

March 25, 2014

Docket No. 00-108-10

Regulatory Analysis and Development

PPD, APHIS

Station 3A-03.8

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We the undersigned are pleased to offer the following comments on the revised CWD Program Standards published in the Federal Register on December 31, 2013 (Docket No. 00-108-10; CWD Program Standards). Collectively, we consider CWD a serious threat to our country's free-ranging deer, elk, and moose as well as our rich hunting heritage which involves more than 15 million Americans annually and generates more than \$87 billion for our nation's economy.

With this in mind, we believe the Revised CWD Program Standards are not only inadequate, but also inconsistent with USDA-APHIS' stated program goal, "*to assist States, Tribes, and the cervid industry to minimize the risk of introduction, transmission, and spread of CWD in captive cervid populations in the United States.*" Numerous changes made to the 2012 CWD Program Standards increase risk of CWD transmission from captive cervids to wild deer, elk, and moose as well as perpetuating CWD in captive cervids and the environment. As evidence, nearly all of the guidelines in the 2012 document that were more stringent than the Federal requirements have been deleted and/or replaced with others which are far less stringent; thus elevating risk of CWD spread to captive and wild cervids.

I. Movement of CWD-Positive, Exposed or Suspect Animals

One of the most troubling aspects of the revised standards is that movement of animals into or out of quarantined herds that are CWD-Positive, CWD-Exposed, or CWD-Suspect is recommended in several sections. These practices are inconsistent with commonly accepted disease mitigation protocols and do not *minimize the risk of introduction, transmission, and spread of CWD in captive cervid populations in the United States*, the stated goal of the Federal Herd Certification Program (HCP). Thus, we strongly recommend deleting the following three paragraphs:

- 1) *States may consider moving animals from CWD suspect, exposed, or positive herds by permit and under seal to a known CWD-positive hunt facility within the same State for purposes of selective culling and continuity of business, and all animals harvested to be tested for CWD as described in the Herd Plan (See Section B1).*
- 2) *See Section A 8.3 for information on approval by the Administrator for interstate movement of animals from CWD suspect, exposed, or positive herds to hunting operations or terminal slaughter facilities, and requirements for CWD testing.*

- 3) *States also may modify a quarantine to permit movement of apparently healthy cervids onto a CWD-positive, quarantined premises – such as a hunt facility – and all cervids harvested must be tested for CWD. Other stipulations may apply to the modifications.*

II. CWD Monitoring

The National CWD HCP requires five years of monitoring to achieve certification as “low risk” for CWD, as well as mandatory monitoring after achieving certified status. We strongly support continued mandatory monitoring, especially given the 2012 detections of CWD in captive herds in Iowa, Minnesota, and Pennsylvania that had been monitored far longer than five years. Thus, we recommend requiring “at least five years” of monitoring in the Program Standards.

III. Indemnification

It is troubling that the proposed Best Management Practices (BMPs) for managing CWD-Positive, CWD-Suspect, or CWD-Exposed herds in the revised CWD Program Standards are based on the availability of funds for indemnification of owners for animals that are destroyed. Depopulation of infected/exposed/suspect herds is widely regarded as the preferred method for mitigating known or suspected disease risks, regardless of indemnity. Thus, we strongly encourage depopulation, either under APHIS jurisdiction or state authority, to remain in accordance with best practice disease management. Unless required by law under the Anti-Deficiency Act, we also recommend deleting the phrase, “If funding for indemnity is available” in all sections where it relates specifically to disease control.

IV. CWD Testing for Animals Transferred to Hunting/Slaughter Facilities

A major concern with the revised standards is the absence of mandatory CWD testing for animals from certified herds that are sent to hunting operations or slaughter facilities. APHIS should strongly encourage States to require continued on-farm mortality testing to maintain certified status as it did in the 2012 Program Standards.

V. Hunt Facility (*definition*)

In the definition of a “hunt facility” we recommend replacing “should” with “must” as it pertains to a facility owner’s responsibility to have fenced enclosures maintained to prevent ingress and egress of cervids.

In closing, we appreciate the opportunity to provide input on the 2013 revision of the CWD Program Standards and sincerely hope our recommendations will be incorporated in the final standards to the benefit of wild and captive cervids.

Respectfully submitted,

- Alabama Wildlife Federation
- Anderson-Tully Company
- Boone & Crockett Club
- Campfire Club of America
- Catch-A-Dream Foundation
- Conservation Federation of Missouri
- Dallas Safari Club
- Florida Wildlife Federation
- Forest Investment Associates
- Forest Landowners Association
- Georgia Wildlife Federation
- Hancock Timber Resource Group
- Masters of Foxhounds Association
- Mississippi River Trust
- Mississippi Wildlife Federation
- Mule Deer Foundation
- National Alliance of Forest Owners
- National Wild Turkey Federation
- National Wildlife Federation
- North American Grouse Partnership
- North Carolina Wildlife Federation
- Orion - The Hunter's Institute
- Pheasants Forever / Quail Forever
- Plum Creek Timber Company
- Pope and Young Club
- Potlatch Corporation
- Quality Deer Management Association
- Rayonier
- Resource Management Service, LLC
- Rocky Mountain Elk Foundation
- Ruffed Grouse Society
- Teddy Roosevelt Conservation Partnership
- The Westervelt Company
- The Wildlife Society
- Tennessee Wildlife Federation
- Tennessee Chapter – The Wildlife Society
- Texas Chapter – The Wildlife Society
- U.S. Sportsmen's Alliance
- Weyerhaeuser
- Whitetails Unlimited
- Wild Sheep Foundation
- Wildlife Forever
- Wildlife Management Institute
- Wildlife Mississippi