

**RECOMMENDED GUIDING PRINCIPLES  
FOR  
WOLF MANAGEMENT IN MICHIGAN**

**REPORT OF THE MICHIGAN WOLF MANAGEMENT ROUNDTABLE  
TO  
THE DIRECTOR OF THE MICHIGAN DEPARTMENT OF NATURAL RESOURCES**

**NOVEMBER 2006**

## **FACILITATOR'S NOTE**

I believe it is important to convey the depth of thinking and the process that created this document. From June through September 2006, delegates from 20 Michigan organizations and agencies met for 10 full days to define wolf-management issues, review the relevant social and biological science, and address the difficult task of reaching consensus on guiding principles for wolf management in Michigan. The intellectual growth and experience this diverse group shared during that time allowed the development of guiding principles that are informed, considered and fair.

Delegates represented their organizations, their agencies, and the people of Michigan equally well. Collectively, they comprise a group that knows more and has thought more deeply about wolf management in Michigan than any other single group of organizations and agencies in the State. As the facilitator of the Wolf Management Roundtable process, I am grateful for their personal talents, sacrifices and persistence, and I am proud of the work they have done to produce this document for the people of Michigan.

R. Ben Peyton  
Wolf Management Roundtable Facilitator  
Department of Fisheries and Wildlife  
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## **MICHIGAN WOLF MANAGEMENT ROUNDTABLE**

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## INTRODUCTION

We, the Michigan Wolf Management Roundtable, present this report to the Michigan Department of Natural Resources (DNR) to help guide the management of wolves and wolf-related issues once the species is removed from the Federal list of threatened and endangered species. We ask the DNR to apply the guiding principles contained herein in its efforts to develop a wolf-management plan that addresses the diverse interests of Michigan society.

### **Need to Revise the Existing Wolf Plan**

The DNR developed the *Michigan Gray Wolf Recovery and Management Plan* in the early 1990s, following the natural re-colonization of wolves in the State. Since that time, the number of wolves in Michigan, as well as in Wisconsin and Minnesota, has increased substantially. Recently, the U.S. Fish and Wildlife Service proposed removing wolves in the western Great Lakes region, including Michigan, from the Federal list of threatened and endangered species.

When wolves in the western Great Lakes region achieve both biological and statutory recovery, anything that prompts a need to reclassify them as threatened or endangered would be detrimental to both the wolf population and the citizens of Michigan. The DNR has stated its commitment to maintain a viable Michigan wolf population above a level that would require its reclassification as threatened or endangered. To achieve that goal, the DNR must implement a wolf plan that assures adequate protection and management of the species. Although the existing State plan has been a valuable tool for recovery of the species, wolf population size and distribution have changed and understanding of wolf biology has improved significantly since it was written. To continue to manage the wolf population based on the best available scientific information, the DNR has initiated review and revision of the existing plan.

### **Planning Challenges**

Many Michigan citizens derive benefits from the presence of wolves. As top predators, wolves fill an important ecological niche and are indicators of environmental health. Wolf-based tourism may provide significant economic benefits to local economies. Many people value the presence of wolves for cultural and religious reasons. Many people also find personal enjoyment and satisfaction by observing wolves in the wild or by simply knowing they exist. Provision of these benefits fosters public support for a wolf population and thus serves the best interests of both wolves and Michigan citizens.

The presence of wolves also poses significant costs and concerns for some Michigan residents, and effective management must minimize and resolve wolf-related conflicts. Conflict-resolution is important to affected stakeholders, but it is also critical to wolf conservation. Citizen support for a wolf population depends, in part, on confidence wolf-related conflicts will be resolved effectively. Failure to address conflicts could foster negative attitudes that lead to adverse impacts on wolf distribution and abundance. Thus, effective management of wolf-related conflicts benefits affected stakeholders as well as the wolf population as a whole.

