

# NAEBA's Position on Wild Elk Relocation Projects

By Travis Lowe, NAEBA Executive Director

Over the last two decades, thousands of wild elk have been captured and transported across the United States and Canada in the name of elk relocation or restoration projects. These elk are then released to roam free in specific states and provinces. Projects like these are planned and carried out by wildlife/natural resources government agencies with funding assistance from allies such as the Rocky Mountain Elk Foundation.

Though the North American Elk Breeders Association and its membership love elk to the extent they devote untold resources and every calendar day to their care, wild elk restoration projects raise concern. In reality, closer looks at these projects show both farmed and free-ranging elk and deer are at risk by these actions.

NAEBA does not oppose the philosophy of wild elk restoration projects in states and provinces. However, the projects must be planned and executed in a responsible manner. In an effort to protect farmed elk and free-ranging species of the elk and deer family, NAEBA has a strong position opposing wild restoration projects that lack basic animal health safeguards issued by the United States Department of Agriculture (USDA) and Canadian Food Inspection Agency (CFIA).

NAEBA has adopted the following policy position: The North American Elk Breeders Association opposes any wild elk relocation/restoration project that does not adhere to the minimum interstate movement requirements for farmed elk set forth by the United States Department of Agriculture or the Canadian Food Inspection Agency relating to Tuberculosis, Brucellosis and Chronic Wasting Disease. Any such projects not complying with these minimum requirements may put both farmed and free-ranging elk and deer at risk.

Elk ranchers in both the United States and Canada must participate in a Chronic Wasting Disease monitoring program for a minimum of five years in order to transport animals across state/provincial lines. The CWD monitoring program requires 100% testing of all eligible mortalities for CWD. This is by order of state/provincial governments, USDA and CFIA. Despite most elk ranches participating

in CWD monitoring programs acquiring more than a dozen years of monitoring status, no farmed elk are exempted in this rule. There is no ante-mortem test approved by USDA or CFIA to allow circumvention of the monitoring requirements. There are no exceptions. In fact, movement across state lines in violation of these rules is a Lacey Act violation and will likely impose a federal prison sentence as the penalty. This is simply the law.

However, to date over two-dozen projects transporting wild elk across state/provincial lines have been completed for restoration projects. None of these projects were in compliance with the minimum CWD interstate movement requirements for farmed elk.

NAEBA has opposed such projects publicly for years with little impact. State wildlife agencies, often referred to as wildlife agencies, natural resource agencies or conservation agencies, depending on the state, secured an exemption from the USDA/APHIS Federal Chronic Wasting Disease rule. Elk in restoration projects must comply with Tuberculosis and Brucellosis requirements but are left unchecked by Chronic Wasting Disease movement protocol.

These restoration projects are publicly promoted as returning the once great roaming elk herds to the recipient state. Though it sounds admirable, the health risk is great and blatantly ignored by wildlife agency officials. Most of the elk restoration projects in the United States have been supplied by the State of Kentucky. Several states such as Missouri and Wisconsin, among others, have received wild elk from Kentucky. Many other states in the east are currently proposing new projects using Kentucky as the probable source herd. In a troubling revelation, the Kentucky Department of Fish and Wildlife Resources' report shows it imported 1,500 elk<sup>1</sup> from several western states including Utah, New Mexico, North Dakota and Kansas<sup>2</sup>. Kentucky is not publicizing the fact that all four of these states are CWD positive states. In fact, the known CWD areas in states such as Kansas are the same areas that outsourced elk to Kentucky<sup>3</sup>. Kentucky imported wild elk from Kansas in 2001, which is the same



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year Kansas first discovered CWD<sup>4</sup>. Kentucky now ships animals from those herds to other states. This is a real problem for states that claim they work to control the spread of Chronic Wasting Disease. Wildlife agencies do not seem to care.

