



NATIONAL DEER ASSOCIATION

P.O. Box 162305 · Atlanta, Georgia 30321 · phone: 1-800-209-3337 · DEERASSOCIATION.com

North Carolina Wildlife Resources Commission
C/O Rulemaking Coordinator
1701 Mail Service Center
Raleigh, North Carolina 27699-1701

28 September 2023

RE: Support for North Carolina WRC Proposed CWD Rules, 2023

Dear North Carolina Wildlife Resources Commission:

On behalf of the National Deer Association (NDA), I am writing to state our support for the recently proposed permanent rules to assist with the detection and isolation of chronic wasting disease (CWD) in North Carolina. We are a national non-profit conservation organization with the mission to ensure the future of wild deer, wildlife habitat and hunting. We represent more than 100,000 members nationwide, and our membership includes hunters, landowners and natural resource professionals.

NDA appreciates the North Carolina Wildlife Resources Commission's (WRC) proactive and aggressive approach to managing CWD, including the proposed permanent rules to apply to areas surrounding CWD detections to reduce movement and infection opportunities. 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 agencies is imperative to keeping prevalence rates low, deer populations healthy and hunter engagement stable.

We support all of the rules that specify activities prohibited in Surveillance Areas, including: exportation of cervids, cervid carcasses, or carcass parts with exceptions; white-tailed deer fawn rehabilitation and transportation; placement of minerals, bait, and food; and possession and use of certain substances used to take, attract, or scout wildlife. With respect to cervid movement (live and carcass parts) and rehabilitation, we oppose all movements of live cervids by private individuals or wildlife agencies until a reliable and practical live-animal test exists. While there remains much to learn about CWD, we do know that moving deer and other susceptible 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. We do appreciate the inclusion of cleaned lower jawbones with teeth or cleaned teeth to the list of exempted deer parts that may be transported outside of a Surveillance Area.

We are also supportive of the proposed rule regarding deer scents, and specifically, we're supportive of the listed exceptions. According to current research, the risk of spreading CWD to new areas through use of natural urine-based lures is extremely low, but it's not zero. The accumulation of infectious materials is much higher in muscle tissue and organs than urine. As intended with the exceptions, we encourage hunters to only buy urine-based scent products from companies participating in the Responsible Hunting Scent Association (RHSA).



NATIONAL DEER ASSOCIATION

P.O. Box 162305 · Atlanta, Georgia 30321 · phone: 1-800-209-3337 · DEERASSOCIATION.com

Finally, the NDA supports WRC's proposal to prohibit the placement of bait, food, or food product to purposefully congregate wildlife in a Surveillance Area for eight months out of the year. The practice of baiting and its role in deer management have grown in terms of controversy and complexity in recent years. The NDA acknowledges the available scientific data surrounding this issue is incomplete and, at times, inconsistent. However, baiting increases density around a single food source and therefore increases the potential for direct and indirect contact among individuals. Similarly, the Association of Fish and Wildlife Agencies (AFWA) sites that unnatural concentration of cervids facilitates CWD transmission and establishment if CWD prions are present.

AFWA lists the prohibition of baiting or feeding wild deer as a best management practice (BMP) for the prevention of CWD introduction and establishment. Currently, there are 12 deer diseases that are thought to be spread by direct contact, two of which are bovine tuberculosis (TB) and CWD. NDA opposes baiting in known CWD and bovine TB areas or where this activity may disrupt natural migratory patterns of deer, and we encourage WRC to consider prohibiting baiting and wildlife feeding in Surveillance Areas year-round, including during hunting seasons.

Undoubtedly, the deer hunting tradition and industry in North Carolina has deep and widespread roots. Nationwide, about 80% of all hunters pursue deer, and research has shown that CWD prevalence can discourage 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 WRC to work with hunters, landowners and other stakeholders to curb the spread of CWD in North Carolina and keep prevalence rates low.

We look forward to continuing to assist WRC with CWD management and hunter engagement in the state, and we welcome any questions you may have regarding our positions.

Sincerely,

Torin Miller
Senior Director of Policy