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To: [Dr. Scott Leibsle](#); [Rulesinfo](#)
Cc: [Boudreau, Toby](#); [Trever, Kathleen](#); [Fredericks, Jim](#)
Subject: {External}IDFG Comments on IDAPA 02.04.19 Domestic Cervidae Strawman 06.16.21 post-meeting
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Dr. Leibsle and Mr. Knight,

Chronic Wasting Disease (CWD) poses a significant risk to wild and captive populations. The Idaho Department of Fish & Game recognizes that once present, controlling CWD is not currently possible in wild cervid populations and is highly problematic in domestic populations. Current CWD prevention strategies include regulation of the movement of live cervids and cervid carcasses, the two highest-risk activities for introduction of CWD into new areas.

(https://www.fishwildlife.org/application/files/5215/3729/1805/AFWA_CWD_BMPS_12_September_2018_FINAL.pdf)

The nature of CWD prions makes the disease highly spreadable and persistent. Not only are they extremely resistant in the environment, they are found in body tissues and shed in saliva, feces, and urine. In elk, the experimental incubation ranges from 12-34 months (Williams and Miller, 2002), and shedding can begin prior to development of clinical signs. Transmission may occur indirectly from environmental contaminants and directly from one animal to another.

The long-term (20+ years) persistence of CWD prions in the environment represents a significant obstacle to eradication of CWD from captive and free-ranging cervid populations. Long incubation periods, limited signs of early clinical disease, absence of a reliable and practical ante-mortem testing, and environmental contamination of extremely resistant infectious prions limit the ability to control or eradicate CWD, and emphasize the importance of prevention.

Concentrating animals, whether man-made or natural, can intensify the prevalence of chronic wasting disease. Domestic cervid farming concentrates animals into contained areas, making them prone to infection. Surveillance programs have demonstrated high prevalence in many infected captive elk herds, ranging as high as 59% ([CWD Overview – CWD-INFO.ORG](#)). Wild and domestic animals are at increased risk in areas, where CWD is not only on the landscape but in high prevalence. Post-CWD detection, management options for domestic cervid facilities are limited to depopulation or quarantine. Repeated attempts to eradicate CWD from cervid research facilities have failed. Whether contaminated environments can ever be completely disinfected remains questionable, thus leaving prevention as the goal.

IDFG is supportive of measures that would mitigate the risk of introduction of CWD into Idaho and subsequent detrimental effects on both wild and captive elk populations. While the measures described in the IDAPA 02.04.19 Domestic Cervidae Strawman 06.16.21 post-meeting (https://agri.idaho.gov/main/wp-content/uploads/2021/06/020419_Cervidae-strawman-proposed-final-1.pdf), do not prevent potential introduction of CWD, they do provide an ability to detect and take actions to prevent spread to wild populations and other captive facilities.

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