The needs to maintain a viable population, to provide wolf-related benefits, and to resolve conflicts are broadly accepted, but determining the methods that should be used to meet those needs tends to be more controversial. Interested parties often disagree on the ways wolves should be managed, and those disagreements often originate from differences in values and beliefs held within different segments of society. Although multiple management approaches could be used to achieve wolf-management goals, some of those approaches may not be acceptable to some stakeholder groups or to society at large. Effective planning must identify goals and objectives that are supported by Michigan society.

### **Guidance from the Roundtable**

To help it develop a wolf plan that is acceptable to a wide range of stakeholder interests, the DNR convened the Michigan Wolf Management Roundtable. We, the members of that group, were selected to represent the diversity of Michigan interests in wolves. Our membership includes 20 agencies and organizations, which represent environmental and ecological interests, hunting and trapping interests, livestock-producer interests, public-safety interests, tourism and resource-development interests, Tribes, and wolf-protection interests. Our membership includes Upper Peninsula and Lower Peninsula residents in roughly the same numbers to ensure adequate representation of the different regions of the State. Our charge, as given by the DNR, was to develop principles to guide management of Michigan wolves and wolf-related issues following Federal de-listing.

The original *Michigan Gray Wolf Recovery and Management Plan* addressed issues at the strategic level. That is, it identified an overall goal for wolf recovery and management and it identified management objectives pertinent to specific issues; it did not outline the operational details of how those goals and objectives should be achieved. The revised plan will also be a strategic plan. Accordingly, the DNR asked us to develop guiding principles that addressed planning needs at a strategic level. We were not asked to provide recommendations regarding specific methods that should be used to achieve goals and objectives.

We have developed guiding principles consistent with the direction we were provided. Consequently, the DNR will have considerable latitude to select and implement specific methods for achieving strategic goals and objectives. We trust the DNR will, to the extent legally and practically possible, develop a strategic plan that is consistent with our recommendations. In the following sections, we have offered explanations to clarify our intent and thus ensure correct interpretation of the guiding principles.

Approval of the specific language for each guiding principle required consensus among all members of the Roundtable. Given the breadth of values and beliefs represented on the group, achieving consensus was often challenging and would not have been possible without considerable commitment and sincere, objective thinking by each member. The guiding principles are the product of months of substantial deliberation and compromise. We developed them after review of the best available science and with consideration and respect for all of the diverse perspectives represented.



We recommend the following guiding principles with the belief they will serve the best interests of the Michigan wolf population and the people of the State.

## **WOLF ABUNDANCE AND DISTRIBUTION**

We believe the goal of managing wolf abundance and distribution should be to maintain acceptable levels of positive and negative interactions while ensuring the long-term viability of a wolf population. Setting numeric goals for wolf abundance at large geographic scales (e.g., the entire State, the entire Upper Peninsula) would therefore be inappropriate, because it would not reflect the unequal distribution of wolf habitat, human activity and the potential for positive and negative interactions. Moreover, wolf numbers alone do not necessarily predict the frequency of certain types of interactions. In an area of abundant natural prey and few human residences, for example, a large number of wolves could cause a relatively low level of negative interactions. Conversely, a small number of wolves could create an unacceptably high level of negative interactions in local areas where natural prey is scarce or where human population density is high. Therefore, setting numeric goals for wolf abundance at large geographic scales should be avoided because it would not necessarily reduce negative interactions, could unacceptably restrict positive interactions desired by the public, and could promote an inaccurate public perception regarding the relationship between wolf numbers and the risk of conflict.

Previous management experience suggests most wolf-related conflicts are best handled on a case-by-case basis, and managing individual conflicts by reducing wolf numbers at a broad geographic scale would be inappropriate. However, we recognize some unique situations may warrant consideration of reducing wolf numbers in local areas as a means to reduce the risk of negative interactions. The potential feasibility and efficacy of such an approach in Michigan remains uncertain. Wolves are prolific and have quickly re-colonized other areas where population-control efforts have been conducted. Whether management could effectively reduce wolf numbers in local areas of Michigan, especially over the long-term, has not yet been proven. Moreover, conflicts in local areas are often caused by a few individual wolves, and the potential efficacy of generally reducing wolf numbers to manage conflicts remains unclear. Given this uncertainty, we stress that consideration of local population reduction should be approached with caution. If such action is ever deemed necessary, it should be planned based on the best available research, and its effects should be evaluated thoroughly to ensure the future use of the action is appropriate.

