CWD Action Coalition Position Statement on Farmed Cervidae Operations and Chronic Wasting Disease Prevention and Management
January 2023

Whereas, the presence of wild cervids (deer, elk, and moose) on the landscape represents an intrinsic value to Minnesotans residing in all corners of our state; and

Whereas, wild cervids hold great cultural value for all Minnesotans, including the Anishinaabeg and [Dakota], among whom deer, elk, or moose are featured within many traditional stories and exemplify generosity and the abundance of creation; and

Whereas, the hunting of wild cervids is a deep-rooted tradition amongst Minnesotans, with around 500,000 people purchasing a deer hunting license each fall and participating in a tradition that connects them to one another, to the land they hunt on, and to the food they eat; and

Whereas, deer hunting generates nearly $500 million annually in total economic activity to the state and is a crucial part of Minnesota's economy;[1] and

Whereas, the hunting of wild cervids was preserved as a tribal treaty right to ensure tribal members had continued access to traditional foods and cultural practices, including for example, the first kill ceremony which celebrates an individual's transformation from child to adult provider, now accountable for one's family and community; and

Whereas, wild cervids continue to be a significant source of lean, healthy protein for Minnesotans and tribal communities and helps address food insecurity and rising rates of chronic disease; and

Whereas, hunting cervids supports healthy lifestyles, traditional and cultural practices, and keeps cervid populations in balance; and

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[1] MINN. DEP'T NATURAL RESOURCES, MINN. WHITE-TAILED DEER MANAGEMENT PLAN: 2019-2028 ii (2019).

Whereas, Chronic Wasting Disease (CWD) is a prion based disease that is terminally fatal to all cervid animals who contract the prion; and

Whereas, the spread of the disease presents an immediate threat to our state's wild cervid animals and could lead to the loss of healthy cervid populations throughout the state; and

Whereas, health-concerns related to the consumption of CWD-infected animals is likely to lead to a reduction in hunter retention and recruitment across the state; and

Whereas, a loss of deer hunting participation due to the spread of CWD would have a direct negative impact on business across the state, especially in areas outside the metro, including: sporting goods stores, hospitality businesses, butcher shops, taxidermists, etc.; and

Whereas, the movement of captive cervids for the benefit of captive cervid operators has proven to present an unacceptable risk to our state's wild deer, moose, and elk and those who hunt, photograph, or otherwise value wild cervids on the landscape; and

Whereas, wild cervids are a public resource being threatened by a small private industry;[2] and

Whereas, the state has a duty and trust responsibility to protect said public resource.

Now therefore be it resolved, that the undersigned hereby agree and advocate for:

- An immediate moratorium on any new captive cervid[3] operation in Minnesota, except for cervid facilities created for the following purposes: wildlife research, rehabilitation, reintroduction efforts, or zoological facilities accredited by the Association of Zoos and Aquariums.
- The closure of all currently operating cervid operations in Minnesota, except for captive cervid facilities created for the following purposes: wildlife research, rehabilitation, reintroduction efforts, or zoological facilities accredited by the Association of Zoos and Aquariums. This coalition advocates for the compensation of captive cervid owners, operating in full regulatory compliance, for the loss of their herd. The process for indemnification and payouts performed by the USDA could serve as a model for compensating operators.[4]

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[2] JOHN KECKHAVER CONSULTING, LLC, MINN. CERVID FARMING AND ITS ECONOMIC IMPACT 8 (2017) (estimating the economic impact of cervid farms in Minnesota in 2016 as $24.2 million).

[3] The use of the word "cervid" is intended to include all members of the *Cervidae* family, including, but not limited to, white-tailed deer, elk, moose, etc.

