

3.3 Firearms

Safety Initiatives in Place Prior to Review

Wildlife Services has a long tradition in firearms use and firearms safety. It should be noted that WS wildlife damage management activities are distinctly different from recreational sport hunting. Wildlife Services employees frequently conduct wildlife management operations under difficult or unusual conditions in both rural and urban settings, sometimes in high profile situations. Wildlife Services policy and firearms safety training need to reflect this unique role.

In 1999, after an accidental discharge of a firearm inside a vehicle, WS recognized the need to formalize a WS firearms safety policy and proficiency training program. The WS Firearms Safety Committee was tasked with updating the WS firearms safety policy and writing the first WS Firearms Safety Training Manual. In 2002, the WS Firearms Safety Training Manual was provided to WS employees. This training manual reflects the unique mission of WS employees. The manual includes these sections:

- Basic safety training requirements
- WS Directive 2.615, Firearms Use and Safety
- Firearms Safety, APHIS Safety and Health Manual
- General firearms safety considerations
- Firearms carrying positions
- Safety distance guidelines
- Shot-travel distance table
- Lead contamination
- Rifle, shotgun, handgun description
- Rifle, shotgun, handgun marksmanship
- Firearms care
- Reloading safety and ammunition
- Pyrotechnics
- Suppressed firearms, night-vision equipment, and infrared aiming lights
- Shooting range rules
- Sharp-shooting procedures\guidelines for white-tailed deer damage management
- President Clinton's memorandum on child safety lock devices for handguns
- The Lautenberg Domestic Confiscation Law
- Contacts for firearms instructor training

To implement the training required by WS Directive 2.165, WS Firearm Use and Safety, volunteer WS employees were trained and certified as Firearms Safety Training Instructors. Currently WS has 86 certified Firearms Safety Training Instructors throughout the U.S. providing firearms safety training to the over 1,700 WS employees. All WS employees who use firearms in the field have received firearms safety training from a certified firearms safety instructor in accordance

with WS policy and the WS Firearms Safety Training Manual. Employees receive training on all types of firearms (rifle, shotgun, and handgun) at least once every other year. Written tests and live-fire exercises are included in the training.

Each year, WS employees fire tens of thousands of rounds while conducting wildlife damage management activities. Other than the military, this is more than any other state or federal organization, including law enforcement agencies. Although WS strives for zero accidents, the two injury accidents involving WS employees over the past five years is a remarkably low number, when compared to the number of rounds fired and the large number of WS employees who use firearms.

Review Activities

Review of the WS firearms program was conducted by the National Security Academy (NSA). The NSA is a private firearms use and safety training organization. They specialize in providing training to law enforcement, military, mobile security teams, and security consultants. During the review, NSA representatives examined all WS Directives, documents and manuals pertaining to management and operations of WS firearms program, training requirements and curricula and training records, firearms safety procedures. In addition, NSA representatives interviewed WS management and field personnel. As part of the review the NSA team inspected four WS state offices and accompanied field personnel on projects involving live-fire of firearms. They also attended one WS firearms safety training.

Summary of Review Findings

Wildlife managers use many tools to minimize conflict between people and wildlife. Firearms are commonly used when it is determined that removal is the best solution to a conflict. Wildlife Services employees rely on firearms and shoot thousands of rounds each year. It is therefore imperative that WS employees be highly skilled in their use of firearms and employ safe practices.

During the initial site visit, reviewers met with the Chairman of the Firearms Safety Committee who stated, "Wildlife Services" goal is to be at the forefront in firearms safety among all government agencies." Upon completion of the review, it was apparent that WS is an agency with employees that share this same goal; who demonstrate a willingness to learn and who have a genuine desire to act in a safe and responsible manner. Demonstrating the importance of safe firearms use (through actions and attitude) at each of the various levels within WS will help to ensure that this goal continues to be met.

Wildlife Services has implemented a comprehensive firearm safety program for its employees, resulting in well-trained, competent staff, employees who are knowledgeable about the safe-use, transport, and storage of firearms. When compared to employees of other federal and law enforcement agencies, WS field employees discharge their firearms significantly more on a daily basis. While it was

difficult to calculate from the data WS currently collects, it is noteworthy, that the number of firearm-related incidents, relative to the number of rounds fired, is disproportionately low. On the rare occasion that a firearm incident occurs, it is generally the result of an employee failing to comply with WS stated policies and procedures, or failing to exercise the fundamental rules of safe gun handling. It is important to note that the few accidents that WS has incurred involved WS personnel, not members of the public.

Strict adherence to firearms safety rules, a continued emphasis on training, and well documented training program in each state will minimize the chances of further firearms incidents.

Priority Recommendations

The top priority recommendations made by the firearms reviewers were as follows:

1. Wildlife Services firearm safety training should be standardized. The NRA is the only nationally recognized firearm safety training organization. Wildlife Services should adopt the use of NRA certified instructors, use of NRA curriculum (to include their three fundamental safety rules) and certification standards for pistol, rifle and shotgun, NRA proficiency standards, NRA testing, and NRA certification for WS employees. Additional state-related firearm safety training may be added, such as information regarding concealed carry laws.
2. The Firearm Safety Committee should devise a system to track all firearm related accidents, incidents and safety violations, regardless of whether injury or property damage has occurred. A toll-free, anonymous hotline should be instituted in addition to other reporting mechanisms. The committee should develop an investigative process to respond to reports of unsafe firearm situations. Guidelines should be developed for stricter disciplinary action regarding firearm accidents/incidents to include mandatory drug testing and retraining.
3. Wildlife Services directives should clearly address whether shooting out of vehicles is allowed. Additionally, directives should clearly define the phrase “out of vehicles” (e.g. muzzle out of window, person completely out of vehicle). If shooting out of vehicle is indicated, a procedure for transporting the firearm while in pursuit of wildlife should be clearly addressed.
4. Firearms should be transported in vehicles in an approved rack system or hard sided case. When use is not imminent the bolt should be locked to the rear, magazines removed or empty, and safeties on.
5. All firearms that are used by WS employees on the job should be inspected annually. All work performed on these firearms should be initially approved by the State Director and the work should be conducted only by a certified gunsmith. Firearms should be inspected periodically to ensure proper functioning of actions and safeties.