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**November 11,**

**The Honorable Frank Pallone, Jr.  
Chairman  
House Committee on Energy and Commerce  
2125 Rayburn House Office Building  
Washington, DC 20515**

**The Honorable Cathy McMorris Rodgers  
Ranking member  
House Committee on Energy and Commerce  
2125 Rayburn House Office Building  
Washington, DC 20515**

**IN SUPPORT OF ENDING HORSE, BURRO, MULE AND OTHER EQUID SLAUGHTER AND TRANSPORT FOR  
SLAUGHTER IN USA AND TO FOREIGN COUNTRIES – IN SUPPORT OF SAFE ACT BILL OF 2021-2022**

As a professional wildlife ecologist specializing in the Perissodactyla of the world, including wild Horses and Burros of the United States and Mountain/Andean Tapirs of South America and a member of the IUCN Species Survival Commission, I strongly support the SAFE Act bill that would end the cruel and unnecessary slaughter of horses, burros and other equines. Last year ca. 65,000 horses, etc., were shipped from the USA for slaughter mainly to Mexico, Canada and Asia. Many were the wild horses who had been unjustly removed from their legal habitats on BLM-USDI and USFS-USDA lands.

The horse and burro are closely related and much that I describe here about the horses applies as well to the burros. Both species have enabled our human species to proliferate on the face of the Earth. They have been strong, loyal, and indispensably cooperative presences through all kinds of situations, enabling us humans to pull through even in the most trying circumstances. There exists a strong natural affinity and connection between these two highly evolved presences who share the Earth as home and have done so for hundreds and even thousands of years. According to the immutable laws that govern our relationship and our linked journey, we humans truly owe horses so much. They are our natural companions and collaborators. Consequently, to ignore and demean their value and position in the world when it seems to suit our materialistic advantage becomes the most despicable and dishonest

form of betrayal. To abandon and discard these highly evolved, very sensitive, intelligent, and beneficial presences, merely for our own superficial and temporary convenience reveals a moral blindness – a cruel injustice and ingratitude of monstrous proportions!

For well over two decades, honorable and spiritually awake people have sought to put an end to this most grievous betrayal that the abandonment of the horses to slaughter constitutes. But each time and in spite of widespread and well-founded public support, the horse supporters have met with a cold indifference and callous denial for this long-overdue and urgent reform. Our world today is a wonderful home that humans share with many other fascinating and competent species – each with their indispensable and interrelated role and niche. And we are related to each of them in some special way. But this shared home has presently reached a critical point, a dramatic juncture born of a moral and linked ecological crisis! This is being brought to light in the ongoing COPF-27 conference currently taking place in Egypt. Basically, we are faced with a crucial choice concerning our human species' relationship with the Great Rest of Life. And we must do some soul-searching to find a better way of life that will present a solution to our and all shared life's desperate dilemma. Passing the SAFE Act bill and conscientiously implementing it will initiate a whole series of much-needed transformations in human society's relationship with horses, burros and all the Great Rest of Life. It will force people to treat these marvellous animals not just as throw-away objects but as the wonderful sentient beings that they are – deserving of a natural habitat and the natural freedom to fulfill their life-preserving and sustaining role.

Please now listen up to some of the sound reasons that justify this wise and compassionate bill: SAFE:

1. The captive bolt method forcefully shoots a steel bolt at the head of the horse with the intent of penetrating the brain and instantly killing the horse. However, the horse's brain is encased in a very solid, bony structure and is well in the rear of its cranium, making captive-bolt killings difficult. Also, the horse moves its head around in many different and wide angles because of his/her long, marvelously designed *ophistocoelous* neck. This makes it very hard for a direct blow and killing. Many blows are glancing. And besides this, who has ever asked a horse what he/she feels? (Downer 2014, *The Wild Horse Conspiracy*. p. 238; Grandin, T. 2011, pers comm.).
2. Since the horse has a long coevolutionary history with many diverse plant and animal companions in a variety of ecosystems – in North America, its evolutionary cradle more than any other place, its disappearance constitutes a major ecological setback. Indeed, as a pre-Ice-Age (ca. 12,000 ybp) megaherbivore and also subsequently, it plays a major role in enhancing and perpetuating ecosystem health. As a major *climax* species, or member of the more stable, long-term and biodiverse life community that has established itself over great periods of time, the horse has helped to characterize and to assist in a wide variety of ecosystems where it belongs and where it is fully capable of self-stabilization of population once its niche is filled (Downer 2005; also see <https://www.gofundme.com/mstngreservedesign> ).
3. Crucial ways by which horses enhance and perpetuate adaptable and resilient biodiverse ecosystems include the following: (a) dispersing many including native plant seeds that are intact and capable of germination; (b) building healthy soils by contributing greatly to their humus content; (Both of the foregoing are superior capacities in post-gastric, cecal digesting horses and burros when compared with the pre-gastric, multi-stomach ruminant cows, sheep, deer, etc., that are enormously promoted by people. Thus, it is proven that horses and burros restore much needed balance in ecosystems with ruminant herbivores. See Janis, 1976.)

4. Horses and burros are very important in combatting the life-threatening effects of Global Warming. They are superior Carbon Sequesters and are also superior at munching down coarse, dry, flammable vegetation, which often becomes even more dry and flammable later in the year during drier seasons of Summer and Autumn. Thus, they are great catastrophic wildfire mitigators and even preventers. They reduce the dry tinder that starts fires and remove the lower limbs of their shelter trees that permits crown fires. For a scholarly analysis of this see my article and references at <https://www.horsetalk.co.nz/2021/07/17/horses-carbon-sequesters/> .
5. Horses are considered one of the ideal species for restoring degraded ecosystems as a decade-long study by ecologists have proven. They are truly healers of the Earth and should be recognized as such. To remove them from their legal habitats and overlook their very benign role in the life community is the depth of ignorant arrogance. They should be restored in many ecosystems where they will help our living home world to stave off the worst effects of Global Warming and permit the life community to have sufficient resilience to survive. Those who languish in holding pens should be released into many areas where they are desperately needed to prevent catastrophic wildfires and restore ecosystems.
6. Here are important publications that I highly recommend to the serious and concerned reader that prove the foregoing and other related points in favor of naturally living horses, burros, etc:
7. Naundrup, P.J. & Svenning, J.C. 2015. A Geographical Assessment of a Global Scope for Rewilding with Wild-Living Horses. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4503665/> PloS one 10(7), e0132359, doi: 10.1371/journal.pone. Quote: “[The Horse] is an obvious species to use in rewilding due to its former very wide range, wide extant ecological tolerance, particular grazing functions, and our extensive knowledge of its ecology, behavior and management.” See maps for suitable areas around the world.
8. <https://www.horsetalk.co.nz/2021/12/15/50-years-saving-americas-wild-horses/>
9. <https://www.researchgate.net/publication/239848265> Facilitation between Bovids and Equids in an African Savanna
10. <https://www.horsetalk.co.nz/2021/07/17/horses-carbon-sequesters/>
11. <https://www.horsetalk.co.nz/2017/07/31/wild-horse-fire-brigade-work/>
12. <https://www.horsetalk.co.nz/2019/05/06/ecosystems-horse-ecologist-wild-horse-message/>
13. <https://www.counterpunch.org/2020/11/27/the-focus-on-wild-horses-distracts-from-the-massive-damage-caused-by-the-livestock-industry/>
14. <https://www.researchgate.net/publication/274006946> The Horse and Burro as Positively Contributing Returned Natives in North America
15. <https://reno-newsreview.com/2021/10/03/wild-horse-roundup-brutal-unnecessary/>
16. My The Wild Horse Conspiracy book: <https://www.amazon.com/dp/1461068983>
17. My website: <https://thewildhorseconspiracy.org>
18. <https://www.horsetalk.co.nz/2019/05/06/ecosystems-horse-ecologist-wild-horse-message/>
19. <https://www.newswise.com/soil-samples-reveal-mammoths-yukon-wild-horses-survived-thousands-of-years-longer-than-believed/>
20. Bell, R.H.V. 1970. The use of the herb layer by grazing ungulates in the Serengeti. IN: Animal Populations in Relation to Their Food Source. *Brit. Ecol. Soc. Symp.*)
21. <https://www.horsetalk.co.nz/2017/10/17/avoid-selfish-interests-wild-horses-ecologist/>
22. <https://www.horsetalk.co.nz/2016/06/05/secret-lives-well-digging-burros/>
23. <https://img.pr.com/release-file/1908/791815/ImpactOfWildHorsesOnWildernes.pdf>

