



Fiscal Note for Proposed Wildlife Control Technician Certification and Eligibility Rule

Rule Amendments: 15A NCAC 10H .1510 Wildlife Control Technician Certification and Eligibility Requirements

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Impact: State Government: Yes
Local Government: No
Private Impact: Yes
Substantial Economic Impact: No

Authority: G.S. 113-134; 113-273; 113-274

BACKGROUND

The wildlife resources of the State belong to the people of the State, including the enjoyment of these resources (G.S. 113-131(a)). The Wildlife Resources Commission (hereinafter WRC or Commission) is tasked with the conservation of wildlife resources of the State (G.S. 143-239). This responsibility includes managing as equitably as possible the various competing interests regarding these resources, including the use and take of such resources (G.S. 113-131.1(a)). The statutes governing wildlife resources are found in Chapter 113, Subchapter IV of the General Statutes, and WRC has been granted rulemaking authority to implement the provisions of these statutes (G.S. 113-134).

Individuals who perform wildlife damage control and removal activities for compensation are required to be licensed Wildlife Control Agents (WCA) in accordance with G.S. 113-273(l) and 15A NCAC 10H .1501. Most WCAs either run their own business or are employees of a larger company that handles wildlife damage control. Because of the nature of this business, there are often individuals who help with wildlife control activities but do not perform all the activities of a WCA, and according to WCAs, turnover of those individuals tends to be high.

To legally have individuals help WCAs with certain wildlife control activities without requiring

these businesses to invest extensive time and money into licensing everyone as a WCA, the General Assembly established a Wildlife Control Technician (WCT) Certification under G.S. 113-273 (Session Law 2021 – 160). The certification is required for an individual to engage in wildlife damage control or wildlife removal activities for compensation under the direct supervision of a WCA.

Proposed rule text is included in Appendix A and is expected to have minimal state and private impacts.

PROPOSED RULE CHANGE

This proposed rule establishes standards and requirements for the WCT certification and details wildlife control and removal activities that technicians can perform under the direct supervision of a licensed WCA or certified alligator control agent, including: placement of traps, euthanasia of wildlife, bat evictions, and alligator removal or relocation. Wildlife technicians will not be allowed to issue depredation permits.

Impacts & Benefits

State Impact

Benefits

Currently, the Commission has 416 licensed WCAs. Some businesses have one employee and others have many, so the agency cannot predict how many WCT certifications will be issued because, depending on the business, the number of employees is different and can fluctuate frequently. However, based on available information, the agency estimates that there will be between 300 – 500 WCTs requesting certification. Certification costs \$25 annually. Thus, the agency estimates between \$7,500-\$12,500 will be generated annually from the sale of wildlife technician certifications ($\$25/\text{certification} \times 300 \text{ applicants} = \$7,500$; $\$25/\text{certification} \times 500 \text{ applicants} = \$12,500$).

Cost

The application, training and certification processes will all be costs to the agency. Applications will need to be developed and processed, staff will need to create a training course for applicants, and additional administrative work will need to be done to complete certification of these individuals.

This course is likely to be a hybrid of online and in-person learning that will last approximately six hours. Once the course is completed, staff will need to take the time to review and approve each certification application.

Development:

It is projected to take staff one week (40 hours) to create the training program and make it accessible to those who wish to certify. It will cost the agency an estimated \$1,320 in staff time to develop the hybrid training ($40 \text{ hours} \times \$33/\text{hr} = \$1,320$).

It will cost the agency an estimated \$264 to develop the application ($\$33/\text{hr} \times 8 \text{ hours} = \264 staff time)

The total anticipated cost to the agency for developing materials for this certification is \$1,584 ($\$1,320$ developing training course + $\$264$ developing application = $\$1,584$).

Program Maintenance:

The average cost for staff to process a certification application is \$33 (1 hour/certification x $\$33/\text{hr} = \33 certification). It will cost the agency an estimated \$9,900-\$16,500 in staff time processing applications ($\$33/\text{application} \times 300 \text{ applications} = \$9,900$ staff time; $\$33/\text{application} \times 500 \text{ applications} = \$16,500$ staff time).

The in-person portion of the WCT certification course will be four hours in length. The course will cover a review of responsibilities of the WCT, wildlife laws and rules including trapping regulations, zoonotic diseases, humane restraint and euthanasia, interaction with the public and clients, personal safety, and trapping demonstrations. The agency will likely run an in-person training twice per year in each of the 9 districts. The in-person training is estimated to cost the agency approximately \$2,376 annually ($\$33/\text{hr} \times 4 \text{ hrs} = \132 per training; $\$132/\text{training} \times 18 \text{ trainings annually} = \$2,376$ in staff time training).

