIFICATION STANDARDS FOR CHICKENS

In January, the animal welfare organization Global Animal Partnership (GAP) released updated production standards for meat chickens under its six-tier Animal Welfare Certified rating program.

Prior to the release, AWI submitted comments urging the organization to make two changes to its standards. First, we requested that GAP explicitly prohibit the use of ventilation shutdown (VSD) and VSD plus heat (VSD+) for the depopulation of flocks (for disease control or other reasons) for all tiers (referred to as “steps”) due to the suffering these methods cause. Second, we requested that in addition to requiring facilities to have an emergency plan that addresses fires, GAP mandate compliance with the National Fire Protection Association’s animal housing fire code to strengthen fire protections for chickens, in the wake of the significant death toll from fires that have occurred on poultry operations in the past decade. (See back page.)

GAP adopted AWI’s first suggestion, making it the first animal welfare certification program to explicitly prohibit VSD and VSD+ on certified farms. No changes were made to improve fire protections for chickens, however. Another change to the standards, which AWI supported, is the establishment of a five-year timeline within which all GAP-certified chicken producers must transition away from fast-growing



ZEN Z

breeds associated with adverse health and welfare impacts toward approved breeds associated with normal growth and better welfare outcomes.

CAGE-FREE LAWS IN THE CROSSHAIRS

In recognition of the immense suffering experienced by egg-laying hens confined to battery cages, 10 states in the last 15 years have enacted laws prohibiting the use of these ultra-confining enclosures. Eight of those states have also passed laws prohibiting the sale of eggs produced elsewhere via battery cages.

These laws have benefited millions of birds. However, the hard-won victories of animal protection advocates in this area are facing renewed challenge in several states because of bird flu, which has led to the killing of over 166 million domestic birds—including 115 million egg-laying hens—in the last three years. (See page 9.) This mass depopulation of the nation’s flock has been a major contributor to the high egg prices that

have been much discussed in the media (even as some outlets have reported that major egg producers continue to make record profits).

In response, legislation has been introduced or administrative steps taken in four states to limit or repeal cage-free egg laws. First, Arizona’s director of agriculture announced an order postponing the implementation of that state’s caged egg sales ban for two years. Shortly after, bills were introduced in Nevada, Colorado, and Michigan to repeal or delay the implementation of their cage-free laws. The Colorado bill died early in the legislative process. Nevada, however, enacted a law that allows the state quarantine officer to temporarily suspend cage-free regulations for up to 120 days in emergencies; such a suspension went into effect at the end of February. The Michigan bill would repeal the state’s cage-free egg requirements that went into effect in January. AWI continues to monitor the situation. Sign up for alerts via our online Action Center to keep up to date on our efforts to fight these repeals.

Seeking to Slam the Door on Ventilation Shutdown

It's too small to see and too big to miss: The H5N1 virus, which causes highly pathogenic avian influenza (HPAI, aka bird flu), has wrought havoc on US poultry and dairy farms and wildlife, contributed to rising food prices, and made dozens of people sick—one fatally so. Since the current outbreak began in February 2022, Americans have collectively witnessed and struggled to navigate the most devastating animal health disaster in US history.

Over the last three years, an unfathomable 166 million domestic birds—chickens, turkeys, and ducks—have been killed either by the virus itself or by farm operators trying to prevent its spread. Once disease is detected in a flock, it is “depopulated” (all the animals killed). Increasingly, the method of convenience for doing so has become “ventilation shutdown plus” (VSD+), a horrific procedure that involves sealing the animals’ sheds (often containing several hundred thousand individuals), adding heaters and sometimes steam to increase humidity, and raising the inside air temperature to as high as 130°F. The birds eventually succumb to heatstroke, but it can take hours—and even then, there are frequently survivors who must be found and (finally) killed.

Domestic flocks can become infected with HPAI when the virus is shed into the environment from the feces, feathers, and saliva of migratory or resident wild fowl carrying the disease. From there, it can come into contact with outdoor birds or be drawn through poultry house air inlets, where it can infect birds confined inside. The pathogen can also be transmitted from contaminated clothing, farm equipment, and vehicles—as well as the ventilation outlets of infected poultry barns nearby.

So how can the industry, as well as state and federal regulators, more effectively prevent, prepare for, and respond to bird flu infections? AWI has advanced multiple regulatory, research, and on-the-ground recommendations.



Petitioning APHIS to require more humane methods

In June 2023, we petitioned the US Department of Agriculture's Animal and Plant Health Inspection Service (APHIS) to amend its rules regarding how it compensates producers for the costs associated with destroying poultry flocks infected with HPAI. Specifically, we urged the agency to mandate that producers seeking compensation develop comprehensive plans outlining how they will handle and kill their animals as humanely as possible in the event of an infection and subsequent depopulation. Importantly, as the petition notes, the plans should explain how the depopulation strategy will kill *all* animals as quickly as possible, and how the use of VSD+ will be avoided. APHIS has not yet responded.

Urging APHIS to consider smaller flock sizes

In September 2024, AWI again contacted APHIS, submitting detailed comments on a draft environmental impact statement (EIS) issued by the agency in connection with its HPAI response activities. As explained in our comments, one of the key shortcomings of the EIS was APHIS's failure to consider requiring poultry farmers to restock with smaller flock sizes and lower flock densities. Research on infectious diseases suggests that larger farm sizes have the potential to promote larger livestock epidemics. And some studies, as well as our own analysis of USDA records, suggest that larger commercial egg production operations (those with 100,000 or more layer hens) are far more likely to become infected with HPAI than smaller operations.

USDA records also reveal that larger flocks take a longer time to destroy: Between February 2022 and July 2024, infected farms containing 10,000 to 25,000 birds took an average of 1.86 days to depopulate, while farms of 1 million to 5.5 million birds took an average of 9.54 days. According to the USDA, depopulation delays may increase HPAI transmission risk, as viral particles continue to disperse into the environment. Furthermore, the largest farms were more likely to rely on VSD+: about 54 percent of operations with 100,000 to 1 million birds used the method, while more than 92 percent of farms with more than 1 million birds did so.

Identifying urgent research priorities

In October 2024, the National Academy of Sciences (NAS) held a public workshop to identify research priorities to inform readiness and response to the ongoing HPAI outbreak. AWI sent the NAS a letter describing several urgent research needs. For example, we explained that APHIS must rapidly develop well-matched HPAI vaccines for poultry. Vaccination would greatly decrease birds' risk of becoming infected and

ensure that any birds who do become infected shed far lower amounts of the virus than they would otherwise. This would decrease the risk of spread to other farms, animals, and people. The USDA must approve use of HPAI vaccines, however, and negative impacts on international trade (due to other countries potentially barring products from vaccinated birds) have thus far been one of the primary reasons why HPAI vaccination has not been permitted for general use. Therefore, we also recommended undertaking research to ensure that *all* relevant impacts, including animal welfare, are incorporated into decision-making on this issue.

We also emphasized that additional research is needed regarding higher-welfare depopulation methods. Currently, the primary methods of mass killing used on commercial premises are VSD+ and low- or medium-expansion water-based foam. Both methods involve severe suffering. As mentioned above, VSD+ causes death via heatstroke, which causes damage to numerous body systems over the course of hours—and even then, not all birds die. Water-based foam kills faster than VSD+, but the way it kills—the bubbles block the birds' airways—likely causes significant distress. Indeed, the United Kingdom's Animal Welfare Committee has expressed concern over killing via water-based foam, characterizing it as “equivalent to drowning or suffocation ... neither of which are recognized as humane under European legislation.”

