

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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To Whom It May Concern:

SUBJECT: ERO # 019-0154 - Updating our Chronic Wasting Disease Surveillance and Response Plan

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest non-profit conservation-based organization, representing 100,000 members, supporters, and subscribers, and 740 member clubs. We have reviewed the draft Chronic Wasting Disease Surveillance and Response Plan (hereafter referred to as "the Plan") and submit the following comments for consideration.

Chronic Wasting Disease (CWD) is one of the greatest threats to North American wildlife that exists today and is one of the OFAH's top priorities. In September 2018, CWD was detected on a red deer farm in Quebec only 15 km from Eastern Ontario. This put CWD directly on Ontario's doorstep. In response, we dedicated our 2019 Fish and Wildlife Conference to the subject of CWD. Much of this submission is informed by the material presented at the conference by leading experts in CWD, wildlife management, and human health. We highly recommend visiting [www.ofah.org/ccac](http://www.ofah.org/ccac) to read the full conference report and the associated recommendations (some of which are detailed below).

The OFAH supports the Plan and recommends that it be adopted immediately to protect the health of Ontario's cervid populations and all of the ecological, social, cultural and economic benefits they provide to the people of Ontario. We have been advocating for many of the strategies listed in the Plan for years and are very pleased to see positive government proposals for action on this issue. Our recommendations below represent additional steps that should be taken to address the threat of CWD.

## ***General comments***

As the Plan clearly states, only one jurisdiction (New York State) has successfully eradicated CWD within its borders. This reinforces the consensus among scientists and wildlife managers that the best option is to not get CWD in the first place. Detection and response are important, but only as emergency backstops to a rigorous and comprehensive prevention strategy. Successful detection = failed prevention.

## **Recommendation**

1. All plans related to CWD should have a "prevention first" approach.

We are concerned that the Ministry of Natural Resources and Forestry's (MNRF) communication strategy as laid out in the Plan has a largely reactive, rather than a proactive, focus. An informed and engaged public is crucial for enacting strategies to addressing the threat of CWD. Many of these strategies are restrictive and drastic and are only acceptable when compared to the extreme consequences associated with getting the disease. As such, proactive communication must be an overarching principle of the Plan. This is especially true when communicating about response actions should CWD be detected. The Plan states that in response to a CWD-positive cervid (either wild or captive) the MNRF will consult to consider response options. That is far too late. New York's successful 2005 response demonstrated that actions must begin within days and there is simply not sufficient time to carry out adequate consultation. Therefore, a decision tree on actions that will be taken must be developed prior to any detection of CWD. This was the approach taken by the MNRF to deal with future wildlife rabies outbreaks.

Recommendations

2. Communicate on CWD at a level necessary to engage the general public so they understand the importance of the issue and support calls to action.
3. Combat misinformation as a clear understanding of CWD and its impacts is essential for public buy-in.
4. Promote deer and moose hunting and the consumption of CWD-negative venison. More hunters mean more support and funding for actions to address CWD.
5. Incorporate information about CWD into the Ontario Hunter Education Program.

It is only through luck that CWD has not yet been introduced into the province by the cervid farming industry. No barriers exist that would have prevented the CWD-infected farm in Quebec from shipping red deer into Ontario right up until the first case was detected in 2018. The Plan proposes to significantly increase the regulation of the cervid farming industry. This is sorely needed, but the OFAH maintains its position that as long as this minor industry exists in Ontario, the threat of CWD will remain. There is no argument for maintaining this threat, especially when compared to the economic benefits of healthy cervid populations. The Plan values farmed cervids in Ontario at \$24.3 million. This is less than 6% of the \$275 million and \$200 million that deer and moose hunting respectively generate annually for the Ontario economy. This is even less than the estimated loss through reduced consumer surplus of \$24.9 million if CWD resulted in just a 5% reduction in hunting effort. The estimated 97 cervid farms in Ontario are dwarfed by the 186 outfitters who offer deer hunts and the 435 outfitters who offer moose hunts and who would be significantly impacted by the arrival of CWD. Low enrollment among Ontario cervid farmers in the Voluntary Herd Certification Program (VHCP) indicates that cervid farmers do not take the threat of CWD seriously. Rather than attempting to address the threat through regulation of a resistant industry, it makes much more sense to simply phase it out. Any minor benefits do not justify the risk and the buy-out costs are small relative to the potential costs of dealing with CWD in the province.