[4] Based on information provided by the USDA we estimate the total compensation to the operators, under the USDA model, to be approximately $24 million. This number is generated from the $3,000 maximum payout allowed by the UDSA for a cervid animal, multiplied by the

- A ban on the interstate and intrastate transportation of live cervids except to a terminal facility. Provisions may be made for transportation to a terminal facility, but not a "terminal hunt facility." An allowance for the movement of wild cervid animals within the boundaries of the state of Minnesota for the purposes of research, reintroduction, or rehabilitation, or the movement of captive cervids between zoological facilities accredited by the Association of Zoos and Aquariums, should be made.
- A prohibition on the sale, transfer, or movement of bodily fluids originating from cervids, including, but not limited to, doe urine and semen straws.

Sincerely,

Minnesota Conservation Federation
Fond du Lac Band of Lake Superior Chippewa
Backcountry Hunters and Anglers- Minnesota Chapter
Bluffland Whitetails Association
Minnesota Chapter of the Wildlife Society
Minnesota Deer Hunters Association
Minnesota Division of the Izaak Walton League of America
National Deer Association
National Wildlife Federation
Sportsmen for the Boundary Waters

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roughly 8,000 captive cervids present in the state according to the Board of Animal Health September 2020 Farmed Cervid Program Report.

Veterinary Medical Research & Development

NEWS RELEASE

FOR IMMEDIATE RELEASE

New Improved Test for CWD

VMRD and CWD Evolution Partner to Commercialize RT-QuIC Test Technology Similar to PCR

PULLMAN, WA, AUGUST 1, 2022—RT-QuIC (Real-time quaking-induced conversion) testing for Chronic Wasting Disease (CWD) is a new testing technology with a long and successful track record in research studies. The key advantage for RT-QuIC over past CWD testing technologies is dramatically improved sensitivity through PCR-like amplification of the CWD agent.

Benefits RT-QuIC technology can bring hunters include better control of CWD, reduced introduction of CWD to new regions, easier and simpler sample collection for testing of harvested game, timelier CWD test results, and the possibility of live animal testing for wildlife management agencies and game farms.

CWD Evolution founder Davin Henderson offered, "RT-QuIC offers new testing technology that will give wildlife managers badly needed new tools in their tool chest to combat CWD." He also added "The addition of a predictive live animal test for CWD is a game changer. Many states are poised to use this test as soon as it becomes available." VMRD CSO, Don Knowles, added, "Providing quality-controlled RT-QuIC reagents to the diagnostic community is an important first step in reducing CWD and preserving wildlife."

CWD Evolution has a decade of RT-QuIC testing experience and VMRD is a USDA-licensed manufacturing facility that has commercialized over twenty USDA-licensed diagnostics over the last four decades. Together the companies are partnering to commercialize a USDA-licensed RT-QuIC laboratory test. Pending the license process, the companies began offering RT-QuIC reagents for research purposes June 15th. These reagents can be used by state agencies in pilot studies before the USDA-licensed test is available commercially.

ABOUT CWD EVOLUTION – CWD Evolution offers the first commercial RT-QuIC test and has been a leader in advancing RT-QuIC testing in the diagnostic world.

MEDIA CONTACTS:
Davin Henderson Ph.D.
CWD Evolution LLC
(760)317-7301
info@cwdevolution.com
testcwd.com

ABOUT VMRD, INC. – VMRD was founded in 1981 by D. Scott Adams, DVM, Ph.D., and currently employs over 50 researchers, lab technicians and support personnel. From its site in Pullman, Washington VMRD develops and manufactures veterinary diagnostic test kits and related reagents for distribution in more than 77 countries. As a rapidly growing company, VMRD strives to preserve its family-focused culture and core values of integrity and quality.

MEDIA CONTACTS:
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February 6th 2023

Sen. Foung Hawj, Chair of the Senate Environment, Climate, and Legacy Committee

Rep. Rick Hansen, Chair of the House Environment and Natural Resources Conference Committee

RE: RT-QuIC and CWD

Dear Chair Hawj, Chair Hansen, and Committee Members:

I am writing to express Wildlife Research Center's support for, and our use of and confidence in RT-QuIC testing.

A family business based in Ramsey, Minnesota, Wildlife Research Center is an industry leader in Urine-Based Scent and Scent Elimination products used by deer hunters across the state and country.