Another widely used method of depopulation is gassing with carbon dioxide (CO₂). In the United States, it is most commonly used to kill several dozen birds at a time in carts or containers. This approach is undesirable because, at high concentrations, the gas can cause pain and respiratory distress, and the catching and handling required to place poultry in carts or containers often results in injury and stress. Since only a relatively small number of birds can be killed at the same time, it can also take days or weeks to destroy an entire flock. Alternatively, studies suggest that CO₂ whole-house gassing may be less aversive because it avoids having to handle the birds, and if gas concentrations are increased gradually, it may allow the birds to lose consciousness prior to experiencing severe discomfort.

Two higher-welfare and potentially more effective methods of depopulation that are currently being used in other countries are high-expansion nitrogen-filled foam and nitrogen whole-house gassing. Nitrogen gas kills by displacing oxygen in the air, creating anoxic (oxygen-free) conditions that rapidly lead to loss of consciousness in poultry, typically within several seconds to less than one minute. Because the gas is non-aversive and undetectable by birds, it is considered acceptable as a form of euthanasia. Unlike water-based foam, high-expansion nitrogen-filled foam creates large bubbles that do



A barn full of turkeys killed using water-based foam, a method associated with significant distress.

WE ANIMALS MEDIA

not occlude the animals' airways. Further, nitrogen foam can be used even when buildings cannot be completely sealed.

The USDA recently acknowledged that it considers nitrogen whole-house gassing acceptable for caged poultry and high-expansion nitrogen-filled foam acceptable for confined, floor-reared poultry. However, neither method has, to date, been used in the United States for HPAI-related depopulations. There are several research gaps that, if addressed by the NAS or other scientific bodies, could help these higher-welfare methods replace practices such as VSD+, airway-occluding foam, and CO₂ containers. For example, research focused on the logistics of nitrogen supply and commercial-scale application would be helpful, so producers in different regions of the country could understand how and where to obtain sufficient quantities of liquid nitrogen, particularly for the outsized barns often used in the United States.

Asking the AVMA to downgrade VSD+

Finally, AWI has worked with the veterinary community to discourage VSD+ and promote more humane depopulation alternatives. In 2019, the American Veterinary Medical Association (AVMA) published, for the first time, a set of depopulation guidelines. Last year, the AVMA issued a draft

update and made it available for comment by AVMA members. In January, AWI (through our veterinary medicine consultant, Gwendolen Reyes-Illg, DVM) submitted more than 120 recommended changes to improve the accuracy and broaden the welfare considerations of the guidelines, with respect to VSD+ and other problematic depopulation methods.

In addition, we worked with veterinarians and animal protection groups to develop a sign-on letter urging the AVMA to reclassify the use of VSD+ for poultry (along with certain other mass killing practices) as a lowest tier, not-recommended method. More than 860 veterinarians and vet students signed the letter. Such a recategorization would be a critical step toward discouraging producers from resorting to VSD+, because it could mean that the USDA—which relies on AVMA guidelines to set some of its indemnification policies—might disallow compensation for flocks destroyed by this cruel practice.

As HPAI continues to tear through wild and domestic animal populations—threatening public health, creating financial hardship, and causing immeasurable suffering—AWI will continue to push for policies that decrease the risk of infections, reduce the spread of the disease, and prevent avoidable pain and distress, for humans and animals alike. 🐾

NICK DALE



The Trump administration has suspended funding for US agency-led efforts to fight trafficking of black rhinos and other endangered wildlife.

CITES STANDING COMMITTEE MEETS IN GENEVA

The Standing Committee of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) met in early February in preparation for the 20th meeting of the Conference of the Parties to CITES (CoP20) later this year.

Unfortunately, the United States, a committee member, was under a partial gag order from the Trump administration, preventing it from taking a position on several agenda items and diminishing its historic pro-conservation role within CITES. The administration has also suspended funding for international conservation projects and anti-trafficking programs administered by various US agencies, including the US Agency for International Development (USAID) and the State Department's Bureau of International Narcotics and Law Enforcement Affairs (INL). Nevertheless, the committee made progress on several issues involving elephants, sharks, great apes, rhinoceroses, and other species,

as well as on implementation issues regarding trade in captive-bred animals and other matters.

Compliance issues involving a dozen countries were also discussed. Disappointingly, the committee chose not to recommend a trade suspension against Mexico for its ongoing failure to stop the illegal trade in totoaba swim bladders. Instead, it directed Mexico to continue to report on implementation of its totoaba Compliance Action Plan at future CITES meetings. The committee did, however, soundly reject Mexico and Canada's proposal to introduce consideration of the negative economic impact of trade suspensions on third parties, including traders—an attempt to make trade suspensions in cases of persistent noncompliance even less likely.

AWI is now preparing for CoP20 where its delegation, working with allied organizations and governments, will support the integrity of CITES and the listing of several imperiled species to protect them from detrimental international trade.

FUNDING FREEZE PUTS KEY RED WOLF RECOVERY PROJECT ON ICE

In December, the Federal Highway Administration announced that the North Carolina Department of Transportation (NCDOT) had won a Wildlife Crossings Pilot Program grant competition and would receive \$25 million to build new wildlife crossing structures on US Route 64 through the Alligator River National Wildlife Refuge to help save endangered red wolves from extinction. Multiple groups, including AWI, the Center for Biological Diversity, and Wildlands Network, wrote letters in support of NCDOT's application and pledged additional funding.

The Trump administration's freeze on federal funds already appropriated by Congress, however, may turn glad tidings to gut punch. As of mid-March, NCDOT has not received its grant, and it is unclear at this point whether funds will ever arrive.

Vehicle strikes are now the leading cause of red wolf deaths. Six red wolves have been killed on US 64 within the past five years. Most recently, in June 2024, a breeding male was killed on the highway, a loss that led to the deaths of his five young pups. A new study from Wildlands Network (funded in part by AWI) found that, during a four-month period last year, over 2,400 animals were killed by vehicles on US 64, including more than 700 turtles, 700 snakes, 600 amphibians, 100 birds, six river otters, two black bears, and two bobcats. Scuttling this crossing project, therefore, would not only throw a wrench in red wolf recovery efforts, but also sentence many thousands more animals to death by vehicle strike.

Day-One Executive Orders Will Decimate Wildlife Habitat

On his first day back in office, President Trump signed multiple executive orders designed to advance policies that are disastrous to wildlife and their habitats. The orders expand oil and gas drilling, mining, and logging; undermine bedrock environmental laws; and withdraw the United States from an important international climate agreement. If fully implemented, the orders will exacerbate the climate crisis and erode critical protections for America's public lands and waters and the wildlife they support.

Invoking the National Emergencies Act, Trump declared the first-ever "national energy emergency" to facilitate leasing, production, transportation, and refinement of energy resources on federal lands. The order directs multiple agencies, including those responsible for implementing the Endangered Species Act (ESA), to operate under emergency provisions, which often allow for truncating important consultations and other processes designed to limit environmental harm.

The ESA's emergency rules, once invoked, require the US Fish and Wildlife Service and the National Marine Fisheries Service to do nothing more than issue nonbinding recommendations to other federal agencies on ways to mitigate harm to species and habitats from agency projects. Formal consultation with the agency on the projects' impacts on threatened and endangered species is deferred until after the harm has already occurred. The emergency declaration also requires four meetings per year of the Endangered Species Act Committee (often referred to as the "God Squad"), which has met only six times previously in the ESA's entire 50-year history. The committee may, under certain circumstances, exempt a federal

agency's action from the prohibitions of the ESA, giving it the authority to potentially doom a species to extinction.

