



American Association of Wildlife Veterinarians

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To: USDA Animal and Plant Health Inspection Service

From: American Association of Wildlife Veterinarians

Re. COMMENT: 71 FR 41682-41707, Docket No. 00-108-3, *Chronic Wasting Disease Herd Certification Program and Interstate Movement of Farmed or Captive Deer, Elk, and Moose* [Docket No. 00-108-5]

The American Association of Wildlife Veterinarians (AAWV) is a 220+ member organization representing veterinarians from the United States and Canada who work with free-ranging wildlife. Many of our members are responsible for protecting and promoting the health of free-ranging cervids as state or provincial wildlife veterinarians, or are conducting cutting-edge research on infectious diseases of North American cervids.

On behalf of these members, we wish to go on record in strong support of the concerns raised in petitions submitted by the Association of Fish and Wildlife Agencies, the National Assembly of State Animal Health Officials, and the United States Animal Health Association to the USDA APHIS in August 2006, requesting a delay in implementation of, and reconsideration of certain provisions in, the final rule, *Chronic Wasting Disease Herd Certification Program and Interstate Movement of Farmed or Captive Deer, Elk, and Moose* (71 FR 41682-41707, Docket No. 00-108-3).

The AAWV is of the firm opinion, given the current understanding of the epidemiology of chronic wasting disease (CWD), that the length-of-time requirement prior to interstate movement warrants a far more conservative approach in order to limit the spread of CWD and eradicate this disease from captive herds *if we are to protect our wild cervid populations as well.*

Specifically, CWD may have an extremely protracted incubation period; at a minimum, time from infection to clinically-evident disease is 16 months, and a maximum incubation period *has not yet been determined.* Chronic wasting disease appears to be transmitted laterally – recent research has demonstrated that infectious prions are present in saliva – and environments contaminated by CWD-positive animals remain infectious for several years.

Furthermore, there is strong circumstantial evidence for the lateral transmission of CWD between captive and free-ranging cervids. Since it was first discovered in Colorado and Wyoming during the 1960s, CWD has been diagnosed in farmed cervids in 10 states and two provinces, and *in free-ranging elk, mule deer, white-tailed deer and moose in 11 states and two provinces*. While movement of wild cervids contributes to the spread of disease locally, there is broad agreement that human transport of CWD-positive cervids has exacerbated the situation, bringing CWD to formerly disease-free states and provinces.

The AAWV strongly agrees with the petitioners' concern that the current rule prescribes a phased-in herd certification program that is insufficient because it allows for interstate movement of cervids from farms too soon after initial enrollment in the certification program. There is no scientific evidence to support the assumption that just one year of enrollment in the federal herd certification program ensures that those farmed cervids are CWD-free.

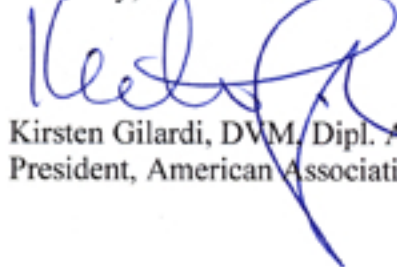
We propose that as an absolute minimum, and in perpetuity, the movement restriction requirement should be set at 5 years, and we urge the USDA not to implement a certification program that starts with a one year wait period, with a gradual increase to 2, 3, 4, then finally 5 years.

We acknowledge that this may represent a short-term hardship to the captive cervid industry; however, the herd certification program as it is currently designed will not prevent the spread of CWD, and will not achieve its goal of eradicating CWD from captive cervids. The long-term economic hardship that will result from the certification program as currently outlined will be far greater than any short-term impact that will result from our recommended change. In addition, the negative economic impact of the introduction of CWD to free-ranging cervids for individual states and provinces must not be overlooked and should be considered when evaluating this program.

Finally, we also recommend that a revised Final CWD Rule should preempt state requirements for movement of cervids *to the extent that the State requirements are less restrictive than federal requirements*. No portion of the Final Rule should prohibit states from enacting more restrictive requirements regarding the entry or in-state movement of cervids, should states wish to take a more stringent approach to limiting the spread of CWD.

We thank you for your hard work in planning a CWD herd certification program, for the opportunity to comment on the proposed Final CWD Rule, and for your consideration of our recommendations.

Sincerely,



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President, American Association of Wildlife Veterinarians