### **Guiding Principles:**

- Goals for wolf management should be based on wolf impacts (positive and negative) rather than wolf abundance or numbers. When establishing strategic goals for wolf abundance and distribution on multiple geographic scales, the DNR should consider the importance of:
  - maintaining a wolf population to ensure adequate genetic diversity and population sustainability;
  - providing ecological and social benefits associated with wolves;
  - maintaining sustainable populations of wildlife and their habitats;

- minimizing risks to human safety; and
  - limiting depredation of dogs, livestock and other domestic animals.
- Conflicts should be managed at an appropriate scale. Whenever applicable, wolf conflicts should be resolved at the individual and pack level. If wolf numbers are determined to be the cause of increased conflicts significantly affecting human safety, depredation of dogs, livestock and domestic animals, or sustainable wildlife populations, then population management at the broader scale can be considered.
  - Wolf population management should be done in an adaptive management framework. Strategies should be researched and outlined to afford timely response to population-management needs. Application of control should include an evaluation component.
  - In recent years, Michigan wolves have been killed on a case-by-case basis by government personnel for the purpose of addressing wolf-related conflicts. All reason suggests wolves will continue to be killed for this purpose. The DNR can use hunters for this management need. Satisfying, in part, the interest to recreationally hunt would be an outcome of killing wolves to address wolf-related conflicts.
  - If wolves expand naturally into regions within the Lower Peninsula to the extent that social acceptance permits such expansion, proactive education should be aimed at developing tolerance among the public and understanding the value of the cost and benefits of living with wolves.

## **BENEFITS OF WOLVES**

We recognize wolves provide benefits to many citizens of Michigan. Accordingly, we feel the revised wolf plan should address ways to maximize those benefits and foster positive interactions associated with wolves. Although we were not able to agree on all of the positive experiences wolves provide or could provide, we did agree the presence of wolves is associated with the following benefits.

*Cultural Values:* Wolves are a species of great significance to Native Americans. Today, Native American communities in Michigan value the return of Ma'iingan (i.e., the wolf) as an intrinsic spiritual component in the reaffirmation and continued viability of their own cultural well-being.

*Effects on Tourism and Recreation:* A Michigan public-attitude survey conducted by Michigan State University in 2005 indicated the presence of wolves in an area would attract some citizens while deterring others, but nearly half of survey respondents indicated the presence of wolves would not be a consideration when choosing a vacation area. A marketing strategy that promotes the values of wolves could attract members of this latter group to local communities, thus yielding tourism and economic benefits.

*Personal Appreciation:* Many citizens feel the wolf has an 'existence value' and they benefit from knowing wolves exist as a healthy, thriving wild population in the State. This benefit can be realized whether or not people are able to see or hear those animals. The presence of wolves

signifies 'wilderness' for many people and those individuals may place a higher value and feel a sense of stewardship on Michigan's wolf range.

*Nature Appreciation:* The presence of wolves provides an exciting opportunity for those Michigan citizens who enjoy studying and observing nature. Although the opportunity to hear, see, photograph or study wolves in the wild of Michigan may be restricted to a relatively small portion of citizens, the experience and the option of having that experience are highly valued by those individuals.

*Ecological Benefits:* Not all citizens view the ecological role of the wolf in a positive way but most believe the wolf is an important component of a complex and dynamic ecosystem. Nearly three-quarters of interested Michigan citizens who responded to the 2005 public-attitude survey believed the ecological benefits were a 'very' or 'somewhat' important reason to have wolves in Michigan. Many Roundtable members viewed the presence of a self-sustaining population of wolves over time to be a positive indicator of ecosystem health.