Another executive order abandons the previous administration's commitment to conserve 30 percent of the nation's lands and waters by 2030 and lifts bans on offshore oil and gas drilling in public waters off the Alaska, Atlantic, Gulf, and Pacific coasts. A separate order reopens oil and gas leasing in Alaska's extremely fragile and ecologically vital Arctic National Wildlife Refuge and repeals protections in the state's Tongass National Forest, potentially ushering in industrial-scale logging of irreplaceable old-growth forest that provides habitat for hundreds of species.

Trump also issued an order directing the United States to withdraw from the Paris Agreement, an international treaty to limit global temperature increases by cutting fossil fuel emissions that was adopted by 195 nations in 2015. This action mirrors a similar directive issued by Trump in 2017 during his first term, making the United States the only nation to withdraw from the agreement—now twice. (In 2021, President Biden reversed the previous directive.)

A further order seeks to strip civil service and due process protections from tens of thousands of federal employees, a prelude to dismantling programs and dismissing much of the federal workforce, including the personnel needed to protect endangered species and habitats and address climate change. (See page 19.)

Expanding fossil fuel production and reneging on climate commitments ignore the grave consequences of climate change that are compounding many species' declines. Importantly, many of these orders require additional actions from Congress or federal agencies to achieve the stated objectives, which provide opportunities for the public to oppose those actions. AWI urges all animal advocates to join us in the fight to protect the wild animals who call our public lands and waters home. 🐾





A CALL TO ADVOCATES:

Answer the Assault on Animal Welfare

For animals and those who care about their welfare, the outlook in our nation's capital is bleak. In January, the second Trump administration and majority leadership in the 119th Congress assumed office with the stated objectives of dismantling many federal agencies and programs, including those responsible for protecting and regulating the treatment of animals, and of rolling back key environmental and animal protection laws.

The previous Trump administration presided over an unprecedented series of actions that weakened animal protections. While some of the damage was undone during the intervening years, a flurry of executive orders issued since President Trump

returned to the White House (see page 13) served as the initial volley in an accelerated and amplified assault on animal welfare.

This landscape makes AWI's work far more challenging and far more urgent. Though difficult times are ahead, one of AWI's most powerful assets has always been the collective engagement of our members, who unfailingly respond to our calls to contact legislators, other government officials, and corporate leaders to voice support for protecting animals. In the midst of this current concerted assault, such engagement takes on heightened importance.

This article highlights nine critical animal protection statutes that face

the greatest risk of being undermined in the coming months and years. AWI was instrumental in getting many of these laws enacted with widespread bipartisan support. Today, we rely on them extensively to advance our mission, and we need your help to defend them.

This article also highlights proactive opportunities to support certain federal and state measures that would strengthen animal protections. Lastly, we will tell you how you can use AWI's Action Center to enhance your engagement on important issues. Above all, and by whatever available means, please continue to speak up for animals. Your voice matters—now more than ever.

■ ANIMAL WELFARE ACT

The Animal Welfare Act (AWA) of 1966 is the main federal law that establishes minimum standards of humane care for animals in research, public display (including circuses, aquariums, and roadside zoos), and commercial trade (including breeders and dealers). Not all animals are covered, nor all uses, but the law does protect many animals from suffering—when it is enforced properly. Achieving adequate funding for such enforcement has tended to be a bipartisan effort.

AWI is taking a number of steps to head off efforts to cut staffing and funding and otherwise curtail enforcement and discourage inspectors from doing their jobs. Even as we seek to shield the AWA from attempts to weaken it, we are also working to fix longstanding issues with the enforcement mechanisms and to ensure that suffering animals are removed from abusive conditions. This includes tightening the inspection process and closing loopholes in the licensing process to prevent chronic violators from staying in business.

■ ENDANGERED SPECIES ACT

The 1973 Endangered Species Act (ESA) is the world's most powerful and successful conservation statute. It currently protects around 2,400 domestic and foreign species that are listed as threatened or endangered. The goal of the ESA is to prevent extinction by safeguarding members of the species while conserving the ecosystems necessary for populations to recover.

Once a species is listed as endangered or threatened under the law, it is protected from “take,” which includes killing, wounding, and harassing. AWI's terrestrial and marine programs have used the ESA to help save the red wolf from extinction in the wild and champion greater protections for critically endangered North Atlantic right whales and vaquita porpoises. In recent years, petitions from AWI and allies resulted in ESA listings for the Taiwanese white dolphin and the Atlantic humpback dolphin and a pending proposal by the US Fish and Wildlife Service (USFWS) to list the pygmy three-toed sloth. We also focus on limiting commercial trade of species listed under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which the United States implements through the ESA.

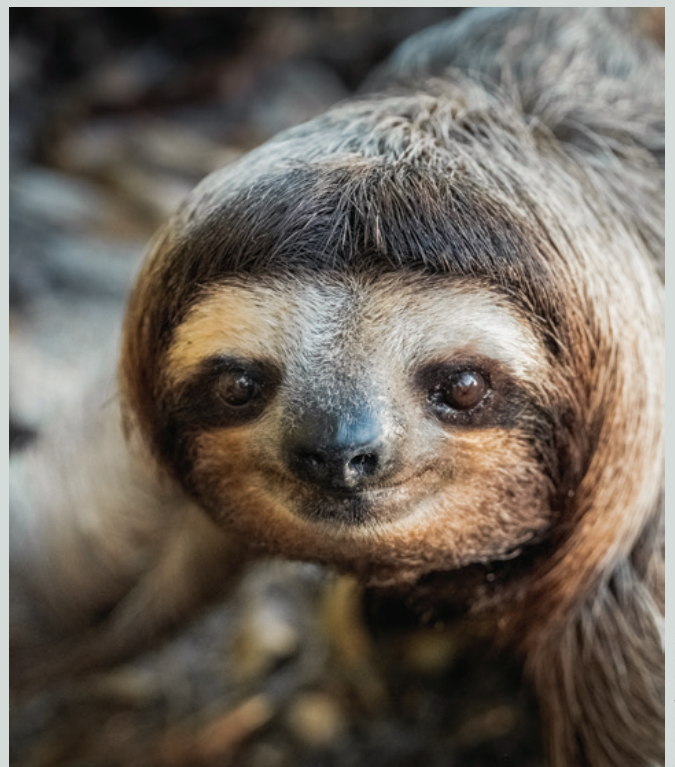
The ESA experienced extensive regulatory rollbacks under the first Trump administration. While the Biden administration partially reversed these rollbacks, the current Trump administration has issued an executive order to rescind the Biden-era regulations. Last Congress, we fought off 115

legislative attacks on the ESA. Many of those same bills or amendments have already been reintroduced, so we must continue the fight to preserve this vital law. With 1 million species globally at risk of being lost forever, the ESA is the best tool that we have to stem the tide of extinction.

■ MARINE MAMMAL PROTECTION ACT

Marine mammals are vital to ocean ecosystems. Recognizing the threats these species face from human activities, Congress set a global standard for conservation in 1972 by passing the Marine Mammal Protection Act (MMPA) with bipartisan support. The MMPA prohibits harassing, hunting, capturing, or killing marine mammals without federal authorization. Regulation under the law extends to unintentional harm such as fisheries bycatch, as well as permits for public display, scientific research, and “enhancement” (i.e., activities to aid recovery) of marine mammal species or populations.

There have been remarkable conservation successes under the MMPA. Pinnipeds such as the northern elephant seal and California sea lion, and cetaceans such as the humpback whale and bottlenose dolphin, have rebounded since the law's enactment. Yet myriad threats to marine mammals persist—most notably, continued global fisheries bycatch, ship strikes, marine pollution, anthropogenic ocean noise, and climate change. AWI remains committed to safeguarding marine wildlife by defending the MMPA from harmful



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amendments and working to shield the agencies that implement this vital law from funding, programmatic, and staffing cuts. With ongoing challenges, public support is crucial to our advocacy for science-based policies that fulfill the mandate of the MMPA.

