



January 7, 2013

Review: Version 23 of Chronic Wasting Disease Program Standards
“Better than Version 22, but still Burdensome to Industry”
ACA Creates Comparison Chart to Show New Changes

AYR, NE- The long anticipated 23rd version of the Chronic Wasting Disease CWD Program Standards was published last week, marking the end of formal negotiations with USDA/APHIS and the start of the public comment period. The public comment period will last until March 31, 2014, and is the final step of the process before the USDA officially unveils their suggested guidelines for Federal Chronic Wasting Disease policy.

After several cervid industry leaders compared Version 23 to Version 22, there have been a few positive changes but several problems referred to as “deal breakers” still exist. The comparison shows language suggesting 100% testing of harvested trophy animals as been removed. Version 23 also removed language for restrictive physical inventories.

Version 23, however, still has major language concerns such as the suggestion of double fencing and mention of 10’ fences. Containment procedures noted in Version 23 mirror Version 22, including language calling for the removal of 4” of top soil on farms with CWD. Cleaning requirements for sale barns are also still in the document. On page 34, the USDA recommends producers and transporters contact every state prior to traveling through with deer or elk.

“This is still a document that will cause unnecessary hardship for our members,” said Eric Mohlman, Moderator of the ACA. “If the USDA has 8’ foot fences as the minimum requirement, then it’s inappropriate to even mention 10’ fencing in the standards; which it still does on page 46. These are suggestions that some wildlife agencies will use to over regulate our industry.”

The American Cervid Alliance leaders meet this week to discuss the Program Standards and the Chronic Wasting Disease Federal Rule.

Please see below for comparison chart between Version 22 and Version 23.

<u>Concern</u>	<u>Federal Rule</u>	<u>Version 22 Standards</u>	<u>Version 23 Standards</u>
Fencing Requirements	Rule 9 CFR 55.23 “For herds established after the effective date of the CWD rule, the fence must be a minimum of 2.4 meters (8 feet) high and must comply with any other existing State regulations or requirements. In either case, the fence must be structurally sound, maintained in good repair, and of sufficient construction to contain the animals.”	Appendix II of Version 22. The document states, “in at least one study (VerCauteren, et.al 2010) recommends fence height greater than 2.4 meters (at least 10 feet) to ensure 100 percent containment.” “However, a survey of 150 wildlife biologists found six individuals who had witnessed deer jump fences higher than 2.4m, suggesting that only a higher fence could achieve 100 percent deterrence.”	Appendix II of Version 23 (pg 46) VerCauteren, et al. (2007a and b) also measured behaviors and contacts through game-farm fences between farmed and wild white-tailed deer in Michigan and between farmed elk and wild elk and mule deer in Colorado. All sites in Michigan employed a single 3 m high woven-wire fence.

Please see below

<p>Double Fencing</p>	<p>No mention in Rule</p>	<p>Part B, Section 1.1. "In areas where CWD is not known to be present in free-ranging wild cervids, a second barrier is recommended that is adequate to prevent fenceline contact of wild cervids with this exposed herd." Part A, Section 4- "the program does recognize the risks of CWD infection to farmed cervids held in facilities that operate in areas known to have CWD in free-ranging cervids. Therefore, the risk of CWD transmission between farmed cervids and free-range cervid populations should be assessed by individual States and addressed by additional barrier requirements as necessary."</p>	<p>Part B, Section 1.1 (pg 37) In areas where CWD is not known to be present in free-ranging wild cervids, a second barrier is recommended that is adequate to prevent fenceline contact of wild cervids with a CWD-exposed farmed cervid herd. Examples of barriers are described in Appendix II. Part A, Section 4 (pg 22) Therefore, the risk of CWD transmission between farmed cervid and free-ranging cervid populations should be assessed by individual States and addressed by additional barrier requirements as necessary. Appendix II (pg 46) Fence types in Colorado included a single woven-wire fence (2.4 m high), double woven-wire fences separated by 1 to 4 m (2.4 m high), and a single woven-wire fence (2.4 m high) plus a 3-strand offset electric fence either inside or outside the woven-wire fence. The study recorded only two direct naso-oral contacts between wild and farmed deer in Michigan during more than 77,000 hours of camera monitoring. Conversely, 77 interactions were documented between wild and farmed elk involving naso-oral contact. No direct contacts were observed through double woven-wire fences. Risk of direct contact was about 3.5 times greater for single woven-wire fences compared to an offset electric fence attached to the single woven-wire fence.</p>
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<p>100% Testing for all Harvested Cervids in Preserves.</p>	<p>No Mention in the Rule</p>	<p>Page 6 under the heading of “Hunt or Shooter Facility” of the Version 22. In the last sentence of the definition of “Hunt or Shooter Facility,” Version 22 features the suggested idea of 100% testing for all harvested cervids in preserves by stating “States also may have CWD testing requirements of all cervids harvested from these facilities.”</p>	<p>Removed</p>
<p>Definition of “Commingling” to allow Artificial Insemination Program to Lower Your Herd Status.</p>	<p>No mention of semen or bodily fluids as commingling in the Rule</p>	<p>Pertaining to Part B-2.4 item 6, under heading of “Limited Contact” of the Version 22 Standards document draft. The document states on page 12, “Commingling includes contact with bodily fluids or excrement from other farmed animals. Farmed cervids commingled with other farmed cervids assume the status of the lowest program status animal in the group.” Semen is considered a “bodily fluid.”</p>	<p>Part 2.4 (pg 16) Commingling was amended to say “Commingling includes contact with bodily fluids (blood, saliva, urine), or excrement from other farmed animals.”, However, The same exemption was not made in the definition of “Limited Contact” on page 8.</p>

