



# NATIONAL DEER ASSOCIATION

P.O. Box 162305 · Atlanta, Georgia 30321 · phone: 1-800-209-3337 · [DEERASSOCIATION.com](http://DEERASSOCIATION.com)

**Testimony of  
Torin Miller, Director of Policy  
National Deer Association**

**In Support of Proactive, Science-Based Management of Chronic Wasting Disease in Pennsylvania**

Dear Senators:

On behalf of the National Deer Association (NDA), I am writing to express our organization's support for the continued proactive, science-based management of chronic wasting disease (CWD) in Pennsylvania. We are a national non-profit conservation organization. We represent 30,000 members nationwide, including hunters, landowners and natural resource professionals.

The NDA is dedicated to ensuring the future of wild deer, wildlife habitat and hunting. The NDA outlines deer diseases as a critical focus area and slowing the spread of CWD is of primary concern. The vast majority of professional deer managers view CWD as the largest threat to the future of wild deer management and one of the largest threats to greater wildlife conservation that we have encountered over the last century. Through our extensive work on this issue across North America, we know that proactive, science-based management by state wildlife agencies is imperative to keeping prevalence rates low, deer populations healthy and hunter engagement stable. This has never been more evident than over the last year. In 2021 and early 2022, three more states and dozens of counties have joined Pennsylvania in its CWD-positive status, expanding the disease's reach to 29 states, five Canadian Provinces, Finland, Norway and South Korea.

## **About Chronic Wasting Disease**

CWD is an always-fatal brain disease affecting members of the deer family (cervids), with natural infections having been found in white-tailed deer, mule deer, elk, moose and reindeer. CWD belongs to a group of diseases known as transmissible spongiform encephalopathies (TSEs). Within this family of diseases, there are several other variants that affect domestic animals such as scrapie, which has been identified in domestic sheep and goats for more than 200 years, bovine spongiform encephalopathy (BSE) in cattle (mad cow disease), and transmissible mink encephalopathy in farmed mink.

CWD is highly contagious, and the infectious agent known as prions may be passed in feces, urine, blood, semen and saliva. Recent research suggests that infected prions can also bind to soils and vegetation where it can be later taken up by animals. Experts believe prions can remain in the environment for several years – if not decades – so other animals can contract the disease even after an infected animal has died. There is no evidence that CWD can be transmitted to people despite thorough attempts to find a link to similar human diseases, such as Creutzfeldt-Jakob disease and Alzheimer's disease. However, the Centers for Disease Control (CDC) recommends that people do not eat venison from animals that have tested positive for the disease.

There is currently no vaccine or treatment. Infected animals with clinical symptoms become emaciated and exhibit abnormal behavior including lack of fear of people, drastic weight loss, stumbling, listlessness, and loss of bodily functions. However, the average incubation period is 18-24 months, and it may take more than two years for an infected animal to develop symptoms. So, most hunters will never see a deer with these symptoms. Infected individuals overwhelmingly perish from other causes. CWD-positive animals are more likely to succumb to predation, hunters or car collisions than non-infected animals, and research shows they die at 2-3 times the

rate of deer without the disease. The origin of CWD is unknown, and it may never be possible to definitively determine how or when it arose. It was first recognized as a syndrome in captive mule deer held in wildlife research facilities in Colorado in the late 1960s. Computer modeling suggests the disease may have been present in free-ranging populations of mule deer for more than 40 years before first detection.

### **An Urgent Need**

Undoubtedly, the wild deer hunting tradition and industry in Pennsylvania have deep and widespread roots, and like many in this room today, I grew up and remain a proud Pennsylvania hunter. In fact, some of my fondest memories thus far in life have originated in the deer woods or at deer camp, and my connection to these places only grows stronger. You see, my father passed was when I was a teenager. But those precious years that he encouraged me to tag along on, and then partake in, the deer hunting tradition stuck, even though cut short. Now, as a father myself, I find myself constantly reflecting on those early years and realizing just how insignificant that act of 'hunting' was in forming my most cherished memories. Deer hunting in Pennsylvania is so much larger than the act. It's comradery, coming-of-age, connecting to nature, with our food and with ourselves, and of course, the creation of life-long memories and stories. I do not exaggerate when I say that all of these emotions, experiences and benefits are put at risk by chronic wasting disease. Multiple scientific studies have confirmed population declines over time in white-tailed deer, mule deer and elk populations from CWD.

Throughout 2021, we saw CWD spread both in Pennsylvania and throughout the country. In Pennsylvania, we witnessed the expansion of existing Disease Management Areas (DMAs) and the creation of a new DMA. In fact, the property where I shot my first buck with archery equipment at age 16 is now in a DMA. Nationwide, three new states detected CWD in their deer herds, bringing the national total to 29 and dozens of counties in multiple states also had their first positive detections. We've also witnessed concerning 'missteps' in captive cervid facilities nationwide, including the detection of the disease and subsequent contact tracing through massive intra and interstate webs, most notably in Pennsylvania, Minnesota, Texas and Wisconsin.

