



NATIONAL DEER ASSOCIATION

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Mississippi Commission on Wildlife, Fisheries, and Parks

1505 Eastover Drive
Jackson, MS 39211

15 June, 2021

RE: Proposed Chronic Wasting Disease Rule Changes

Dear Commissioners,

On behalf of the National Deer Association (NDA), I am writing to provide our comments regarding the recent Department of Wildlife, Fisheries, and Parks (MDWFP) proposal to amend chronic wasting disease (CWD) rules in Mississippi. 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 CWD more specifically. Through our extensive work on this issue across North America, we know that proactive research and testing – especially in known CWD areas – is critically important to the management of the disease and wild deer herds. MDWFP's recommendation would allow hunters to transport deer heads outside of a MDWFP-defined CWD Management Zone to a permitted taxidermist participating in the CWD collection program. The NDA believes that the best method for limiting the spread of CWD is to prohibit all transportation of live deer and elk and transportation of potentially-infected deer carcasses and parts out of CWD zones. We will continue to encourage hunters to learn how to debone, cape, process and dispose of deer properly themselves or use taxidermists and processors within their area of harvest.

Still, we understand that the proposal is aimed at protecting the long-term health of Mississippi's deer herd and hunting heritage for current and future generations by increasing CWD sampling via approved taxidermists and maintaining hunter engagement in CWD Management Zones. We believe the use of MDWFP-approved businesses, which have appropriate carcass handling and disposal methods in place, could be a safe way to move deer heads out of CWD Management Zones for testing. However, enforcement of this program would be key, and we encourage MDWFP to fully consider all options to ensure strict compliance with the proposed changes. If enforced properly, the disease monitoring and management gains resulting from the proposal should outweigh the potential risks. We do see potential for equity concerns – those hunters who do not wish to have their deer mounted by a taxidermist will not be able to handle their harvest in the same manner as those who do. We respectfully ask MDWFP and the Commission to think through these concerns and consider potential solutions.

We also support the proposals to bring hunting and management regulations in Mississippi's CWD Management Zones more in-line with those of surrounding states. Specifically, we support MDWFP's adoption of a CWD sampling and monitoring system that closely follows the system developed and utilized by the Arkansas Game and Fish Commission (AGFC).

We applaud MDWFP's and the Commission's continued proactive action on CWD issues and management, and we encourage MDWFP to take all steps necessary to ensure these proposals are executed and enforced as efficiently and effectively as possible. The NDA stands ready to help Mississippi in the on-going fight against CWD.

Sincerely,

Torin Miller
Director of Policy