

## **THE WILDLIFE SOCIETY**

5410 Grosvenor Lane • Bethesda, MD 20814-2144  
Tel: (301) 897-9770 • Fax: (301) 530-2471  
E-mail: [tws@wildlife.org](mailto:tws@wildlife.org)

March 28, 2014

Docket No. 00-108-10  
Regulatory Analysis and Development  
PPD, APHIS  
Station 3A-03.8  
4700 River Road, Unit 118  
Riverdale, MD 20737-1238

### **RE: TWS Comments on Docket No. 00-108-10; CWD Program Standards**

Dear Sir or Madam,

The Wildlife Society appreciates the opportunity to provide the following comments on the revised Chronic Wasting Disease (CWD) Program Standards published on December 31, 2013. We have reviewed the revised CWD Program Standards and are concerned the proposed standards fall short of adequately managing and preventing the spread of CWD. We urge stronger program standards that will help prevent CWD from becoming more prevalent.

The Wildlife Society (TWS), founded in 1937, is a non-profit professional scientific and educational organization of nearly 10,000 wildlife professionals dedicated to excellence in wildlife stewardship through science and education. It is our mission to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and associated habitats worldwide.

The appropriate management and control of CWD is of primary importance to our members. The spread of CWD within and between both captive and wild cervid populations has complicated the work of professional wildlife biologists, impacting cervid population management activities and wildlife recreational opportunities. Management of wild populations of deer, elk, and moose for the continued benefit to the public requires the establishment of program standards that help prevent the spread of CWD.

Due to the impact CWD has on the work of professional wildlife biologists, we have a vested interest in ensuring CWD program standards live up to the defined 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.” We are concerned with the apparent liberalization of the CWD program standards in this revision. Several of the more stringent guidelines have been removed or weakened, and as a result we do not believe that the revised standards will achieve the mission of the program.

We encourage the strengthening of CWD program standards to help ensure healthy captive and wild cervid populations. We also wish to provide more specific comments on the revised standards:

#### Part A: Herd Certification Program

- Movement of CWD-Positive, CWD-Exposed, and CWD-Suspect and proper containment of captive cervids

Allowing for the movement of animals into or out of quarantined herds is not a generally accepted disease management practice. Movements of animals do not minimize the risk of introduction, transmission, or spread of CWD as outlined in the CWD program's mission and should be heavily discouraged.

The Wildlife Society encourages you to review and reconsider the statements that allow for the movement of animals into or out of herds that are CWD-Positive, CWD-Exposed, or CWD-Suspect. The movement of CWD-suspect animals across state line is extremely risky and should be avoided. If such movement does occur, it should only be made under official seal, and under the observation of responsible respective state regulatory officials at both departure and arrival, as well as in those states through which the movement will take place. Responsible state officials must be notified of the pending transport before such movement occurs.

The revised program standards stop short of requiring "double-fencing" for captive cervids, even in areas with endemic CWD in wild cervids. The lack of double-fencing in areas with endemic CWD again falls short of adequately preventing the spread of the disease. CWD is spread through contact with CWD-positive individuals; double-fencing standards would help prevent contact of captive cervids with potentially CWD-positive individual cervids in the wild, or vice versa.

- Inspections and Testing of captive animals

The detection of CWD is our first line of defense in preventing the spread of the disease. Regular inspections of facilities and testing of all captive animal mortalities will allow for early detection of CWD in herds, and allow for proper containment methods to be pursued more immediately.

As such, we support stronger recommendations for the immediate reporting and recovery of all mortalities of captive cervids and any missing or escaped cervids. All mortalities from HCP herds, regardless of the animal's status on the owner's enrolled herd inventory, should be tested for CWD. Loopholes in the program standards that allow herd owners to avoid CWD testing should be removed.

We recommend more clearly defined objectives of annual inspections, including the contents of the inspection. We also have concerns that the 3 year span between full

inventory inspections may be too long to accurately trace records of escapees, unreported mortalities or illegal movements and encourage more frequent inventory inspections.

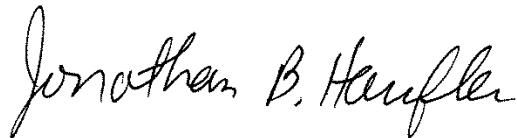
#### Part B: Guidance on Responding to CWD-Affected Herds

- Depopulation or Quarantine of CWD-positive herds

The revised CWD program standards allow herd owner discretion when determining whether to depopulate or quarantine the CWD-positive, CWD-suspect, or CWD-exposed herd based on the availability of indemnity. The decision to depopulate or quarantine captive cervid herds must be made at the discretion of the responsible respective state officials, regardless of the availability of funds for indemnification. The status of wild cervid populations should also be considered when determining the course of action to take; if a state is not known to have CWD among wild cervids, then depopulation of the captive herd should be the recommended action. The decision that most appropriately prevents the spread of CWD should not be impacted or delayed by the herd owner.

The Wildlife Society strongly requests that the program standards be revised to reflect these concerns and recommendations. The CWD program standards must encourage worthwhile actions that strive toward the goal of restricting the spread of CWD, a goal we feel should be the mandate of responsible state and federal agencies.

Sincerely,

A handwritten signature in black ink that reads "Jonathan B. Haufler". The signature is written in a cursive style with a large initial 'J' and 'H'.

Jon Haufler, President  
The Wildlife Society