### **Considerations for Proactive, Science-Based Management**

While the battle against CWD outwardly appears to be fought on two fronts – captive and wild – the end goals align more than perceived. We need to slow the spread of this disease, and we need to take aggressive steps to do so now. But, as many states have learned, preventing the spread of this always-fatal disease is a daunting task and early detection and rapid response once the disease is found is critical for long-term management. An all-hands-on-deck approach is needed, including state and federal wildlife and agriculture agencies, legislatures, academics, professional land managers, hunters, dedicated conservationists and nature enthusiasts. The NDA has outlined a number of position statements that represent our views, based on the best-available science, on the most effective ways to manage CWD.

In many cases, the regulatory matrix of who oversees captive cervids within a certain jurisdiction is a direct result of lobbied and enacted law, transferring oversight from one agency to another. Inconsistencies across state or provincial boundaries can cause missed opportunities for communication between agencies responsible for regulating captive cervid facilities and certainly limits management efforts. There are also philosophical differences between wildlife and agricultural departments regarding captive cervid issues and free-ranging wildlife populations. Given the potential for disease transmission and the threat to our multi-billion-dollar hunting industry, the NDA advocates for sole regulatory authority of captive cervid facilities to belong to state/provincial wildlife agencies. These agencies have more experience with wildlife species, and have more at stake with wildlife disease issues, especially regarding transmission to free-ranging wild populations.

Similarly, on a jurisdictional basis, the authority which oversees captive cervids may have the ability to classify them as either “wildlife” or “livestock,” and as of late, there have been more deliberate efforts from special-interest groups to move captive cervids from the wildlife to livestock category. The problem is this inconsistency across state or provincial boundaries possibly creates missed opportunities for communication among agencies controlling and regulating captive cervid facilities and certainly limits management efforts. There are also philosophical differences between wildlife and agricultural departments regarding captive cervid issues and free-ranging wildlife populations, and when a public-trust resource like whitetails is legally considered livestock, ultimately control moves to the latter. Given the potential for disease transmission and the threat to our multi-billion-dollar hunting industry, NDA advocates for captive cervids to be categorized as wildlife so they are protected under the Federal Lacey Act of 1900 and the North American Model of Wildlife Conservation.

While there remains much to learn about CWD, we do know that moving deer and other cervids, dead or alive, can facilitate the disease’s spread, including the transport of carcasses by hunters who can't be immediately sure if their deer is infected. CWD spreads the fastest and the furthest when carried in a vehicle, and that's something that all deer managers and hunters should be concerned about. Certain parts of deer carcasses (most notably the brain, spinal cord, lymph nodes, eyes, and tonsils) may be contaminated with prions that cause CWD. Thus, most states have adopted regulations restricting the transport of whole cervid carcasses or carcass parts harvested outside the state or in known CWD areas within the state. Viscera, bones, skull, and other scrap/waste material should be left at the kill site for animals processed (deboned) in the field. Disposal of waste from cervids processed by meat processors, taxidermists or at home should be in an approved landfill that accepts these materials to minimize the risk of CWD spread. The NDA supports state and provincial regulations that restrict the transport of cervid carcass parts into the state and from known CWD areas within the state, and we engage in numerous outreach and education opportunities every year to help inform hunters about the importance of knowing these regulations prior to heading afield and following these regulations after a successful hunt. We also support regulations or recommendations for disposal of waste from cervid carcasses by methods deemed safe or low-risk.

Deer farming or cervid propagation is the raising of native or exotic cervid species for pleasure or commercial production of antlers, venison, breeding stock, semen, or other salable parts. Cervid propagation has grown rapidly in North America over the past few decades. About 40 states and several Canadian Provinces permit cervid propagation, although regulations vary. Captively propagated cervids in North America include fallow deer, red deer, white-tailed deer, elk, sika deer, and axis deer. Because of the potential negative effects, several states and some Canadian provinces have banned this practice. The most common concern is the introduction of novel diseases, such as CWD, from captive cervids to native wildlife and domestic livestock. The NDA opposes captive propagation of deer and other cervids and especially opposes the movement of live cervids from one facility to another. Certainly, this past year has shown that the movement of captive cervids from one facility to another can and does advance the spread of CWD.

Certainly, translocation of cervids for restoration purposes has been a successful strategy in North America that gained widespread public approval. However, the need for restoration has passed and most agency restoration programs have been abandoned or continue as a result of political motivations. The current trapping and translocation of cervids to increase populations for hunting, provide trophy animals for canned hunts, or to alter the genetic characteristics of a herd raises ethical questions and the significant potential for disease transmission. These issues are also relevant to movements of other cervid species that could potentially harbor CWD. For these reasons, and the reasons stated previously, the NDA opposes all movements of live cervids, by private individuals or wildlife agencies, until a reliable and practical live-animal test exists.

