



RESOLUTION NUMBER: 11 APPROVED

SOURCE: Committee on Captive Wildlife and Alternative Livestock

SUBJECT MATTER: Live Animal Testing For Chronic Wasting Disease

BACKGROUND INFORMATION:

Detection of Chronic Wasting Disease (CWD) in live animals remains an important component of CWD Prevention and Control Programs. The United States Animal Health Association (USAHA) and the United States Department of Agriculture (USDA) recognize this and have stated such for several years (see USAHA resolutions 14 (2011), 16 (2011), 20 (2012), 13 and 23 combined (2012), 24 (2012), and 28 (2015), with associated USDA replies).

Notwithstanding the development and evaluation of the rectoanal mucosa-associated lymphoid tissue (RAMALT) test, CWD program regulatory analysis and actions continue to rely on post-mortem tissue collections, with Immunohistochemistry (IHC) testing in the laboratory, in accordance with current USDA CWD Program Standards.

This continues to impose significant adverse impacts on the industry, the economies of local communities, and the regulatory agencies involved. Post-mortem testing also limits the data and information that can be gathered and used to improve management and control of CWD.

The need for a successful live test option, with the accuracy and sensitivity equal to current post-mortem testing, is critical. A rational deployment of such a solution will require regulatory updates and guidelines to account for live testing of white-tailed deer, in both a trace-forward / trace-back scenario, as well as in CWD Herd Certification and/or Management Programs.

A group of veterinarians with specific white-tailed deer experience, led by VERGE PLLC, has successfully developed an ante-mortem procedure to collect the tissues required for IHC testing, as well as enzyme linked immunosorbent assay and other approved test protocols. This solution, the VERGE procedure, provides the same medial retropharyngeal lymph node (MRPLNs) tissues with negligible morbidity or mortality, for the same regulatory lab tests as are currently in use, thus virtually eliminating the concerns for sensitivity and accuracy associated with live tests using other tissues or lab protocols.

Preliminary regulatory reviews indicate that the VERGE procedure may be employed under 9 Code of Federal Regulations 55.8, as implemented by USDA CWD Program Standards (May 2014). The VERGE group has done preliminary work on implementation guidelines for an effective live test to allow integration of the live test option into existing programs and standards for both trace-forward/trace-back and herd certification and management programs, as well as refinement and development work for rapid training and wide-spread deployment to Industry.

RESOLUTION:

The United States Animal Health Association (USAHA) urges the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) as well as state animal health officials to continue and to expedite discussions and evaluation of ante-mortem collection procedures for medial retropharyngeal lymph node (MRPLN) tissues for the live testing for chronic

wasting disease (CWD) in white-tailed deer. USAHA also urges USDA-APHIS-VS to issue a VS Guidance Document stating that ante-mortem collection procedures for MRPLN tissues are acceptable and authorized in accordance with current federal regulations (9 Code of Federal Regulations (CFR) 55 and 9 CFR 81) and existing federal CWD Program Standards (MAY 2014).

INTERIM RESPONSE:

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) recognizes the concerns of the U.S. Animal Health Association and appreciates the opportunity to respond.

VS continues to support research to develop and validate live animal tests for chronic wasting disease (CWD), including ante-mortem medial retropharyngeal lymph node (MRPLN) biopsies. In November 2015, VS cooperated with animal health officials in Wisconsin, representatives from VERGE, and the herd owner to perform ante-mortem collection of MRPLN biopsies during a depopulation of a whitetail deer herd as a proof of concept. Additionally, VS' National Veterinary Services Laboratories is evaluating methods and developing laboratory protocols to test and interpret these samples. VS will collaborate with States and industry to develop a policy concerning the use of this sample collection method once the evaluation of laboratory protocols is finalized.