■ NATIONAL ENVIRONMENTAL POLICY ACT

The National Environmental Policy Act (NEPA), signed into law in 1970, is the national charter for the protection of the environment. NEPA's primary function is to promote efforts to prevent or mitigate damage to the environment from federal activities. It requires federal agencies to use the best information and rigorous scientific analysis to assess significant environmental impacts of projects before they begin and to consider a range of mitigation alternatives.

Wildlife management plans, logging, highway construction, mining, oil and gas exploration, and power plant construction are some of the projects that may be subject to NEPA review. Factors considered in such reviews include impacts on wildlife (including protected species), habitat, animal welfare, air and water quality, climate change, environmental justice, and public health.

AWI uses NEPA, among other ways, to contest plans to kill certain wildlife populations in national parks and wildlife refuges, to challenge the lethal control conducted by the US Department of Agriculture's Wildlife Services program, and to protest wild horse and burro roundups.

The current administration has taken extraordinary measures to gut NEPA by issuing an interim final rule that will rescind over 50 years' worth of regulations that implement the statute, sowing profound uncertainty for conservationists

and industry alike. AWI will fight all efforts to eviscerate NEPA implementation and to avoid the public scrutiny and participation that is essential to fulfilling NEPA's fundamental purpose: to preserve wildlife, wild lands, and a healthy environment.

■ HUMANE METHODS OF SLAUGHTER ACT

Enacted in 1958, the Humane Methods of Slaughter Act (HMSA) is one of only two federal statutes explicitly aimed at promoting farmed animal welfare. The law requires that livestock be slaughtered using "humane methods" that are "rapid and effective" and render the animals insensible to pain prior to their being shackled, hoisted, or cut. USDA regulations implementing the law also prohibit certain forms of abuse while animals are in slaughter plants, such as beating them with pipes and dragging disabled animals.

While it offers meaningful protections, the HMSA falls short in many ways. The USDA has thus far interpreted the law to apply only to mammalian livestock such as cattle and pigs and not to birds, who constitute roughly 98 percent of the land animals killed for food in the United States each year. Further, HMSA regulations do not address important aspects of the slaughter process such as worker training and maintenance of stunning equipment.

AWI campaigns for regulatory reforms to address these shortcomings, and we monitor and report on evidence of abuse at slaughter facilities and on the effectiveness of the USDA's enforcement efforts. Where there is evidence of repeated or egregious mistreatment, we seek permanent suspensions of plant operations and criminal prosecutions for animal cruelty. We also oppose ongoing efforts in Congress to expand special exemptions that allow plants to skirt regular federal inspection.



■ HORSE PROTECTION ACT

The Horse Protection Act (HPA) was enacted in 1970 to prevent the “soring” of Tennessee walking horses. Soring involves deliberately inflicting pain on a horse’s hooves and legs to elicit an unnatural, high-stepping gait for competition.

Despite the HPA’s enactment, soring abuse has persisted for decades—largely due to an inadequate inspection system whereby horse shows are permitted to appoint their own inspectors. Both a USDA Office of Inspector General audit and a National Academies of Sciences, Engineering, and Medicine report emphasized the inherent conflicts of interest with the current industry-run inspections that allow soring to persist.

Regulations to strengthen the HPA and reform the inspection system—over a decade in the making and widely supported by the public, members of Congress, veterinary groups, and other stakeholders—were slated to go into effect on February 1 of this year. The USDA, however, has postponed full implementation until at least February 1, 2026.

A prior iteration of these regulations was frozen by the first Trump administration in 2017. As rationales for postponement this time around, the USDA cited ongoing litigation brought by the Tennessee Walking Horse National Celebration (the largest show for the breed), as well as the “Regulatory Freeze Pending Review” presidential memorandum issued on Trump’s first day back in office. AWI will continue to urge adoption of these long-awaited regulations, which cannot come too soon for the Tennessee walking horses who endure this senseless cruelty.

■ WILD FREE-ROAMING HORSES AND BURROS ACT

AWI’s efforts to protect wild equines date back almost to the organization’s founding, during an era when mustangs were routinely rounded up and slaughtered. The 1971 Wild Free-Roaming Horses and Burros Act was enacted because equines were “fast disappearing from the American scene.”

The law tasked the Bureau of Land Management and the US Forest Service with humanely managing our nation’s wild herds. Over the years, however, both agencies have pursued a misguided and reckless approach predicated on mass roundups, whereby horses are permanently removed from the range and shunted into off-range holding for the rest of their lives. According to BLM data, over 68,000 wild equines are currently in holding while roughly 73,500 remain on the range across millions of acres of designated habitat in 10 western states.

Although countless Americans cherish wild equines and the beauty and freedom they represent, some special interests continue to push for lethal population control and even commercial slaughter to drastically reduce the number of wild horses and burros on the range. AWI has long worked to ensure that annual federal spending packages include provisions that bar such inhumane options. Moreover, we’ve worked to secure language directing the BLM to increase its use of immunocontraceptive vaccines—a humane alternative to brutal and chaotic helicopter roundups that would allow herds to remain relatively undisturbed in their natural habitats. We continue to fight for wild horses in the courts as well: Our lawsuit to stop the BLM from eliminating millions of acres of designed wild horse habitat in Wyoming is currently before the US Court of Appeals for the Tenth Circuit.

■ ORGANIC FOODS PRODUCTION ACT

The recently revised organic livestock and poultry standards apply to animals raised under the National Organic Program (NOP), established under the Organic Foods Production Act of 1990. They are the first federal care standards created for any farmed animals while they are on farms. For animals within the NOP, the regulations now prohibit certain types of mutilations, such as cutting off the tails of pigs and cattle, cutting off the beaks of chickens, and cutting strips of skin off the buttocks of sheep (a process known as “mulesing”). They also prohibit extreme confinement, require outdoor access, and prohibit transport of animals unfit to travel.

AWI was extensively involved in the development of these standards. In January 2017, the Obama administration finalized a prior version of the regulations, but the first Trump administration withdrew them. However, the Biden administration revived the process and finalized the regulations in 2023. The current Trump administration has not yet indicated an intent to withdraw them, but if it does, AWI stands ready to defend them. While not perfect, the organic welfare standards improve the lives of millions of farmed animals and better align the USDA Organic label with consumer expectations regarding the welfare of animals raised organically.

■ MIGRATORY BIRD TREATY ACT

The 1918 Migratory Bird Treaty Act (MBTA) protects over 1,100 species of birds and their eggs from take (including killing, capturing, selling, trading, and transport) without a permit. This prohibition covers both intentional take and incidental killing stemming from an otherwise lawful activity.

During the first Trump administration, the USFWS issued a new policy reversing the agency's decades-long interpretation that the MBTA prohibits the incidental killing of migratory birds protected under the law. This change was implemented to shield the oil and gas industry and electric utilities from liability for the millions of birds their operations kill each year. It allowed these industries to forego reasonable and cost-effective precautions to avoid deaths. While this policy was deemed by a court to be illegal and was reversed by the Biden administration, the current Trump administration has issued an executive order to reinstate it. If the reinstated policy is allowed to stand, it will likely once again cause the deaths of millions of birds in the coming years.

