THE WILDLIFE SOCIETY
NORTH CAROLINA CHAPTER
Excellence in Wildlife Stewardship Through Science and Education

5 June 2015

Representative Tim Moore
16 W. Jones Street, Room 2304
Raleigh, NC 27601-1096

Dear Speaker:

The House is currently considering legislation (Senate Bill 513, Sections 14a and 14b) regarding the breeding and/or captive farming of cervids, which are members of the deer family. Legislation of this nature concerns our profession, and we would like to briefly comment on the unique management challenges and issues posed by the confinement of wild North American cervids.

The North Carolina Chapter of The Wildlife Society was founded in 1983 and is a non-profit scientific and educational association of nearly 250 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation. Our international parent society was established in 1938 and has a membership of nearly 9,000 wildlife professionals.

We believe policy decisions regarding the management of wildlife populations should be science-based, and offer the following insights into the wildlife science related to captive cervid management. Captive cervid facilities maintain animals at artificially high densities, which greatly exacerbates the potential for infectious disease transmission – both within the captive population and to nearby wild populations. Chronic Wasting Disease (CWD) is a particular concern for captive and free-ranging cervid populations:

- CWD is a transmissible spongiform encephalopathy, which affects the brain and nervous systems of infected animals (Williams et al. 2001). There is currently no vaccine or known way to decontaminate environments with CWD, and the mortality rate is 100% for infected animals (Chronic Wasting Disease Alliance 2012; Williams 2005).

- Human movement of cervids has likely contributed to the spread of CWD in captive facilities and the establishment of the disease in previously uninfected free-ranging populations (Saunders et al. 2012). CWD was first identified in captive mule deer in Colorado during the 1960s and has since spread to both captive and free-ranging cervid populations in 23 states and 2 Canadian provinces (Williams 2005; Saunders et al. 2012). Both escape of captive animals and wild animals entering enclosures are routinely experienced at captive facilities, allowing for disease transmission (Fischer and Davidson 2005).

- CWD may have significant ecological and economic impacts. High CWD prevalence has been associated with significant decreases in mule deer populations, and infected animals may be more likely to be involved in vehicular collisions contributing to economic damage associated with CWD (Miller et al. 2008).

- Eradication and control of CWD is difficult, and eradication of CWD in wild cervid herds has never been accomplished. Diagnostic tests for CWD require a biopsy of tonsil or lymphoid tissues; live-testing of animals would require anesthesia (Wigurdson et al. 1999; Williams et al. 2002; Wolfe et al. 2002). These procedures are not suited towards testing large numbers of animals such as herds kept in captive facilities.

Disease transmission between captive and wild animals is a growing concern with potentially far-reaching ecological consequences. TWS supports a moratorium on the construction of high-fenced facilities and shipment of live cervids until live-animal diagnostic tests are available for detecting and monitoring important infectious diseases, including CWD.

Furthermore, we support applying the concepts of the North American Model of Wildlife Conservation as the cornerstone of wildlife management. One of the key tenets of the conservation model is that wildlife is a public trust resource, managed and maintained by government agencies for the benefit and use of the public. Private ownership of native North American wildlife in captive facilities both fails to conform to the principle of managing wildlife as a public trust resource and threatens the ecological stability of cervid populations belonging to and used by the public.

We support state wildlife agencies as the primary regulatory authority over native North American cervids, including those held in captive facilities. We encourage state wildlife agencies to work cooperatively with other state, provincial, and federal wildlife, agriculture, and health agencies as well as hunting groups, conservation organizations, private landowners, and managers to reduce the potential issues such as disease transmission and genetic exchange among native wildlife and captive or exotic species.

Our parent society has developed a series of technical reviews, which are drafted by panels of wildlife biology and management experts drawing from the body of peer-reviewed scientific literature. Two previous technical reviews have specifically outlined the role of the public trust doctrine in wildlife management and the biological and social issues resulting from confinement of wild cervids. The challenges outlined in this letter are detailed in these technical reviews and used to form the basis of The Wildlife Society's Position Statements on these topics.

Since May 2002, the NC Wildlife Resources Commission has diligently continued to implement a conservative disease management strategy designed to prevent the introduction of CWD into

North Carolina and to increase the likelihood of detection should it exist. But over the last year, these rules have been severely weakened, significantly increasing the risk of introducing CWD into North Carolina. As you are aware, the potential biological, economical, and sociological implications associated with CWD are significant. 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 state. 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. Therefore, we believe that the state wildlife agency should remain responsible for protecting the wildlife resources of our state, and should be allowed do everything within its power to reduce the risk of CWD occurring within North Carolina.

We trust that you will consider all the impacts of expanding the captive cervid industry and transitioning oversight of that industry away from those individuals with knowledge and expertise in managing North Carolina wildlife on behalf of the entire public. We look forward to working with you to prevent any further exploitation of public trust wildlife resources, which belong not to individuals but to present and future Americans in North Carolina and other states throughout this great nation.

Respectfully,

Susan Cameron

Susan Cameron, Executive Board
North Carolina Chapter of The Wildlife Society

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