Recommendation

6. Phase out the cervid farming industry over a 5-year period with adequate compensation to farmers.

***Objective 1: Coordinate and collaborate within MNRF and other government agencies, with Indigenous communities, stakeholders and strategic partners.***

The OFAH is pleased to see coordination and collaboration as a key objective of the Plan. CWD is a multi-jurisdictional challenge involving agencies from different fields and levels of government. It is critical to ensure that all pathways for CWD entry into Ontario are addressed and that can only be done through interagency coordination and collaboration. This holds true for government to public relationships. The Plan states that "local government, stakeholders and Indigenous communities may have a role to play." The OFAH contends that these groups have a necessary and critical role to play. Experience from other jurisdictions has shown that CWD plans that have not successfully engaged the public before their implementation are at best met with considerable resistance and at worst fail, resulting in CWD becoming endemic.

*Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA)*

As the agency whose mandate includes cervid farms, OMAFRA has important responsibilities regarding CWD. However, while this Plan clearly outlines the roles and strategies of the MNRF, those of OMAFRA are much less defined. This is especially worrisome as history has shown that cervid farms present the greatest risk for spreading CWD. Our submission will highlight specific instances where more information on OMAFRA's response is needed, but as a general statement, we recommend that OMAFRA content in the CWD Surveillance and Response Plan be as comprehensive as that of the MNRF.

Recommendation

7. That the MNRF and OMAFRA collaborate to include strategies in the CWD Surveillance and Response Plan specifically related to farmed cervids.

*Ontario Ministry of the Environment, Conservation and Parks (MECP)*

The role that MECP can play regarding CWD, as defined by the Plan, is currently limited to assisting in the response to a positive CWD case. However, we feel that this neglects some of the key responsibilities of MECP. First, MECP is responsible for many areas with cervid populations but no hunting (e.g. parks and conservation reserves). Second, MECP is responsible for Ontario's caribou populations as a species at risk. The Plan does not address the threat of CWD to caribou despite the fact that in Saskatchewan, the distribution of CWD is beginning to overlap with caribou range. Caribou are a highly gregarious and mobile species with a near continuous distribution in Canada's North including Ontario. Caribou are susceptible to CWD as evidenced by its detection in Norway's reindeer population. CWD in either protected areas or in Ontario's caribou population would present significant challenges to both detection and response not addressed in the Plan.

Recommendation

8. That the MNRF and MECP collaborate to include strategies in the CWD Surveillance and Response Plan specifically related to protected areas and Ontario's caribou population.

*Parks Canada*

The challenge of CWD in cervid populations protected from hunting applies to Canada's National Parks; therefore, Parks Canada also has an important role to play.

*Canada Border Services Agency (CBSA)*

The import of hunter-harvested cervid carcasses from the United States presents a significant risk of spreading CWD. The relationship between CBSA and the MNRF must be formalized as it relates to CWD, or the MNRF must work with the federal government to draft federal regulations related to the import of cervid carcasses. Federal regulations would make enforcement by CBSA automatic and benefit all provinces and territories.

Recommendation

9. Work to solidify CBSA's role in preventing the international introduction of CWD.

*Public Health Agency of Canada (PHAC)*

The Plan does not include reference to the Public Health Agency of Canada. As the agency responsible for the Canadian Creutzfeldt-Jakob Disease Surveillance System, PHAC has a critical role to play related to human health concerns around CWD.

Recommendation

10. Include PHAC in the list of partner agencies under the Plan.

***Objective 2: Contribute to knowledge about CWD***

The OFAH fully supports additional funding and research dedicated to furthering our understanding about CWD. Many aspects of this disease are still unknown and this contributes significantly to uncertainty among hunters and members of the public in addition to making addressing the disease more challenging.

***Objective 3: Prevent entry of CWD into Ontario wild cervid populations***

*Wild cervid surveillance*

The OFAH supports the MNRF's method of roving surveillance informed by the risk model. We do have concerns about the quality of the data on the most important risk factor in the model: the density of cervid farms. In Ontario there is no mandatory registration of cervid farms; therefore, the data used by the MNRF to inform their surveillance is potentially incomplete.

Recommendation

11. That the MNRF work with OMAFRA and the Canadian Food Inspection Agency (CFIA) to improve the quality of the data on cervid farms in the province, preferably through mandatory farm registration.

Rigorous surveillance is a critical emergency backstop to a thorough prevention strategy. The current level of investment by the province in surveillance does not reflect the value of healthy wild cervid populations. An annual investment of \$250,000 to \$300,000 would dramatically increase the number of surveillance zones that could be sampled. This would increase our confidence that CWD is not present in Ontario's wild cervid populations and allow for it to be detected earlier if it does arrive. This increased investment represents ~3% of revenue from deer licence sales and 0.1% of the \$275 million that deer hunting contributes to the Ontario economy.

Recommendation

12. Increase funding to the MNRF CWD Surveillance Program to \$250,000 to \$300,000 annually to allow for increased CWD sampling and surveillance.

