

THE WILDLIFE SOCIETY

NORTH CAROLINA CHAPTER

Excellence in Wildlife Stewardship Through Science and Education



Kate Pipkin
NC Wildlife Resources Commission
1701 Mail Service Center
Raleigh, N.C. 27699-1701

October 9, 2014

Dear Mrs. Pipkin,

The North Carolina Chapter of the Wildlife Society (NCTWS) is hereby submitting its opposition to the proposed administrative rule changes to 15A NCAC 10H.0301 to allow the issuance of new licenses for captive cervid facilities in North Carolina [proposed rule text attached].

The NCTWS was founded in 1983 and is an association of wildlife professionals from all backgrounds. Members of the Chapter come from state and federal agencies, universities, private industry, private conservation organizations, and other natural resource entities. The membership, currently totaling 269, consists of wildlife professionals and students involved in research, management, education, administration, and other disciplines.

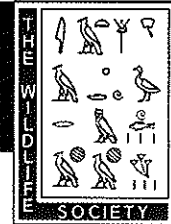
We commend the North Carolina Wildlife Resources Commission (NCWRC) for its continued diligence, since May 2002, in implementing a conservative disease management strategy designed to prevent the introduction of chronic wasting disease (CWD) into North Carolina and to increase the likelihood of detection should it exist¹. As you are aware, the potential biological, economical, and sociological implications associated with CWD are significant^{2,3,4}. For example, Wisconsin spent \$32.5 million the first 7 years after detecting CWD, in an attempt to reduce the spread of the disease within their state⁵. Simply from an economic perspective, we cannot afford to get CWD in North Carolina. The spread of wildlife diseases, especially CWD, is inadequately regulated in many states and is directly linked with the transportation of animals within the captive cervid industry^{6,7,8}. Therefore, we believe that as the state agency responsible for protecting the wildlife resources of our state, the NCWRC should do everything within its power to reduce the risk of CWD occurring within North Carolina.

We are aware of the latest legislative action in the General Assembly regarding captive cervid facilities in our state. Although Session Law 2014-100 states "nothing in this section is intended to limit the issuance by the Commission of new captivity licenses or permits for cervid facilities," it does not *require* the NCWRC to issue new licenses for captive cervids. And although the Session Law states the NCWRC cannot "adopt standards more stringent than those expressly set out in the" United States Department of Agriculture's Chronic Wasting Disease Program Standards, those Standards also do not *require* new licenses. The NCWRC has not issued new licenses for captive cervids since 2004, and we sincerely hope the NCWRC will continue to prohibit new licenses for captive cervids in North Carolina. As you are

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aware, the most likely vectors for the introduction of CWD into North Carolina are through transportation of captive cervids and importation of infected carcasses^{8,9}.

In 2002, North Carolina had an estimated 190 captive cervid facilities. That number declined to 89 in 2005, after captive cervids were voluntarily relinquished by licensees, inspections and buyouts were completed, and illegally-held cervids were confiscated¹. We now have 37 licensed captive cervid facilities in NC. During the buyout program (from 2002-2004), the NCWRC spent over \$247,000 of sportsmen's dollars to purchase cervids from 15 facilities, who voluntarily relinquished their license and animals for testing¹. Under the proposed rule changes, those individuals would automatically be eligible to apply for a new license and begin breeding captive cervids again.

The conditions of CWD have not changed in 12 years – we still do not have a *reliable* live animal test, there is no vaccine, treatment, or cure, and no state has been able to eradicate the disease once present – so we have no new data to show that it is safer to import or possess captive cervids now than in 2002. We, therefore, ask: why is the NCWRC reversing course now, especially having expended so much time and money to prevent CWD, to allow increasing the number of captive cervids and facilities in our state?

The NCTWS is against allowing new captive cervid facilities in North Carolina, and therefore, are opposed to the proposed rule changes that would allow new facilities. We are also against relaxing the fencing, inspection, and CWD testing requirements for captive cervid facilities. As we have stated in the past, when our Chapter opposed similar rule changes proposed by the NCWRC in 2012, we feel there are serious concerns that need to be addressed (i.e., a *reliable* live test for CWD, vaccinations for captive animals, environmental contamination, etc.) before our state should *ever consider* expanding the captive cervid industry in North Carolina.