24. Duncan, P. 1992. Zebras, Asses, and Horses: An Action Plan for the Conservation of Wild Equids. IUCN SSC Equid Specialist Group. Gland Switzerland. Page 5 for 2,500 individual viable population in the wild recommendation by world's authorities on equids & their conservation.
25. [https://www.researchgate.net/publication/318163234\\_Pleistocene\\_megafaunal\\_extinctions\\_and\\_the\\_functional\\_loss\\_of\\_long-distance\\_seed\\_dispersal\\_services](https://www.researchgate.net/publication/318163234_Pleistocene_megafaunal_extinctions_and_the_functional_loss_of_long-distance_seed_dispersal_services)
26. <https://www.gofundme.com/mstngreservedesign> for my Reserve Design proposal to restore the wild horses and burros and their habitats to truly long-term viable levels IN THE WILD!
27. <https://www.recordcourier.com/news/2021/jan/21/wild-free-roaming-horses-and-burros-act-requires-r/>
28. Donlow, J. et al. 2005. Rewilding North America. *Nature* 436(7035): 913-914.
29. Forsten, Ann. Ph.D. 1992. Mitochondrial-DNA timetables and the evolution of *Equus*: comparison of molecular and paleontological evidence. *Ann. Zool. Fennici* 28: 301-309. Presents proofs that modern horse species evolved in North America ca. 2 million years ago. (Remember related species in the same genus and related genera in the Horse Family Equidae have been here for ca. 60-million years, in a long and elaborate development, making them very integral to the authentic North American ecosystem, more so than just about any of the other large mammalian herbivores. And they greatly complement the other herbivores, including the cloven-hoofed ruminant mammals.
30. Janis, C.M. 1976. The Evolutionary strategy of the Equidae and the origins of rumen and cecal digestion. *Evolution* 30: 757-774. Clearly explains the advantages of the Equidae in many arid and semi-arid ecosystems due to their different digestive systems along with their positive fitting in many other types of ecosystems. Yet, in preparing herd management plans, BLM and USFS often merely lump them with "livestock" – cattle and sheep!
31. Downer, C.C. 2005. Wild and Free-Roaming Horses and Burros of North America: Factual and Sensitive Statement—How They Help the Ecosystem. *Natural Horse* (Dec.). 7(3):10-11.
32. <https://thewildhorseconspiracy.org/true-path-forward-mustangs-burros/>
33. Perissodactyla (Odd-toed ungulates) by Craig C Downer. IN: Grizmek's Animal Life Encyclopedia. 2<sup>nd</sup> Edition. Volume 15, Mammals IV. Gale Publishers, Detroit, MI, etc.
34. MacPhee, Ross, Ph.D. 2013. The Wild Horse is Native to North America. Curator – Division of Vertebrate Zoology, American Museum of Natural History, New York, NY. <https://www.thecloudfoundation.org/reading-room-faw-s-article/wh-ret>
35. Downer, C.C. 1997. Status and Action Plan of the Mountain Tapir (*Tapirus pinchaque*) IN: *Tapirs – Status Survey and Conservation Action Plan*. Eds. D.M. Brooks, R.E. Bodmer, & S. Matola. Gland, Switzerland & Cambridge, UK: IUCN/SSC Tapir Specialist Group. In English & Spanish.

Sincerely and respectfully submitted,

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