



NATIONAL DEER ASSOCIATION

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The Honorable Jeffery Hildebrand, Chairman
Dr. David Yoskowitz, Executive Director
Texas Parks and Wildlife Department
4200 Smith School Road
Austin, Texas 78744

25 October, 2023

RE: Support for Proposed Amendments to Texas Parks & Wildlife Department's Chronic Wasting Disease Management & Response Regulations

Dear Chairman Hildebrand and Dr. Yoskowitz:

On behalf of the National Deer Association (NDA), I am writing to state our support for the recently proposed permanent rules governing chronic wasting disease (CWD) detection, response, and management, and deer breeder permits 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 more than 100,000 members nationwide, and our membership includes hunters, landowners and natural resource professionals.

NDA appreciates the Texas Parks and Wildlife Department's (TPWD) proactive and aggressive approach to managing CWD, including the proposed permanent rules intended to function collectively to refine surveillance and investigation efforts as part of agency's effort to manage CWD. 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 were supportive of TPWD's adoption of emergency CWD rules in July, including enforcement of existing permanent visible ID requirements on all released deer and 100% antemortem testing on all deer prior to transfer between facilities. We support the adoption of these rules as permanent, along with the additional amendments put forth by TPWD. Specifically, we're supportive of the additional proposed rules regarding cervid carcass transport and disposal; elimination of provisions allowing deer breeders to transfer fawns to external facilities for nursing purposes; imposition of a residency requirement on breeder deer as a condition of transfer to another breeding facility or to a release site; strengthening provisions governing the obligations of release-site owners in the event a release site becomes epidemiologically linked to a CWD-positive deer breeding facility; and providing for the suspension of Managed Lands Deer Program (MLDP) privileges for landowners who fail to comply with harvest, testing, and recordkeeping requirements at release sites epidemiologically linked to a CWD-positive deer breeding facility.



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With respect to cervid movement (live and carcass parts), rehabilitation and rearing, 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.

The NDA engages in numerous outreach and education opportunities every year to help inform hunters about the importance of knowing carcass transport and disposal regulations prior to heading afield and following these regulations after a successful hunt. TPWD's proposed rules would require carcasses to be inspected at a TPWD check station prior to movement out of CWD management zone. 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 Texas' deer herd and hunting heritage for current and future generations. We believe that the proposed rules, which require safe and appropriate carcass handling and disposal methods, could be a safe way to move deer carcasses out of CWD management zones while also increasing sampling opportunities. However, enforcement of this program would be key, and we encourage TPWD 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, and aid in keeping Texas hunters engaged in the disease management process.

Undoubtedly, the deer hunting tradition and industry in Texas 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. In Texas alone, deer hunting generates over \$4.3 billion in economic activity each year. To ensure that the tradition of deer hunting in Texas remains for generations more, it is critical that wildlife managers are equipped with an oversight toolkit that prioritizes rapid detection and traceability. The proposed regulations succeed in improving the ability of TPWD to meet that need. Now is the time to use all resources at the disposal of TPWD to work with hunters, landowners and other stakeholders to curb the spread of CWD in Texas and keep prevalence rates low.

We look forward to continuing to assist TPWD 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