The wildlife agency in Missouri, known as the Missouri Department of Conservation, claims to be so concerned about CWD entering Missouri that it adopted rules in 2014 to close its state borders to the importation of farmed whitetail and mule deer<sup>5</sup>. The Missouri Department of Conservation (MDC) does not have jurisdiction over farmed elk and therefore their rule does not apply to farmed elk. It does, however, have ruling authority over high fence trophy preserves and voted to ban importation of all cervid species into these ranches<sup>6</sup>. This even includes deer species not susceptible to CWD. Yet in a bizarre twist, the same state agency imports wild elk from Kentucky and does not comply with any CWD interstate rules set forth by USDA for farmed deer and elk. Is elk hunting MDC's end goal? According to their website, rebuilding the wild elk herds will allow elk to be hunted<sup>7</sup>. The MDC will not allow 16-year CWD monitored farmed whitetail deer from a state with no known CWD cases into their state but they import wild elk from a CWD exposed wild herd with little or no testing protocols.

In 2014, the Wisconsin Department of Natural Resources pushed forward a plan to bring more wild elk into their state. Kentucky's elk herd will once again serve as the supplier. Despite outcry from the North American Elk Breeders Association, Wisconsin Commercial Deer & Elk Farmers Association and the Whitetails of Wisconsin Association, the Wisconsin DNR ignored the animal health concern. Plans are underway to transport wild elk from Kentucky to Wisconsin without following any CWD protocol that elk ranchers must follow if they import farmed elk from Kentucky to Wisconsin. Again, the Wisconsin Department of Natural Resources does not appear to care about the disease.

In Tennessee, ranchers can own any species of cervids except whitetail deer. Legislative bills have been proposed to allow whitetail deer farming with no success. Opponents of the bills cite concerns about Chronic Wasting Disease. Yet, Tennessee too, imported over 200 elk over six different occasions. The majority of these elk came from Alberta<sup>8</sup>. Alberta has found CWD in its free-ranging deer population and farmed elk population, which is another CWD positive source province.

In 2010, the Virginia Department of Game & Inland Fisheries published a document called the "elk restoration operational plan." The plan outlines evaluation and coordination plans on transporting wild elk into Buchanan County. Kentucky was once again chosen to serve as the source state. Though there were measures suggested that involved quarantines for the elk during transfer, the operational plan outlined by the State Veterinarian's Office set seven restrictions dealing with Tuberculosis<sup>9</sup>. There is no mention in the document about Chronic Wasting Disease. It is apparently not an issue.

The West Virginia Department of Natural Resources has studied the possibility of relocating elk into the state for years. The first study was completed in 1972<sup>10</sup>. At the time, Chronic Wasting Disease was generally unknown. In 2015, after nearly two decades of a highly regulated CWD protocol imposed on West Virginia deer and elk ranchers, the West Virginia Department of Natural Resources is undeterred. Additional studies in 2010 have now led to several public meetings to determine

public interest in restoration projects. Public support for wild elk is strong but the wildlife agency is not citing the disparities in CWD prevention compared to elk and deer farmers. The West Virginia Elk Management Plan, prepared by the West Virginia Department of Natural Resources, mentions Chronic Wasting Disease only one time in their 20-page document by simply stating CWD is recognized to be in captive and wild elk but has never been detected in eastern wild elk herds<sup>11</sup>. By February 2015, local media outlets report the Rocky Mountain Elk Foundation has awarded its second grant to West Virginia for the project<sup>12</sup>.

It is unclear if these government agencies believe they are above the law or simply are not genuinely concerned about CWD. Almost all of these projects were commenced after the first cases of CWD in free-ranging and farmed elk and deer. The North American Elk Breeders Association's concern is the clear disparity of rules between these government agencies and elk ranchers. Elk and deer ranchers are the only stakeholders on the continent that test 100 percent of all eligible mortalities for CWD. Wildlife agencies test less than one percent on average. Some none at all. Eight states have found CWD in their wild deer population while there are no cases in the farmed elk and deer industry<sup>13</sup>. Almost half of these states do not even have elk or deer farms at all. Chronic Wasting Disease is a disease of deer, elk and moose. It is not just a farmed deer disease or just a wild deer disease. However, if CWD is found in these restoration states, fingers will surely be pointed at the farmed industry as the likely source.

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