



# NEW ENGLAND BACKCOUNTRY HUNTERS AND ANGLERS

March 19, 2019

To Chairman Bennett and the members of the House Committee on Environment and Natural Resources

Re: Rhode Island 2019 – H5849, Amendment to RIGL Chapter 20-19 “Field Trials and Shooting Preserves”

As the fastest growing organization of hunters and anglers in the United States, Backcountry Hunters and Anglers (BHA) seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting. Our members recognize the need to protect and enhance opportunities in the few open spaces we have remaining. BHA supports the North American Model of Wildlife Conservation, which asserts that wildlife is held in public trust as a scientifically managed natural resource to be enjoyed by all Americans. BHA also maintains that hunting involves elements of skill, woodsmanship and challenge and promotes the Fair Chase principal that the outcome of the hunt should always be in doubt and survival tilted toward the animal.

The New England chapter of BHA opposes H5849 for the following reasons, which are described in greater detail below.

1. Importing deer, elk, and other members of deer family poses the significant risk of introducing Chronic Wasting Disease, which would devastate native deer populations over time. There is currently no reliable method to test for the disease in live animals, so it is impossible to guarantee that imported animals are free of Chronic Wasting Disease. If introduced, there is no proven strategy to stop the spread of the disease or remove it from the ecosystem.
2. If introduced, the cost of trying to control Chronic Wasting Disease in wild populations would overwhelm fish and wildlife agency budgets in Rhode Island and surrounding states, and there is no federal funding available to assist with the cost of managing Chronic Wasting Disease.
3. Rhode Island's regulations for the movement of live deer are lacking compared to adjacent states, where the importation of live members of the deer family has been strictly prohibited to prevent the introduction of Chronic Wasting Disease.
4. Other animals such as wild hogs could be imported for hunting on shooting preserves under this bill. These animals can readily escape from enclosures, and if established in Rhode Island they would devastate natural areas and agricultural crops as they have in other areas of the US.
5. Hunting animals on shooting preserves as described in this bill involves arranging hunts with predetermined outcomes where animals are extremely unlikely to survive or escape. These types of hunts, even in enclosures several hundred acres in size, violate the ethics of Fair Chase.

## **Chronic Wasting Disease**

The New England Chapter of BHA opposes the proposed amendment to § 20-19-2 because of the unacceptable threat of introducing diseased animals and pathogens into Rhode Island that could decimate Rhode Island's deer population. Chronic Wasting Disease is a deadly, untreatable, transmissible spongiform encephalopathy similar to Mad Cow Disease that is lethal to all members of the deer family, including native whitetail deer and non-native elk. It is widely accepted that the movement of live deer presents the greatest risk for spreading Chronic Wasting Disease to new locations, and there is currently no method to reliably test for the disease in live animals, so screening and/or quarantine is not an effective strategy to prevent importing infected animals. The disease takes years to manifest in infected animals, and over that time the infectious agent is continuously shed into the surrounding environment by urine, feces, and saliva. Infectious material is easily moved by

animals scavenging from discarded carcasses and other animal byproducts, natural movement of animals, and environmental factors such as rain water runoff. Once introduced to an area, the infectious agent that causes Chronic Wasting Disease is long-lived in soils and water, is transmissible to other deer, and is virtually impossible to eliminate from the ecosystem.

To address the interstate spread of Chronic Wasting Disease in captive industries, the United States Department of Agriculture (USDA) created a Herd Certification Program (HCP), a collaborative effort between the USDA Animal and Plant Health Information Service, State animal health and wildlife agencies, and farmed deer owners. In simple terms, the program requires testing all animals from the captive herd that die, and after five years of negative tests the herd achieves the maximum level of certification. Unfortunately, this program has not prevented the spread of Chronic Wasting Disease or eliminated the disease from captive herds enrolled in the program. An Association of Fish and Wildlife Agencies Technical Report on Chronic Wasting Disease published in 2018 mentions instances of both intrastate and interstate transmission of Chronic Wasting Disease from herds certified by the USDA HCP. For example, a deer that was discovered to be infected with Chronic Wasting Disease in a captive facility in Wisconsin and was traced back to a Pennsylvania herd that had been certified by the USDA's HCP for more than five years. The same report asserts that no federal funding has been available for surveillance, monitoring or management of Chronic Wasting Disease – if it is introduced, it is the state's burden alone.

