

July 11, 2013

## **CWD Standards Comparison between Industry and USDA Versions**

Standards Working Group Adopts Only 25% of Cervid Rep's Suggestions

The American Cervid Alliance analyzed two major versions of the standards from the CWD Standards Working Group led by USDA's Dr Patty Klien. The Standards Working Group, which concluded in early June, produced the final running draft of the standards known as Version 22. Version 22 is currently being prepped for the public comment period after the completion of technical approval by USDA attorneys.

In April, Version 18, known as the "Industry Suggestions Draft" was created after the Working Group allowed a subcommittee of the committee's cervid and state veterinarian representatives to offer an alternative they could all agree to live with. Version 18, which had the approval of Eric Mohlman, Shawn Shafer and Charly Seale, was submitted to the full Working Group. The remainder of the Working Group then reviewed the suggestions to determine which ones they would incorporate into the running draft.

After a side by side comparison of Version 18 and Version 22, it shows that only 25% of the industry suggestions made by Mohlman, Shafer, and Seale, were adopted by the Standards Working Group after it was presented. Version 18 made 241 changes the cervid industry needed. Version 22 reflects only 61 of the 241 changes within the 56 page document.

Below is a snap shot breakdown of the number of suggestions made section by section between Version 18 and Version 22.

| Section Number and Topic           | Version 18-<br>Industry | Version 22 |
|------------------------------------|-------------------------|------------|
|                                    | # of Suggestions        | # Adopted  |
|                                    |                         |            |
| Introduction                       | 3                       | 0          |
| Part A/Part B Descriptions         | 3                       | 1          |
| Definitions                        | 24                      | 16         |
|                                    |                         |            |
| Part A- Hard Certification Program |                         |            |
| 1- Administrative Procedures       | 1                       | 0          |

| 1.4- Reporting Activities                                  | 1  | 0 |
|--|----|---|
| 2.1- Approving Existing State CWD HCP                      | 1  | 1 |
| 2.3- Participating Approved State: Requirements            | 5  | 1 |
| 2.4-Participating Herd: Requirements for Enrollment        | 4  | 0 |
| 2.5- Herd Owner Enrollment and Advancement                 | 3  | 1 |
| 2.6- Additions of Animals or Genetic Material(Semen)       | 1  | 0 |
| 2.7- Inspections and Inventories                           | 3  | 1 |
| 2.8- Loss of Certification Status                          | 8  | 1 |
| 2.9- Relocation of Herd                                    | 3  | 1 |
| (2.10) - Cancellation of Participation                     | 4  | 2 |
| 3.2- Animal Identification                                 | 3  | 0 |
| 3.3- Herd Inventory- Records                               | 1  | 1 |
| 4- Fencing Requirements                                    | 1  | 0 |
| 5.3- On Farm Surveillance                                  | 4  | 1 |
| 5.4- Animal Surveillance on Private Hunt or Shooter        |    |   |
| Facilities   | 5  | 1 |
| 5.5- Slaughter Surveillance                                | 2  | 0 |
| 5.7- Sample Collection and Submission Procedures           | 1  | 0 |
| 7.2- Regularity  | 2  | 0 |
| 8- Interstate Movement                                     | 1  | 0 |
| 8.1- Requirement for Interstate Movement                   | 2  | 0 |
| 8.2- Issuance of Certificates(CVI) for Interstate Movement | 1  | 1 |
| 8.3- Exemption for Interstate Movement                     | 5  | 1 |
| 8.4- Transiting  | 1  | 0 |
|  |    |   |
| Part B- Guidance on Response to CWD-Affected Herds         | 3  | 2 |
| 1- Herd Plan   | 8  | 3 |
| 1.1- Herd Plan: CWD Positive Herds                         | 16 | 7 |
| 1.2- Herd Plan: CWD Exposed Herds                          | 25 | 8 |
| 1.3- Quarantine  | 5  | 0 |
| 1.4- Release from Quarantine                               | 1  | 0 |
| 1.5- Depopulation  | 7  | 3 |
| 2- Carcass Disposal  | 1  | 1 |
| 2.1- Suitable Disposal Methods                             | 1  | 1 |
| 3- Sanitary Precautions                                    | 6  | 0 |
| 4.1- Responsibility  | 1  | 1 |
|  |    |   |
| Appendix I- Official Animal Identification                 | 1  | 0 |
| Appendix II- Fencing Requirements and References           | 2  | 0 |
| Appendix III- Sample Collection                            | 30 | 4 |
| Appendix IV- Guidelines on Environmental Contamination     | 40 | 1 |
| ·  |    |   |

| Total Suggestions | 241 | 61 |
|-------------------|-----|----|

Version 22 will be open for a thirty-day period in which any public person can offer thoughts of suggestions or comments. After 30 days, the USDA will consider the comments received and unveil a finished product that will then be entered in the Federal Register.