



The voice of fish and wildlife agencies

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Benjamin D. Richey  
Executive Director  
United States Animal Health Association  
4221 Mitchell Ave.  
St. Joseph, MO 64507

**RE: Resolution 30, Chronic Wasting Disease Carcass Disposal Dumpster Management  
Resolution 31, Proximity Barriers for Interstate Movement of Farmed Cervidae and  
Biosecurity**

Dear Mr. Richey:

On behalf of the Association of Fish and Wildlife Agencies (“Association or AFWA”), we are pleased to provide the following comments relating to the USAHA Committee on Wildlife, Resolution 30, Chronic Wasting Disease Carcass Disposal Dumpster Management and Resolution 31 from the Committee on Farmed Cervidae, Proximity Barriers for Interstate Movement of Farmed Cervidae and Biosecurity.

The Association is the professional organization that represents the collective voice of state fish and wildlife agencies in all 50 states, Canadian provinces and territories, U.S. Territories and District of Columbia. These agencies exercise primary statutory authority for management of fish and wildlife as public trust resources within their borders. The Association serves to represent North America's fish and wildlife agencies to advance sound, science-based management and conservation of fish and wildlife and their habitats in the public interest. The Association represents its state agency members on Capitol Hill and before the Administration to advance favorable fish and wildlife conservation policy and funding and works to ensure that all entities work collaboratively on the most important issues. The Association also provides member agencies with coordination services on cross-cutting as well as species-based programs that range from birds, fish habitat and energy development to climate change, wildlife action plans, conservation education, leadership training and international relations.

The AFWA Fish and Wildlife Health Committee membership is composed of fish and wildlife health technical staff and agency leadership. The resolutions presented provide several of many issues surrounding wildlife management in relation to the management of an emerging disease and the complexities and challenges of mitigating stakeholder needs and uses of the wildlife resource. As your committee identified, the 2018/2019 AFWA Best Management Practices for Surveillance, Management and Control of Chronic Wasting Disease stand as a voluntary guidance document for states, provinces and tribes and are intended to be adaptable as new information becomes available and are not meant to be prescriptive or to mandate programs at the state, federal, tribal or territorial level; “they should be regarded as a set of recommendations for agencies to consider as they develop or revise their CWD programs.”

Resolution 30, Chronic Wasting Disease Carcass Disposal Dumpster Management, refers specifically to improved placement and maintenance of carcass disposal dumpsters. We presume the resolution refers specifically to dumpsters used for the containment and subsequent disposal of hunter-harvested carcasses. The Association is aware of the use of carcass dumpsters by some CWD infected states/provinces. These carcass disposal programs may be managed by the wildlife agency or in cooperation with other agencies or non-government organizations, but each jurisdiction is free to manage carcasses based on individual strategies, capacities and funding. The AFWA leadership will be advised of this specific issue, and I suggest USAHA authors meet with their local agency staff to find ways to mitigate local carcass disposal issues. We will also provide this topic to the BMP editors for consideration during the next update of the AFWA Technical Report on Best Management Practices for Prevention, Surveillance, and Management of Chronic Wasting Disease; Chapter 14, related to Carcass Disposal.

Resolution 31, Proximity Barriers for Interstate Movement of Farmed Cervidae and Biosecurity, refers to state rules and statutes not aligning with federal rules or standards in relation to farmed cervids and the risk they may pose from interstate movement. State, provincial and tribal rules and statutes provide an agency entity the authority to manage resources within their legal boundaries as defined in law. Federal rules are often superseded when state statutes and rules are more restrictive, and in this case, more protective, than the federal rule. The management of captive cervids is not uniform across North America with the industry managed by wildlife or agriculture oversight or shared management between agencies. The allowance or restriction of captive cervid movement within or between jurisdictions of authority is based on perceived or documented risk by decision makers as stewards of their agency responsibility or resource. Additionally, many states consider the APHIS National CWD Voluntary Herd Certification Program and Standards to be inadequate to prevent the spread of CWD as evidenced by continued CWD detections in certified low risk herds throughout the industry in every year of the program's existence. The lack of complete and effective trace-back and trace-forward epidemiological investigations by the USDA indicates that the risk is real and continues. Without conclusive investigations that provide solutions for eliminating new detections in certified herds, management agencies are likely to take more restrictive or protective actions through rule making and statutes.

As stated previously, the AFWA Best Management Practices for CWD are not prescriptive; however, the agency authors recommend as a best practice that agencies prohibit all human-assisted live cervid movements because live animal movement is regarded as the greatest risk for CWD introduction to unaffected areas. Many states, provinces and tribal agencies have, for the most part, incorporated alternative strategies allowing the limited or restricted movement of captive cervids based on their level of perceived risk. The AFWA leadership will be advised of this specific issue, and I suggest USAHA authors meet with their local agency staff to discuss their specific concerns. We will also provide this topic to the BMP editors for consideration during the next update of the AFWA Technical Report on Best Management Practices for Prevention, Surveillance, and Management of Chronic Wasting Disease.

Sincerely,



Curt Melcher  
President