■ PROACTIVE 2025 PRIORITIES

While we are strongly focused on maintaining the integrity of the important federal laws outlined above, we are also campaigning for state and federal bills that would advance animal protections in other areas. The following are some of the bills we are rallying support for in Congress:

- Save America's Forgotten Equines (SAFE) Act, to prohibit the slaughter of horses in the United States for human consumption and the export of live horses for the same purpose
- Child and Animal Abuse Detection and Reporting Act, to require that data collected by the federal government from state child protection agencies include information about animal abuse as a risk factor for child abuse
- Opposing the Cultivation and Trade of Octopus Produced through Unethical Strategies (OCTOPUS) Act, to prohibit the commercial farming of octopus in the United States and the importation of octopus from commercial farms elsewhere
- Developing Alternative Mitigation Systems (DAMS) for Beavers Act, to establish a federal grant program to fund the use of nonlethal beaver management systems
- Strengthening Welfare in Marine Settings (SWIMS) Act, to phase out the captivity of larger cetacean species such as orcas and beluga whales
- Captive Primate Safety Act, to end the pet primate trade in the United States

At the state level, we are seeking to advance bills on a range of topics, including the following:

- Restricting mink farming and banning the sale of new fur products
- Expanding prohibitions on exotic pet ownership
- Ending wildlife killing contests



BETH BAISCH

- Strengthening coordination between law enforcement and other agencies related to domestic violence and animal abuse
- Prohibiting gestation crates, battery cages, and other forms of extreme confinement of farmed animals
- Updating fire safety codes to prevent deadly barn fires
- Reforming aquaculture practices, such as prohibiting net pen fish farming
- Prohibiting the use of wild animals in traveling shows

■ AWI'S ACTION CENTER

AWI's Action Center keeps you informed and provides simple ways to take action on important measures. You'll be notified via email when key animal welfare legislation and policies are under consideration in Congress, the White House, state legislatures, federal and state agencies, company boardrooms, and other influential forums around the world. The email messages will link to our Action Center, from which you can quickly and easily contact federal and state policymakers, draft regulatory comments, and sign petitions.

Your voice is important, and together, our voices make a difference. If you are not already signed up for our alerts and would like to be, please visit awionline.org/alerts. Given the current climate in Washington, we must continue to be a voice for the voiceless—defending hard-won animal protections and seeking to improve animal welfare in pursuit of our grand vision: a world where no animal suffers because of humans. 🐾

EXTOLLING SUSTAINABILITY AT SEAFOOD EXPOS

AWI is once again attending two key seafood industry events: Seafood Expo North America in Boston in March and Seafood Expo Global in Barcelona in May. Among the world's largest seafood industry trade shows, these events draw tens of thousands of attendees from more than 150 countries. The expos provide us with an opportunity to meet with industry representatives, government agencies, certifiers, traceability groups, and allied animal protection and conservation groups.

The seafood industry has enormous power to help the world's oceans through a commitment to sustainable fishing. Many of the companies in attendance, however, have ties to shark finning, bycatch of endangered and protected species, and commercial whaling. At the expos, AWI and allies meet with key suppliers and buyers from the seafood industry to urge them not to support these inhumane and unsustainable practices.

Seafood certification groups also play a key role in promoting sustainable practices. Their logos affixed to seafood product packaging are meant to assure consumers that the certifier has verified that the products come from fisheries with strong conservation measures in place. In reality, however, many seafood certifiers have weak standards, and their seal of approval is no guarantee that the products are wildlife friendly. At both events, AWI meets with representatives of seafood

certifiers to share our continued concern that their eco-labels are misleading consumers and their standards need to be more rigorous.

CUTS TO NOAA CAST SCIENCE ADRIFT

The National Oceanic and Atmospheric Administration is well known for its weather-related work, which for decades has included studying the science of climate change. Less familiar to the general public are the functions of NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), which is dedicated to the protection of marine wildlife, fisheries management and bycatch issues, and ecosystem and habitat conservation. NMFS is responsible for implementing numerous environmental laws, and its programs range from domestic and regionally focused efforts to international wildlife protection.

The issues that NOAA regulates reside at the heart of AWI's Marine Wildlife Program, and under the Trump administration, the agency is in trouble. Reports indicate plans to

slash NOAA's workforce by at least 20 percent and its budget by 30 percent, in line with broader efforts to dismantle climate-related agencies and privatize weather data. These forces are already in motion despite the administration's failure to follow appropriate legal procedures. Further complicating matters, NOAA staff have been directed to halt international engagements, including routine collaborations with foreign scientists.

Diminishing or dismantling NOAA will have staggering effects not only on marine wildlife, but also on the American public. Heightened vulnerability to extreme weather and increased threats to marine ecosystems through overfishing and weakened oversight of ocean conservation would pose major risks to our communities, economies, and public safety. Undermining important ocean research, international conservation initiatives, and scientific cooperation, meanwhile, would have global ramifications. Federal lawmakers have called for an investigation into the potential repercussions of such cuts on coastal resiliency and public safety.

marine wildlife

Citizens rally in Washington, DC, to protest staffing and funding cuts to NOAA—cuts that will render the agency unable to continue much of its critical scientific work to safeguard people and marine life.



NAOMI ROSE



The Captive Display Industry Fights Back

SINCE 2013, with the release of the documentary *Blackfish*, the campaign to end the captive display of cetaceans has made strong progress. Locations where free-ranging cetaceans were still captured for sale to dolphinariums have shuttered operations; legislation restricting or phasing out captive display of cetaceans has passed in several countries; and (outside of China) the number of captive cetaceans held for display has declined.

Not surprisingly, dolphinariums are doing what they can to turn the tide. They and their adherents have published scientific papers purporting to show that captive display benefits cetaceans, while sanctuaries would be dangerous for them. Since 2012, they have tried to import new breeding stock (other than bottlenose dolphins, most species are held in such small numbers that inbreeding is a risk), but have failed so far, due to the efforts of AWI and other organizations. Dolphinariums are also heavily promoting their work with stranding networks. AWI accepts that there will always be rescued cetaceans who are non-releasable, which is one reason we support establishing sanctuaries. For now, such animals are held by dolphinariums.

Most recently in the United States, dolphinariums have begun an effort to reclassify “public display” as “research” and/or conservation “enhancement” under the Marine Mammal Protection Act (MMPA). Under this landmark law, these are the three allowed purposes for holding marine mammals in captivity. When the marine mammal is listed under the Endangered Species Act (ESA), however, only research and/or enhancement are allowed. Enhancement, by regulatory definition, means breeding and returning the resulting progeny to the wild to augment declining populations, which to date has never been done by US cetacean facilities.

Waikiki Aquarium

The Waikiki Aquarium in Honolulu focuses on displaying local species. They have held various endangered Hawaiian monk seals in the past. They now hold one male, Hō‘ailona (aka KP2), who is presently at Long Marine Laboratory in Santa Cruz, California, where the facility is conducting research under an expiring MMPA permit. The Waikiki Aquarium is applying for a new permit, this time for enhancement.

However, the aquarium does not intend to breed KP2, let alone return any of his offspring to the wild. (It explicitly states it will not conduct research with him either.) Therefore, this permit would in fact be for public display only—which, again, is not allowed for endangered species under the MMPA.

AWI sees the current application as an effort to blur the lines between the three types of MMPA permits, so that displaying animals becomes *de facto* enhancement. The permit application devotes an entire section to describing the husbandry of maintaining KP2 in captivity, claiming it is “enhancement,” in the sense of enhancing his *individual welfare*. But “enhancement” legally means enhancing the *conservation of the species*. A captive marine mammal’s individual welfare is addressed under the Animal Welfare Act, not the MMPA.

Our public comments urge the government to insist that the Waikiki Aquarium apply for a research permit and submit a research proposal for KP2—it should not even consider this permit request as it stands.

