

1. INTRODUCTION

The Wildlife Services (WS) program is unique among APHIS programs, in that a high percentage of some employees' daily duties involve hazardous procedures and materials. To complete the Program's mission, employees use motorized land vehicles (ATVs, snowmobiles, trucks and automobiles), watercraft, aircraft, hazardous chemicals (laboratory, manufacturing), pesticides, immobilization and euthanasia drugs, explosives (including pyrotechnics), animal handling, and firearms. Recognizing the risk involved in these operations, WS has in place extensive safety policies and procedures to ensure the safety of WS employees. Accidents during the last five years involving aircraft, firearms, pyrotechnics, and water safety highlighted the need for WS to reassess safety policy and procedures to ensure the work environment is as safe as possible for WS employees.

This safety review was not designed to assess the appropriateness or effectiveness of WS mission activities. It was designed and conducted for one purpose: to ensure WS is doing everything that can be reasonably expected, to provide the safest working environment for its employees.

2. PURPOSE AND ORGANIZATION OF THE REVIEW

Aviation, firearms, pyrotechnics and water safety accidents in 2006 and 2007 highlight the need for WS to take a critical look at its safety policy and procedures. In June 2007, working cooperatively with the APHIS Administrator's office, the WS Deputy Administrator began a comprehensive review of nine WS programmatic areas that present a significant safety risk.

Nine major program areas of the WS program were included in this safety review: aviation, explosives and pyrotechnics, firearms, hazardous materials (chemical and biological), immobilization and euthanasia drugs, pesticides, vehicles, watercraft, and wildlife diseases/parasites (zoonotic disease). To facilitate the program-wide review process, one WS employee was identified as the facilitator and primary contact for each area. The facilitator was responsible for assuming the lead role in the initial design of his or her component review, securing contracts or cooperative agreements with the reviewing organization, and ensuring the final report was complete with findings and recommendations. Since this was a voluntary review, no punitive actions were associated with the review process. This approach allowed all WS programs and employees freedom to be transparent and open when contacted by reviewers.

The actual program area reviews were conducted by independent subject-area experts to ensure objectivity. It was also determined that organizations familiar with the WS mission would increase the quality of the review, however, this was not a critical condition of contractor selection. Subject area experts selected to conduct the reviews included the following organizations:

- The Interagency Committee for Aviation Policy (ICAP) – The ICAP is recognized as leaders in government aviation safety programs. The ICAP conducts standardized reviews according to ICAP’s “Guide for the Conduct of Aviation Resource Management Surveys.” Through ICAP, the General Services Administration and other federal agencies work together to foster the safest, most efficient and effective federal aviation operations. ICAP reviewed the WS aviation program.
- The Institute of Makers of Explosives (IME) - The IME is a non-profit incorporated association founded in 1913 to provide accurate information and comprehensive recommendations concerning commercial explosives. The IME is the safety association for the commercial explosives industry in the United States and Canada. IME reviewed WS’ use of explosives and pyrotechnics.
- The National Security Academy (NSA) – The NSA is a private firearms use and safety training organization. The NSA, staffed with prior law enforcement and military professionals, specializes in providing training to law enforcement, military, mobile security teams, and security consultants. NSA reviewed WS’ use of firearms.
- Federal Occupational Health (FOH) – FOH is one of the primary government agencies tasked with assessing workplace safety. Through FOH, reviews were contracted for WS use of hazardous materials, vehicles and pesticides.
 - Hazardous Materials – Century Environmental Health specializes in industrial hygiene, toxicology and risk assessment.
 - Pesticides – EnviroHygiene, LCC is involved in all aspects of integrated environmental safety auditing, training, and consulting, including pesticide use and safety.
 - Vehicles – Tidewater Inc. is involved in all aspects of industrial hygiene, environmental engineering, and occupational safety and health. Among work in management and safety of vehicle fleets, Tidewater manages the Job Corps safety program.
- The Berryman Institute – The Berryman Institute is the premiere non-governmental organization dedicated to professionalism in resolving human-wildlife relationships and resolving human-wildlife conflicts through teaching, research, and extension. Located within the Mississippi State University and Utah State University, it was the lead agency on the review of the WS zoonotic disease review. (It is noted that the Berryman Institute receives financial support from WS but is independent and co-directed by university faculty.)
- Global Wildlife Resources (GWR) – GWR, a nonprofit agency, supports wildlife professionals and universities with field assistance, training and educational resources. It provides euthanasia and immobilizing training to many wildlife management professional organizations including WS. The course offerings including “Wildlife Handling and Chemical Immobilization for Wildlife Professionals,” are considered the best in the industry. GWR conducted the immobilization and euthanasia drug review in conjunction with The Berryman Institute.

- The Maryland Natural Resources Police (NRP) - The NRP, a state law enforcement agency, is a member of the National Association of State Boating Law Administrators (NASBLA) and provides training to all Maryland residents operating boats in Maryland waters and to Maryland WS boat operators. The Maryland NRP boating safety program is considered one of the best in the United States.

Reviewers were asked to evaluate the WS safety program areas in the following ways:

- Review applicable APHIS and WS Directives in relation to safety policies. Identify weaknesses and make recommendations as appropriate.
- Evaluate safety program administration. This includes staffing, staff responsibility and accountability, line authority for compliance and intra-program hazard communication and dissemination of safety information, manuals and standard operation procedures. Conduct telephone or field interviews with State Directors, District Supervisors, specialists, biologists or other employees.
- Evaluate relevant training-program course materials, and the tracking system for employee training and recertification requirements. Identify weaknesses and make recommendations. If applicable, observe at least one training workshop.
- Conduct on-site field inspections at a minimum of two Western Region and two Eastern Region locations, unless otherwise specified. The overall WS program review was coordinated to maximize the number of research and state operational program locations receiving at least one component safety inspection. Field inspections were to examine the availability of relevant safety information and equipment, employee knowledge of and adherence to safety policies, use of personal protective equipment, on-site hazard communication rules, transportation, handling and storage of hazardous materials, and equipment condition. Reviews included State office, headquarters and field-level observations and interviews.
- Review WS accidents that occurred between 2002 and 2007 (five years). This review will focus on identifying causes and provide recommendations to prevent reoccurrences.
- Evaluate the entire WS program culture regarding fostering and promoting safe working environments.
- Produce a written final report of the review and conduct an exit interview including recommendations for program improvement and establishing systems to monitor safety compliance. The final report should summarize all findings and observations into firm recommendations aimed at improving overall program safety.

Unless reviewers noted specific conditions during site visits that warranted immediate or specific attention, recommendations were targeted at programmatic improvement. Any safety conditions warranting immediate attention were to be brought up at the time of observation allowing corrective action to be taken immediately.