UNIVERSITY OF MINNESOTA

Twin Cities Campus

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Bio Corporation
Attn: Mr. Bill Wadd
3910 Minnesota Street SW
Alexandria, MN 56308
320-763-9094 phone

April 3, 2018

Dear Mr. Wadd:

Instantaneous death is consistent with the practices employed in pest control industries for killing vertebrate pests. What you do at the Bio Corporation should be considered pest control and I think the practice of drowning pigeons is consistent with what the industry standard is.

I disagree with the contention in the materials you showed me that birds put into water can live up to 10 minutes. I am an avian pathologist and have studied avian physiology and do not understand the reasoning behind this statement. Diving birds, like ducks, can hold their breath and in fact some, like cormorants don't have external nares (nostrils) to facilitate diving. This is very unlike pigeons which are great flying birds and do not dive and have an open nostril in their cere. It is my understanding that non-aquatic birds, including pigeons, do not hold their breath when they enter water and that death by drowning would be nearly instantaneous. In light of this, I don't think that this form of inducing death should be classified as animal cruelty.

Please let me know if I can be of additional help to you in clarifying this quandary.

Sincerely,

Carol J. Cardona

Carol J. Cardona, DVM, PhD, DACPV