



Comprehensive Animal Welfare Program Team Assessment Report

July 21, 2025

Off-Range Corral: Ewing Off-Range Corral

State: Illinois (Eastern States State Office)

Facility Manager or COR: Ben Aynes, Acting Facility Manager

CAWP Assessment Team Members: Jerrie Bertola, Tami Howell, and Preston Rushing

Assessment Date: July 21, 2025

Total Number of CAWP Off-Range Corral Standards: 117

Number of Applicable CAWP Standards: 80

Compliance with Applicable CAWP Standards: 61/80 = 76%

Understanding Assessments: The Comprehensive Animal Welfare Program promotes the welfare of wild horses and burros during management activities while minimizing stress and ensuring humane care, handling and treatment. CAWP assessments evaluate compliance with standards during the activities taking place at the time of the assessment. This framework helps ensure a clear and unbiased evaluation of events or actions as they occur. Here are some key points:

- **Holistic Approach:** Assessments reflect the entirety of the activity, not targeting individuals or specific groups.
- **Time-Specific:** The evaluation focuses solely on the observed circumstances during the assessment period.
- **Limitations:** Previous or subsequent events are not accounted for, meaning the assessment is a standalone observation.

General Notes and Comments from the CAWP Team: Assessments of Off-Range Corrals include the Comprehensive Animal Welfare Program standards for Off-Range Corrals and Transportation, as applicable.

Coordination with the Ewing Off-Range Corrals was excellent. The CAWP team was well received and was provided with access to the entire facility, and the team on site answered questions as needed during the assessment. The team was able to observe wild horses being sorted for an adoption event.

Requirements of Permanent Instruction Memorandum (PIM) 2021-002, Wild Horse and Burro Comprehensive Animal Welfare Program (CAWP):

- All state, district, and field offices will continue to comply with the WHB CAWP policy within their jurisdictions at all times. This includes the CAWP Standards for Off-Range Corral Facilities, Transportation, and Adoption/Sale Events.
- All personnel, including contractor and partners involved in the care, handling, and transportation of wild horses and burros at off-range corrals and adoption/sale events are required to complete training annually.

Conditions found to be in non-compliance with the CAWP Standards for Wild Horse and Burro Off-Range Corrals:

Facility Personnel

Standard

- 1.I.B** The facility must have employees with training, skills, and experience to observe, move, and handle the WH&Bs on the facility.

Non-Compliance: The employees there have the training, skills, and experience to observe, move and handle wild horses and burros, however, there are not enough employees.

Standard

- 1.I.C** The facility must have personnel that can properly maintain the working chute systems and facility infrastructure to provide for the safe housing, movement, and processing of the WH&Bs.

Non-Compliance: The corral is not staffed with adequate personnel to maintain the working chute systems and facility infrastructure.

Standard

- 1.I.D** The facility should be staffed by appropriate office staff for record maintenance and recording.

Non-Compliance: The facility is not staffed appropriately to complete the data entry timely so that records are maintained and current.

Facility Design

Standard

- 1.II.A** Facilities must be operated in a manner to provide a safe, clean and supportive environment for all WH&Bs.

Non-Compliance: While considerable cleaning had been accomplished, the presence of significant mud and manure in most pens indicated that the environment was not yet safe, clean or supportive for the wild horses and burros.

Standard

- 1.II.E** Facility fences, gates, alleys, tubs, and working chutes must be constructed of stout materials and must be maintained in proper working condition.

Non-Compliance: There were many places where the panels were tied together with twine and neck ropes and not maintained in proper working condition.

Standard

- 1.II.F** Fences in pens, alleys, and working chute systems must be not less than 6 feet high for horses, 5 feet high for burros, and the bottom rail must not be more than 12 inches from ground level.

Non-Compliance: Several internal pen fences were not 6 feet high due to the accumulation of manure and dirt, and there were several places where the bottom rail was more than 12 inches from the ground.

Standard

1.II.G Fences must be of stout design and be maintained in proper condition with no holes, gaps, or sharp edges which could result in WH&Bs being injured.

Non-Compliance: There were panels with broken legs and rusty sharp edges that could injure animals.

Standard

1.II.H All WH&Bs within a pen must have adequate dry space to rest.

Non-Compliance: Due to wet and muddy conditions, not all animals were able to access dry space to rest.