Wildlife Research Center shares the concerns of deer hunters and public policy officials about the potential CWD contamination of Minnesota's wild deer herd. Recognizing the adverse effects of CWD on wild deer herds, Wildlife Research Center has actively engaged in science-based efforts to prevent the spread of CWD. As a family-owned business dependent on a vibrant and healthy wild deer herd, and as avid hunters ourselves, we consider it our responsibility to do so.

More than half a decade ago, with the help of the Archery Trade Association, hunting scent industry leaders worked with Wildlife Agencies, Wildlife Disease Experts and industry experts, to develop a set of rigorous standards and strict biosecurity measures to protect the facilities where the urine in our scent products comes from, providing safe sources of urine-based scent products. These standards go above and beyond state and federal regulations. The result was the establishment of the Deer Protection Program (DPP).

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Program compliance is measured by verification of required paperwork and inspection reports completed by 3rd party accredited veterinarians. Additional facility inspections may be conducted to ensure compliance. Only upon verification of compliance of all DPP measures is a participant certified and allowed to use the DPP checkmark certification trademark logo on their packaging.

The Deer Protection Program is built on top of the USDA Herd Certification Program and, in addition to federal and state- approved CWD program guidelines, the Program:

I. prohibits urine production facilities from importing live cervids;
II. requires that all cervids exported from the facility be tested for chronic wasting disease upon death;
III. mandates annual inspections by an accredited veterinarian, including inspection of the herd, facilities and applicable records; and
IV. specifies construction and maintenance of an 8-foot or higher perimeter fence to protect the facility and, in CWD zones, a double perimeter fence to prevent direct contact between captive and wild cervids.

CWD has never been found in a Deer Protection Program collection facility.

In further effort to ensure safe and responsible hunting scent products, industry leaders in 2019 began to take yet another step and began RT-QuIC (Real-time quaking-induced conversion) testing every lot of urine used in these products. Since then, it has become yet another requirement of the Deer Protection Program (DPP).

RT-QuIC testing is used as a final conformation to ensure that the deer urine in these products poses no risk to wildlife.

Independent lab testing of each lot of deer urine is performed prior to distribution of any DPP urine product. No urine from DPP facilities has tested positive for CWD which is congruent with the current CWD free status of the DPP deer herds providing urine to the scent industry.

RT-QuIC is a reliable test to determine if prions are present in urine and many other samples as well. RT-QuIC testing is the next generation of CWD tests and is being used widely in the veterinary diagnostic world to detect CWD. Several universities and states are exploring Rt-QuIC as a method for live animal testing and surveillance, and more than 40 peer reviewed papers have confirmed the validity of RT-QuIC as a detection assay for prion diseases like CWD.

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The laboratory CWD Evolutions LLC that RT-QuIC tests our products has recently partnered with VMRD Veterinary Medical Research & Development to commercialize a USDA-licensed RT-QuIC laboratory test. (see attached press release)

Wildlife Research Center has strongly supported for many years and continues to support the use of RT-QuIC testing in the fight against CWD.

Understanding the threat that CWD poses to wild deer herds, WRC and other industry leaders, as business owners and hunters that depend on a healthy, vibrant deer population appreciate the efforts that our state legislators and officials are putting into combatting Chronic Wasting Disease.

Thank you for this opportunity to share with legislators, regulators, hunters, and the general public what Wildlife Research Center and other industry leaders are doing to protect wild deer.

Sincerely,

Sam Burgeson, President
Wildlife Research Center

Joint: House Environment and Natural Resources Finance and Policy and Senate Environment, Climate and Legacy Committees.

Chair Hansen and Joint Committee Members:

Thank you for the opportunity to testify before your committees as we try to work together to solve the problem of Chronic Wasting Disease as it impacts both the wild and captive cervids in the state of Minnesota.