SeaWorld San Antonio

The Cook Inlet beluga whale population in Alaska is listed as endangered under the ESA. In 2017, Tyonek, a month-old male, was rescued there and deemed non-releasable, due to his age and inability to learn survival skills. He was sent to SeaWorld San Antonio soon after for permanent holding, with the understanding that he would be the subject of research, primarily to aid in the recovery of the Cook Inlet population.

Research permits must be renewed periodically. SeaWorld has duly applied to renew Tyonek’s permit, but its application has a number of weaknesses. AWI will urge the government to require revisions to the research proposal and insert certain

provisions in the permit. For any behavioral research, the proposal should detail the hypotheses to be tested, with replicable methodology and an explanation as to how the research is relevant to Cook Inlet beluga conservation. (The current proposal is vague and does not specify how one animal who developed his present behavior while being raised with unrelated animals at SeaWorld can produce research results of relevance to his natal population.) Any research permit issued must specify that (1) breeding Tyonek is prohibited and (2) any proposal for moving Tyonek to another facility must be made in consultation with the relevant government agency, which has the final decision-making authority for any move.

Clearwater Marine Aquarium

Clearwater Marine Aquarium is a Florida rescue facility that for years has been responding to injured and stranded marine wildlife, rehabilitating and releasing them back to the wild, and, when necessary, providing permanent homes for non-releasable individuals. It currently holds two rough-toothed dolphins and three common bottlenose dolphins, all of whom were rescued very young or with injuries or conditions that rendered them non-releasable.

To provide better conditions for the permanent residents and more room for rescues, Clearwater Marine Aquarium undertook a substantial expansion (completed in 2021), building a new dolphin facility that features more space than the original facility. However, rather than reserve the added space for future rescues, the aquarium seeks to fill it with five captive-born male dolphins from Greece. It has applied for an import permit for these animals, claiming they need a home after the Greek facility decided to close its dolphin exhibit.

Among other reasons, AWI opposes this import because (1) these captive-born dolphins should remain in the European Union rather than become part of the unsustainable international trade in live cetaceans, and (2) the Greek facility operated for a decade in violation of Greek law prohibiting animal performances in zoos and aquariums and only chose to close its dolphin exhibit when the Greek government finally enforced this law. Under the MMPA, the source of any marine mammal import must be in compliance with domestic law. Clearly, the Greek facility did not meet that standard for many years. There is no mention of this history in the application.

AWI will continue to counter any efforts by dolphinariums to rebrand themselves as saviors rather than exploiters of marine mammals. 🐬

The Clearwater Marine Aquarium, shown here, is one of three facilities whose permit applications related to the acquisition and holding of marine mammals run afoul of MMPA provisions. Photo by Naomi Rose.



AWI FUNDS WELFARE REFINEMENT EFFORTS

Every year, AWI provides financial support for the creation and implementation of “refinement” initiatives meant to advance the welfare of animals used in research through improved housing, husbandry, handling, or care. The Refinement Research Award supports research projects that explore novel refinement methods, and the Implementing Refinement Grant funds the purchase of equipment or training to implement existing (known) refinements.

AWI is pleased to announce two recipients of the Refinement Research Award and eight recipients of the Implementing Refinement Grant for the 2024 funding cycle:

Refinement Research Award

Dr. Michael Brunt of MWB Research Consulting Services to survey public attitudes around current research practices involving insects.

Dr. Samuel Olutunde Durosaro of Indiana University, Indianapolis to develop species-specific protocols for adequate anesthesia of insects, including cockroaches, crickets, and yellow mealworms.

Implementing Refinement Grant

Dr. Diana Coulon of Pennington Biomedical Research Center to purchase materials for climbing and perching for rodents, encouraging species-specific behaviors and providing new places to explore and hide.

Ioan Cozma of the Research Institute of the McGill University Health Centre for the purchase of tree branches to promote natural tree-gouging behaviors in a marmoset colony.

Joshua Ejdelman of the Research Institute of the McGill University Health Centre for the purchase of low-noise and low-vibration wheels for

transport carts to reduce stress during intra-facility animal transportation.

Tania Liboiron of the University of Saskatchewan for the purchase of large, double-decker cages and enrichment items for rats to provide environmental complexity and to allow for social housing without overcrowding.

Dr. Kerith Luchins of the University of Chicago to purchase handling tunnels for mice and to implement their use facility-wide as a non-aversive alternative to picking up mice by their tails.

Dr. Carly Moody of the University of California, Davis to purchase elevated platforms and shelters for mice and create educational infographics about the benefits of these enrichment items.

Dr. Vanessa Oliver of the University of Calgary to purchase pens, toys, and shelters to implement an exercise program for rabbits that will enhance physical, mental, and social stimulation.

Jenna Owens of Texas Biomedical Research Institute to build cooperative enrichment items for singly housed primates, which allows for social play between neighboring individuals.

THE UK INVESTS IN NON-ANIMAL RESEARCH METHODS

An important but underacknowledged barrier to reducing and replacing the use of animals in research and testing is that few researchers are trained in how to use *non*-animal methodologies. To help address this gap, the Queen Mary University of London recently launched the new Centre for Doctoral Training in Next Generation Organ-on-a-Chip Technology. Organs-on-a-chip are lab-grown, three-dimensional miniature organs that can be used instead of animals to study medicines and diseases. (See *AWI Quarterly*, spring 2020.) Over the next eight years, through a grant from the UK government’s Engineering and Physical Sciences Research Council, the center will train 60 PhD students to join a new generation of scientific experts in the use of organ-on-a-chip technology. To complement the training center, the university also launched one of Europe’s “largest and most advanced” organ-on-a-chip facilities to accelerate the development and adoption of this cutting-edge technology.



ANWA



Stills from natural landscape videos shown to monkeys in laboratories. Researchers used a grant from AWI to seek indicators that exposure to these videos has a positive effect on the animals' welfare.

ENHANCING THE AUDIO-VISUAL ENVIRONMENT FOR NONHUMAN PRIMATES

by Jeannine Cason Rodgers, enrichment, behavior and training specialist, and Dr. Christopher Cheleuitte-Nieves, senior clinical veterinarian, the Memorial Sloan Kettering Cancer Center and Weill Cornell Medicine; and Eme Chan, student at Cornell University College of Veterinary Medicine at time of study

Nonhuman primates housed in indoor laboratory environments are generally exposed to blank walls. This environment is not ideal for species whose primary sensory modality is visual. The aim of this study, which was funded by an AWI Refinement Research Award, was to assess the potential welfare benefits of providing a passive natural audio-visual stimulus to macaques.

Four long-tailed macaques were exposed to videos depicting scenes and sounds of natural landscapes projected onto the walls of their rooms. Urine cortisol:creatinine ratio levels—an

indicator of stress—were gathered weekly, and behavior was scored from video recordings before, during, and after removal of the enrichment (four weeks in each condition).

Urine cortisol:creatinine ratios trended upward during visual enrichment and fell back to baseline levels after removal of enrichment; this trend may indicate a normal response to novelty. Behavioral analyses showed a decrease in stereotypies (abnormal, repetitive behaviors), such as rocking or pacing, during the study. Specifically, there was a trend toward a decrease in stereotypies when visual enrichment was present, and a further significant decrease after its removal. Positive behaviors increased during visual enrichment and decreased with its removal; these included allogrooming, cuddling, locomoting, observing (mirror), playing, and resting.

This study has provided preliminary evidence that projection of natural audio-visual stimuli as a form of environmental enrichment holds the potential to decrease stereotypies among indoor laboratory macaques.

EFFECTS OF COGNITIVE TESTING ON SALIVARY CORTISOL MEASURES IN LEMURS

by Raymond Vagell, PhD candidate at Texas State University

Cognitive research using nonhuman primates is common, yet little is known about the effects of cognitive research on the animals themselves. This project, funded by an AWI Refinement Research Award, sought to understand whether cognitive testing induced an arousal response in lemurs by measuring cortisol before and after a cognitive testing condition or a control condition.