If introduced, Chronic Wasting Disease would significantly affect the health of the wild deer herd that is managed in trust for all Rhode Islanders, and the costs of trying to control the disease would overwhelm public wildlife agency budgets in Rhode Island and adjacent states. According to the Wisconsin Department of Natural Resources, Chronic Wasting Disease was first detected in Wisconsin in 2002, and the immediate management strategy was to significantly reduce the wild deer population in an area larger than the state of Rhode Island, including attempting to eradicate as many as 15,000 deer - equivalent to Rhode Island's total deer population - in an area of over 200 square miles surrounding the infection. According to a Wisconsin Legislative Audit Bureau report from 2006, the state spent over \$30 million to address Chronic Wasting Disease and monitor its spread in both wild and farm-raised deer over the five years following detection, and acknowledged that their efforts had not been effective. As of 2018, the spread of the disease from the initial Wisconsin detection has been expansive despite the significant efforts by the state, and it is regularly detected in an area roughly equivalent in size of Rhode Island, Connecticut and Massachusetts. Within the 200 square mile focus area surrounding the original detection, Chronic Wasting Disease is now regularly detected with over 50% occurrence in adult males, who have larger habitat ranges and more interactive social patterns, and over 25% occurrence in adult females and yearlings.

Looking to Rhode Island's neighboring states, preventing the introduction of Chronic Wasting Disease has clearly been a priority in Massachusetts and Connecticut. Both states have prohibited importing any live member of the deer family for any purposes, and Rhode Island should do the same.

### **Wild Hogs and Wild Boar**

The New England Chapter of BHA also opposes the amendment of § 20-19-2 because it would allow for the import and hunting of other animals. Of greatest concern other than members of the deer family are wild hogs and their close relatives, Eurasian wild boars. The wild hog/boar, also known as feral hog or wild pig, has been listed as Invasive Species by the US Department of Agriculture. In states where these animals have escaped or been stocked in the wild they cause huge amounts of damage to the environment and native wildlife. They can readily escape from enclosures, which is inevitable given that a 500-acre preserve would require over 5 miles of perimeter fencing. When they do escape, they are very expensive to control and nearly impossible to eradicate. Allowing this species to be imported into Rhode Island is irresponsible and a violation of the trustee role the State holds to manage wildlife responsibly for the benefit of all its citizens

## **Shooting Penned Animals**

The position of the New England Chapter of BHA is that the hunting of members of the deer family, wild pig/boar and other big game animals on shooting preserves or game ranches in situations that are designed so that it is extremely unlikely that they can escape or avoid being killed is in direct conflict with Fair Chase principals, and therefore we oppose the amendment to § 20-19-2 to that would allow the taking of deer, elk and other animals on shooting preserve

In summary:

1. There is no practical, reliable method to screen or assess deer, elk, or related animals for Chronic Wasting Disease prior to importing. If a single infected animal is imported, Chronic Wasting disease would spread to wild deer, causing unavoidable and uncontrollable impact throughout Rhode Island and adjacent states.
2. Costs of controlling Chronic Wasting Disease would overwhelm state wildlife agency budgets.
3. Importing live members of the deer family for any purpose is prohibited in states bordering Rhode Island because those states have recognized the significant risk associated with this practice and importing should be prohibited in Rhode Island for the same reason.
4. Wild hogs/pigs that inevitably would escape would cause unacceptable amounts of damage to the environment and agricultural crops.
5. Captive animal hunting is the opposite of Fair Chase hunting.

The New England Chapter of Backcountry Hunters and Anglers strongly urges the Committee to reject H5849. Thank you for your consideration of our position.

Sincerely,

Michael Woods

Rhode Island State Leadership Team Chair  
New England Chapter Board  
Backcountry Hunters and Anglers