



National Rifle Association Unified Sportsmen of Florida



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Importation of Captive Deer into Florida and CWD

The National Rifle Association and Unified Sportsmen of Florida support a Florida ban on the importation of captive deer and cervids into Florida.

The risk of Chronic Wasting Disease (CWD) to Florida's native deer population is too great to continue to allow importation of deer from other states.

Closing Florida's border to the importation of captive deer will substantially lower the risk that Chronic Wasting Disease (CWD) will enter the state.

It is important to remember that CWD is similar to Mad Cow disease in cattle. CWD is a contagious neurological disease that affects members of the deer family (cervids) including white tail deer, mule deer, elk, moose, reindeer, red deer and sika deer.

CWD is *always* fatal. There is no vaccination. There is no cure. There is no fool proof test or screening for CWD in *live animals*.

All states bordering Florida have already imposed bans on the importation of captive deer, thus virtually eliminating the risk of CWD from the natural migration of wild deer into Florida.

Florida's predominate risk of CWD is from the importation of infected, captive deer that show no symptoms of the disease.

Currently, over 80% of Florida's 242,000 licensed hunters are big game hunters who contribute over \$700 million to the state's economy annually.

The Effect of an Outbreak of CWD in Florida

Any short term financial impact that a ban on importation might have on deer farms and shooting/hunting preserves would pale in comparison to the long term financial impact that a

CWD outbreak would have on those same businesses, FWC, the state of Florida and Florida's hunting community.

The discovery of CWD on a deer farm or shooting/hunting preserve in Florida would be devastating to those businesses as well a regulatory, enforcement and financial nightmare for FWC and the state of Florida.

Based on states that have experienced a CWD outbreak, should CWD be discovered in captive deer on a farm or shooting preserve in Florida, we believe the following minimum regulations would need to be put in place:

- An immediate long term (5 years or longer) quarantine would need to be imposed on the infected facility and any facility materially connected to the infected facility.
- No live deer could leave any quarantined facility during the term of quarantine.
- Every facility from which a deer was received by the infected facility within the past 5 years would have to be quarantined.
- Every facility that received a deer from the infected facility within the past 5 years would have to be quarantined.
- Regular biological testing of deer in these quarantined facilities would have to be conducted by a laboratory or facility approved to monitor the potential spread of CWD.
- Careful monitoring of all quarantined facilities by FWC to insure compliance would be essential. Since the only truly reliable test for CWD is on dead deer it would necessitate the killing of a deer at regular intervals on every quarantined facility.
- Detailed recordkeeping to assure compliance and facilitate enforcement would be necessary.
- Clients of shooting or hunting preserves would have to be notified of the possibility of undetected CWD infection in the herd and would need to sign a waiver saying they understand the possibility of risk if they eat diseased meat.
- Due to the possibility of captive animals escaping from an infected or quarantined private enclosure, and since experts believe CWD can be transmitted by nose to nose interactions through a fence, all quarantined facilities would be required to have a

second perimeter fence installed outside the primary perimeter fence to prevent any physical contact between captive deer and wild deer.

- Should CWD subsequently be transmitted to wild deer, FWC would have to cordon off the area surrounding the outbreak and initiate a program to eradicate the deer population in that region. Hunters in that region would need to be notified of the risk of taking and eating diseased deer.
- Since CWD migrates into the soil and there is no known way to eradicate the disease from the soil, there would need to be a prohibition on the introduction of any new deer into the contaminated area for a period of 10 years.

An outbreak of CWD in Florida would be a regulatory nightmare for FWC, the state of Florida and the private industry that depends on deer farms. The loss of substantial revenue for FWC from Florida's hunting programs would be minuscule compared to the huge negative economic impact caused by the overwhelming expense of regulations and enforcement to eradicate the CWD over the next 5 to 10 years.

The best management practice and the only reasonable preventative action for FWC to take is to close our border and ban the importation of deer and all other cervids into Florida.

Who among us would want to explain a refusal to support the only reasonable action to protect Florida's native deer population from this devastating disease?

The NRA and USF support the proposed ban on the importation of captive deer into Florida.