Sharpshooting, or ‘targeted removal’, is the procedure of removing deer from an area to monitor disease prevalence rate and spread, to enable research, and/or to expedite the local reduction of deer density in a quick fashion. These are not “deer eradication” efforts; too many hunters see these techniques collectively as an attempt to remove all deer from their hunting area. When CWD is confirmed in an area, it is vital to determine the prevalence rate and distribution. Targeted removal allows a wildlife agency to determine whether the disease is likely new to the area and only found in a small number of deer or has likely been in the area for several years and has already impacted a much larger percentage of the deer herd. Knowing this is important, and it identifies the next best step to fight the disease. Targeted removal can help reduce spread of CWD and/or keep it at a low prevalence rate as demonstrated by the Illinois CWD Surveillance and Management Program. This is because strategic removal from a known CWD area increases the odds of removing additional CWD-positive deer. Research from Wisconsin shows adult does are 10 times more likely to be CWD-positive if they have a CWD-positive relative nearby. Thus, concentrating population reduction efforts in areas known to contain CWD-positive deer is a sound strategy to slow the increase in prevalence rate and spread across the landscape. The NDA supports the use of targeted-removal strategies in CWD management. We encourage that hunter harvest be used in CWD population reductions to the greatest extent possible and that agencies provide educational information on its benefits. Sharpshooting should be conducted on private lands only with permission of the landowner, and all collected deer should be tested and those with results of “Not Detected” should be processed and donated to charity. Public acceptance will be necessary for these programs to be successful.

Finally, the Association of Fish and Wildlife Agencies (AFWA) has outlined best management practices (BMPs) for prevention, surveillance, and management of CWD. AFWA notes that state success in managing CWD relies on a robust and adaptable surveillance strategy to detect CWD as early as possible, when prevalence rates are low and seeding of the environment is minimal. This strategy should include a variety of sampling methods, including targeted removal and sampling of suspect populations and widespread testing of hunter harvested deer. Sampling of hunter harvested deer and other cervids provides the most common and efficient use of existing resources and management strategies, and hunter harvest sampling is the most efficient passive sampling method for estimating prevalence of CWD in a population. The Pennsylvania Game Commission has subscribed to many of AFWA’s BMPs

### **Conservation Implications**

Beyond the science and administrative aspects of CWD, it is creating significant challenges for the future of deer hunting, and broad wildlife conservation. According to the U.S. Fish and Wildlife Service’s most recent survey (2016), approximately 80 percent of all hunters pursue big game, and about 70 percent hunt deer. Deer hunting alone generates almost \$40 billion to the U.S. economy each year, and it represents nearly 60 percent of total hunting expenditures.

State wildlife agencies are primarily funded by the sale of hunting licenses and revenue generated from the Federal Aid in Wildlife Restoration Act, commonly referred to as the Pittman-Robertson Act. Therefore, deer hunters are carrying the financial burden for managing all wildlife. From 2011 to 2016, the U.S. Fish and Wildlife Service reports that hunting participation declined by 2.2 million, bringing the total number of hunters down to just 11.5 million. More specifically, big game hunting participation dropped by approximately 20 percent, and there is little doubt that CWD has impacted the decision of many to quit hunting deer. From an industry perspective over the same time period, hunting related expenditures were reported to have dropped nearly 30 percent. It is easy to see what a decline in deer hunter numbers would mean for overall wildlife conservation, including management of at-risk species. While hunting licenses sales and outdoor recreation, more generally,

have seen an increase through the COVID-19 pandemic, that boom is not expected to be permanent, and it's likely that previous participation trends will resume.

Deer hunters, in addition to being the largest segment of the hunting population, account for 63% of all days hunted in the U.S. Deer hunters have averaged slightly more than 115,000,000 days in the field in recent years. Of the more than \$27 billion generated from hunting-related expenditures in 2016, deer hunters accounted for more than half. Every time a deer hunter hangs up his or her rifle or bow for the last time, the negative impact is felt by wildlife and the economy. Imagine trying to convince deer hunters that they should be concerned about CWD and do their part to limit its spread, while at the same time trying to recruit new hunters, or to keep existing hunters in the field to stop what has been a steady decline in participation. That is the reality faced by state and federal wildlife agencies and the greater conservation community.

## **Conclusion**

The NDA appreciates the Pennsylvania Game Commission's (PGC) proactive and aggressive approach to managing CWD in the Commonwealth, and we fully appreciate the daunting task currently and continually facing the wildlife professionals tasked with managing this terrible disease. We overwhelmingly support previous planning, policymaking and rule promulgation designed to ensure that the Commonwealth is as well-positioned as possible to detect, manage, and slow the spread of CWD. These actions should minimize disease risk to the state's wild deer as much as possible. We stand ready to aid the PGC, other agencies and Pennsylvania lawmakers in the fight against CWD. Our deer hunting tradition and industry, including recreation and tourism economies, rely on the presence of healthy wild deer in Penn's Woods and engaged deer hunters to pursue them. We cannot let CWD get in the way of that.

Please don't hesitate to reach out with questions or for more information.

Sincerely,



Torin Miller  
*Director of Policy*