#### Guiding Principles:

- The DNR should work with other agencies, Tribes and private organizations to foster benefits associated with wolves and to provide positive wolf-human interactions.
- Information describing the cultural and spiritual significance of wolves to Native Americans should be drafted in consultation with Michigan Tribes and appear in the body of the wolf-management plan.

### WOLF-RELATED CONFLICTS

We recognize the presence of wolves imposes more costs on some groups of Michigan citizens than others. These costs range from actual losses of domestic animals to anxieties over the presence of wolves in residential or recreational areas. The following guiding principles were developed to help minimize the incidence of wolf-related conflicts, provide relief to citizens adversely affected by the presence of wolves and certain wolf behaviors, and thereby foster public acceptance and long-term viability of the wolf population.

We accept lethal control of wolves should be an option for response to conflicts involving wolves and livestock. However, the revised wolf plan should place a high priority on developing, evaluating and applying non-lethal management methods to reduce negative wolf impacts wherever possible. The guiding principles regarding lethal removal of wolves that attack livestock apply to situations where livestock losses have been documented or where a wolf is in the act of livestock depredation; they do not recommend lethal removal of wolves as a preventative measure in areas where problems have not yet occurred.

An attack on a dog that enters the territory of a wolf pack is a predictable, normal behavior of wild canines and, in itself, does not justify removal of all or some wolves in the pack. Not until such attacks become a chronic occurrence should removal of all or some of the wolves in the pack be considered.



We also place a high priority on avoiding abuse of management options (e.g., lethal removal of depredating wolves by livestock owners). The revised wolf plan should ensure lethal removal of wolves will be accompanied by whatever reporting, monitoring and enforcement is necessary to prevent excessive or inappropriate use.

#### Guiding Principles:

##### *Depredation of Livestock*

- The DNR should provide timely and professional responses to wolf–livestock complaints.
- Economic and other incentives, including compensation for losses at fair value, should be provided to livestock producers who voluntarily implement best management practices that decrease the potential for wolf–livestock conflicts.
- The DNR should take an incremental approach to addressing wolf–livestock conflicts that is guided by severity and frequency of conflicts. When severity and frequency of conflicts are low, more conservative methods should be applied whereas increasingly aggressive control methods may be applied as the severity and frequency of conflicts increase.
- As part of the incremental approach to addressing livestock losses, a suite of approaches must be used, including technical support and non-lethal and lethal methods. After depredation losses have been confirmed, lethal take permits to landowners on private land may be issued if non-lethal methods are determined to be ineffective.
- Livestock owners should be allowed to kill wolves in the act of livestock depredation without a permit on private property. All such incidents must be reported immediately and investigated. Abuses should be referred for prosecution.

##### *Depredation of Dogs in Non-residential Areas*

- We acknowledge there are conflicts between wolves and dogs.
- We recognize there is an inherent risk to dogs allowed to range in areas frequented by wolves. The primary responsibility for avoiding or minimizing conflicts between wolves and dogs, which includes making good-faith efforts to avoid areas the DNR has identified as having had wolf–dog conflicts, rests with the dog owners. The DNR should provide timely and professional responses to conflicts between wolves and dogs. Further, the agency response should be guided by the severity and frequency of conflicts. Lethal control should not be used unless wolf-attacks on dogs become a chronic occurrence and non-lethal methods are determined to be ineffective.

- The DNR should make pack territory information in known areas of probable or previous conflicts between wolves and dogs available to the public in an effort to reduce those conflicts.
- In an attempt to reduce conflicts between wolves and dogs, the DNR should work with the Natural Resources Commission and stakeholders to allow voluntary alternatives to reduce wolf visitation to bear bait sites.

