

**The Idaho Department of Fish and Game considers the following document to be an agency guidance document for purposes of Idaho Executive Order 2020-002. The guidance document is not new law; it is the Department's interpretation or implementation of existing law.**

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## IDAHO DEPARTMENT OF FISH AND GAME

### Use of Pharmaceutical Agents in Wildlife POLICY NO.: W-2.0

Revision Date: April 2015

#### **POLICY STATEMENT**

To accomplish the mission of the Idaho Department of Fish and Game (Department), it is sometimes necessary for Department personnel to capture, handle and transport wildlife for management, research and public safety purposes. Although physical capture and restraint techniques are used commonly, the safe and efficient handling of wildlife may require the administration of anesthetic agents. The use of pharmaceutical agents is accepted as a necessary part of wildlife management activities.

Pharmaceutical agents may also be needed to treat disease conditions or as adjunct therapy in some situations. Pharmaceutical agents used include antibiotics, anthelmintics, anesthetics, and agents used for treatment of a variety of medical conditions. The administration of most pharmaceutical agents in wildlife requires the involvement of a licensed veterinarian within the context of a valid veterinary-client-patient relationship. Federal and/or state rules require that animals in which pharmaceutical agents are used must be identified and a meat withdrawal time established.

The Department endorses the use of drugs for the immobilization or anesthesia of wildlife, treatment of disease, and adjunct therapy, provided that users have been properly trained and qualified; the choice of drugs, dosages, and methods of administration are appropriate for the species and situation; and all applicable federal and state laws and regulations are followed.

The Idaho Veterinary Practice Act (IC Title 54 Chapter 21) defines the conditions wherein a licensed veterinarian can obtain, use, distribute, dispense or prescribe pharmaceutical agents for use in animals. In order for a veterinarian to use, dispense or prescribe pharmaceutical agents, a valid veterinary-client-patient relationship must be in place (IDAPA 46.01.01.150).

For pharmaceutical agents that are approved for use in a species and have label approval by the US Department of Health and Human Services Food and Drug Administration (FDA) label instructions and known meat withdrawal periods for use of these agents in some species is known and must be followed. For those pharmaceutical agents that do not have label approval for a species, or to alter the dosage or frequency in a label approved species, veterinarians can operate under the Animal Medicinal Use Clarification Act (AMDUCA) (21 CFR Chapter I Part 530) to use drugs in an off-label or extra label manner within the context of a valid Veterinary-Client-Patient relationship.



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The use and storage of controlled substances (Butorphanol, Ketamine, Telazol, Midazolam, Diazepam, Carfentanil, Etorphine, Thiafentanil, Barbiturates and others) is under the jurisdiction of the US Department of Justice Drug Enforcement Administration (DEA) within the Controlled Substances Act (21 CFR Chapter 13). The Idaho Board of Pharmacy has jurisdiction over the use of controlled substances in Idaho under the Uniform Controlled Substances Act (IC Title 37 Chapter 27). Access to and use of these agents is restricted to veterinarians or individuals that are registered for particular schedules of drugs and also requires specific storage requirements. Ordering of controlled substances in Idaho and for most other pharmaceutical agents used by the Department requires the use of a prescription from a licensed veterinarian (IDAPA 27.01.01.120).

Rules of the Idaho Board of Pharmacy (IBOP) for prescription, non-prescription and controlled substances largely follow FDA and DEA rules, but there are minor differences. For example, IBOP requires annual inventory reporting of controlled substances vs. biennial inventory for controlled substances by DEA.

Within the context of these multiple layers of agency regulation and rules, the Department establishes this policy for the use of pharmaceutical agents in wildlife. Additional guidance for use of pharmaceutical agents in wildlife is provided in the "Use of Pharmaceutical Agents in Wildlife Procedures" maintained in the Procedures Manual of the Wildlife Bureau.

#### **1. CLASSIFICATION OF ANESTHETIC AGENTS**

- 1.1 For the purpose of this policy, the classification of anesthetic agents used to immobilize wildlife will be based on drug schedules as defined by the DEA (21 CFR, Chapter II, Part 1308) and the IBOP (Idaho Code 37-2705, 37-2707, 37-2709, 37-2711, 37-2713).

#### **2. ALLOWABLE USES OF ANESTHETIC AGENTS**

- 2.1 Schedule II-V controlled substances may be used as anesthetic agents to capture or restrain wildlife for management, research or public safety purposes when deemed appropriate.
- 2.2 The use of anesthetic agents for these purposes will be restricted to Department personnel who have been trained and issued cards as described in Section 3.
- 2.3 Under normal circumstances, only classified IDFG employees will be allowed access to pharmaceutical agents. All other personnel that work with, for, or on behalf of, IDFG will need to be directly supervised on site



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by IDFG personnel with a current certification for the pharmaceutical agents to be used, or have project specific approval by the Wildlife Bureau Chief or State Wildlife Veterinarian.

