

3.5 Immobilization and Euthanasia Drugs

Safety Initiatives in Place Prior to Review

The WS Chemical Immobilization and Euthanasia (I&E) Committee was established in 1990 to identify program I&E needs, and to determine ways of incorporating immobilizing and euthanizing drugs into wildlife damage management. The veterinary medical community relies heavily on chemical (drug) techniques to accomplish the safe and humane capture/euthanasia of animals. The majority of these chemicals are state and federally controlled substances. Legislation passed by Congress (Animal Medicinal Drug Usage Clarification Act of 1994 - AMDUCA) also reflects the public, professional, and regulatory demand that individuals and organizations involved in chemical immobilization and euthanasia of animals meet veterinary medical standards. Wildlife Services recognizes and supports this momentum toward improved, safer and more humane methods.

Current regulatory standards and humane guidelines are primarily focused on domestic animals in commercial, clinical, or laboratory conditions. Wildlife management activities conducted in field conditions are not addressed by these standards. Wildlife Services has developed a training program, field protocol, and internal supervisory guidelines that accommodate both wildlife management and regulatory needs. This training program enables WS to meet program objectives of using more humane methods, improving safety for WS personnel and the general public, raising the professionalism and credibility of WS biologists, and ensuring regulatory compliance and increased environmental sensitivity.

Wildlife Services employees are provided I&E training from highly qualified internal and external experts in animal handling and immobilization. Wildlife Services has pursued protocol and training goals by contracting with a wildlife veterinarian to write a training manual that has become the foundation of an overall I&E training program. This manual has provided an educational resource, and has also helped to refine WS' I&E policy and program implementation. Required subject matter currently includes laws and regulations, pharmacology of selected drugs, dosage calculations and recommendations, equipment and techniques, safety/first aid, security, disposal, record keeping, ethics, and professionalism. The need for improved delivery of professional I&E training programs led to the creation of an online I&E course. The course was originally developed from the WS I&E Manual by Colorado State University in 2003. The online course was transferred to the Berryman Institute through Mississippi State University in 2006. Currently, WS has 463 employees trained/certified to use I&E drugs in the course of their duties.

Wildlife Services also recognized the need to establish a system to adequately document I&E activities and to improve accountability. Wildlife Services currently meets these documentation needs through the Management Information System

(MIS), Controlled Materials Inventory System (CMITS) and, additionally, utilizing DEA and/or state record-keeping forms.

Wildlife Services utilizes controlled substances ranked by the DEA at Schedule III or lower when immobilizing and euthanizing animals is required. Immobilization and euthanasia drug users are required to have veterinary oversight for their operations. Nationally, the NWRC provides the animal care veterinarian who oversees WS I&E activities. Currently, 40 WS state programs use chemical I&E methods. However, some WS state programs have established cooperative relationships with private, state game & fish, state health, or extension veterinarians in order to train personnel and to obtain the necessary drugs. Several state WS programs have not been able to implement chemical I&E methods due to the lack of a local veterinarian partner.

Wildlife Services encourages and uses partnerships with outside organizations and agencies to meet training and procurement needs when possible. Wildlife Services voluntarily consults with other wildlife veterinarians for training and information on I&E activities and other wildlife veterinary medical issues. Wildlife Services has also established a Memorandum of Understanding (MOU) with the American Association of Wildlife Veterinarians that established a pool of DVM trainers and consultants for each state. Wildlife Services continues to encourage a collaborative partnership with the veterinary medical community and other wildlife management entities.

Review Activities

Review of the WS I&E program was conducted by Global Wildlife Resources (GWR) in conjunction with the Berryman Institute. Global Wildlife Resources provides euthanasia and immobilizing training to many wildlife management professional organizations including WS. To assess the degree of safety for WS in the arena of chemical immobilization and euthanasia of wildlife, reviewers identified the major risks associated with the WS I&E program; reviewed agency policies, directives, and supporting documents; reviewed training requirements, procedures, materials, tracking, and enforcement; visited four state programs to observe drug storage and handling, record keeping, field activities, and other pertinent issues; interviewed WS staff, administrators, and I&E committee representatives; and inquired about and investigated I&E-related accidents.

Summary of Review Findings

Overall, WS is doing an admirable job of addressing safety risks through their policies, administration, training, field operations, and culture. As reviewers discovered during state visits, some programs are highly conscientious about safety, while others are significantly less so. It appeared to be an “all or nothing” situation with each state program. Indeed, reviewers expected their findings to be reflective of the diversity of attitudes and approaches within the broader agency with respect to safety protocols. Some programs are doing nearly everything correctly and have little room for improvement, but other programs must make significant progress to

minimize the risks associated with I&E drugs and create a safe working environment.

In consideration that each program is unique, and that findings and recommendations must be rectified with the reality in each program, the reviewer offers the following analyses and recommendations to increase the level of safety in the WS I&E program. The greatest risk associated with the WS I&E is accidental and intentional loss or unaccountability of drugs. This can result in risk to the agency, the employees, and the public. Addressing this risk includes legally complying with Drug Enforcement Administration (DEA) requirements. The other principal risk is accidental exposure to drugs, which includes direct exposure of field personnel and indirect exposure of the public through consumption of recently drugged animals. Addressing this risk includes legally complying with the Food and Drug Administration (FDA) requirements and providing quality training to further develop safe field practices and conscientious attitudes.

Priority Recommendations

The top priority recommendations made by the immobilization and euthanasia reviewers were as follows:

1. Conduct unannounced, random, and physical (on-site) inspections of state programs to verify that requirements of drug storage and inventory documentation are met. This will effectively prevent potential drug abuses, sales, or loss and ensure that the legal requirements for DEA are met.
2. Clarify, create, and/or enforce policies regarding: a) veterinary supervision of state I&E programs, b) holding and disposal of empty or expired drug vials, and c) transfer of I&E drugs.
3. Empower an independent entity to track the certification status of employees and evaluate the acceptability of training reported by State Directors and other employees to meet certification requirements. This same entity could be responsible for creating and delivering integrated, standardized, and centralized training in the arena of I&E.
4. Create an online clearinghouse of all I&E information pertinent to the WS program, including directives, policies, updates and memos, training curricula, technical information, and other pertinent resources.
5. Increase accountability among administrators, State Directors in particular, to ensure safety protocols are followed. This includes accountability for all I&E policies, but in particular issues relating to drug inventories, storage, and documentation, veterinary supervision, and training requirements/certifications.
6. Standardize terminology and format for drug inventory forms. The exact format is less important than that the forms are self-apparent, relatively standardized, and allow for the diversity of individual programs.