<p>• Semen as a Possible Transmitter of CWD</p>	<p>No mention in Rule</p>	<p>Part A-2.6 of the Version 22. "At this time there is no scientific evidence that germplasm (embryos or semen) may transmit CWD. If scientific evidence of the roles or embryos or semen in the transmission of CWD should become available, this guidance will be changed"</p>	<p>Page 17 still lists it: "At this time there is no scientific evidence that germplasm (embryos or semen) may transmit CWD."</p>
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<p>Definition of Hunt or Shooter Facility.</p>	<p>No Definition in Rule</p>	<p>Page 6 under the heading of "Hunt or Shooter Facility" of the Version 22. "Hunter or Shooter Facility" as "A privately owned ranch or other premises that operates to sell commercial hunts. These facilities should have fenced enclosures maintained to prevent ingress and egress of cervids. They may participate in an Approved State CWD HCP if they can comply with all minimum requirements of Approved State CWD HCP as set forth in the federal rule. States also may have CWD testing requirements of all cervids harvested from these facilities."</p>	<p>On page 8, "Hunt Facility- A privately owned ranch or other premises selling commercial hunts. These facilities should have fenced enclosures maintained to prevent ingress and egress of cervids. They may participate in an Approved State CWD HCP if they can comply with all minimum requirements for Approved State CWD HCPs as set forth in the Federal regulations. "</p>
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<p>Top Soil Removal Requirements</p>	<p>No mention in the Rule</p>	<p>Appendix IV- Section B, under heading of “Dry lot Where CWD positive animals have been held in close confinement (this includes but is not limited to corrals, pens, stalls, and alleyways or pathways),” of the Version 22 Standards document draft. The document states, “In addition, removal of the top 1 to 2 inches of soil may help to reduce surface contamination. The soil removed may be buried deeply or incinerated.” There is no instruction of what state or federal agency will be responsible for soil removal cost therefore it would fall on the producer. Moreover, the language “Dry lot Where CWD positive animals have been held in close confinement (this includes but is not limited to corrals, pens, stalls, and alleyways or pathways)” is very vague and could incorporate dozens to hundreds of acres requiring the removal depending on the speculation.</p>	<p>Appendix IV- Section B, under heading of “Dry lot Where CWD positive animals have been held in close confinement (this includes but is not limited to corrals, pens, stalls, and alleyways or pathways),” of the Version 22 Standards document draft. The document states, “In addition, removal of the top 1 to 2 inches of soil may help to reduce surface contamination. The soil removed may be buried deeply or incinerated.” There is no instruction of what state or federal agency will be responsible for soil removal cost therefore it would fall on the producer. Moreover, the language “Dry lot Where CWD positive animals have been held in close confinement (this includes but is not limited to corrals, pens, stalls, and alleyways or pathways)” is very vague and could incorporate dozens to hundreds of acres requiring the removal depending on the speculation.</p>
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<p>Cleaning Requirement for Sale Barns</p>	<p>No requirement in Rule</p>	<p>Part B under heading of "Limited Contact" of the Version 22 Standards document draft. The document states, "Pens at fairs, livestock auctions, sales, shows, and exhibitions must be thoroughly cleaned and all organic material removed after use and before holding another animal."</p>	<p>Definition of "Limited Contact" on pg 8 "Pens at fairs, livestock auctions, sales, shows, and exhibitions should be thoroughly cleaned and all organic material removed after use and before holding another animal."</p>
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<p>Requiring Notification for Every State Traveled Through to Destination for Interstate Transport.</p>	<p>CFR 81.5, allows interstate transit to destination. There is no notice requirement for every state passed through.</p>	<p>Part A-8.4 of the Version 22. "Although the CWD rule does not require such transport permits, APHIS intends to advise producers and transporters to provide prior notification to any state through which they may transit en-route to their final destination "</p>	<p>Part A, Section 8.4 (pg 34) "While it is not required, APHIS recommends producers and transporters provide a courtesy notification to any State through which they may transit en route to their final destination. This may be a benefit should emergencies arise and State assistance is needed. "</p>