#### *Depredation of Pets in Residential Areas*

- The DNR should provide timely and professional responses to wolf-pet complaints.
- The DNR should take an incremental approach to addressing wolf-pet conflicts that is guided by severity and frequency of conflicts.

#### *Habituated Wolves*

- The DNR should provide timely and professional responses to reports of habituated wolves and take necessary measures to minimize or eliminate human-safety risks posed by identified habituated wolves.
- We support the concept of a legal framework to hold persons accountable for intentionally engaging in behaviors that lead to the habituation of wolves.

### **WOLF HARVEST FOR REASONS OTHER THAN MANAGING WOLF-RELATED CONFLICTS**

As addressed in the earlier section on wolf abundance and distribution, we accepted harvest of wolves by licensed hunters and trappers as a possible management tool to reduce wolf-related conflicts under specific conditions. We also considered the separate issue of whether a regulated wolf hunting/trapping season should be provided in the absence of any need to reduce wolf-related conflicts through management, provided good scientific data showed the harvest would be sustainable and would not threaten the viability of the wolf population.

We considered the available science and thoroughly explored many diverse perspectives on this issue. Some of us supported a hunting/trapping season in the absence of a specific need to reduce local wolf abundance because many Michigan residents would place an important value on and derive benefits from the opportunity to harvest wolves. Others of us opposed a hunting/trapping season in the absence of a specific need to reduce local wolf abundance because it would conflict with the cultural and personal values of many other Michigan residents. After substantial deliberation, we concluded consensus on any guiding principles regarding this issue was not possible because the disagreement focused primarily on important differences in fundamental values.

## INFORMATION AND EDUCATION

The 1997 *Michigan Wolf Recovery and Management Plan* stated an extensive public information and education (I&E) campaign was needed to develop a supportive social environment for the recovery of wolves in Michigan. The plan outlined five I&E objectives:

1. Develop a coordinated information and education plan.
2. Develop materials for specific educational needs.
3. Maintain public contact.
4. [Participate in] public presentations and events.
5. [Provide] training for agency personnel.

Those objectives are still valid today. In fact, given the larger wolf population and greater potential for wolf-human interactions, the public need and demand for I&E regarding wolves is even greater now than it was in 1997. We believe the DNR should give a high priority to planning and implementing an effective I&E program regarding wolves. As with all management, an important component of this effort should include a periodic needs assessment and an evaluation of program effectiveness.

During our deliberations, we identified many specific issues that an I&E program should address. In no particular order, some of the I&E needs include:

- Educate residents, legislators and other decision-makers about wolf ecology and natural history.
- Educate residents, legislators and other decision-makers about the benefits and risks associated with wolves.
- Inform livestock producers how to reduce risks of depredation of livestock.
- Inform dog owners how to reduce risks of wolf-attacks on dogs at locations away from their residences.
- Inform users of wild lands of the risk of conflicts between wolves and dogs in an effort to reduce those conflicts.
- Inform pet owners how to reduce risks of depredation near their residences.
- Inform residents how to help prevent habituation of wolves.
- Educate Lower Peninsula residents to prepare them for the potential presence of wolves in their region.
- Disseminate information emerging from current research programs on wolves and their relationships to the Great Lakes ecosystem.

These needs include separate information and education components. The information component should address immediate needs of residents regarding possible interactions with wolves. The education component should be designed to provide a broader understanding of the wolf and its presence in Michigan. This component should address a broad audience and include public school audiences.

We identified the lack of sufficient communication staff and resources in the DNR to be one barrier to an effective I&E program. Overcoming this barrier will require extensive cooperation and partnering among the DNR, other agencies, Tribes and private organizations to develop and disseminate informational materials and educational programs. The wolf-management advisory council (recommended later in this report) should play an instrumental role in helping the DNR identify and respond to I&E needs.

There is a public perception the DNR lacks a clear policy regarding the types of wolf-related information that should be provided to the public. The revised plan should address this apparent lack of policy and develop an open, systematic process for responding to information requests at all levels. In the past, requests for information often failed to receive a response from the DNR. However, the addition of a wolf coordinator in the Wildlife Division in recent years has improved the DNR response to information requests and this position should be maintained.

