



An Alternative View to CWD

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Chronic wasting disease (CWD) is a neurological illness, that can be fatal, affecting members of the cervid family, including Whitetail Deer

The goal

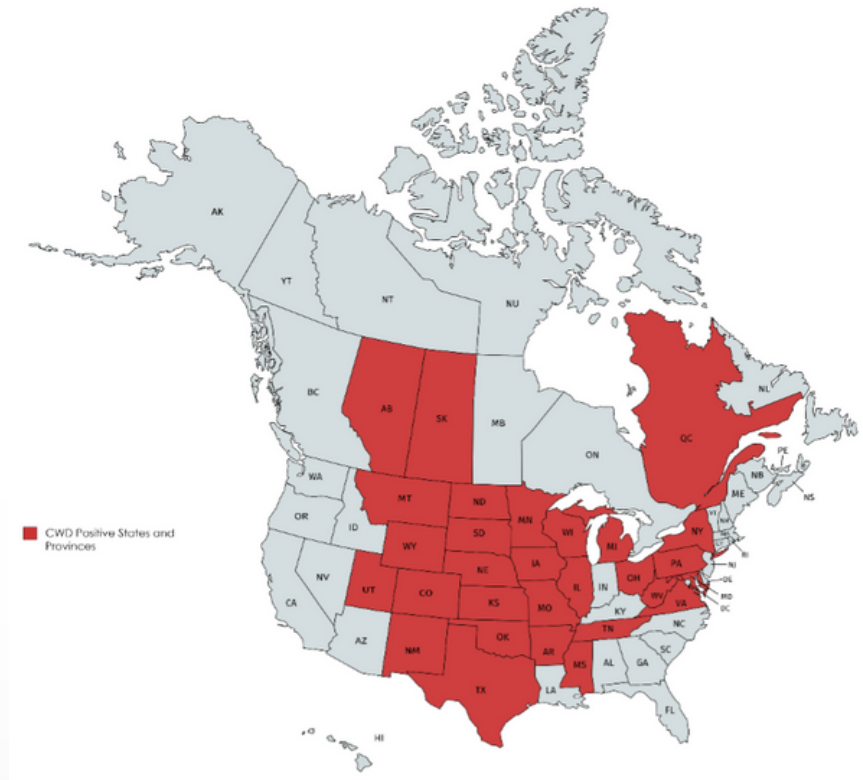
of this document is to present data and discussion points for an alternate view on the control of Chronic Wasting Disease (CWD) as it pertains to Whitetail Deer and Whitetail Deer Breeding Facilities in Texas.

It is also to bring into discussion **alternate options of testing for TPWD and the whitetail deer breeding industry as opposed to the euthanizing of numerous valuable & healthy whitetail deer breeding herds**. It is essential attention is directed to the rules and regulations that are crippling a four-decade thriving Texas industry.

The control of CWD is not only at the center of Texas Parks and Wildlife, but also at the heart of the deer breeding industry.

Origin of CWD, The Spread and Correlation with Breeder Herds

- In 1967, the Colorado division of wildlife research facility in Fort Collins, Colorado detected CWD in their research based captive mule deer herd.
- By 1990, CWD was reported in surrounding southern areas in Colorado & Wyoming.



- In 2021, 29 states & 4 provinces in Canada have detected CWD.
 - o Wyoming, Colorado, New Mexico, Virginia, Nebraska, & Tennessee all have detected CWD positives in their free ranging herds but have zero whitetail breeding facilities within the states.
 - o Arkansas has few whitetail breeders, which are under strict regulations and closed borders; however, numerous positive cases have been detected within the State.
 - o Maryland has a single pet deer owner with no other breeding facilities yet contains positive cases of CWD across the state.
 - o Mississippi maintains a closed border with no true breeding industry within the State and has numerous CWD positives in the free ranging herd.
 - o North Dakota and West Virginia allow all cervids to be farmed, and have had CWD in the wild herds, in both states, for almost 2 decades, yet their farmed herds still have no detected CWD cases.
 - o Wyoming has one grandfathered elk farmer, which has been in operation for 50 years, in one of the worst infected states, yet has never had a CWD positive case.
 - o Finland, Norway, and Sweden all have CWD in the free ranging herds and not in their farmed cervid industries.

