

Canadian Deer and Elk Farmers Association Inc.
operating as the



03-080-1 215
Association canadienne des éleveurs de cerfs
et de wapitis, inc. opérant en tant que

Canadian Cervid Council

Conseil canadien des cervidés

Regulatory Analysis and Development
PPD, APHIS
Station 3C71
4700 River Road
Unit 118, Riverdale
Maryland. 20737-1238
USA

Re: Proposed Rules for Allowing of Import of Animal (ruminant) Products from
Canada
Docket No. 03-080-1

To Whom It May Concern:

The Canadian Cervid Council (CCC) recognizes the fact that the United States Department of Agriculture and the Food and Drug Administration wish to restrict the risk of TSEs entering the food chain. The CCC has similar objectives and fully subscribes to the World Health Organization on this issue.

However, upon reading the proposed USDA rules for the partial reopening of the border and further conversations with several US officials and researchers, the CCC realizes that the rules and regulations governing the farmed cervid industry in Canada should be re-examined carefully enough or not fully taken into account in the drafting of these proposed regulations.

The CCC therefore wishes to respectfully provide comment on the proposed rules and suggest possible changes.

1. Live animals

The USDA proposal has not addressed the possibility to reopen the border for live Canadian farmed cervidae. We believe this to be an oversight that should be corrected.

The oversight has caused the Canadian cervid farming considerable hardship and US hunt farm operators and breeders significant economic losses due to the fact that they were unable to reach a sufficient supply of cervidae.



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Canada has for years had stringent regulations governing the farmed cervid industry, such as for over ten years, a compulsory movement certificate system for any animal entering or leaving a farm, administered by the Canadian Food Inspection Agency. Surveillance and certification programs for chronic wasting disease coupled with other regulations (annual inventories, animal movement permits, etc...) provide one of the best assurances for any types of livestock within North America.

With the regulations in place, Canada can provide safe cervidae to clients in the United States. These regulations can demonstrate that herds of origin have years of surveillance for chronic wasting disease with on-farm deaths tested by IHC or equivalent testing (which would detect BSE) and third-party inventory controls to ensure compliance, etc...

It should be remembered that BSE has never been detected in farmed cervidae.

While exposed to the same feed given to other breeds that came down with BSE in zoos, cervidae remained healthy.

Documents attached provide information about the different programs in place in Canada.

Our proposal is that Canadian farmed cervidae be allowed to enter the United States provided that they originate from herds having participated for a period of at least three years in a CWD surveillance program.

2. Live animals for terminal use only

Same as Section 1 with the inclusion that cervidae must be brought directly to a hunt farm, the animals not move from the destination until destroyed. Brains of imported Canadian cervid must be submitted for testing by IHC or equivalent.

3. Trophies from Canadian hunt farms

A number of US hunters come to Canada on a regular basis to harvest cervidae on hunt farms.

The proposed regulations would be a step back from the rules announced in August. We see this as extremely disturbing. Indeed, under existing rules, hunters can bring back trophies to the United States, regardless of the age of the cervid in question. The proposed rules would stop hunters from bringing such trophies back to the US should the cervid be born prior to the feed ban. We would respectfully submit that trophies are not an edible product and therefore the possibility for the trophy to transmit BSE to a hunter, is quite remote.

With the potential of cervidae being infected by BSE not demonstrated, the cervid in question being tested by IHC and the programs in place to detect the presence of TSEs in Canadian cervidae, we believe that the risk associated with meat from hunter-harvested farmed cervidae is close to nil or close to being non-existent.

The value of the trophy is such that we see no possibility of them being brought to rendering plants and we therefore believe that it is not possible that trophies would reach the food chain in the US through the rendering system.

We would then propose that trophies from cervidae harvest in Canadian hunt-farms be allowed for import into the United States with no other conditions than a

certificate of origin attesting to the fact that it was harvested in a hunt farm and with no restriction associated with the age of the elk or deer harvested, and the cervid in question tested by IHC or equivalent.

4. Meat from Canadian hunt farms

US hunters (as explained in section 3) come to Canada to harvest cervidae in hunt farms. While the main reason is to acquire a sizeable trophy, hunters are also keen to bring back the meat from such cervidae.

With the potential of cervidae being infected by BSE not demonstrated, the cervidae in question being tested by IHC and the programs in place to detect the presence of TSEs in Canadian cervidae, we believe that the risk associated with meat from hunter-harvested farmed cervidae is close to nil or close to being non-existent. *We therefore respectfully suggest that hunter-harvested cervidae to be used for personal consumption be exempted from the proposed rules with the hunter certifying that the meat will be used for personal and non-commercial purposes. Herd participate in a TSE surveillance program and the cervid in question tested by IHC or equivalent.*

5. Hard antler

Not unlike trophies, hard antler is considered to be an inedible product. Most of it is sold for the purpose of art production. Clearly not the source of a potential BSE related outbreak in the US...