Cortisol is secreted to regulate the body's arousal response, and increased cortisol levels can be an indicator of stress or excitement. Here, the cortisol levels of seven black-and-white ruffed and red ruffed lemurs from the Duke Lemur Center were measured noninvasively by having the lemurs chew on cotton swabs covered in dried fig pulp. Samples were taken before and after interaction with a cognitive touchscreen, and before and after a control condition without a cognitive touchscreen.

We found that interaction with a cognitive touchscreen induced higher secretion of salivary cortisol. We cannot say, however, whether this increase in salivary cortisol is indicative of a positive response (excitement) or a negative response (stress). More research is needed in order to distinguish between these possibilities.

PRIMATES IN CONTEXT:

An Outsized Demand for Monkeys Reshapes the Research Landscape

A number of recent articles in the *AWI Quarterly* have addressed issues related to the use of nonhuman primates in research: from an alleged international monkey-laundering scheme, to a research industry bid to reverse a species' endangered listing, to plans for a massive primate breeding facility in Georgia.

Why are these primate-related issues occurring all at once? This article will supply relevant background information and provide a larger framework that explains the connections.

PRIMATE SHORTAGE

Approximately 105,000 primates are used or held for research and testing in the United States each year. Between 15,000 and 35,000 primates are imported annually, and at least 90 percent of those imports are long-tailed macaques (LTMs). The majority of imported LTMs are used or resold by pharmaceutical companies, contract research organizations, and other for-profit entities.

Demand for LTMs—the primate of choice for infectious disease research by drug- and vaccine-development companies—skyrocketed during the COVID-19 pandemic. China had previously been the US research industry's primary source of LTMs. In 2020, however, after a live wildlife market in China was identified as a likely point of origin for the pandemic, China banned nearly all trade in wildlife, effectively freezing LTM exports. This precipitated a primate shortage that has dramatically reshaped the US primate research landscape.

SMUGGLING INDICTMENT

With the sudden shutdown of China exports, Cambodia stepped in to become the US research industry's principal primate supplier, at enormous profit: Between 2019 and 2022, the value of the Cambodian monkey export business reportedly surged from an estimated \$34 million to \$253 million, and the selling price of a single monkey skyrocketed from an estimated \$3,000 to \$50,000 or more.



Monkeys imported into the United States for experimentation are typically captive-bred, since wild-caught monkeys can harbor diseases that may endanger human health and affect research outcomes. US demand, however, quickly outstripped Cambodia's supply of captive-bred LTMs. Rather than curtailing the lucrative exports, two Cambodian government officials and six individuals with ties to a monkey-breeding operation allegedly engaged in an international conspiracy to launder wild-caught LTMs by swapping paperwork that falsely reclassified thousands of wild-caught monkeys as captive-bred, according to a federal indictment. (See *AWI Quarterly*, winter 2022.) One official was later acquitted. US-based research industry giant Charles River Laboratories is also under federal investigation for its conduct related to Cambodian LTM imports.

LONG-TAILED MACAQUES' ENDANGERED STATUS

In March 2022, the International Union for Conservation of Nature (IUCN)—the global authority on ecosystem health and biodiversity—uplisted LTMs from “vulnerable” to “endangered” on its Red List of Threatened Species. This designation was based on a scientific assessment that cited accelerating demand from the biomedical research industry as a contributing factor to LTMs' population decline. Red List designations inform species listings under the Convention on International Trade in Endangered Species of Wild Fauna and Flora and the US Endangered Species Act, which can result in wildlife trade restrictions.

In response, the National Association for Biomedical Research (NABR)—an industry-funded, pro-animal-research lobbying group—filed a petition with IUCN challenging the endangered designation. (See *AWI Quarterly*, fall 2023.) After reviewing NABR's petition, an IUCN committee found that “there appears to be adequate evidence to support the current [endangered] listing” but asked the original assessors to submit a revised evaluation that includes additional scientific data and a breakdown of the relative impact of proposed contributing factors on population size. The reassessment has been submitted and is currently under review.

DOMESTIC BREEDING

The primate shortage and uncertain access to future imports have prompted some researchers to call for increased domestic breeding. In 2024, a new company, Safer Human Medicine (SHM), headed by industry insiders who held leadership roles in companies with troubling animal welfare histories, proposed building a massive LTM breeding facility in Bainbridge, Georgia. At peak capacity, the complex would hold 30,000 LTMs—at least triple the number of monkeys

currently housed at any other US breeding facility. Although court battles spurred by local opposition have left this project in limbo, the company is charging ahead: It recently purchased a Florida facility from Charles River Laboratories to quarantine and hold LTMs, ostensibly in anticipation of sending them on to the planned Georgia facility.

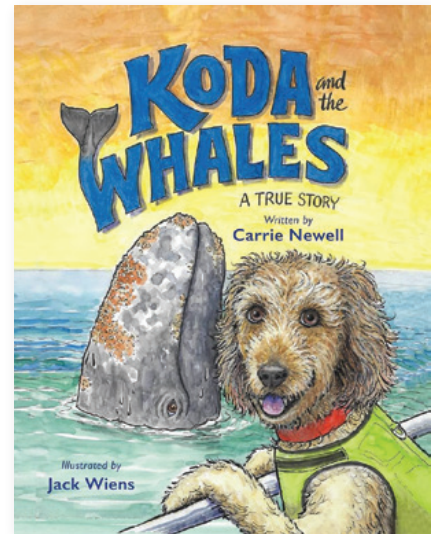
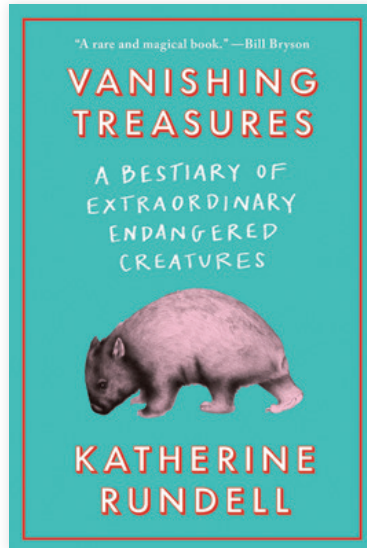
Given the precarious status of the wild LTM population and concerns over the legitimacy of Cambodian exports, AWI believes that international trade of LTMs should stop. But increased domestic breeding is no panacea, particularly in light of the abysmal Animal Welfare Act records of existing, *smaller* US breeding facilities. Federally funded National Primate Research Centers, for instance, have notoriously poor welfare records. (See *AWI Quarterly*, spring 2024.) And Alpha Genesis, Inc. (AGI), which operates a facility one-third the size of the proposed SHM site, has been dogged by whistleblower complaints and USDA inspection reports that chronicle repeated monkey escapes, injuries, and deaths—including, most recently, 43 monkeys escaping into the surrounding neighborhood and 22 monkeys dying from carbon monoxide poisoning two weeks later. AGI's CEO reportedly downplayed the severity of the allegations: “In the context of caring for over 10,000 monkeys ... adverse incidents do occur in isolation.” One can only imagine how many “adverse incidents” might occur at larger facilities.

TIME TO TURN THE PAGE?

Against a backdrop of a dwindling wild LTM population, the increased demand for LTMs and reduction in reliable import sources have created opportunities for huge profits, incentivizing illicit trade in wild-caught LTMs and the construction of enormous for-profit domestic breeding facilities.