Hunters play a crucial role in CWD surveillance as the primary source of samples. However, this severely limits the ability to conduct surveillance in areas where hunting is not permitted (i.e., some provincial parks and municipalities with discharge of firearms bylaws) or for cervids with no regulated hunt (i.e., feral non-native cervids). The unmonitored presence of feral non-native cervids is especially concerning given their unknown origin and disease status.

Recommendations

13. The MNRF should work with MECP, Parks Canada and municipalities to increase hunter access and through that the collection of CWD samples in areas where hunting is currently prohibited such as provincial parks.
14. Explore options for collecting samples in areas where recreational hunting cannot take place such as liaising with provincial and municipal police forces to obtain deer killed in vehicle collisions.
15. Enable legislation and staff capacity within the MNRF to quickly respond to escaped farmed cervids to ensure they do not become established on the landscape.
16. Remove all non-native cervids from the landscape and test for CWD.

*Captive cervid surveillance*

The lack of effective regulation of the cervid farming industry in Ontario to this point has led to great uncertainty about the disease status of Ontario's captive cervids. The risk this poses to Ontario's native wildlife cannot be understated and is the reason the OFAH has been calling for the phase out of the cervid farming industry for decades. While we recognize that on-farm testing is the responsibility of OMAFRA, as per our Recommendation 7, we feel that the MNRF and OMAFRA should collaborate to include more detail on farmed cervids in the Plan.

Recommendation

17. Enact mandatory testing of all farmed cervids sent to slaughter and all on-farm deaths regardless of the cause, at no cost to the farmer.

*Prevention*

The OFAH supports strict regulations related to the transport of hunter-harvested carcasses given the potential of this pathway to introduce CWD into Ontario. The existing regulations rely heavily on hunters knowing and complying with the regulations as enforcement is challenging, especially at provincial borders (see Recommendation 8 related to international borders). This same challenge will remain even if the MNRF enacts the enhanced preventative measures discussed in the Plan. One potential way to address this is by having provincial and territorial governments share information on non-resident hunting licence sales to identify hunters who may be bringing carcasses back to Ontario.

Recommendation

18. That the MNRF develop strategies to enforce regulations related to the import of cervid carcasses into Ontario, especially across provincial borders.

*Enhancing CWD prevention*

The OFAH is very pleased and relieved to see the proposed enhanced preventative measures as the current practices are not sufficient at keeping CWD out of the province. It is unclear from the Plan whether further consultation on these measures is required or if it is included in this ERO posting. If additional consultation is required it must be done quickly as these changes are badly needed and long overdue.

The proposed requirement for hunters to present proof of CWD-negative status in order to import any cervid parts from CWD-positive jurisdiction will present logistical challenges given the delays in testing in many jurisdictions. However, this may serve as incentive for those jurisdictions to further invest in the testing process and reduce wait times for resident and non-resident hunters alike in order to support the hunting tourism industry.

In our October 2018 letters to the Ministers of Natural Resources and Forestry, and Agriculture, Food and Rural Affairs, the OFAH proposed amending the Ontario Cervid Movement Permit to include all cervid species and their hybrids. As such we are delighted to see this step proposed in the Plan. This is badly needed as there are currently no CWD-specific barriers to importing non-native cervids species into Ontario. Non-native red deer make up the majority of farmed cervids in Ontario and were the species that tested positive on the Quebec farm in 2018. The proposed changes will greatly increase control over captive cervid movement and on-farm biosecurity measures.

Recommendation

19. Expand the Cervid Movement Permit to include “all cervids and their hybrids” as red deer-elk hybrids are a commonly farmed cervid.
20. Require mandatory tagging of all farmed cervids as a criterion under the Cervid Movement Permit.

The expansion of the prohibition on the use of natural attractants derived from cervid products to include the use or possession of such substances for any purpose is long overdue. The market in Ontario currently offers numerous synthetic products that are effective and pose no risk of spreading CWD.

CWD is a rapidly evolving disease that requires quick and decisive action. As such, the OFAH supports both the establishment of order-making capacity under the Fish and Wildlife Conservation Act and regulating prions as an invasive species under the Invasive Species Act. One application of the order-making capacity should be to more decisively deal with escaped farmed cervids to prevent them from becoming established on the landscape.

***Objective 4: Detect CWD early and ensure a rapid, effective response***

*CWD detection in captive cervids*

The lack of oversight on the cervid farming industry, the ease with which animals can be moved, and the low level of captive cervid CWD surveillance currently taking place makes it highly unlikely that, when CWD is detected on a farm in Ontario, that farm is the only case. There is a significant chance that other farms will be infected prior to detection. Given the low enrollment rate in the Voluntary Herd Certification Program in Ontario, it is almost certain that OMAFRA would be the main responder in many if not all of the subsequent CWD cases in Ontario after the first detection. This further reinforces our Recommendation 7 that the MNRF and OMAFRA collaborate to include strategies in the CWD Surveillance and Response Plan specifically related to farmed cervids. The current level of detail in the Plan is insufficient. While the steps to be taken on the wild cervid side are clearly laid out in Fig. 2 of the Plan, the farmed cervid component is sorely lacking in detail.