I am Dr. Scott Josephson of the TriCounty Veterinary Clinic in Taunton, Minnesota. I am a graduate of the University of Minnesota College of Veterinary Medicine and have been in practice for 38 years in southwest Minnesota. Although I own a general mixed animal rural practice, my focus is in ruminant reproduction. This includes 35 years experience in embryo transfer and in vitro embryo production for cattle, sheep and goats as well as laparoscopic artificial insemination services for 60+ whitetail farms throughout the Midwest.

Since the appearance of CWD on the landscape in Minnesota, efforts have been made by the Board of Animal Health, captive cervid industry, Minnesota DNR, the state legislature and the University of Minnesota to control the spread of the disease in both the wild and captive cervids. Most of the effort and use of funding has been from a reactive posture where identified infected farms are depopulated and wild deer are killed en mass to reduce their populations in those positive zones. I would like to suggest a different approach.

The captive cervid industry, coupled with private and public research, have identified 4 resistant gene markers to CWD in certain individual whitetail deer. In addition, research has also produced a 50K genomic scale (50,000 locations on the whitetail genome) that appears to have promise as a predictor of an animals susceptibility to developing CWD. Whitetail farms have served as field research laboratories for studies to develop these approaches to solving the problem of CWD. It is also estimated that over 70% of the wild whitetail population possess the least resistant/most susceptible genotype to CWD.

Most whitetail farms are now selectively breeding to introduce and increase the resistant markers in their breeding herds. In addition, the North American Deer Farmers Association is using the 50K genomics to establish CWD resistant breeding values in their registry to assist farms in selective breeding programs. It is worth noting that there are very promising early results in herds that have used and studied these approaches to prevent animals from infection with CWD prions, even in a high exposure environment and adult deer reaching 4 to 5 years of age in that environment. (See "Did We Find a Cure for CWD?" YouTube Video with Greg Flees of Wilderness Whitetails).

As you may know, scrapie is a transmissible spongiform encephalopathy (TSE) disease in sheep that is caused by a prion similar to but not the same as causing CWD. Beginning in the year 2000, the USDA established an eradication effort to rid the United States of scrapie. Through identification of resistant animals using just two markers and by using those animals in farm breeding programs, by 2022 scrapie has essentially been eradicated from the United States.

We need to shift from a predominantly reactive approach to CWD management in Minnesota to a proactive approach whereby we help these farms establish a high level of genetic resistance in their breeding animals. Then we should study their success and use the information from those farms to better understand and control the disease in the wild populations. The scrapie model could serve as a template for the captive herds to help them achieve eradication as well.

In the process, a proactive scientific approach seems also to be a much more prudent use of tax dollars than the predominantly reactive approach we currently employ.

Respectfully,

Scott D. Josephson, DVM
TriCounty Veterinary Clinic
Taunton, MN

MINNESOTA ELK BREEDERS ASSOCIATION

An Industry Dedicated to Responsibly Raising Elk in Minnesota

February 2023

CURRENT STATISTICS

(Fiscal Year 2022)

83 Elk Farms (227 total cervid farms)
3,073 Elk (6,791 total farmed cervids)

Farmed Cervids Tested for CWD
1,358 Animals (includes all species)

No CWD detected in Minnesota Elk herds since 2009

The Minnesota farmed cervid industry has been diligently working to solve the issue of CWD in our farmed operations for 20 years and are now closer than ever to making that goal a reality.

GENETIC RESTISTANCE

Genetic resistance is a promising approach to controlling CWD. USDA has worked with Dr. Christopher Seabury from Texas A&M and others to map the whitetail deer genome and have developed a genomically estimated breeding value (GEBV), a method used in other species to utilize selective breeding to either breed away from undesirable traits or enhance desirable traits. Once all animals in a herd have been given a score and highly susceptible animals have been identified, efforts can be made to remove those animals and selectively breed deer that are the least susceptible to CWD. The data suggests that having a herd with minimally susceptible animals would allow it to avoid propagating an infection upon an introduction of CWD. (1)

The Minnesota Board of Animal Health is currently utilizing USDA funding to determine the GEBV in more than 3,000 Minnesota farmed white-tailed deer.