#### Guiding Principles:

##### *Information*

- The DNR should provide timely information to support education and management efforts.

##### *Education*

- The DNR should coordinate, and evaluate the effectiveness of, a comprehensive education program.
- The DNR should initiate discussion with diverse user groups and provide information and technical expertise so the groups can develop educational materials to meet specific needs of their constituents.

## **RESEARCH**

The gray wolf in Michigan is a component of a large and complex Great Lakes ecosystem. As such, the species presents many complicated management challenges. In our deliberations, we identified many instances where available science was not adequate to guide recommendations for wolf management. For example, we identified needs for more research regarding:



- the interactions between wolves and humans;
- the efficacy of different management options to address wolf-related conflicts (e.g., depredation of domestic animals);
- the complex interactions and population dynamics involved in wolf–ungulate systems;
- the nature and extent of the relationship between wolf population size and wolf-related conflicts; and
- the efficacy of wolf population reduction as a means to reduce the frequency of wolf-related conflicts.

We believe the DNR should place a high priority on wolf-related research. However, we recognize funding available to the agency will not be sufficient to study all the important questions related to wolves. For this reason, the DNR should continue to collaborate with partners to address research needs.

#### Guiding Principle:

- The DNR should continue an active wolf research program, with a focus on projects that clarify factors influencing the Great Lakes wolf population. This program should include investigations of biological and social questions to support science-based wolf management.

### **FUNDING FOR WOLF MANAGEMENT**

As stated in its mission statement, the DNR is committed to the conservation, protection, management, use and enjoyment of the State's natural resources for current and future generations. Since wolves have become re-established in Michigan, they have once again become an integral part of the natural resources of the State. Given the DNR's mission and its implicit trust responsibilities for the State's wildlife, we believe the DNR should expend funds to conduct research and management of wolves.

We recognize most funding for wildlife management has traditionally been derived from revenues generated by sportspersons. The Michigan Game & Fish Fund is generated by State hunting and fishing license revenues, and the Federal Aid in Wildlife Restoration Act (a.k.a. Pittman–Robertson Fund) provides funds derived from an excise tax on purchases of firearms and sporting goods. In the absence of many other funding alternatives, the current DNR wolf-management program has been supported primarily by these two funding sources.

We recognize the important contributions of sportspersons toward the recovery and management of the Michigan wolf population. We also acknowledge the contributions of agencies, Tribes and private organizations that have addressed wolf education, conservation and research needs in places where traditional funding has fallen short.

We recognize wolf management will require significant expenditures by the DNR into the foreseeable future. Costs associated with the DNR wolf program may include expenses for salaries, wages, travel, equipment, facilities, livestock compensation, information and education materials, and other program elements. In the face of growing DNR budget challenges, it will be increasingly difficult to adequately meet wolf-management needs using only traditional funding sources. In light of these anticipated challenges, we encourage the DNR to pursue additional and alternative funding sources and partnerships for the management of wolves. We believe the use of alternative funding sources and partnerships could spread the financial support of wolf management among a greater variety of user groups than traditional funding sources currently allow.

**Guiding Principle:**

- The DNR, in collaboration with other agencies, Tribes and private organizations, should seek and develop funds to support effective implementation of the wolf management program.

### **WOLF-DOG HYBRIDS**

Wolf-dog hybrids are produced when a wolf interbreeds with a dog or another wolf-dog hybrid. Ownership and proliferation of these animals in Michigan could threaten the viability of the Michigan wolf population for multiple reasons. First, released hybrids may breed with wild wolves and thereby introduce dog genes into the wolf population. This behavior can jeopardize the genetic integrity of the population and cause population-wide changes in morphological and behavioral characteristics. Second, a desire to breed and raise wolf hybrids may prompt some people to capture wild Michigan wolves illegally. Third, problems caused by released hybrids are often incorrectly attributed to wolves and thus reduce social acceptance for a wolf population. Collectively, these adverse consequences on the Michigan wolf population can be significant, and we believe the concerns expressed in the 1997 *Michigan Gray Wolf Recovery and Management Plan* are still valid today.

