



## **RECOMMENDATIONS FOR STATE OVERSIGHT OF WILDLIFE DAMAGE CONTROL AGENTS**

Prepared by:

Furbearer Working Group  
of the  
Wildlife Resources Committee

These recommendations were developed by the Furbearer Working Group of the Wildlife Resources Committee for the Southeastern Association of Fish & Wildlife Agencies. This document is not intended to be a binding document, but provides technical information and recommendations for consideration in establishing policies regulating the practices of wildlife damage control agents. This document was adopted by the Wildlife Resources Committee on October 19, 2014 in Destin, Florida and was subsequently adopted by the SEAFWA Board of Directors on October 18, 2016 in Baton Rouge, Louisiana.

**Issues and Recommendations for  
Wildlife Damage Control Agents**  
SEAFWA Furbearer Working Group

Due to the increasing urbanization of southeastern states, coupled with increases in some wildlife populations and a public that often has little knowledge regarding how to resolve wildlife problems, there are increased demands for the services provided by wildlife damage control agents (WDCAs). State wildlife agencies are charged with the stewardship of our natural resource, therefore it is vital that states have the regulatory oversight needed to ensure that WDCAs practices are both beneficial to the state's citizens and not detrimental to our wildlife populations. With the growing number of WDCAs, the SEAFWA Furbearer Working Group (FWG) has developed recommendations for regulatory oversight of this industry that would address concerns about regulatory and statutory compliance, animal welfare, human safety, wildlife diseases, wanton waste, and customer expectations.

Issues:

- **Regulatory/statutory compliance:** WDCAs may not be traditional sportsmen, thus they may be unaware of the rules and laws that govern the legal take and possession of wildlife. Their ignorance of the law is exacerbated when testing or training is not required. This has resulted in instances of WDCAs using illegal methods of take (e.g., trap-type, trapping methods, trap checks), as well as illegally moving wildlife, specifically rabies-vectors species. Many WDCAs illegally moving wildlife promote this service as “humane” relocation to their clients, thus miseducating their clients that moving wildlife is legal and in the best interest of the animal.
- **Animal Welfare:**
  - Harvest seasons were established during a time of year when young are independent. Because removal of furbearers outside established harvest seasons may result in orphaning of dependent young, their removal should only occur if the animal is truly a problem.
  - WDCAs do not always have a background in trapping, yet trapping is the primary method for capturing damaging wildlife. WDCAs without trapping experience or training may use illegal traps and illegal trapping methods to capture wildlife, raising animal welfare concerns. Lack of basic training will increase the likelihood of non-target wildlife species being captured. In sharp contrast to traditional fur trappers, WDCAs are highly visible to the public. Whereas traditional trappers usually work in rural areas, WDCAs are concentrated in suburban and urban areas. The impact of even one incident related to a WDCAs' inexperience with trapping can severely impact regulated trapping, as the public may not differentiate between law-abiding licensed trappers and the reports of illegal activities of WDCAs.

- Euthanasia should be the primary method of disposal for wildlife causing conflicts. However, animal welfare concerns are raised if euthanasia is not done properly due to lack of training, knowledge or experience by WDCAs.
- **Wanton Waste:**
  - Harvest seasons were established during a time of year when furbearers could be utilized and the young are independent. Furbearers taken outside the season cannot be utilized (i.e., pelts not prime), resulting in the resource being wasted. In addition, young may be orphaned, which can negatively impact furbearer recruitment. With recent increases in pelt prices, furbearer species continue to be highly valued by trappers and there is increased interest in maintaining and responsibly managing the resource.
  - Furbearers are a valuable, renewable, public trust resource. However, without restrictions on the conditions in which furbearers can be taken outside the established season(s), every furbearer observed will be viewed and treated as a pest by WDCAs and the public, if not properly educated. This could result in take outside the established harvest seasons equaling or exceeding harvest during established seasons.
  - WDCAs with little or no training will likely be unable to properly identify which wildlife species is causing property damage. When the offending animal is not properly identified, other wildlife species are often removed that were not the problem animal.
  - As there is a monetary incentive to conduct animal removal for a client, many WDCAs will push for removal of animals over non-lethal methods (e.g., exclusion, removal of pet food/bird feeders, secure garbage), even though the non-lethal options can immediately resolve most human-wildlife conflicts.
- **Human Safety:** WDCAs are involved in activities that expose them to risk of injury, such as climbing ladders, working in tight places, working in remote places (e.g., streams, swamps, deep woods), and handling live animals. Without regulatory oversight or training, WDCAs can put themselves, employees, wildlife, and possibly their customers, at needless risk of injury.
- **Wildlife Diseases:** Several furbearer species are rabies-vectors species (e.g., raccoons, foxes), as well as potentially carrying other wildlife diseases (e.g., distemper, *trichenella*, *baylisascaris*) that can impact both human health and the health of domestic animals and wildlife populations. Compliance with laws, as well as knowledge on the proper handling and disposal of wildlife species is important in preventing disease outbreaks among the public, domestic animals, and wildlife populations.
- **Customer Expectations:** While business between a WDCA and a customer is a private transaction, customers still have expectations that WDCAs are trained