Avenues of the Spread of CWD in Whitetail Deer

Infected animals, dead or alive, have the ability to shed the disease through saliva, waste, organs, etc. Through the shedding of the disease deer have the ability to ingest the disease. There are many unknowns to all of the possible avenues that this disease is transmitted and spread.

- **Natural Movement of Deer**

- It has been recorded that a single whitetail buck has moved over 200 miles in a single rut.

- **Annual Hunter Harvest & Movement of Carcasses**

- **Over 900,000 whitetail deer were harvested** in 2020 with a high percentage of those heads and carcasses relocated to other locations and areas of the state.
- The carcasses and heads are heavily compiled in situations such as deer processing operations. The heavier the compilation, the more likely and more prevalent the shed of the disease in one location.

- **Whitetail Deer Breeders Transferring Deer to and from Facilities and Facilities to Release Sites**

- **65,535** deer were transferred out of breeding facilities in 2020 and of those, **26,912** whitetails were released onto game proof fenced properties in 2020. The remaining 38,623 were transferred from breeder to breeder which all are game proof facilities.
- Since 2015, deer from whitetail breeding facilities have only been released onto game proof fenced properties, **which allows the prevention of commingling with** free-range whitetail herds.

- **Spontaneous**

- USDA has stated spontaneous CWD could NOT be ruled out.

- **Cross Species Transmission & Environmental Transmission**

- Scrapie Infected Sheep- Scrapie is the sheep version of CWD
- Medina/Uvalde counties contain the highest percentage of whitetail deer breeding facility positives in Texas. This area possibly contained scrapie positive sheep herds in the past.

- **Other Possible Means of Spread**

- Hay
- Feed
- Birds

"There is evidence Colorado State University was conducting scrapie research on domestic sheep where sheep and deer were in pens together." -Gene Schoonveld (Retired Colorado Division fo Wildlife Senior Wildlife Biologist)

"Chronic wasting disease first was observed as a clinical syndrome of mule deer in research facilities more than 50 years ago. Modeling suggests that the disease may have been present in free-ranging mule deer populations for more than 60 years. The origin of CWD is unknown and it may never be possible to determine how or when CWD arose. Scrapie, a TSE of domestic sheep, has been recognized in the United States since 1947, and it is possible that CWD was derived from scrapie." (<http://cwg-info.org/cwg-overview/>)



Is the SPREAD of CWD across Texas inevitable? IN FACT, if the spread IS INEVITABLE, then WHAT are the goals and objectives for the TEXAS PARKS & WILDLIFE DEPARTMENT in their response?

CWD Testing Data & Options for the State of Texas

Whitetail deer breeders are at the forefront of testing and monitoring for CWD

- **There are currently 949 whitetail deer breeding facilities in the state of Texas containing a total of 85,479 whitetail deer.**
- **Whitetail deer breeders test at an astronomical higher rate than any other wildlife entity. Whitetail deer breeders have:**
 - Spent over **4 million dollars** in testing for CWD in their own herds since 2015 at their own expense.
 - **Test 80-100% of all mortality**
 - **Tested 92,290 deer to date**
 - **33% of whitetail breeders have voluntarily tested 100% of mortalities, in which 13% have voluntarily tested 100% of their mortalities for over 5 years consecutively.**
- **In 2020 the free-range whitetail deer population was approximately 5.7 million**
 - Hunter harvest was over 900,000 animals in the state of Texas in 2020 with a high percentage of the carcasses and heads transported all over the state.
 - **TPWD tested 13,154 samples for CWD in 2020 (.23% of the population & approximately 1.4% of hunter harvested deer.**

A molecular biologist with USDA, is on record explaining that CWD is detectable first in the tonsils & lymph nodes, then rectal and lastly in the obex. The tonsils and rectal biopsies both allow for ante-mortem testing (live testing). The obex is the last location to detect CWD and is the primary biopsy location for post-mortem testing (kill testing), which is the preferred method by TPWD and leads to the euthanization of entire healthy whitetail breeding herds, enforced by the State Agency.