**Guiding Principle:**

- We are concerned wolf-dog hybrids will have negative effects on the wild wolf population in Michigan.

### **CAPTIVE WOLVES**

Captive wolves that are released or escape pose a threat to both people and the wild wolf population. These wolves could pose risks to human safety; they could also reduce social acceptance for the wild population because the public is unlikely to distinguish between problems caused by released captive wolves and those caused by wild wolves. Given these adverse effects potentially caused by released or escaped captive wolves, we do not believe private citizens should be allowed to possess wolves in captivity in Michigan.

The Michigan Large Carnivore Act (Public Act 274 of 2000) prohibits the possession of several large carnivore species, except under permit. However, the list of species covered by this law does not currently include wolves. To provide a tool for limiting the possession of wolves in captivity, we feel the law should be amended to include wolves.

#### Guiding Principle

- We support adding the wolf as a species covered by the Michigan Large Carnivore Act (Public Act 274 of 2000).

### **WOLF-MANAGEMENT PLAN REVIEW PROCESS**

Wolf abundance and distribution, attitudes of Michigan residents, and wolf legal status are likely to change after the revision of the wolf plan is complete. To address ecological, social and regulatory shifts in a timely manner, the wolf plan should be reviewed and revised at regular intervals. We ask the DNR to conduct timely reviews that incorporate adequate public input.

#### Guiding Principles:

- We encourage the DNR to include a provision in the plan for a wolf-management advisory council to continue to identify and discuss management goals, conflict resolutions, and public-education opportunities on an annual basis.
- The DNR should formally review and update the wolf management plan at 5-year intervals. The review process should provide for public input.

## CERTIFICATION

We, the members of the Michigan Wolf Management Roundtable, as the designated representatives of our respective organizations and agencies, reached consensus on all of the preceding guiding principles and hereby certify we support the recommendations set forth in this report.



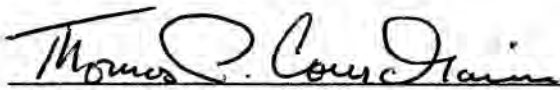
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Michigan Resource Stewards

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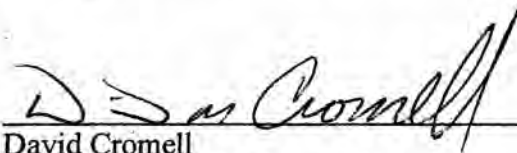
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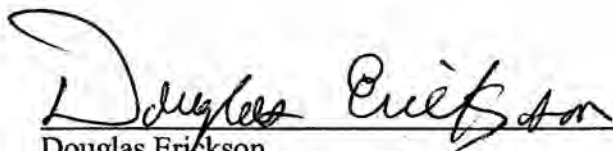
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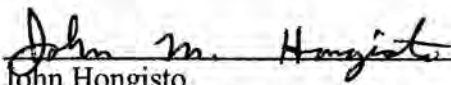
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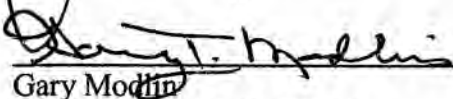
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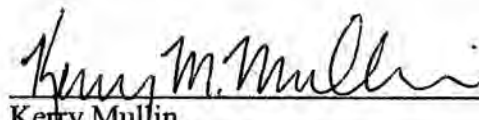
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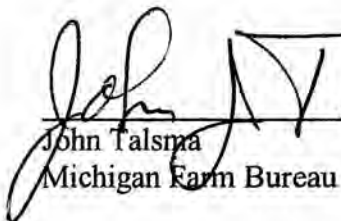
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