Once again, with the rules and regulations in place in Canada regarding the farmed cervid industry and the use of the product, we believe that there are no risks associated with it and therefore suggest that *hard antler be allowed into the US with no restrictions associated with its import other than a certificate of origin attesting to the fact that it came from a farm. Herd participate in a TSE surveillance program.*

6. Velvet antler

Velvet antler is a natural health product harvested from cervidae while still in a cartilaginous stage. It is either sold in a processed form (in bulk powder or capsules) or still frozen or dried in the form of sticks or even sliced.

Earlier explanations on the lack of evidence that BSE transmits to cervidae and the rules and regulations in place in Canada should be sufficient by themselves to allow the import of such products. However, the safety of velvet antler is even further demonstrated by limited experiments conducted by both Canada and the US government on velvet antler. Indeed, in these limited experiments, velvet antler sticks harvested from cervidae affected by chronic wasting disease were tested with IHC with no signs of prions found.

We therefore believe that velvet antler be allowed for import into the United States as long as it can be demonstrated that it was harvested on farms (which in Canada is easy to do with existing traceback measures), that farms participate in TSE surveillance programs and that the velvet antler can be traced to the farm of origin. Herd participate in a TSE surveillance program.

Yours truly,

 for Serge A. Buy
 Executive Director

Products and proposed measures

Canadian Cervid Council proposals are in **Bold** in the text.

Description	Required Risk Mitigations <i>Import Permit Req'd for All Products</i>	Description Risk factor/mitigation summary
Cervidae (live)	Trucks are sealed and contents documented. CFIA verifies that the animals were born after the feed ban and are not known to have been fed ruminant proteins during their lifetime; cervidae enter the United States through designated ports of entry. Animals must be members of a herd participating in a nationally or provincially recognized TSE surveillance program for at least three years; herd is not known to have been infected with or exposed to TSE.	Source is animals under surveillance for TSE for at least three years, not known to have TSE, born after feed band and not known to have been fed ruminant proteins; CFIA verifies; movement is controlled in Canada and controlled within the United States.
Cervidae (live for terminal use only)	Same as above with the inclusion that animals must be destroyed, not moved from the end destination and brains to be submitted for testing by IHC.	Source is animals under surveillance for TSE for at least three years, not known to have TSE, born after feed band and not known to have been fed ruminant proteins; CFIA verifies; movement is controlled in Canada and controlled within the United States.
Cervids (intended for immediate slaughter)	Trucks are sealed and contents documented to move as a group direct to slaughter; CFIA verifies that the animals were born after the feed ban and are not known to have been fed ruminant proteins during their lifetime; cervids enter United States through designated ports of entry. Animals must be members of a herd participating in a nationally or provincially recognized TSE surveillance program; herd is not known to have been infected with or exposed to TSE.	Source is animals under surveillance for TSE, not known to have TSE, born after feed ban, and not known to have been fed ruminant proteins; CFIA verifies; movement is controlled.
Cervidae meat from domesticated farmed animals processed in a	CFIA verification that the animals were born after the feed ban and	

<p>slaughterhouse; bone in or bone out, fresh or frozen ground meat or sausage is allowable if it is derived from either (1) only cervidae meat or (2) only cervidae and porcine meat</p>	<p>that the animals were subject to a ban on the feeding of prohibited materials during their life span; the animals are members of a herd not known to be infected with or exposed to a TSE; no visible nervous or lymphoid tissue present (if frozen, verify no visible nervous or lymphoid tissue prior to freezing).</p>	
<p>Products (trophies such as hard antlers or skull) from cervids harvested on a game farm or similar facility (so-called "shooter bulls" or "shooter bucks").</p>	<p>Certificate of origin attesting the source of the animal being from a hunt farm, farm-raised and participating in a TSE surveillance program.</p>	
<p>Products (meat) from cervids harvested on a game farm or similar facility (so-called "shooter bulls" or "shooter bucks"); meat may be bone in or bone out, fresh or frozen; ground meat or sausage is allowable if it is derived from either (1) only cervidae meat or (2) only cervidae and porcine meat</p>	<p>CFIA verification that the animals are members of a herd not known to be infected with or exposed to a TSE; no visible nervous or lymphoid tissue present (if frozen, verify no visible nervous or lymphoid tissue prior to freezing). Importer certification that the meat imported is for personal use only with no intent for commercial distribution. Herds of origin participate in a TSE surveillance program.</p>	
<p>Hard antler</p>	<p>Certificate of origin attesting the source of the animal being from a hunt farm or farm-raised. Herds of origin participate in a TSE surveillance program.</p>	
<p>Velvet antler and velvet antler products</p>	<p>Certificate of origin attesting the source of the animal being farm-raised. CFIA verification of traceback measures in place enabling the tracing of the product to the farm of origin. Herds of origin participate in a TSE surveillance program.</p>	