



MINNESOTA ELK BREEDERS ASSOCIATION

February 20, 2022

Chair Senator Foug Hawj
Senate Environment, Climate and Legacy
3231 Minnesota Senate Building
St. Paul, MN 55155

Senator Kelly Morrison
Senate Environment, Climate and Legacy
3205 Minnesota Senate Building
St. Paul, MN 55155

Chair Hawj, Senator Morrison and Members of the Committee,

The Minnesota Elk Breeders Association represents elk farmers from across Minnesota who are working diligently to responsibly raise elk and support our local small-town communities and economy. We share your passion for a healthy cervid population, both inside and outside the fence and ask you to thoughtfully consider our comments below.

The Minnesota Elk Breeders Association does see several new provisions we can support but also several we oppose relating to S.F. 1526. Most notably, we draw your attention to:

- Section 1 Subd. 6 – We oppose making physical location data publicly available. Allowing public access to farmed cervid location premises data significantly increases the probability for every cervid farmer in Minnesota to experience vandalism to our fences, animals, property and self. There is no reason that deer or elk farmers should be subjected to public exposure any more than producers of cattle, pigs or poultry.
- Section 3 Subd. 4 – We oppose requiring the addition of a physical barrier be added to existing fencing as well as double 120” fences. Data from a recent study by the University of Minnesota does not support the effectiveness of a physical barrier or double fencing to control CWD on either side of the fence. No state in the nation requires the addition of a physical barrier to existing 96” fencing or double fencing of all farmed cervid facilities within its jurisdiction. In addition, there has never been a documented case of a farmed cervid escape being caused by a farmed cervid jumping up and over a 96” fence in Minnesota. Requiring a physical barrier or 120” fence is not warranted.
- Section 7 Subd. 11 (3) – We oppose the 10-year requirement to maintain fences after a CWD detection. There is no data or science to support maintaining fences for 10 years as being more effective than the current five-year requirement. Federal guidelines require five years. There is currently no action taken for public property where CWD positive deer have been taken, nor for dumpster sites where carcass overflow has likely created super-saturated prion sites.
- Section 8 Subd. 11a – This section needs to reflect someone knows their herd is infected or has been exposed to CWD prior to that sale or unlawful disposal. Line 5.27 could read, “...unlawful disposal of farmed Cervidae known to be infected with or exposed to chronic wasting disease.”
- Section 9 Subd. 12 – We oppose restricting interstate movement of live cervidae and/or semen into Minnesota from states where CWD has been detected in the wild and/or farm. Under current regulations, we are not aware of any documented farmed cervid moving from an out of state herd to a Minnesota farmed cervid herd causing that herd to later become infected with CWD. The transfer of semen has never been documented either experimentally or on-farm to cause CWD in the receiving animal. This language would severely diminish the ability for producers to utilize A.I. as a means to accelerate CWD-resistant genetics into their herd. Utilizing artificial insemination also lowers live animal movement in order to introduce new bloodlines into the herd. In addition, if the receiving farm is already located in a CWD endemic area, even the most negligible risk semen or animal importation is a mute point.

CWD is endemic in Minnesota and will continue to spread with or without cervid farms. The farmed cervid industry is closer than ever to breeding genetic resistance into our herds, identifying enhanced biosecurity measures and beginning discussions on how to utilize live animal testing when it becomes validated. We are on the verge of being able to manage the threat of CWD in a farm situation with these increased measures. We stand ready to work with you on achieving our shared desire for healthy deer herds on both sides of the fence without eliminating over 200 small family farms through overregulation in doing so.

Sincerely,

Mark Luedtke, President