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MEMORANDUM

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COMDT (DCMS)

To: Distribution

Subj: FINAL ACTION ON THE INVESTIGATION INTO LIVE TISSUE TRAINING
CONDUCTED ON MARCH 3, 2012

1. **Overview:** On March 3rd, 2012, 29 active duty U.S. Coast Guardsmen preparing to deploy to the Iraq theater of operations, and 3 other Coast Guard members, participated as students in combat lifesaver training, which included a Live Tissue Training (LTT) component using live goats as training patients. On the final day of a five-day course, the instructors anesthetized and intentionally injured animals so the students could assess and treat combat-like injuries they might face while deployed on Coast Guard duties in Iraq and the Persian Gulf.

On April 18th, 2012, People for the Ethical Treatment of Animals (PETA) publicly released a video showing three minutes and 49 seconds (3:49) of the LTT. On April 19th, PETA wrote to the Secretary of Homeland Security, alleging the animals seen in the video were not adequately anesthetized and may have been feeling pain. The letter stated that the training did not reflect battlefield casualty situations and that neither students nor instructors displayed any sense of urgency while the animals were being cut apart and their wounds were being treated. The letter also mentioned an instructor that cheerfully whistled while dismembering an animal as Coast Guard members made jokes. PETA urged the Secretary to "take swift and decisive action to end this cruel and irrelevant practice" of LTT.

On April 20th, 2012, Coast Guard Force Readiness Command (FORCECOM) initiated an administrative investigation into the March 3rd training, including when and where it took place, who was trained and whether any students or instructors did not act in accordance with standards of conduct.

This Final Action Memorandum (FAM) sets forth the material facts as determined by the administrative investigation, states my conclusions, and orders certain actions.

2. **Findings of Fact and Opinion:** United States Central Command (CENTCOM), the combatant commander responsible for the Iraq theater of operations, requires a minimum percentage of deploying military personnel to receive combat lifesaver training. In addition, Coast Guard policy requires a minimum percentage of its deploying personnel to undergo combat lifesaver training. Combat Life Saver (CLS) training includes a LTT component.

On March 3rd, 2012, 29 Coast Guard members preparing to deploy to Iraq, and three additional Coast Guard members, attended LTT at an outdoor training site in Virginia Beach, Virginia, on the final day of a five day Tactical Combat Casualty Care course (also known as Combat Life Saver).

Tier 1 Group LLC (T1G), a federal contractor, conducted the training. T1G is registered with the U.S. Department of Agriculture as a Class R Research Facility under the Animal Welfare Act, 7 U.S.C. § 2131 et seq. The United States Special Operations Command has approved T1G to provide tactical combat casualty care training to its personnel using live animals.

In Phase 1 of the day-long LTT, teams of four to six students and one T1G instructor were formed. Instructors and students referred to the live animals as "patients." Each team was under a canopy with one anesthetized patient on a table. Instructors had the students turn their backs to the table while the instructor inflicted trauma to the animal. Instructors then directed the students to turn around, assess the trauma, and perform medical care procedures in accordance with the previous four days' classroom training sessions. Medical care equipment available for student use was from individual first-aid kits (IFAK) or from emergency medical technician (EMT) packs. The medical traumas inflicted to patients in Phase 1 progressed from simple, singular wounds to more severe, multiple wounds. Students demonstrated proficiency in the application of classroom training knowledge and practical medical care using the IFAK and EMT pack supplies.

A T1G instructor administered anesthesia to the animals before inflicting injuries. Additional anesthesia was administered if a live animal displayed indications of twitching, moaning, or otherwise coming out of the medically induced sleep. One student said the lead instructor was impressive and quick to provide additional anesthesia to the goats as needed, but that having only one person (the lead instructor) administering anesthesia was not sufficient to attend to all of the animals at once. The PETA video shows an instructor inflicting an injury to a goat lying on the table and the animal moaning. Subsequent to administrative investigation, it was learned that the Department of Agriculture cited T1G for violation of the Animal Welfare Act based on its review of the video.

Many students described the training as professionally conducted and some referred to it as the best medical training they have ever received. Before the training started, both a T1G instructor and a Coast Guard chief petty officer encouraged students to make reports of any unprofessional behavior. Neither individual received any reports. However one student opined that instructors and students were too lighthearted during the training. The PETA video includes a scene with laughing in the background. One student reported being present during the laughing and said the video presented it out of context. That student said the laughter was connected to something completely unrelated to the course. The video and audio captures someone briefly whistling and another person making a comment about writing a song about cutting limbs off the animal. But there is nothing in the video to suggest that this type of behavior was prevalent during the training or was motivated by anything other than reaction to a high stress situation. When one student inappropriately waved a severed animal leg in the air, a more senior ranking student quickly reprimanded him and the behavior stopped.

Students took a break following Phase 1, while instructors set up for the next exercise. Phase 2 consisted of a combat casualty scenario. Instructors inflicted combat-like injuries to the animals with a shotgun, pistol, ax, and scalpel. The injured animals were laid out alongside a gravel road or path simulating an improvised explosive device attack or an enemy fire-fight. Two animals were used for each team of students. Teams ran into the simulated "hot zone" to initially assess the wounds and provide immediate medical care. This initial assessment period lasted approximately one minute. While some team members tended to the patients, others secured the area and simulated returning gunfire, all in accordance with the previous week's classroom training. Following the initial assessment and medical care of the most life-threatening injuries, students were then required to rapidly evacuate their patients to a simulated "safe zone" where further medical care could resume. Students spent approximately the next hour tending to their patients, providing medical care in an attempt to keep the animal alive by demonstrating proficiency in the application of classroom training knowledge and practical medical care using the IFAK and EMT pack supplies. At the end of Phase 2, all animals were euthanized by injection into the established intravenous tube or directly into the heart.

3. **Findings and Directed Actions.**

A. I find that no misconduct was committed by any Coast Guard members participating in the LTT. I base this finding on the following facts:

1. Live Tissue Training is required by The Coast Guard Tactical Medical Manual (Commandant Instruction M16601.16) and CENTCOM policy for Coast Guard members deploying to the CENTCOM area of operations.
2. Coast Guard members were under military orders to attend combat lifesaver and LTT prior to deployment or as instructors observing the training.
3. Neither the administrative investigation nor the PETA video revealed any evidence that Coast Guard personnel violated any law, regulation, or standard of conduct while participating in the mandated training.

Action: While no misconduct was committed by Coast Guard personnel, the controversial nature of LTT demands the Service continue to closely scrutinize its policies to assess the requirements for LTT.

1. I direct the Assistant Commandant for Human Resources to work with the Assistant Commandant for Response Policy to continue to compare and align Coast Guard policies to those of the Department of Defense and DHS components.
2. I direct the Assistant Commandant for Human Resources to work with the Assistant Commandant for Response Policy to continue to assess the availability and effectiveness of training alternatives through federal and military sources to further reduce and/or eliminate the role of live animals in future LTT-type training. Along with the Deputy

Commandant for Operations, the Deputy Commandant for Mission Support has chartered a separate Work Group to examine these issues. The Work Group's findings will be issued separately.

3. I direct that appropriate Program Managers, FORCECOM and the Training Quota Center to carefully manage LTT student rosters to ensure the service does not exceed the minimum necessary requirements for this training.

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