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POLICY 5303

Cancels: M6003

See Also: WACs: [246-887-220](#); [246-887-230](#); [246-887-240](#); [246-887-250](#); [246-887-260](#); [246-887-270](#); [246-887-280](#); [246-887-050](#); [246-887-060](#); [246-887-070](#); [246-887-080](#), PRO 5303

Approved By: /s/ Joe Stohr

POL-5303 USING DRUGS TO CAPTURE WILDLIFE

This policy applies to all WDFW employees and volunteers. However, if policies or procedures are in conflict with or are modified by a bargaining unit agreement, the agreement language shall prevail.

Federal and state laws allow the administration of certain drugs under specified conditions for wildlife research and management purposes, including capture, relocation, examination, treatment, euthanasia, and other legitimate uses. This policy applies whenever Department of Fish and Wildlife personnel participate in the chemical immobilization of terrestrial wildlife and marine mammals.

Definitions:

Controlled Substances: Drugs are listed in the *Controlled Substances Act* (1970) because of their potential for abuse. Schedule I drugs have the highest abuse potential and no accepted medical use; Schedule V drugs have the least abuse potential. The federal Drug Enforcement Administration (DEA) controls the use of narcotics and other dangerous drugs that are listed in the *Controlled Substances Act*. Examples of DEA-scheduled controlled substances used in wildlife management include:

Schedule II: carfentanil, fentanyl, etorphine (M99®), diprenorphine (M50-50®)

Schedule III: ketamine, Telazol®, sodium pentobarbital euthanasia solutions

Schedule IV: diazepam (Valium®)

Extra-label Use of Drugs: The application of an approved drug in a manner not according to the directions on its label. Most drugs used in wildlife species are used in an extra-label manner because the extensive testing required for Food and Drug Administration (FDA) approval has not been done in wildlife. The *Animal Medicinal Drug Use and Clarification Act* (AMDUCA) of 1994 specifies protocol and record keeping for extra-label use of drugs. AMDUCA applies to controlled substances, other legend drugs, and over the counter (OTC) drugs.

Legend Drugs: Drugs required by the state Department of Health Board of Pharmacy (Board) rules to be dispensed by prescription only, or are restricted to practitioner use. These include DEA controlled substances and FDA prescription drugs.

Over the Counter Drugs (OTC): Drugs that are not controlled substances and do not require a prescription for purchase or use. Examples include some formulations of penicillin, de-wormers, and topical antibiotics.

Prescription Drugs: Drugs that are regulated by the FDA and restricted to use by or on the order of a veterinarian or physician (i.e. prescription only). Examples include xylazine (Rompun®), yohimbine, acepromazine, and naltrexone.

Withdrawal Period: The period between the administration of a drug to an animal and the time when the meat of that animal can be safely consumed. Withdrawal periods must be observed for controlled substances, other legend drugs, and OTC drugs.

1. **The Use of Controlled Substances and Prescription Drugs Shall Comply with all Federal and State Laws**

- The DEA regulates the inventory and use of controlled substances and requires WDFW to maintain a DEA controlled substances registration.
- The FDA regulates the administration of all drugs in food producing animals, including wildlife.
- The Board has granted the Department a limited registration under RCW 69.50, *Controlled Substance Act*, to purchase, possess, and use certain controlled substances for wildlife management purposes.

2. **A Designated Veterinarian Serves as WDFW's Wildlife Drug Program Administrator**

(See PRO 5303)

3. **A Designated Regional Wildlife Drug Coordinator Coordinates the Wildlife Drug Program in Each Regional Office**

(See PRO 5303)

4. **Employees Must Complete a WDFW Approved Training Course to Possess, Handle, or Administer Legend Drugs**

WDFW employees shall not possess, handle, or administer legend drugs unless they have completed a WDFW-approved training course within the preceding 5 years and their names have been placed on the Board's list of authorized WDFW employees. Training must be repeated every 5 years.

The training includes:

- Basic drug pharmacology
- Characteristics of different immobilizing drugs

- Appropriate drug selection for the species to be immobilized
- Dosage calculations
- Drug delivery
- Animal care and welfare concerns
- Euthanasia
- Potential hazards
- Safe handling and administration of drugs
- Response to accidental human exposure
- Legal issues related to the administration of legend drugs
- Record keeping
- Demonstration of knowledge by WDFW attendees of the potential hazards and proper techniques to be used in administering controlled substances

5. Legend Drugs Shall be Stored According to Federal and State Laws

(See PRO 5303)

6. Employees Shall Receive Special Authorization from the Drug Enforcement Administration and the Director or His or Her Designee in Order to Possess and Administer Carfentanil

7. Employees Must Receive Special Authorization from the Director or His or Her Designee in Order to Possess and Administer Sodium Pentobarbital Solutions

8. Employees Who Administer Legend Drugs, Their Supervisors, Regional Wildlife Drug Coordinators, and the Wildlife Drug Program Administrator are Responsible for Ensuring that Records are Maintained and Reports are Submitted as Required by Federal and State Laws

(See PRO 5303)

9. Employees Must Ensure that Meat Contaminated with Drug Residues Does Not Enter the Human Food Supply

(See PRO 5303)

- Legal harvest periods include state general, special permit, and tribal hunting seasons, including tribal ceremonial hunts.
- If an immobilized animal is subject to legal harvest within the withdrawal period for the drug used, employees shall identify the animal with an ear tag that has a unique identification number, a warning to contact WDFW before consuming meat from the animal, and contact information for the Wildlife Drug Program Administrator.
- Withdrawal periods for the drugs used by WDFW are:

• Ketamine	3 days
• Telazol®, acepromazine, diazepam	14 days
• Xylazine, <i>Capture-All 5</i> (ketamine + xylazine mixture)	15 days
• Penicillin (antibiotic)	21 days
• Yohimbine, carfentanil and reversal agents	30 days
• Ivermectin (dewormer)	49 days

- If an animal is legally harvested within the drug withdrawal period, the hunter may be issued another tag at the discretion of the Regional Enforcement Program.

10. **All Legend Drugs Shall Be Purchased and Disposed of by the Wildlife Drug Program Administrator**

(See PRO 5303)

11. **A Physical Inventory of Legend Drugs Shall Be Performed, Reconciled, and Documented Every 12 Months**

(See PRO 5303)

12. **Employees Shall Proceed with the Use of Immobilizing Drugs Only After all Other Alternatives, Including Physical Control or Allowing an Animal to Leave an Area on its Own, Have Been Considered and Deemed Inappropriate or Infeasible**

- Employees shall follow the procedures and techniques taught in their wildlife chemical immobilization-training course.
- Employees shall not use legend drugs for the immobilization of domestic animals, except in an emergency situation.

13. **Employees Shall Use Immobilization Drugs and Equipment in a Manner That Ensures Maximum Safety to Themselves, Co-Workers, and the Public**

(See PRO 5303)

14. **Employees Shall Make Every Reasonable Effort to Retrieve Darts, Needles, and Syringes Used During Field Immobilization Efforts and Dispose of Them Properly**

(See PRO 5303)

15. **Employees Shall Maximize Human Safety, be Sensitive to Public Sentiment, and Ensure the Safe and Humane Treatment of Affected Wildlife**

(See PRO 5303)