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I. POLICY SUMMARY

Effective vertebrate pest management is a vital component of ANR research and agricultural operations. The overall goal of this policy is to use the safest, most effective, economical and legal methods to control and suppress vertebrate pest populations to minimize damage to agricultural research and preservation of natural resources.

Prior to embarking on any form of a vertebrate pest management program the federal and/or state legal status of the animal must be determined. The legal status afforded an animal will influence the selection of an appropriate management technique, whether lethal or non-lethal, or an integrated pest management program.

Knowledge of and compliance with local, state, and federal regulations regarding the use, storage, disposal, and record keeping of pesticides used in vertebrate pest control programs is essential. The use of the pesticides in manners not consistent with label instructions is a regulatory violation and can increase the risks to non-target species or result in less effective control programs. The improper use of pesticides can have wide-ranging effects; reduce efficacy, safety, and increase cost, result in fines, loss of the use of the chemical as a management option, and has the potential for adverse media coverage.

In addition to pesticide use, certain vertebrate pests are best managed by use of legal traps or by use of a firearm. Vertebrate pest management via firearms is highly regulated. It is essential that employees follow the Universities stringent policies and procedures regarding firearm use.

Along with University policies, any individual or entity planning to undertake vertebrate pest management should bear in mind that in addition to all federal and state laws, there may be county or city ordinances that apply to specific species.

All definitions of Resident Small Game, Non-Game Animals, Furbearing Mammals and Big Game Animals is defined by the California Fish and Wildlife Code. Use your search engine to find the most up-to-date regulations and statutes.

II. DEFINITIONS

Firearm: Any device capable of discharging a center or rim fire cartridge, black powder, CO₂- powered metal-projectiles, or metal-projectiles powered by pumping or cocking the device. For the purposes of this policy, this includes but is not limited to: rifles, handguns, shotguns, pellet guns, and BB guns.

Dormitory: A “dormitory” at a REC is a living facility where the occupant has a shared living space and shared kitchen and/or bathroom facilities. Dormitories are used by visiting researchers and their associates (graduate students, Staff Research Associate, etc.), who typically stay for days, weeks or months.

Period of Authorization: This is the specific period of time that the authorization is

granted. Depending on circumstances, the authorization may encompass one day or up to one calendar year. Authorizations must have an end date and shall expire no later than December 31 of the calendar year. Renewal of authorizations may be requested annually with the completion of a new Firearm Authorization Form ([see REC Firearm Policy](#)).

Residence: A “residence” is a single-family dwelling (house or duplex, etc.) on University Property where REC-based employees or visiting researchers live and work for extended periods of time.

Unloaded: There is no cartridge in the chamber or magazine. University

Property : Buildings and grounds that are operated by, or under the control of, the Regents of the University of California.

Vertebrate Pest: An animal with a spinal cord that damages agricultural research or endanger the health, safety and welfare of employees, visitors or livestock and needs to be reduced, managed or eliminated using a legal, science-based program.

III. POLICY TEXT

A. All Plans that include the use of firearms for pest management must first follow the ANR Firearm Authorization Policy [LINK]

B. Vertebrate Pest Management Plan

1. Prior to embarking on any form of vertebrate pest management program the federal and or state legal status of the animal must be determined. The legal status afforded an animal will influence the selection of an appropriate management technique, whether lethal or non-lethal, or an integrated pest management program.
2. Knowledge of and compliance with local, state, and federal regulations regarding the use, storage, disposal, and record keeping of pesticides used in vertebrate pest control programs is essential. Any individual or entity planning to undertake vertebrate pest management should bear in mind that in addition to all federal and state laws, there may be county or city ordinances that apply to specific species.
3. RECs may find it necessary to use firearms for the purposes of controlling predators or pests on REC property. REC locations must follow the ANR Firearms Policy and Procedure [LINK]
4. The Center Director shall submit the Vertebrate Pest Management Plan to the Director, REC System for review and approval.
5. Plans must be reviewed and updated every 5 years.
6. Science-based justification in support of the plan will be developed by

consultation with Fish and Wildlife population census reports, Fish and Wildlife Personnel and ANR Advisors, Specialists or other ANR professionals.

- a. Example: *“Coyotes’ excellent sense of smell and their tendency to avoid new objects makes it very difficult to capture or even to study them, as they often recognize and evade traps, snares, and cameras, therefore firearms are most effective.”*
 - b. The Management Plan must include scientific-based recommended method (firearm, traps, chemical control, etc.).
 - c. Disposal methods must be best practices for a particular Vertebrate Pest. In addition, all local regulations should be followed. See ANR EH&S Guidelines for Disposal of Non-Regulated Waste, Section VI.C., “Animal Carcasses” for general guidelines (<http://safety.ucanr.edu/files/2871.pdf>).
7. Management Plans DO NOT include situations where there is a direct threat to the safety and welfare of Center livestock, employees and visitors.

C. Safety and Training

1. Employees using firearms for University business must have firearm safety refresher training every five years, either by completing a certified hunter safety course or other applicable firearm safety training approved by ANR Risk & Safety Services. Note: refresher training may be specific to the task that the employee is using a firearm for, e.g. proper techniques for animal euthanasia.
2. Eye and ear protection must be made available and used by staff as appropriate.

D. Pest Management Log

1. RECs shall maintain a management log. The log shall include information such as date of use, authorized user, method used, authorized by and purpose, number of animals euthanized or harvested.

E. Communication of Policy

1. Center Directors are responsible for providing copies of this policy and procedures and any REC-specific policies to the REC’s employees, on-site researchers, as applicable.

IV. COMPLIANCE / RESPONSIBILITIES

- A.** The REC Director is responsible for compliance with this policy at their Center and will report issues of non-compliance to the Director, REC System.
- B.** The ANR Risk & Safety Services office will periodically review compliance with this Policy and Procedures, including audits of records, training and disposal practices. The Director, Risk & Safety Services will report audit findings to the Director REC System and to the ANR Controller.

C. The UC Whistleblower Hotline is available for staff or the public to report any violations of this policy or any federal, state, or local laws and regulations.

D. Authority

1. Authority for enforcement of this policy is vested with [ANR Vice President](#), and through the Vice President, with ANR's [Associate Vice President](#).

V. PROCEDURES

The Vice President for ANR has authority under California Penal Code, Section 626.9 (h) to grant permission for possession, discharge or storage of firearms on property owned or managed by ANR. The Vice President, ANR has further delegated authority for approval of firearms at RECs to the Director of the REC System.

Failure by any individual to comply with this policy or additional REC-specific policies and guidelines or handling a firearm in an unsafe manner will result in an immediate revocation of their authorization and possible disciplinary action, in accordance with University policy and labor agreements.

VI. RELATED INFORMATION

VII. FREQUENTLY ASKED QUESTIONS

VIII. REVISION HISTORY

November 2017:

Format updated.