individuals licensed by the state, and often believe that WDCAs are acting as agents of the state's natural resource agency. Customers expect that WDCAs are knowledgeable in laws and regulations, trained in proper capture and animal handling techniques, and proficient in identifying the animal causing damage. When issues arise, customers usually call the state agency to complain about the WDCA's activity or behavior. State agencies do not have the personnel resources to address complaints and could lose credibility if the public perceives that the state allows individuals to deal with a public trust resource without any regulatory oversight, licensing or training. In addition, better trained WDCAs will provide better services to customers experiencing wildlife damage, which will assist the state in meeting the demands to address problem wildlife issues.

### **Recommendations:**

1. A permit or license should be required to perform wildlife control work for a fee. This would allow state agencies to identify their WDCAs and assist in connecting WDCAs with potential clients. A fee-based permit or license would allow WDCAs to financially contribute to state agencies' wildlife management efforts, including agency efforts to test and train WDCAs.

However, licensed trappers should be exempted during the trapping season in order to encourage fur trapping, proactive population management, and utilization of the furbearer resource. In addition, until fairly recently, licensed trappers were the traditional avenue for individuals entering the WDCA industry. This path should be preserved.

2. WDCA applicants should be required to pass a test in order to receive a WDCA permit or license. Passing the test would demonstrate that they have a basic understanding of the rules and laws governing wildlife, and of proper animal handling and euthanasia techniques. This would increase both regulatory compliance and awareness of wildlife diseases, human safety, and animal welfare issues. Most industries (e.g., pest control companies, teachers, paralegals) have training requirements and minimum standards; WDCAs should be held to those same standards.
3. A permit or license should be required for each individual that works in a WDCA business. Large pest control companies, such as Terminix® and Orkin®, are increasingly getting into nuisance wildlife control work. Their employees perform on-site inspections and implement wildlife control activities. Therefore, they

should also be expected to meet testing and training requirements to receive a WDCA permit or license.

4. WDCA applicants should complete a training program. Training programs would help develop knowledgeable and responsible WDCAs by educating them on the rules and laws governing wildlife, acceptable animal handling and euthanasia techniques, and recommended capture techniques.
  - a. Controlling damaging wildlife is becoming an industry in the southeast. Most industries (e.g., pest control companies, teachers, paralegals) have intense training requirements. Additionally, in all states hunter certification, which includes a course and test, is a requirement for all new hunters. As WDCAs are being paid to remove a public trust resource outside established seasons, they should be held to high standards mandated by the state wildlife agency.
  - b. Individual states should determine how best to implement a training program for their state-specific needs (e.g., agency-run, non-agency run, web-based, in-class).
  - c. Two levels of training could be provided:
    - i. Full training program for the WDCA owner.
    - ii. An on-line training course and test for individuals working underneath the WDCA owner.
5. WDCAs should be required to report activities conducted under their WDCA license or permit. At minimum, reports should include information on the number and disposition of animals taken by county and date. Each state can determine what additional information should be required in order to monitor and regulate WDCA activities.
6. State agencies should recommend guidelines and implement basic requirements for proper euthanasia methods for WDCAs. The SEAFWA FWG could develop guidelines for the southeastern region.
7. States agencies should require that wildlife be disposed in a safe and sanitary manner and in a location that is away from water sources.
8. State agencies should require that rabies-vectors species either be released at capture site, especially if it is a non-target capture, or euthanized by WDCAs. Rabies-vectors species and other nuisance wildlife species should not be relocated or translocated.

9. The NWCOA<sup>®</sup> Certified Wildlife Control Professional Certification:
  - a. The SEAFWA FWG opposes requiring WDCA applicants to obtain the NWCOA<sup>®</sup> Certified Wildlife Control Professional Certification. There are concerns about requiring a specific certification, which would create a monopoly. Additionally, the certification is very difficult to obtain. While there should be regulatory oversight of WDCAs, we are concerned that requiring this specific certification would discourage individuals from becoming WDCAs.
  - b. State agencies can consider recognizing this certification in lieu of other permit/license renewal requirements, based on their state's needs.
  
10. The National Wildlife Control Training Program (NWCTP):
  - a. The SEAFWA FWG opposes the NWCTP being a sole-source training program for WDCAs in the southeastern states. The following comments and concerns were raised regarding NWCTP:
    - i. The NWCTP has limited flexibility in training and testing WDCAs on state-specific rules and laws. States need more flexibility in training and testing WDCAs to meet state requirements.
    - ii. The costs of NWCTP is higher than that charged by most state agencies.
    - iii. Concerns about sole-sourcing training and testing to NWCTP.
    - iv. Individual states should determine whether to require or implement the NWCTP for their state.
      1. The NWCTP can supplement a state's training program.
      2. If a state does not have testing requirements and/or the manpower to implement a program, the NWCTP can serve as that state's program.