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<p>Definition of Limited Contact</p>	<p>There is no requirement in the Rule.</p>	<p>On page 6, "Limited Contact- Any brief contact with a farmed animal such as occurs in sale or show rings and alleyways at fairs, livestock auctions, sales, shows, and exhibitions. Limited contact does not include penned animals having less than 10 feet of physical separation or contact through a fence, or any activity where uninhibited contact occurs such as sharing an enclosure, a section of a transport vehicle, sharing equipment, food, or water sources, or contact with bodily fluids or excrement."</p>	<p>On page 8, "Limited Contact- Any brief contact with a farmed animal such as occurs in sale or show rings and alleyways at fairs, livestock auctions, sales, shows, and exhibitions. Limited contact does not include penned animals having less than 10 feet of physical separation or contact through a fence; or any activity where uninhibited contact occurs such as sharing an enclosure, a section of a transport vehicle, sharing equipment, food, or water sources; or contact with bodily fluids or excrement. Pens at fairs, livestock auctions, sales, shows, and exhibitions should be thoroughly cleaned and all organic material removed after use and before holding another animal.</p>
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<p>Prohibiting Movement of Animals with definition of Hold Order</p>	<p>There is no such definition in the Rule</p>	<p>On page 7, "Hold Order- A temporary order issued by a State prohibiting movement of animals from or in to a premises for a given period of time."</p>	<p>On Page 8, "Hold Order- A temporary order issued by a State prohibiting movement of animals from or into a premises for a given period of time."</p>
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Physical Inventories	55.23 "In addition, a complete physical herd inventory must be performed for all herds enrolled in the CWD Herd Certification Program no more than 3 years after the last complete physical herd inventory for the herd"	Part A, Section 2.7. "States may require more frequent physical inventories for all herds in their Approved State CWD HCP ."	Removed
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Safety Precautions	No mention in the Rule	Appendix III, Section A, Section B, includes two pages of oversight spelling out safety precautions and equipment requirements.	Appendix III, Section A, Section B, includes two pages of oversight spelling out safety precautions and equipment requirements.
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<p>Sanitary Precautions for Vehicles</p>	<p>There is no mention in the Rule</p>	<p>Part B, Section 3. "Any third-party vehicle used to transport cervids must be cleaned and disinfected before and after transporting CWD susceptible cervids. The owner will require the transporter to provide a statement that the truck or trailer was cleaned and disinfected and will keep a copy of the statement.</p> <p>Producer-owned vehicles such as cars, pickup trucks, and tractors only may be shared among herds or premises under common ownership. Producer-owned equipment for transport of animals must be cleaned and disinfected if it is to be used for multiple herds managed by the same producer. Other farm equipment that tends to be heavily contaminated with soil or feces such as manure spreaders and drags may not be shared among herds or premises unless it is cleaned and disinfected each time. Producers should keep records of these activities which involve commingling of animals in those herds. .</p> <p>Part B, Section 3. "Any third-party vehicle used to transport cervids must be cleaned and disinfected before and after transporting CWD susceptible cervids. The owner will require the transporter to provide a statement that the truck or trailer was cleaned and disinfected and will keep a copy of the statement.</p> <p>Producer-owned vehicles such as cars,</p>	<p>Part B, Section 5 (pg 42) Same as Version 22</p>
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		<p>pickup trucks, and tractors only may be shared among herds or premises under common ownership. Producer-owned equipment for transport of animals must be cleaned and disinfected if it is to be used for multiple herds managed by the same producer. Other farm equipment that tends to be heavily contaminated with soil or feces such as manure spreaders and drags may not be shared among herds or premises unless it is cleaned and disinfected each time. Producers should keep records of these activities which involve commingling of animals in those herds. .</p>	
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Language below, from Version 23, are also of major concern, however, coincide with the language in the Federal Rule.

Page 18 CWD Positive or Exposed Herd – “If a herd is designated a CWD positive herd or a CWD exposed herd, it immediately loses its program status, and may only re-enroll after entering into a herd plan.”

Page 18 at the very bottom- “If the epidemiological investigation is unable to determine the exposed versus negative status of the herd because the animal or animals of interest are no longer available for testing (for example, a trace animal from a known positive herd died and was not tested) or for other reasons, the herd status would continue to be considered suspended until a herd plan is developed for the herd and implemented by the approved state official.”