Fact Sheet on CWD

About CWD

- CWD is an always fatal neurological disease that affects members of the deer family (cervids) including white-tailed deer, mule deer, elk, moose, reindeer, red deer and sika deer.
- CWD is a transmissible spongiform encephalopathy (TSE) in cervids similar to disease in cattle commonly known as Mad Cow disease.
- The disease agent that causes CWD is an abnormally folded form of a naturally occurring protein called a prion. The CWD-variant of this prion causes normal proteins to also change, ultimately causing hole-like lesions in the brain and degeneration of the central nervous system tissues until death occurs.
- There is no vaccine or cure for CWD.
- The only validated tests for CWD can only be performed on dead animals. Tissue sampling can be conducted on anesthetized deer, but it is expensive.
- Live animal tests for CWD currently are unable to detect the disease in the earliest stages of infection; therefore, no test can guarantee that an animal was not infected at the time of sampling.
- The CWD incubation time in whitetails can take up to 3-5 years, if not longer. Most infected animals show few, if any, clinical signs (symptoms) until the very late stages of the disease. Within CWD endemic areas, more than 97% of free-ranging deer and elk that test positive for CWD show no outward signs of having the disease.
- Prions are extremely resistant to degradation and can remain in soil for years. Unlike some other diseases, there is currently no known way to decontaminate an environment once CWD prions are present because they are not living things (they have no RNA or DNA) and therefore extremely difficult to denature or destroy.
- Since cervids normally ingest soil while foraging, CWD that is present in the soil has the ability to infect deer that come in contact with it in the future which presents a tremendous long-term risk to wild deer.

Discovery & Distribution

- CWD was first identified in a captive mule deer herd at Colorado State University in 1967. The first documented case of CWD in a wild cervid was in 1981.

- Centers for Disease Control (CDC) reported that as of March 2012, CWD had been identified in approximately 100 captive herds in 13 states, 2 Canadian provinces and in South Korea. In the same year, CWD was found in three new states: Iowa, Texas and Pennsylvania.
- As of spring 2013, CWD had been detected in captive and/or wild populations in 22 states.

Spread

- The critical issues with respect to disease transmission include:
 1. Escape of captive animals into the wild and wild animals entering private enclosures.
 2. Nose to nose interactions through a fence.
 3. Runoff of contaminated soil into or out of a captive cervid facility.
 4. Lack of early detection of the disease.
 5. High costs of proactive surveillance programs.
 6. Inability to successfully eradicate diseases once present in wild populations.
 7. Costs and consequences of managing diseases in wild populations.
- Disease experts believe that CWD can be transmitted among deer through fence-to-fence contact.
- Numerous disease experts agree that the distribution map of CWD suggests the disease likely arrived in several new states through transportation of live deer or deer parts and not spontaneously or through natural deer movements.
- CWD has spread into additional states despite transport regulations intended to prevent the spread of the disease.
- Despite monitoring and management programs, CWD continues to spread among captive facilities. In the last 10 years, CWD has been diagnosed in captive herds in New York, Michigan, Missouri, Pennsylvania, and Iowa. Many of the herds had been monitored for CWD for more than 5 years.
- Intensive culling of wild populations has failed to halt the spread or decrease the prevalence of CWD in Wisconsin, Illinois, Colorado and West Virginia. Only New York has no recurrence of the disease.
- Depopulation is likely only effective soon after the introduction of CWD to free-ranging deer, and it often is not feasible.
- Florida's Key Deer population could potentially be placed at great risk if CWD was discovered near their native range since the typical management strategy is intensive culling.

- Culling as a management tool becomes less effective as CWD spreads, prevalence rates increase, and the environmental build-up of infectious prions worsens over time.
- Florida does not require external tagging of captive cervids. This makes it impossible to identify animals when (not if) they escape. This will be particularly important if CWD or another infectious disease is ever discovered.
- Because all the states contiguous to Florida have banned the importation of deer into their states, a Florida ban would be the surest way of preventing an outbreak of CWD in the state.

Captive Deer and CWD

- States at a Glance:
 1. Eighteen states currently do not allow importation of live cervids: AI, AZ, AR, CT, DE, GA, LA, ME, MD, MA, MI, NV (does not allow captive farms), NJ, OR, SC, TX (elk allowed under strict regulations), WA (does not allow captive farms), and WVA.
 2. In the Southeast, FL is one of just 3 states in the 11-state southern region which currently allow importation (the others being LA, and OK).
 3. In the Midwest, 9 states allow import and exports. Minnesota and Nebraska do not.
 4. In the Northeast, 2 (New York and Vermont) of 11 states allow imports.
 5. Five of 10 states allow exports....CT, DE, NJ, NY, and WVA.
 6. Seven of 10 states allow exports....AL, AR, FL, LA, MS, NC, and TX.
- Most states and Canadian provinces where CWD has been documented in wild deer also are home to captive deer facilities (Wyoming is an exception).
- Captive deer escape on an all-too-frequent basis. For example, the Wisconsin DNR reported in March 2003 that 671 deer had escaped from game farms, of which 436 were never found. Captive deer escaped from 1/3 of the state's 550 deer farms over the lifetime of the operations.
- Unidentified CWD-positive deer can be unknowingly transported across state lines and/or among captive facilities, even if they have met USDA's 5-year CWD monitoring requirement.
- CDC reported that CWD testing of captive cervids among states varies considerably in scope from mandatory testing of all dead animals to voluntary herd certification programs or mandatory testing only of animals suspected of dying of CWD.
- As a result of these and other opportunities for transmission, CWD has become more widespread among captive cervid facilities and in wild populations across North America.

