



NATIONAL DEER ASSOCIATION

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5 October, 2021

Florida Wildlife Commission
Farris Bryant Building
620 S. Meridian St.
Tallahassee, FL

RE: Proposed Rule Changes for 2022-2023 – Deer Carcass Handling

Dear Florida Wildlife Commission:

On behalf of the National Deer Association (NDA), I am writing to state our support for the proposed rules that would clarify and provide consistency regarding deer carcass handling, storage, transfer, possession, and labeling requirements. We are a national non-profit conservation organization with the mission to ensure the future of wild deer, wildlife habitat and hunting. We represent 30,000 members nationwide, including hunters, landowners and natural resource professionals.

The NDA supports the proposals to clarify, provide consistency, and in some ways, simplify, deer carcass handling, storage, transfer, possession, and labeling requirements. The proposed rules provide new definitions regarding deer carcass handling, storage and possession, update and simplify what information is required by an individual who possesses a harvested deer, amend storage labeling rules to align with harvest reporting requirements, and clarify possession limits for deer processing and storage facilities. These rules should prove helpful to hunters, taxidermists and deer processors.

The NDA is dedicated to ensuring the future of wild deer, wildlife habitat and hunting. Among our core focus areas are hunter recruitment, retention and reactivation (R3) and deer diseases, including chronic wasting disease (CWD). The FWC proposed rules should advance R3 efforts while maintaining provisions to help reduce the spread of CWD. Difficult to understand or multi-layered rules can serve as a barrier to entry for new and seasoned hunters alike. Clarifying, simplifying and providing consistency go a long way in assuring hunters that they're compliant after a successful hunt and alleviates worry when heading afield. However, the proposed rules still ensure that accurate and proper carcass handling, labeling and storage information is present for FWC tracking and game-law enforcement. Additionally, the proposed rules do not alter or hinder carcass handling or transport rules intended to reduce the spread of CWD.

The NDA appreciates the FWC's proactive approach to clarify and provide consistency regarding deer carcass handling, storage, transfer, possession, and labeling requirements in Florida, and we believe these rules should prove helpful to hunters, taxidermists and deer processors. Please don't hesitate to reach out with questions or for more information.

Sincerely,

Torin Miller
Director of Policy