



# NATIONAL DEER ASSOCIATION

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Texas Animal Health Commission  
C/O Amanda Bernhard  
2105 Kramer Lane  
Austin, Texas 78758

12 July, 2022

**RE: Proposed amendments to §40.1 and §40.3 to clarify, correct and update information regarding chronic wasting disease (CWD) management and the CWD Herd Certification Program (HCP)**

Dear Texas Animal Health Commission:

On behalf of the National Deer Association (NDA), I am writing to provide our comments in support of the Texas Animal Health Commission's (TAHC) recently proposed amendments to clarify, correct and update information regarding chronic wasting disease (CWD) management and the CWD Herd Certification Program (HCP) in Texas. 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 outlines deer diseases as a critical focus area and slowing the spread of CWD is of primary concern. CWD is one of the largest threats to wildlife conservation that we have encountered over the last century. As many states have learned, slowing 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. Through our extensive work on this issue across North America, we know that proactive, science-based management by state wildlife and agricultural agencies is imperative to keeping prevalence rates low, deer populations healthy and hunter engagement stable.

We support the TAHC's proposed amendments to add and/or modify definitions regarding CWD exposure status and facility inspection. Similarly, we support amendments to the state's HCP strengthening language regarding escaped cervid reporting procedures, herd status levels, identification requirements, and inventory and subsequent inspection requirements. These amendments clarify Texas's HCP and bring the program up to federal standards. It's incredibly important that state captive cervid CWD management programs, at minimum, meet federal standards. Undoubtedly, the federal HCP has its own shortcomings, and the NDA has been working with the United States Department of Agriculture and others to address needed updates. Still, we encourage states to meet, and ideally exceed, federal standards, and we encourage the TAHC to continue to take a hard-look at its own HCP on a consistent basis.

Undoubtedly, the deer hunting tradition and industry in Texas has deep and widespread roots. Nationwide, about 80% of hunters pursue deer, and research has shown that CWD prevalence discourages hunter participation, ultimately threatening our deer hunting traditions and the Pittman-Robertson model of conservation funding. Now is the time to use all resources at the disposal of the TAHC to work with captive cervid facility operators, landowners and hunters to curb the troubling and rapidly-expanding spread of CWD in Texas.

The NDA appreciates the TAHC's proactive and aggressive approach to managing CWD, including the proposed amendments that clarify and strengthen definitions and meet federally-determined captive cervid standards. These actions should advance Texas's effort to reduce the disease risk to the state's wild deer. We encourage the TAHC to continue to work collaboratively and in cooperation with the Texas Parks and Wildlife Department and other state agencies, and applaud the continued inclusion of the interests and involvement of various stakeholder groups.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Torin Miller". The signature is fluid and cursive, with a prominent initial "T" and "M".

Torin Miller  
*Director of Policy*