- It can be argued that there is no risk with the importation of captive cervids that meet the U.S. Department of Agriculture’s 5-year CWD monitoring requirement. However the following circumstances need to be taken into account:
 1. A no-risk factor implies that 100% of all animals that died in a given facility were tested and CWD was not detected. This is not possible due to the absence of a practical live animal test and the extremely long incubation period. Consequently, the so-called “CWD-low risk status” is obtained by testing age eligible mortalities – those animals 12 months or older that die in these facilities.
 2. Even if no animals died during the monitoring period (i.e., no animals to test), the long incubation period would make it possible for some animals to be carrying the disease after the monitoring period, but still be alive and not showing clinical signs.
 3. A breeder frequently liquidates 2.5-4.5 year old bucks to be shot as “shooter bucks” in hunting preserves. These animals are not required to be tested, despite the fact that bucks of this age and, especially those older, have the highest CWD prevalence rates (confirmed by the Wisconsin Department of Natural Resources).

Costs Associated with CWD

- Permitting, testing, surveillance (testing selected deer) and enforcement, as well as combating the disease once it takes hold, drains the state fish and wildlife agency of funding that should be directed to projects that benefit fish and wildlife.
- When CWD or other diseases require state/provincial-mandated action, the costs often run in the millions of dollars. The Wisconsin Department of Natural Resources (WDNR) has spent over \$46 million dollars (including US Department of Agriculture grants) on CWD actions since the disease was detected in that state in 2002.
- WDNR’s website states that:
 1. It is increasingly clear that controlling CWD will be extremely challenging.
 2. All available evidence indicates that CWD has the potential for significant, negative impacts on the future of hunting in Wisconsin.
 3. There are secondary risks to the state’s economy, socio-cultural traditions and ecosystem from the long-term effects of the disease.
 4. Eliminating CWD in Wisconsin using the tools currently available is unlikely given the difficulty in managing CWD in free-ranging deer, the magnitude of deer reductions required to significantly affect the disease, and declining legislative support.
 5. Controlling CWD will require a commitment of human and financial resources over an extended period of time.
 6. To date, there is no clear prescription for managing CWD.
 7. As high as 30% of adult bucks in the southern part of the state (where CWD has been contained) are infected.

- Much of the state fish and wildlife agencies' funding comes from revenue generated by hunters and anglers. Based on the data from the 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, over 200,000 hunters in Florida spent nearly \$715 million in trip-related, expenses, sporting and outdoor equipment and license fees. The average hunter spent over \$2800. All this in a single year.
- In addition to the contribution of Florida hunters' directly to the budget of the state fish and wildlife agency through license fees, revenue from excise taxes on the sale of firearms, ammunition and archery equipment contributed over \$9 million in funding for the agency. Florida's sportsmen and women have a tremendous stake in how their state fish and wildlife agency spends that money.
- A substantial decline in deer numbers due to CWD and/or management efforts to contain the disease would be a significant loss to hunting and to hunter-generated revenue to the state and the state fish and wildlife agency.

Population Effects

- Although no known wild deer herd has collapsed from CWD, many disease experts believe it is too early to pass judgment given the extremely long incubation period and relatively slow spread of the disease.
- In parts of Wyoming, infection rates in mule deer now approach 50%. Many wildlife and disease experts predict that there is a "tipping point" where populations will begin to decline, possibly quite precipitously.
- CWD is producing a much younger herd structure. With a disease that persists in an animal as long as CWD does, an infected female can have one or two fawns or calves before succumbing to CWD. Thus, population numbers do not swiftly decrease, but rather the population becomes younger since the disease removes them before they are beyond a few years old.

Prepared by the National Rifle Association and Unified Sportsmen of Florida
June 2013