In 2021, the Texas Animal Health Commission, in partnership with Dr. Seabury, was awarded a USDA APHIS CWD cooperative agreement to study the predictive genetics approach in elk. We stand ready to follow a similar path of testing and culling animals in our herds when this technology becomes available.

CWD LIVE ANIMAL TESTING

USDA continues to evaluate research occurring not only in Minnesota but throughout all of North America as researchers continue to generate the data needed to validate CWD live animal testing in cervids. MnEBA has reached out to the Minnesota Board of Animal Health to begin work on developing a

framework to utilize live animal testing in our herds so when this technology becomes available, we are ready to utilize it immediately.

CWD BIOSECURITY

For the past several years, a team led by Dr. Scott Wells, University of Minnesota, has been working to identify risk factors associated with biosecurity at CWD positive farms in order to identify and apply best known biosecurity practices to lower the risk of CWD entering a farmed cervid herd from the wild herd.

Key findings concluded that two thirds of farm infections in the study group of CWD positive farms from Minnesota, Wisconsin and Pennsylvania came from indirect exposures from outside the fence. These factors provide an indication that scavengers bring CWD from infected wild deer sources through the fence to infect farmed cervids. These factors included observing scavengers in and around cervid pens, access of cats to cervid pens or feed storage areas, and location of water sources for farmed cervids at the perimeter fenceline. (2) This data does not support the usefulness of double fencing or physical barrier as an effective means of preventing CWD.

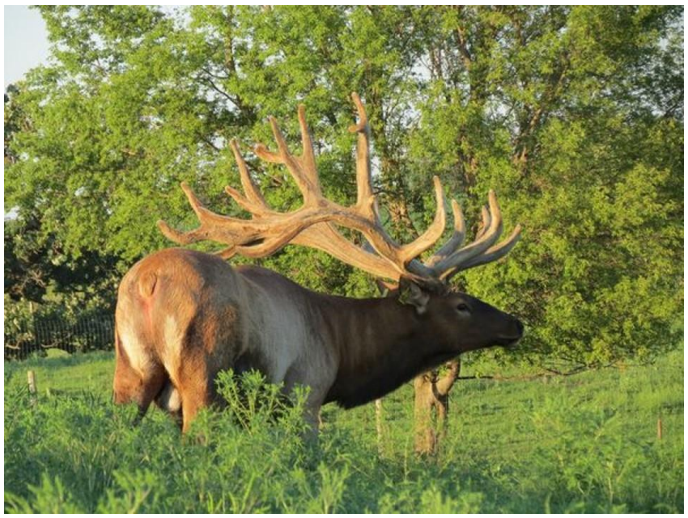
MnEBA has been working closely with Dr. Wells and team to educate elk producers on biosecurity measures to better safeguard our herds from CWD.

DNR CONCURRENT AUTHORITY OVER FARMED WHITETAIL DEER

It is important to note that in 2021, the Minnesota State Legislature passed a new law giving the Minnesota DNR concurrent authority of farmed whitetail deer which has allowed DNR direct access to overseeing Minnesota's farmed deer herds since that time.

CONCLUSION

Let's not give up on solving CWD on the farm. Genetic resistance research is extremely promising and being widely examined on Minnesota deer farms. We are perhaps only months away from an approved live animal test. University of Minnesota research into enhanced biosecurity is working. Let's allow Minnesota's farmed cervid industry to be a leader in finding on-farm strategies to stop CWD from entering their farms and not eliminate the industry with regulations not supported by scientifically-based data.



(1) Tracy Nichols Ph.D., M.S., M.A. USDA APHIS Veterinary Services Cervid Health Program, "Predictive Genetics and Management of CWD in Whitetail Deer", North American Elk Journal, May 2022.
(2) SJ Wells and M Schultze, College of Veterinary Medicine, University of Minnesota, Chronic Wasting Disease Risks to Cervid Farms, https://sites.google.com/umn.edu/farmedcervid-cwd/our-research?authuser=0.