Solutions to CWD

- **Natural Selection**

- Whitetail deer with less resistance to CWD have higher mortality rates than whitetail deer that are genetically more resistant to the disease.

- **Breeding in Genetic Resistance**

- Whitetail deer breeders are the only group currently with the ability to breed in genetic resistance into their herds.
- Genetic resistance breeding is the strategy that solved scrapies in sheep herds. Scrapie is the sheep version of CWD.

- **Depopulation of infected areas has been attempted in the past and every attempt has failed. In fact, numerous areas documented with CWD positive populations have thrived.**

GENETIC RESISTANCE IS THE ONLY LONG-TERM SOLUTION



Why There is an Ever-Increasing Importance for Whitetail Breeding

The primary usage of whitetail deer from a deer breeding facility is to supply the ranching industry with quality whitetail genetics that are bred to produce quality antler production, high survivability, disease resistance, and healthy animals that will overall increase the value of the property for many generations, supply genetic diversity, and slow down the encroachment of urban sprawl.

- The Texas deer breeding industry generates an **estimated \$1.6 billion in total economic impacts annually.**
- This added economic activity supports an estimated **16,892 jobs for Texans, which heavily supports rural regions of the State.** Biologists and individuals from all over the country come to Texas to have the opportunity to work at these intensively managed properties and breeding facilities.
- For rural property values and rural ranch survival, **Trophy whitetail deer are one of the most valued assets a property can contain and are an extremely important component to the preservation of Texas ranching and hunting.**
- Age, nutrition, and genetics are the macro ingredients to producing trophy whitetail deer. Genetics are by far the most important ingredient in long term production of trophy animals. By having the ability to supply the genetic portion of the equation, the acreage of land dedicated to wildlife management increases tremendously, which benefits multiple species across the State of Texas. Many landowners are reluctant to invest hundreds of thousands of dollars into habitat improvements without access to the appropriate genetics to produce quality whitetails in a reasonable time-period.



Summary

The primary strategy thus far to control CWD has been to heavily test the breeding industry and euthanize all deer within a facility that has had a positive CWD test, as well euthanize most of the deer that have been transferred out of that facility within the past 5 years.

Whitetail deer breeders that have been compliant to all testing protocols and regulations for years, have suffered from losing a lifetime of work, love, and finances by having their entire herd euthanized, due to a CWD positive test. To discover a genuine resolution, TPWD and the Whitetail Breeding Industry must work together on monitoring the disease and developing effective solutions. Those solutions should not involve stopping all business enterprise in the industry and euthanizing the heart and soul of a ranch.

The detection of CWD using ante-mortem (live) testing methods has the capability of same time and possibly earlier detection than post mortem (after death) testing. That along with the ability to identify genetic resistance through DNA samples, there should be zero reason, whatsoever, to depopulate an entire breeding facility that has a positive test and euthanize nearly every deer that has left that facility in the past 5 years. As well, there should be no reason to shut down a high percentage of an economically thriving industry, by quarantining numerous facilities, and disabling their ability to earn, especially whenever the transfers of breeder deer are a minute fraction of the avenue CWD is capable of spreading. Keep in mind that the transfer of whitetail deer is always to a location surrounded by **game proof fencing**.

The whitetail breeding industry tests at astronomically high rates for CWD. This industry is at the forefront of volunteer testing and monitoring of the disease, as well as investing an incredible amount of money into developing valid solutions, such as genetic resistance, to the disease. Many of these operations are the result of a lifetime of labor, effort, love, and finances from the owners and employees.

By the end of 2021, we estimate the total whitetail deer euthanized for the sake of CWD control to be several thousand head within breeding operations. The CWD positive detections on low fence properties have not had near the detrimental responses. In low fence positives detections, TPWD has conducted zero depopulating actions as they do to the whitetail breeding operations. **It must be mentioned that with the extremely elevated testing percentages in the breeding industry it is absolute common sense that CWD will be found at a higher rate within the breeding industry.**

In conclusion deer breeders have by far been the most proactive group at controlling and finding solutions for CWD, but unfortunately face the highest number of regulations and repercussions.

**As Texans it is of the utmost importance to protect our private property rights.
This very value is core of this wonderful state.**