Standard

1.II.I Ground surfaces in pens must be maintained to promote drainage, reduce wet ground conditions, and allow for routine manure removal.

Non-Compliance: The pens did not promote drainage or run-off and have not allowed for routine manure removal.

Standard

1.II.K Feeding areas must be accessible to all WH&Bs in the enclosure and maintained as a dry area without excessive manure accumulation.

Non-Compliance: The feeding areas were wet with excessive manure accumulation.

Standard

1.II.M Facilities must provide access to shade and shelter (wind breaks) in pens designated for compromised animals needing special care (i.e., injured or weak animals). Additional provisions for shade and shelter (wind breaks) will be evaluated and determined by managers as appropriate for their region, the function of their facility and the condition of the animals under their care.

Non-Compliance: There are no pens specifically designed for compromised animals. Any compromised animals are moved to normal pens that have shade and shelter (wind breaks).

Loading and Unloading Facilities**Standard**

1.III.A.4 Loading and unloading ramps must have a non-slip surface and be maintained in a safe and proper working condition to prevent slips and falls. Examples of non-slip floors would include, but not be limited to, rubber mats, sand, shavings, and steel reinforcement rods or rough surfaces built into the ramp. There must be no holes in flooring or items that cause an animal to trip.

Non-Compliance: The wooden cleats were broken and missing on the lower end of the loading/unloading ramp.

Biosecurity

Standard

- 1.IV.B.3** Pens should be provided to segregate sick, infectious, injured, or weak WH&Bs from other healthy individuals in the facility when possible.

Non-Compliance: Pens designed for compromised animals are being used for resting loads and building loads to be sent to adoptions or off-range pastures; therefore, there were no pens set aside exclusively for sick, infectious, injured, or weak animals.

Feed and Water

Standard

- 1.IV.C.1** Quality hay must be provided daily to WH&Bs in the amount of 2-3% of their body weight per day.

Non-Compliance: Hay was provided at 2-3% of the body weight per day; however, the hay was not good quality.

Standard

- 1.IV.C.4** Feeding sites must allow all WH&Bs within a pen simultaneous access to hay.

Non-Compliance: Due to overcrowding in a couple of pens, not all animals could access hay simultaneously.

Preparation Procedures

Standard

- 1.IV.D.2** Facilities must conduct Equine Infectious Anemia (EIA) testing and apply freeze-marks within 30 days of receiving WH&Bs, unless directed by the facility veterinarian when age or physical condition requires a delay.

Non-Compliance: According to the randomly selected animal health records, not all animals received their freeze marks and EIA testing within 30 days of arriving at the original preparation facility.

Standard

- 1.IV.D.6** Facilities must adhere to the current BLM vaccination policy.

Non-Compliance: According to randomly selected animal health records, not all animals in the facility received booster on schedule.

Standard

- 1.IV.D.8** Hoof trimming must be performed twice per year at minimum or as necessary to maintain hooves in a proper condition.

Non-Compliance: Multiple burros needed hoof trimming, but due to wet and muddy conditions, it was not possible to assess the condition of the wild horses' hooves.

Standard

1.IV.D.10 Stallions and jack burros should be castrated as soon as approved by the on- site veterinarian for the procedure in accordance with BLM policy.

Non-Compliance: A yearling stallion born in the facility had not yet been castrated.

Table 1: Overall Summary Rating

CAWP Standards and Policy Requirements	Total Numbers	Percent Compliant	Rating
Facility Personnel	1/4	25%	Failure to Comply
Facility Design	5/13	38%	Failure to Comply
Loading and Unloading Facilities	5/6	83%	Complies
Receiving Procedures	10/10	100%	Excellent
Veterinarian	6/6	100%	Excellent
Biosecurity	4/5	80%	Complies
Feed and Water	4/6	67%	Failure to Comply
Preparation Procedures	6/10	60%	Failure to Comply
Euthanasia Procedures	5/5	100%	Excellent
Carcass Disposal	2/2	100%	Excellent
Willful Acts of Abuse	4/4	100%	Excellent
General Handling	6/6	100%	Excellent
Handling Aids	3/3	100%	Excellent
Overall Compliance and Final CAWP Assessment Rating	61/80	76%	Complies

Possible ratings for CAWP Assessments are 96-100% Excellent, 86-95% Good, 70-85% Complies, and 0-69% Failure to Comply.