



1931 N. Meacham Rd.
Suite 100
Schaumburg, IL
60173-4360
phone 847.925.8070
800.248.2862
fax 847.925.1329
www.avma.org

June 5, 2012

The Honorable Paul Koretz
Chair, Personnel and Animal Welfare Committee
Los Angeles City Council
City Hall
200 N Spring Street, Rm 440
Los Angeles, CA 90012

Dear Chairman Koretz:

I am writing on behalf of the American Veterinary Medical Association (AVMA) concerning the proposal being considered by the Personnel and Animal Welfare Committee to prohibit “in any context the use of bullhooks...and other implements and tools designed to inflict pain for the purpose of training and controlling the behavior of elephants.”

After a review of the scientific literature and an examination of available practical data by its Animal Welfare Committee, the AVMA adopted the following policy in April 2008:

Elephant Guides and Tethers

Elephant guides are husbandry tools that consist of a shaft capped by one curved end. The ends are blunt and tapered, and are used to touch parts of the elephant’s body as a cue to elicit specific actions or behaviors, with the handler exerting very little pressure. The ends should contact, but should not tear or penetrate the skin. The AVMA condemns the use of guides to puncture, lacerate, strike or inflict harm upon an elephant.

Tethers provide a means to temporarily limit an elephant’s movement for elephant or human safety and well-being. Tethers can be constructed of rope, chain, or nylon webbing, and their use and fit should not result in discomfort or skin injury. Forelimb tethers should be loose on the foot below the ankle joint, and hind limb tethers should fit snugly on the limb between the ankle and knee joints. Tether length should be sufficient to allow the elephant to easily lie down and rise. The AVMA only supports the use of tethers for the shortest time required for specific management purposes.

We understand that the proposed ordinance would prohibit the use of bullhooks (also known as guides) in any context to train elephants. We believe this language is too broad and fails to recognize the ways in which bullhooks/guides may appropriately be used in animal management.

In her April 24, 2012 report to the Board of Animal Services Commissioners, and subsequently in her May 11, 2012 letter to Mayor Villaraigosa, Ms. Brenda Barnette references the AVMA’s backgrounder on the *Welfare Implications of Elephant*

Training (available on the AVMA website at http://www.avma.org/reference/backgrounders/elephant_training_bgnd.pdf). Unfortunately, Ms. Barnette has quoted selectively from our backgrounder and, accordingly, has provided a description of the use of the bullhook/guide during “free contact” management that is inconsistent with the information provided in that document.

When used appropriately, the bullhook/guide extends a handler’s reach so s/he may touch, push or pull various parts of the elephant’s body. Sometimes contact with specific areas of the body is sought, which will elicit an avoidance movement by the elephant; this movement is paired with verbal commands and food or praise to reduce or eliminate the need for further physical contact. The bullhook/guide is intended to produce a light physical contact that the elephant finds mildly unpleasant; thus it acts as negative reinforcement that is then followed by positive reinforcement to encourage a desired behavior. The use of the bullhook/guide may later be replaced by verbal commands. A bullhook/guide is used in all free contact programs in the United States and may also be used in conjunction with protected contact.

Both free and protected contact are currently used in the management of elephants, depending on the needs of individual elephants, facilities available, and the keepers’ goals. The best method and extent of training desirable depend largely on context, and no approach developed to date is considered universally optimal. Free contact techniques are necessary to allow animals to be controlled outside of their enclosures or in the absence of equipment, such as an elephant restraint device (ERD). Free contact methods may also help elephants cope with otherwise under-stimulating conditions or be necessary during intensive procedures associated with treating chronic illnesses or during assisted breeding. Protected contact may be preferred for elephants that are potentially dangerous, do not need to perform, or have negligible need for human intervention.

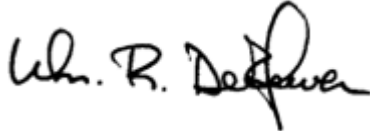
Unfortunately, on a few occasions the bullhook/guide has been abused and implicated in widely publicized investigations into allegations of abusive handling. It is probably for this reason that some groups (including the organizations and individuals who have likely approached you) have been lobbying for the use of the bullhook/guide to be prohibited. Clearly, abuse of bullhooks/guides is inappropriate and is strongly condemned by the AVMA. However, when used appropriately, the bullhook/guide can be a useful tool for management and training. Management and training are key components of the humane treatment of elephants, because they are core to maintaining both physical and mental elephant health. Training facilitates skin and foot care, as well as the veterinarian’s ability to safely administer medications, assist with parturition, and perform other veterinary procedures. We strongly believe in training animals, where possible, as an alternative to chemical or manual restraint. In addition, training is an important part of behavioral enrichment for elephants kept in captivity. Bullhooks/guides are tools that can be used humanely to train elephants.

The AVMA, established in 1863, is the largest veterinary medical association in the world. As a not-for-profit association created to advance the science and art of veterinary medicine, AVMA is the recognized national voice for the veterinary profession. The Association’s more than 82,000 members represent approximately 85% of U.S. veterinarians, all of whom are involved in the myriad areas of veterinary medical practice including private, corporate, academic, industrial, governmental, military, and public health services.

We hope our comments are helpful. If we can be of further assistance to the Personnel and Animal Welfare Committee, please contact Dr. Gail Golab, Director, Animal Welfare Division, AVMA, at 847-285-6618, ggolab@avma.org. Thank you for your consideration.

Sincerely,

W. Ron DeHaven, DVM, MBA

A handwritten signature in black ink that reads "W. R. DeHaven". The signature is written in a cursive style with a large, looped initial "W".

Chief Executive Officer
American Veterinary Medical Association