In addition, the Association of Fish and Wildlife Agencies (AFWA), of which the NCWRC is a member, has signed two resolutions [attached] identifying the risks associated with CWD and captive cervids and “urges its member agencies and other appropriate animal health and agriculture agencies to promulgate and strongly enforce regulations” related to the transportation of captive cervids. The AFWA also recognizes that “CWD is a serious threat to our country’s valuable wildlife resources and associated recreation, and the Association of Fish and Wildlife Agencies strongly supports efforts to control CWD in captive cervids in order to reduce the threat they pose to the country’s native wildlife.”

Captive cervid facilities provide no benefit to wildlife – they only cost the taxpayer. Captive populations must be tested, inspected, and monitored by state authorities on a regular basis. Any incidence of disease would significantly increase that cost, given the state-mandated action that is required.



Wildlife in the United States is considered part of the public trust. The North American Model of Conservation is regarded around the world as the best of its kind. Captive deer breeding undermines the basic tenets of this model: that deer are a resource owned by all people, not individuals with the resources to do so. Furthermore, at a time when the interest in hunting is declining, we cannot afford the negative publicity that frequently results from privately operated reserves¹⁰.

Thank you for allowing us an opportunity to comment on the proposed rules. We hope the NCWRC will do what is right for the wildlife resources of our state – protect our free-ranging cervid herds from disease – and not cater to a few individuals who hold cervids in captivity.

Sincerely,

Gary Marshall, Executive Board At-large
The North Carolina Chapter of the Wildlife Society

Attachments: Proposed Rule Changes 15A NCAC 10H.0301; Session Law 2014-100; United States Department of Agriculture's Chronic Wasting Disease Program Standards; Confinement of Wild Ungulates within High Fences [The Wildlife Society Position Statement]; The North American Model of Wildlife Conservation [The Wildlife Society Position Statement]; Chronic Wasting Disease Prevention [AFWA Resolution 2002-02-26]; Requesting the Department of Agriculture to Remove Provisions for Preemption from the Final Interim Rule [AFWA Resolution 2012-01-06].

¹ Douglass, K.E., D.T. Cobb, and V.E. Stanford. 2005. Chronic wasting disease surveillance in North Carolina. Proceedings of the Annual Conference of the Southeast Association of Fish and Wildlife Agencies 59:79–88.

² Bishop, R.C. 2004. The economic impacts of chronic wasting disease (CWD) in Wisconsin. *Human Dimensions of Wildlife* 9:181–192.

³ Vaske, J.J., N.R. Timmons, J. Beaman, and J. Petchenik. 2004. Chronic wasting disease in Wisconsin: hunter behavior, perceived risk, and agency trust. *Human Dimensions of Wildlife* 9:193–209.

⁴ Williams, E.S., M.W. Miller, T.J. Kreeger, and E.T. Thorne. 2002. Chronic wasting disease of deer and elk: a review with recommendation for management. *The Journal of Wildlife Management* 66(3):551–563.

⁵ Wisconsin Department of Natural Resources. 2010. Wisconsin's Chronic Wasting Disease Response Plan: 2010–2025. WM-482-2010. Madison, Wisconsin, USA.

⁶ Demarais, S., R. W. DeYoung, L. J. Lyon, E. S. Williams, S. J. Williamson, and G. J. Wolfe. 2002. Biological and social issues related to confinement of wild ungulates. *Wildlife Society Technical Review* 02-3, 29 pp.

⁷ Dubé, C., K.G. Mahren, I.K. Barker, B.L. Peart, and A. Balachandran. 2006. Retrospective investigation of chronic wasting disease of cervids at the Toronto Zoo, 1973–2003. *Canadian Veterinary Journal* 47:1185–1193.

⁸ Kim, T., H. Shon, Y. Joo, U. Mun, K. Kang, and Y. Lee. 2005. Additional cases of chronic wasting disease in imported deer in Korea. *Journal of Veterinary Medical Science* 67(8):753–759.

⁹ Miller, M.W., E.S. Williams, N.T. Hobbs, and L.L. Wolfe. 2004. Environmental sources of prion transmission in mule deer. *Emerging Infectious Diseases* 10:1003–1006.

¹⁰ Sabalow, R. 2014. Trophy deer industry linked to disease, costs taxpayers millions: the pursuit of deer bred for enormous antlers and shot in hunting pens is compromising our ethics and laws, and comes with growing risk and costs. *IndyStar*. 16 April 2014.