



# NATIONAL DEER ASSOCIATION

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**Michigan Natural Resources Commission**

9 June, 2021

Constitution Hall  
525 West Allegan Street  
PO Box 30028  
Lansing, MI 48909

RE: Possession or Use of Natural Cervid Urine-Based Lures and Attractants

Dear Natural Resources Commission,

On behalf of the National Deer Association (NDA), I am writing to provide our comments regarding the recent Department of Natural Resources (DNR) memo recommending prohibiting the possession or use of lures or attractants comprised of natural cervid-based urine or other bodily fluids originating from deer while hunting. The NDA is a national nonprofit wildlife conservation organization dedicated to ensuring the future of wild deer, wildlife habitat and hunting. We represent 30,000 members nationwide and our membership includes hunters, landowners and natural resource professionals.

One of NDA's critical focus areas is deer diseases, and chronic wasting disease (CWD) more specifically. The DNR recommendation is aimed at protecting the long-term health of Michigan's deer herd and will protect the wild free-ranging deer hunting heritage for current and future generations – a worthy cause indeed. According to current research, the risk of spreading CWD to new areas through use of natural urine-based lures is extremely low, but it is not zero. The accumulation of infectious materials is much higher in muscle tissue and organs than urine, so in the NDA's view, it is far more important at this time for all hunters and wildlife agencies to focus on stopping the two most risky activities: 1) all transportation of live deer and elk, and 2) transportation of infected deer carcasses out of CWD zones. Adopting a full ban on natural deer urines offers minimal reward in terms of CWD management while potentially alienating hunters who use ATA/RHSA approved urine scents. Additionally, a urine-based scent ban could invite legislative interference into CWD management, compounding the already-difficult task DNR faces in combating the disease. Still, NDA will not oppose state-mandated bans on the use of natural deer urine-based lures. In areas where natural deer or elk urines have not been banned, we encourage hunters to only buy products from companies selling urine products determined to be free of CWD prions based on independent laboratory testing as required by ATA/RHSA requirements.

Certainly, curbing the spread of CWD in Michigan's deer herd is critical to maintaining both the resource and our hunting heritage. We applaud the DNR's and NRC's continued proactive action on CWD issues and management, and we respectfully ask the NRC to consider the broader implications of, or alternatives to, adopting a urine-based scent ban.

Sincerely,

Torin Miller  
*Director of Policy*