



NATIONAL DEER ASSOCIATION

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Johnathan Bordelon
Deer Program Manager
Louisiana Department of Wildlife and Fisheries
765 Maryhill Road
Pineville, LA 71360

18 May, 2022

RE: Proposed rules and regulations for cervid carcass exportation and baiting regulations within CWD Control Areas

Dear Mr. Bordelon:

On behalf of the National Deer Association (NDA), I am writing to provide our comments in support of the Louisiana Department of Wildlife and Fisheries' (LDWF) proposed rules and regulations for cervid carcass exportation and baiting regulations within LDWF designated chronic wasting disease (CWD) Control Areas. We are a national non-profit conservation organization with the mission to ensure the future of wild deer, wildlife habitat and hunting. We represent 30,000 members nationwide, including hunters, landowners and natural resource professionals.

The NDA appreciates LDWF's proactive and aggressive approach to managing CWD, including the proposed rules and regulations intended to reduce the spread of CWD and keep disease prevalence rates low. The NDA outlines deer diseases as a critical focus area and slowing the spread of CWD is of primary concern. CWD is one of the largest threats to wildlife conservation that we have encountered over the last century. As many states have learned, slowing the spread of this always-fatal disease is a daunting task and early detection and rapid response once the disease is found is critical for long-term management. Through our extensive work on this issue across North America, we know that proactive, science-based management by state wildlife agencies is imperative to keeping prevalence rates low, deer populations healthy and hunter engagement stable.

CWD spreads most significantly through direct animal to animal contact and animal contact with prions in contaminated environments. The NDA supports LDWF's proposal to prohibit baiting within designated CWD Control Areas. While baiting has advantages and disadvantages for hunters and deer managers, a major disadvantage of baiting is the risk of spreading disease. Baiting increases density around a single food source and therefore increases the potential for direct and indirect contact among individuals. Currently there are 12 deer diseases that are thought to be spread by direct contact, two of which are bovine tuberculosis (TB) and CWD. The NDA opposes baiting in known CWD and bovine TB areas or where this activity may disrupt natural migratory patterns of deer.

While there remains much to learn about CWD, we do know that moving deer and other cervids, dead or alive, can facilitate the disease's spread, including the transport of carcasses by hunters who can't be immediately sure if their deer is infected. CWD spreads the fastest and the furthest when carried in a vehicle, and that's something that all deer managers and hunters should be concerned about. Certain parts of deer carcasses (most notably the brain, spinal cord, lymph nodes, eyes, and tonsils) may be contaminated with prions that cause CWD. The NDA supports LDWF's proposals that restrict the transport of cervid carcass parts from known CWD areas within the state, and we engage in numerous outreach and education opportunities every year to help inform hunters about the importance of

knowing these regulations prior to heading afield and following these regulations after a successful hunt. We also encourage the inclusion of a cleaned lower jawbone to the list of items allowed to be moved from a harvested animal, and we were pleased to see that included in LDWF's proposal.

Finally, LDWF's proposal would potentially allow, following a report and subsequent findings, permitted hunters to transport uncleaned deer heads outside of a LDWF-defined CWD Control Area solely for taxidermy purposes. The NDA believes that the best method for limiting the spread of CWD is to prohibit all transportation of live deer and elk and transportation of potentially-infected deer carcasses and parts out of CWD zones. We will continue to encourage hunters to learn how to debone, cape, process and dispose of deer properly themselves or use taxidermists and processors within their area of harvest. Still, we understand that the proposal is aimed at protecting the long-term health of Louisiana's deer herd and hunting heritage for current and future generations. We believe that use of LDWF-approved businesses, which should be required to have appropriate carcass handling and disposal methods in place, could be a safe way to move deer heads out of CWD Control Areas while also increasing sampling opportunities. However, enforcement of this program would be key, and we encourage LDWF to fully consider all options to ensure strict compliance with the proposed changes. If enforced properly, the disease monitoring and management gains resulting from the proposal should outweigh the potential risks. We do see potential for equity concerns – those hunters who do not wish to have their deer mounted by a taxidermist will not be able to handle their harvest in the same manner as those who do. We respectfully ask LDWF and the Wildlife and Fisheries Commission to think through these concerns and consider potential solutions.

Undoubtedly, the deer hunting tradition and industry in Louisiana has deep and widespread roots. Nationwide, about 70% of all hunters pursue deer, and research has shown that CWD prevalence discourages hunter participation, ultimately threatening our deer hunting traditions and the Pittman-Robertson model of conservation funding. Now is the time to use all resources at the disposal of the LDWF to work with hunters, landowners and other stakeholders to curb the spread of CWD in Louisiana and keep prevalence rates low.

Please don't hesitate to reach out with questions or for more information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Torin Miller', with a stylized, cursive script.

Torin Miller
Director of Policy