- 2.4 Procedures for the use of pharmaceutical agents within the Department will be reviewed and revised, if necessary, by the State Wildlife Veterinarian and Regional Drug Coordinators under direction of the Wildlife Bureau.

### 3. TRAINING REQUIREMENTS

- 3.1 All Department personnel that immobilize wildlife with pharmaceutical agents as part of their normal and professional duties are required to successfully complete a training course, typically 16 hours. Upon successful completion, a certification card will be provided.
- 3.2 All Department personnel that immobilize wildlife with Schedule II narcotics as part of their normal and professional duties are required to successfully complete a narcotics training course, typically 16 hours. Upon successful completion, a certification card will be provided. Department personnel receiving specialized narcotics training will be restricted in number based on demonstrated need due to the requirements for a veterinary-client-patient relationship and requirements of DEA to limit access to controlled substances to the absolute minimum number of specifically authorized personnel (21 CFR Chapter II, Part 1301.72d).
- 3.3 All Department personnel that immobilize wildlife using pharmaceutical agents as part of their job must renew their certification every two years.
- 3.4 Regional drug coordinators will be required to meet all training requirements needed for the pharmaceutical agents in the region.
- 3.5 The State Wildlife Veterinarian is responsible for developing and administering training and recertification courses.
- 3.6 Equivalent courses (content and length) may be substituted for Department sponsored courses, with the approval of the State Wildlife Veterinarian and Wildlife Bureau Chief. An additional 1-2 hour orientation to the policy and procedures of the Department provided by the State Wildlife Veterinarian will be required prior to non-departmental personnel being certified and gaining access to pharmaceutical agents.



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- 3.7 Upon successful completion of training requirements, the Department will provide a certification card that specifies the following information:
  - a. Name of personnel certified
  - b. Schedule of drugs the cardholder is certified to use (II-V)
  - c. Date of certification
  - d. Date of expiration

#### **4. ACQUISITION OF CONTROLLED SUBSTANCES AND ANESTHETIC DRUGS**

- 4.1 The Department will follow the requirements of the DEA, IBOP and the Idaho Veterinary Practice Act for ordering controlled substances used in the Department. A valid veterinary-client-patient relationship will be established through training courses and field operations. Prescriptions will be written by the State Wildlife Veterinarian.
- 4.2 The requirements of the Idaho Veterinary Practice Act and the IBOP for ordering non-controlled substances will be followed.

#### **5. STORAGE, TRANSFER AND DESTRUCTION OF PHARMACEUTICAL AGENTS**

- 5.1 All pharmaceutical agents are to be kept in appropriate, locked storage facilities when not in use.
- 5.2 Controlled substances and anesthetic agents are to be stored in safes that meet specifications for GSA Class V for Schedule II and IIS agents (21 CFR 1301.71, 1301.72a) or UL listed burglary-resistant safe or a GSA Class V rated security container or equivalent which complies with the requirements for storing Schedule I and II substances for Schedule III-V agents (21 CFR 1301.72b).
- 5.3 All drugs are to be kept in metal, lockable containers while being transported or stored in the field and must be labeled appropriately and include the name, address, and telephone number of the responsible Department personnel.
- 5.4 All outdated, expired or partially filled bottles of controlled substances will be disposed of as required by DEA (21 CFR 1307.21) and IBOP (IC Title 37 Chapter 27 37-2720).
- 5.5 The State Wildlife Veterinarian may transfer controlled substances and non-scheduled pharmaceutical agents between registered locations under the requirements of DEA (21 CFR Part 1304) and IBOP (IC 37-2720).



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#### **6. REPORTING AND RECORD-KEEPING FOR ANESTHETIC AGENTS**

- 6.6 Record keeping, inventories and reporting of all controlled substances will be done as required by DEA (21 CFR Part 1304.11) and IBOP (IC 37-2720, IDAPA 27.01.01.207).

#### **7. FIELD USE OF IMMOBILIZING DRUGS**

- 7.1 Each field team immobilizing wildlife will have a team leader certified for the schedule and/or type of drug used; who will be responsible for the safety of the public and Department personnel, and humane treatment of animals.

#### **8. MEAT WITHDRAWAL TIMES FOR PHARMACEUTICAL AGENTS USED IN WILDLIFE**

- 8.1 The State Wildlife Veterinarian will establish meat withdrawal times for pharmaceutical agents commonly administered by Department personnel under the Animal Medicinal Drug Use Clarification Act (AMDUCA) (21 CFR Part 530). This information will be maintained and updated by the State Wildlife Veterinarian and provided to the Regional Drug Coordinators, and Department personnel as needed.
- 8.2 Animals harvested within the meat withdrawal period for the pharmaceutical agent(s) should be condemned as unfit for human consumption. The carcass should be confiscated by Department personnel and disposed of appropriately to avoid consumption by humans or animals.