



**THE HUMANE SOCIETY  
OF THE UNITED STATES**

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Sunset Advisory Commission  
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**RE: Role of TPWD on captive cervid management**

To Whom it May Concern:

On behalf of The Humane Society of the United States (HSUS) and our Texas supporters, we submit the following comments to be considered by the Sunset Advisory Commission related to the role of Texas Parks and Wildlife Department (TPWD) in management of captive cervids. The HSUS agrees with the Sunset Staff Report when it states:

“Management of chronic wasting disease, which affects some animals in the deer family like white-tailed deer, mule deer, and elk, requires continued and close coordination between the two agencies. Currently, this coordination works well, and the state would see no significant benefit from combining or reorganizing these two distinct state government functions.”

We believe that TPWD should retain its current authority when managing captive cervids. The threat of chronic wasting disease (CWD) – a fatal, incurable disease that affects deer, elk, and other cervids – is of grave concern to the TPWD, wildlife advocates, and sportsmen alike. CWD has already been found in 26 states, including Texas, where its prevalence has unfortunately continued to increase. Because there is no reliable live test for CWD, it is impossible for captive cervid owners to know whether their animals are healthy or not, unless all of their animals have been killed. Cervid breeding farms across the country have been linked with the spread of CWD, which can devastate native deer populations and cost taxpayers millions of dollars in response efforts.

Once clinical signs develop, CWD is always fatal. Similarly, no approved vaccine is available to prevent CWD infection. In addition, long incubation periods, subtle early clinical signs, absence of live-animal diagnostic tests feasible for large numbers of free-ranging cervids, the persistent infectious-like protein, possible environmental contamination, and an incomplete understanding of the modes of transmission all constrain wildlife officials in their efforts to eradicate and even merely control CWD.

The unusual biological features of CWD pose significant challenges for wildlife managers attempting to control or eradicate the disease. Transmission may occur directly from animal to animal, or indirectly through contaminated soil. Due to the higher density levels in captive facilities, the animals are more frequently in direct contact with each other, and are more consistently stressed, increasing the risk of disease transmission.



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The high population densities that characterize captive cervid facilities can make them dangerous breeding grounds for these diseases, relative to wild populations. The transmission risk poses significant threats to animals both inside and outside the fence. As the agency responsible for protecting Texas' native wildlife, it is essential that TPWD continue to regulate captive wildlife facilities, as diseases – such as CWD – can clearly spread between captive and wild populations.

TPWD is the agency equipped with the skills and knowledge to battle CWD and other diseases that can impact cervids in the wild and so must retain primary ownership in Texas' CWD management. Although the Texas Animal Health Commission (TAHC) – which has a vested interest in protecting the captive deer facilities – plays an important collaborative role, TPWD is the main agency responsible for keeping the wild deer populations healthy. Any efforts to change CWD management from this collaborative effort between TPWD and TAHC to being solely implemented by TAHC should be rejected.

Thank you for your consideration of this issue. Should you have any questions, please contact me [lloney@humanesociety.org](mailto:lloney@humanesociety.org) or (512) 534-7939.

Sincerely,

**Lauren Loney**

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