*CWD detection in wild cervids*

The OFAH supports the key response actions outlined in the plan. While many are drastic, these actions are justified given the seriousness of CWD. As discussed earlier in this submission, proactive communication will be a key component to secure stakeholder and public support and reduce resistance. Jurisdictions that have not effectively communicated as part of their CWD response plan in many cases now have endemic CWD.

Responding to an outbreak of CWD can drain agency budgets, even if the outbreak is small and localized. As such it is important to secure sources of funding, equipment and staffing prior to any positive cases.

Recommendations

21. Before CWD is detected, identify emergency response funding in both MNRF and OMAFRA's budgets to ensure they have sufficient resources for the duration of the required response.
22. Develop and maintain the capacity in terms of both trained staff and equipment to increase the flexibility and rapidity of CWD response.

It is important to recognize that the four native cervid species (white-tailed deer, elk, moose and caribou) differ significantly in terms of the likelihood of detection and the probable extent of CWD spread within the population prior to detection. CWD in deer, should it occur, will likely be detected early under the current approach. In contrast, if CWD occurs in caribou, detection will likely be delayed and the disease will be widespread once it is detected. This also applies to feral non-native species that are not monitored under existing CWD surveillance. While we agree that the most likely occurrence of CWD will be in deer, the Plan should consider how these response actions would relate to CWD in other species, especially those without regulated hunting seasons.

Recommendation

23. Include flexibility in the Plan to allow for an effective response should CWD be present in a species other than deer.

Figure 2 seems to indicate that the intensity of CWD surveillance will not increase if CWD is detected in a wild cervid. As part of the "Wild Cervid Active Rotating Surveillance," Figure 2 states that surveillance will be conducted to detect 1% CWD prevalence with 99% confidence. Under "Determine disease prevalence," mandatory testing is once again to detect 1% prevalence with 99% confidence. The previous version of the Plan increased the testing to detect 0.1% prevalence in the case of a positive wild cervid. Is increased surveillance intensity still a response to a positive wild case?

It is our understanding that sample size guidelines needed to detect CWD at 1% prevalence are flawed as they assume that CWD will be uniformly distributed across the landscape. In reality, if CWD is detected, it will likely be clumped with multiple infected animals in close association.

Recommendation

24. Ensure that the statistical assumptions underlying the CWD surveillance plan are sound and will result in sufficient testing to detect CWD early enough for an effective response.

***Objective 5: Ensure effective long-term management of wild cervids following any response***

If CWD becomes endemic in Ontario it will fundamentally change wildlife and hunting in the province. While the OFAH remains confident that this can be avoided by swift and decisive action to prevent, detect and respond to CWD, it is necessary to plan for this eventuality.

It is important to recognize that the proposed long-term management approach described in the Plan represents a significant departure from how deer are currently managed in the province. If CWD becomes established in Ontario it will require a shift from a trend-based approach to a density-based approach to deer management. This will require new methods of population assessment that can provide density estimates (i.e., pellet counts or aerial surveys) with significantly higher costs. This eventuality should be considered in the White-tailed Deer Population Objective Setting and Harvest Management Guidelines, currently open for comment (ERO # 019-0159).

**Recommendation**

25. Incorporate mechanisms for density-based management into the White-tailed Deer Population Objective Setting and Harvest Management Guidelines should it become necessary as part of the long-term management of CWD.

***Objective 6: Inform the public, stakeholders and communities***

We have already discussed the importance of communication as an overarching principle for addressing CWD. We support the communication strategies outlined in the Plan, but reiterate that to the greatest extent possible, the public, stakeholders and communities must be engaged proactively. It is important to keep these groups informed on ongoing CWD response measures should they be necessary, but all possible steps should be taken to ensure that the MNRF is communicating with an already informed public.

From the wording of the Plan we do have some concerns about the potential “siloing” of communication responsibilities depending on if the positive CWD case is detected on a farm or among wild cervids. This further reinforces our Recommendation 7 that the role and duties of OMAFRA be included directly in this Plan.

***Conclusion***

The OFAH stands ready as an active and long-term partner to prevent CWD from becoming established in Ontario. This threat must be addressed head on and can only be done effectively by engaging and informing the public in order to increase acceptance of the necessary actions.

Yours in Conservation,



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