The average cost for staff to award a certification after all training is complete is \$8.25 (15 minutes/certification x $\$33/\text{hr} = \8.25 certification). It will cost the agency an estimated \$2,475-\$14,125 in staff time processing certifications annually ($\$8.25/\text{certification} \times 300 \text{ trainees} = \$2,475$ staff time; $\$8.25/\text{certification} \times 500 \text{ trainees} = \$4,125$ staff time).

This creates an annual cost to the agency between \$14,751 - \$23,001 ($\$9,900$ processing applications + $\$2,376$ in-person course staff time + $\$2,475$ awarding certifications = $\$14,751$; $\$16,500$ processing applications + $\$2,376$ in-person course staff time + $\$4,125$ awarding certifications = $\$23,001$).

Total cost to the agency in year one may range from \$16,335 - \$24,585 ($\$14,751$ recurring costs + $\$1,584$ development costs = $\$16,335$; $\$23,001$ recurring costs + $\$1,584$ development costs = $\$24,585$).

Additional Cost:

The agency may incur a loss from individuals who no longer wish to be licensed as a WCA and decide to switch to an annual WCT certification. This would be a cost to the agency of \$25 per person ($\50 WCA license - $\$25$ WCT license = $\$25$). While the agency does anticipate any current WCAs switching to become WCTs, it is a possibility.

Local Impact

This amendment is anticipated to have no local government impact.

Private Impact

Benefits

Wildlife control agents and businesses can save \$25 annually by having their employees certified as WCTs rather than having them become licensed WCAs for \$50. There will also be a time savings because the certification course is expected to be 6 hours as opposed to the 2-day agent course. This allows the technicians to go back to their regular wildlife control and removal duties sooner.

Because the Commission does not know how many currently licensed WCAs will become WCTs instead, nor how much those WCTs are paid, there is no way for the agency to quantify the cost or time savings.

SUMMARY

Quantifiable Impacts

State

The following quantifiable one-time costs are anticipated from the proposed wildlife control technician rule:

- Developing application = \$1,320
- Developing training course = \$264
- Total = \$1,584

The following quantifiable annual recurring costs are anticipated from the proposed wildlife control technician rule:

- Processing applications = \$9,900-\$16,500
- In-person training = \$2,376
- Processing & awarding certifications = \$2,475-\$14,125
- Total = \$14,751 - \$23,001

The following total quantifiable costs for year one are anticipated from the proposed wildlife control technician rule: \$16,335 - \$24,585.

Private

The following quantifiable annual cost is anticipated from the proposed wildlife control technician rule:

- Certification application fee = \$25

The following quantifiable annual benefit is anticipated from the proposed wildlife control technician rule:

- Certification application fee = \$25 from the WCA license fee of \$50

Unquantifiable Impacts

State

- Reduced revenue from licensed WCAs becoming certified WCTs

Private

- Reduced course time from 2 days to 6 hours will be a savings

The agency believes that the benefits of the Wildlife Control Technician Certification rule outweigh the potential costs.

15A NCAC 10H .1510 Wildlife Control Technician Certification Eligibility and Requirements

(a) The following definitions shall apply in this Section:

- (1) “Wildlife control technician” or “WCT” means an individual that holds a current and valid wildlife control technician certification issued by the Commission.
- (2) “Wildlife control technician certification” or “WCT certification” means a certification issued by the Commission that authorizes an individual to engage in wildlife control or wildlife removal activities, for compensation, including reimbursement for the cost of materials, under the supervision of a licensed wildlife control agent.
- (3) “Direct supervision” means to physically be within one’s presence while maintaining visual and verbal contact.
- (4) “Wildlife damage control” and “wildlife removal activities” means and includes:
 - (A) bat eviction and alligator damage control or removal activities;
 - (B) setting and moving traps;
 - (C) euthanasia; and
 - (D) issuing depredation permits in accordance with the applicable provision and requirements of 15A NCAC 10H .1502

(b) It shall be unlawful to engage in wildlife damage control or wildlife removal activities for compensation, without first obtaining a WCT certification from the Commission, except that licensed trappers taking wild animals during the applicable open trapping season for that species shall not be required to obtain a WCT certification.

(c) Wildlife control technicians may only perform the following wildlife control or removal activities under direct supervision of a licensed WCA, or certified Alligator Control Agent if applicable:

- (1) placement of traps;
- (2) euthanasia of wildlife;
- (3) bat evictions; and
- (4) alligator removal or relocation.

(d) Wildlife control technicians shall not issue depredation permits.

(e) Individuals shall complete a Commission-approved, WCT training course, that reviews wildlife laws and rules, including methods for trapping, capture, and safe and humane wildlife handling to qualify for a WCT certification.

(f) Individuals may register for a Commission-approved training course at www.ncwildlife.org/wca. Required information shall include the following:

- (1) the applicant's name, mailing address, email address, residence address, telephone number, driver’s license number, and date of birth; and
- (2) organizational affiliation, if applicable.

(g) A WCT certification shall not be transferable between individuals.

History Note: Authority G.S. 113-134; 113-273; 113-274