A report by a committee of scientists (half of whom are primate researchers) states that research with primates is “necessary for both public health and national security.” Yet the future of international trade and domestic breeding is uncertain at best, and either option would be accompanied by animal welfare, conservation, and public health concerns that have only increased in light of the current research landscape.

The biomedical industry faces a reckoning. As one industry consultant questioned in an article in *Science*: “Are we in the drug discovery business, or are we in the monkey breeding business?” In AWI's view, the best way forward is to maintain an emphasis on the former and reduce a troubled reliance on the latter by vastly increasing investments in promising non-animal methodologies, such as “organ-on-a-chip” technology (discussed further on page 22). 🐒



BEFORE THEY VANISH

Paul Ehrlich, Gerardo Ceballos, and Rodolfo Dirzo /
Johns Hopkins University Press / 392 pages

Who better to teach us about the current extinction crisis than three of the world's top ecologists? The authors of *Before They Vanish: Saving Nature's Populations—and Ourselves*, Drs. Paul Ehrlich, Gerardo Ceballos, and Rodolfo Dirzo, have written some of the most important scientific papers on the subject. The book draws upon their many decades studying endangered species to show how human activities are pushing so many of these animals and plants to the brink of extinction, and how we might pull them back.

It begins with a brief explanation of the sixth mass extinction currently taking place on Earth. The fifth one, precipitated by an asteroid slamming into the planet, doomed the dinosaurs. The sixth, in contrast, can be blamed on human population growth and the “five drivers of extinction”—habitat destruction; over-hunting, fishing, and wildlife trade (both legal and illegal); the spread of invasive organisms (including disease-causing pathogens); pollution; and climate change. As we lose animal and plant species, we lose the ecosystem

benefits they provide. To cite just one example, many bird species eat and then disperse seeds of plants that provide us with food, medicine, timber, and more.

The authors argue that we must focus far more on protecting individual populations of plants and animals rather than wait until an entire species is close to extinction to take desperate conservation actions. Identifying extinction threats at the more localized population level would enable us to intervene more rapidly and effectively to prevent broader declines before it's too late. *Before They Vanish* concludes with a set of recommendations along these lines—as well as a call for empathy toward “all the wild species that have been our companions since our origins.”

VANISHING TREASURES

Katherine Rundell / Doubleday / 224 pages

Katherine Rundell's *Vanishing Treasures: A Bestiary of Extraordinary Endangered Creatures* offers a brisk and enjoyable examination of a wide range of species, all

remarkable in their own right—and all at risk of being lost forever. Rundell, a fellow of the University of Oxford's St. Catherine's College, deftly weaves an array of literary and historical sources throughout the book to underscore our longstanding fascination with these creatures and situate them within a much broader historical discourse.

Each chapter highlights a particular species and its extraordinary traits. For instance, the Greenland shark has the longest lifespan of any vertebrate on the planet; indeed, it's possible, says Rundell, that some of the Greenland sharks slowly traversing the ocean depths "are well into their sixth century."

The book features a wide range of highly disparate species (from awe-inspiring elephants to tiny iridescent golden moles) that are imperiled because of human activities. Sometimes inaction or apathy is allowing it to happen; many times, however, there is specific intent to kill. Rundell notes that the United States is a primary driver of the steep decline in giraffe populations and that American hunters imported a staggering 3,744 giraffes trophies during a recent 10-year period—a number corresponding to roughly 5 percent of the number of giraffes left alive today. In some cases, extinction is actually the goal: Rundell grimly observes that "poachers have been paid to shoot even those wild rhinos without marketable horns." The reason? Hastening their final demise translates into skyrocketing prices for those who already have horns stockpiled.

As its title strongly suggests, *Vanishing Treasures* is an urgent plea for humanity not to allow these gems to be lost to the annals of history. The book is a frank exhortation for our own species to try harder to protect other species with whom we share the planet. By inculcating a sense of wonder at the remarkable adaptations and characteristics of these extraordinary creatures, Rundell hopes to reinforce a sense that they—and countless others—are worth far more alive than dead.

KODA AND THE WHALES

Carrie Newell (author), Jack Wiens (illustrator) /
Torchflame Books / 72 pages

Carrie Newell, a marine biologist and whale-watching guide in the Pacific Northwest, has had great success over the years training her companion dogs to locate gray whales when they return from Mexico each summer. In her children's book, *Koda and the Whales: A True Story*, Newell conveys her enthusiasm and knowledge through the eyes of Koda, one of her whale-sniffing dogs. She details the beginning of Koda's training and the canine traits that make her uniquely qualified to detect the presence of these magnificent mammals from a great distance by catching the scent of whale spouts on the wind.

Newell packs a lot of educational material and anecdotes into the book's few dozen pages. Throughout, she shares interesting facts about the whales, their behaviors, and their individual characteristics, as well as stories of Koda's encounters with them and aspects of the research she has completed with the aid of her dogs. Jack Wiens's illustrations strike the right balance between playfulness and realism, providing colorful vignettes to accompany some of the more technical details. The book also contains a moving tribute to the dogs who preceded Koda, offering readers an opportunity to reflect on the relationships we have shared with companion animals who are no longer with us.

Older readers who are fans of whales, dogs—or both—will likely enjoy reading *Koda and the Whales* straight through. Caregivers may need to help younger children absorb its contents through several sessions—an approach made easier by Newell's episodic presentation of Koda's experiences. Bonus content at the end, including a glossary and worksheets, are a nice addition, reinforcing key facts and helping children retain what they learn.

BEQUESTS

If you would like to help assure AWI's future through a provision in your will, this general form of bequest is suggested: *I give, devise and bequeath to the Animal Welfare Institute, located in Washington, DC, the sum of \$ _____ and/or (specifically described property).*

Donations to AWI, a not-for-profit corporation exempt under Internal Revenue Code Section 501(c)(3), are tax-deductible. We welcome any inquiries you may have. In cases in which you have specific wishes about the disposition of your bequest, we suggest you discuss such provisions with your attorney.



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WE ANIMALS MEDIA

AWI REPORT EXAMINES TRAGIC TOLL OF BARN FIRES

In January, AWI released the third edition of *Barn Fires: A Deadly Threat to Farmed Animals*, chronicling farmed animal casualties in barn fires from 2022 through 2024. In the 300+ barn fires reported during this three-year period, more than 2.5 million animals suffered terrible deaths. Illinois, Minnesota, and Delaware had the highest number of casualties, while New York and Wisconsin had the most fires (31 each).

As in previous years, the overwhelming majority of barn fire victims were chickens, and huge fires at mega facilities accounted for a large percentage of the death toll. In 2024, for example, 1.2 million hens died in a single blaze at an egg operation in Illinois. It was the deadliest barn fire in more than a decade and accounted for approximately 80 percent of the total deaths for the year. Of the 10 deadliest fires from 2022 through 2024, nine occurred at facilities housing chickens.

There are no federal laws in the United States specifically designed to protect farmed animals from barn fires. However,

the National Fire Protection Association has developed NFPA 150, *Fire and Life Safety in Animal Housing Facilities Code*—a set of standards that states could adopt. The 2025 edition of NFPA 150 requires medium- and large-sized commercial facilities that are newly built or undergoing major construction to install sprinkler systems, unless exempted by a local fire authority. This is a new requirement that AWI (which has a seat on the NFPA's Technical Committee on Animal Housing Facilities) helped secure despite multiple attempts by industry groups to have the provision removed.

NFPA 150 only takes effect, however, if a state adopts a specific edition of the code, and to date, none have adopted the 2025 edition. (Only five states, in fact, have adopted earlier versions of NFPA 150.) During the coming year, AWI will urge more states to adopt these comprehensive safety standards that could spare untold numbers of farmed animals from suffering horrific deaths in fires. 🐾