

August 7, 2015

To Whom It May Concern:

In an effort to inform the public, Texas Wildlife Association (TWA) offers this update on the recent Chronic Wasting Disease (CWD) finding and ongoing investigation. This has been a rapidly evolving issue, which TWA has been heavily involved in. Here is a brief chronology of events to date:

- On June 30, a two-year old whitetail buck that was born and raised on a facility in Medina County (index facility) tested positive for CWD.
- Captive breeder deer are under dual regulatory control by Texas Parks and Wildlife Department (TPWD) and Texas Animal Health Commission (TAHC). Because CWD is a reportable animal disease, the agencies immediately suspended the movement and release of all captive breeder deer in the state on June 30.
- TPWD and TAHC traced all deer moved into (trace-in) and out of (trace-out) the index facility. Total direct exposures to the index facility include 126 deer from 30 trace-in facilities, and 835 deer to 147 trace-out facilities.
- On July 8, TWA participated in a conference call hosted by TPWD and TAHC to begin sharing information with stakeholder organizations.
- On July 13, TWA released a joint resolution in support of TPWD and TAHC while urging caution in investigation and containment efforts. The resolution can be found here: <http://www.texas-wildlife.org/resources/news/resolution-statement-on-chronic-wasting-disease-in-texas>
- On July 13, TWA attended a special Texas House of Representatives Culture, Recreation, and Tourism Committee hearing on the CWD finding.
- On July 14, the Joint CWD Task Force met to discuss testing and containment protocols.
- On July 16, TWA provided invited testimony to a special TPWD Commissioner meeting. Presentations and audio recording from that meeting can be found here: <http://tpwd.texas.gov/business/feedback/meetings/> TWA testimony begins at 1:36 on the audio.
- On July 22, TPWD and TAHC lifted movement restrictions on all TAHC Certified captive deer breeders (approximately 50). To achieve Certified status, a breeder must test 100% of all eligible mortalities and maintain a “closed” herd, trading only with other Certified herds, for over 5 years. These herds have zero exposure to the index facility.
- On July 24, TWA participated in another conference call hosted by TPWD and TAHC. At that time, 24 trace-out deer had been tested with “no detection” results.
- On July 28, testing began on 35 deer held in pens at the index facility.
- On July 31, two initial positive detections of CWD came from the 35 tests. Those detections are awaiting third-party confirmation.
- On August 6, the Joint CWD Task Force met to discuss a plan to outline steps for captive deer breeders to achieve “movement-qualified status”, or to begin moving breeder deer again. TPWD and TAHC are expected to distribute a DRAFT plan on Monday, August 10.

There are a number of additional factors influencing this matter. Currently, the fastest and most accurate CWD detection test and the only test recognized by the United States Department of Agriculture (USDA) is a post-mortem inspection of the animal’s brain tissue. Captive breeder deer in Texas are property of

the state, held by permit to possess. TPWD and TAHC have the regulatory authority to seize deer in pens for testing, but are going to great lengths to reach compromise and provide options to captive deer breeders, while balancing the risks posed to the native free-range herd as well.

There are ante-mortem, or live animal, tests available to detect CWD. Obviously, this is preferable over euthanizing deer. Unfortunately, these tests require multiple rounds over several months to reach an acceptable accuracy level. Additionally, these tests are not approved by USDA, meaning that Texas would lose “status” with USDA if live animal tests were relied upon and therefore not be able to transport deer across state lines. If the decision is made to use these tests, then a quarantine period would be necessary on exposed facilities and two additional layers of trace-out facilities while testing is completed.

The scope and scale of captive deer breeders exposed to the index facility is huge. Over 10% of the captive deer breeding industry has direct Tier 1 exposure. For disease containment purposes, TPWD and TAHC must consider additional layers of trace-out facilities from those that are directly exposed. If an additional confirmed CWD finding occurs outside of the index facility, then the process starts all over again. This could very quickly reach an enormous share of the captive deer breeder facilities in the state. Of additional concern is the fact that Texas is the only state in the union that allows captive-bred deer to be liberated into the wild and co-mingled with native free-range deer. In fact, one release sight from the index herd is a low-fence property. TPWD and TAHC were absolutely correct to halt all movement statewide. Fortunately, July is the lowest period of captive breeder deer movement in the year. Unfortunately, there is spike in captive breeder deer movement from mid-August to mid-September in preparation for hunting season. This is unfortunate because it creates a financial incentive for the captive deer breeding industry to push for movement restrictions to be lifted, perhaps prematurely. There is still substantial work to be done by TPWD and TAHC on testing and containment efforts. These agencies are literally working around the clock, but there are only so many qualified people and only so many hours in the day. They must be allowed to do their job in a careful way without outside pressure.

There are approximately 1,300 captive deer breeder permit holders in Texas, who hold approximately 110,000 deer in pens. For perspective, there are approximately 700,000 deer hunters and 3,900,000 free-ranging deer in Texas. The deer hunting industry at-large generates \$2.1 billion of economic impact to the state per year. Rural economies and even rural property values rely on deer hunting in some form or fashion. Simply put, public faith in the health of the Texas deer herd (native free-range and captive) transcends the financial interests of 1,300 permit holders. TWA is working hard to provide a voice for the health of the native deer herd in the discussion. As things develop further, TWA will continue to provide updates.

Best,

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To learn more about CWD, visit these two helpful websites:

<http://tpwd.texas.gov/huntwild/wild/diseases/cwd/>

<http://www.cwd-info.org/>