



September 27, 2018

To: Members – Joint Committee on Review of Administrative Rules (JCRAR)

Re: Emergency Rule Suspension

I'm writing to inform committee members that Wisconsin's Green Fire believes the emergency rules on deer fencing and deer carcass transport are science-based and will help reduce human-assisted spread of chronic wasting disease (CWD). Current science demonstrates that once CWD becomes established in wild deer populations it is extremely difficult to eliminate and over time will substantially reduce our deer herds and hunting opportunities. As a result, preventing the spread of CWD should be a top priority for our state. The proposed emergency rules on Deer Farm Fencing and Deer Carcass Transport are important steps in a prevention strategy.

#### Deer Farm Fencing

Research has clearly documented that CWD is readily spread through animal to animal contact. Saliva is known to be one of the most infectious secretions from infected deer. Current state deer farm fencing requirements do not create a sufficient barrier to prevent contact between deer farm animals and wild deer inhabiting adjacent lands. Unfortunately, physical contact of wild and captive deer across fences does occur. This pathway of infection is an important risk both for healthy, CWD-free wild herds where CWD-positive deer farms exist, as well as, to healthy, CWD-free captive herds that reside in areas where CWD has been found in wild deer. The emergency rule adopted by the Natural Resources Board greatly reduces the likelihood of transmission by creating a physical separation between captive and wild deer.

#### Deer Carcass Transport

Research has also clearly documented that healthy deer can become infected through contact with CWD-contaminated environments. Carcasses of CWD-positive deer can be a significant source of infectious material including brain, muscle, nerve, and lymph tissues. If infected carcasses are deposited upon the landscape, they can contaminate that location. These carcasses are also consumed by a variety of scavengers that can spread infectious prions over a larger area. It is clear from Wisconsin's deer harvest records that many deer are taken within the heavily CWD-infected areas by hunters that live in other portions of the state (as well as other states) where surveillance has not yet detected CWD in wild deer. Please see the attached map shared by the Quality Deer Management Association. We need to ensure the proper disposal of these carcasses. The emergency rule directs that any deer carcasses removed from counties within our heavily CWD infected areas be taken to licensed meat processors and taxidermists. Both these entities have waste disposal requirements that can properly contain the infected materials.



## Legislative CWD Assistance

We appreciate JCRAR's interest in CWD management. The following are actions your committee could take to improve Wisconsin's response to minimize the negative impacts of this disease:

1. We need to halt the building of CWD super-fund sites in Wisconsin. Your committee should communicate with the Legislature's Joint Finance Committee and the Governor's Office to ensure the next state budget contains adequate funding to indemnify CWD-positive captive herds so that they can be depopulated immediately. Allowing these herds to remain not only increases the environmental contamination within these farms, it raises the risk to surrounding CWD-free wild deer herds.
2. Your committee should investigate what administrative rules or statutes, if any, are preventing Wisconsin's waste disposal sites from accepting deer carcasses. As soon as possible and no later than the 2019 deer hunting season, we need to make it possible for every Wisconsin hunter to dispose of their deer carcass in a licensed landfill or incinerator. If you can achieve this, carcass movement restrictions could be eliminated.

Thank you for consideration of our comments.

*Tom Hauge*

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Wisconsin Green Fire is non-profit conservation organization formed in 2017 to be a voice for science-based management of our natural resources. Our 400 members have extensive natural resource management experience working for state, federal, private and non-profit entities. You can learn more about us at [www.wigreenfire.org](http://www.wigreenfire.org) or on our Facebook page.

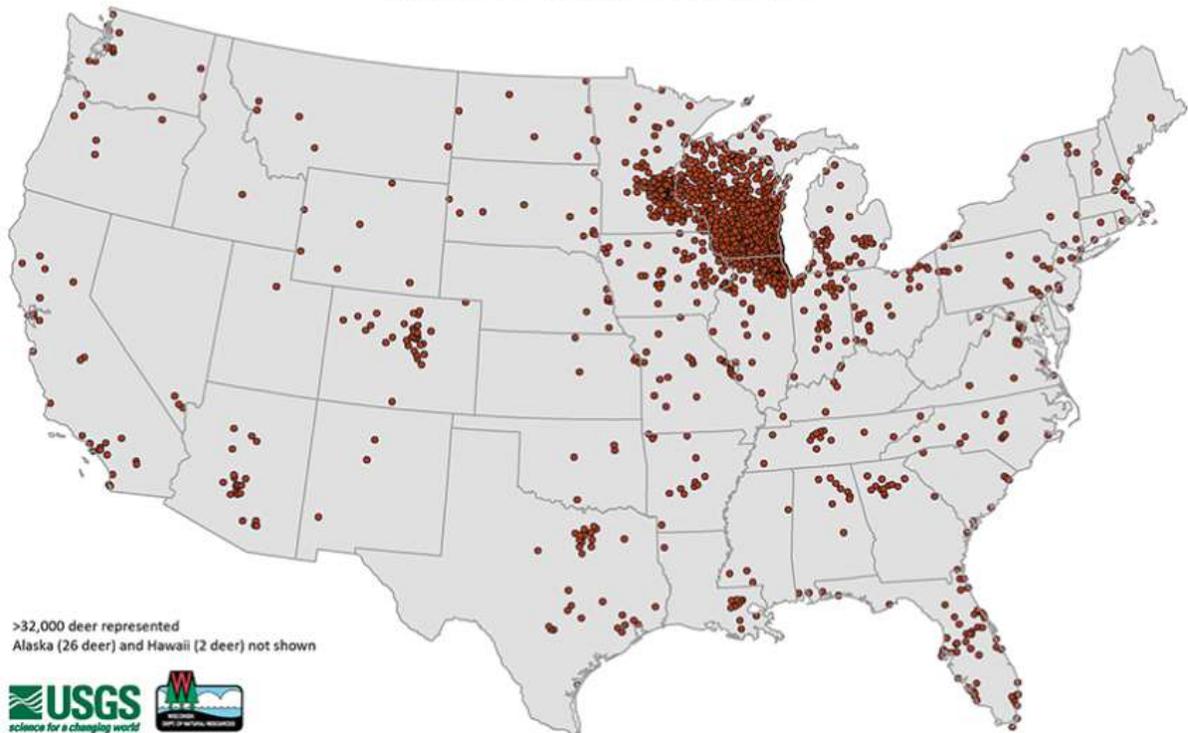
# This Map Spells Trouble for the Future of Deer Hunting

April 25, 2018 | By [Lindsay Thomas Jr.](#)



**Home Zip Codes of hunters harvesting deer in Dane, Iowa, Richland and Sauk Counties, Wisconsin, 2016-2017**

Data: Wisconsin Department of Natural Resources



This article published by the Quality Deer Management Association in April 2018 addresses the concern about movement of potentially CWD-positive deer carcasses from four heavily CWD-infected counties in Southwest Wisconsin. The map shows the home zip code of hunters that harvested a deer in those counties during the 2016-17 deer season.