

QDMA'S STANCE ON CAPTIVE DEER BREEDING

On February 22, 2012 the Quality Deer Management Association (QDMA) issued a national press release urging its members and other concerned sportsmen in several states to contact their elected officials and urge them to oppose legislation initiated by the deer breeding industry that would enable introduction of captive deer breeding operations or expansion of these practices within those states.

QDMA supports the legal, ethical pursuit and taking of wild deer living in adequate native/naturalized habitat in a manner that does not give the hunter an unfair advantage and provides the hunted animals with a reasonable opportunity to escape the hunter. QDMA does not oppose high-fence operations that meet the above conditions.

What is the captive deer breeding industry?

The captive deer breeding industry (also called the deer farming industry or captive cervid industry) uses artificial means to breed captive deer for profit – typically realized through sales of live animals for controlled breeding and shooting, as well as semen and embryos. Current estimates suggest there are approximately 10,000 deer breeders in North America. In general, breeders seek to establish one or more genetic “lines” of deer to produce bucks with the antler size and configuration they desire. Bucks that do not meet this objective typically are sold to fenced shooting preserves, with some killed only days or weeks after release.

The process of selective breeding typically requires animals of known and often narrow pedigrees to be intensively handled and frequently medicated. Bucks from which semen is collected often are physically or chemically restrained and subjected to electro-ejaculation, whereby an electric probe is inserted into the buck's rectum and energized until ejaculation occurs. In does, artificial insemination is common, whereby a doe may be stimulated to ovulate through use of estrous-

synchronizing drugs, followed typically by insertion of semen into the doe's reproductive tract.

Why is this issue one that QDMA felt the need to address?

QDMA's mission is to ensure the future of white-tailed deer, wildlife habitat and our hunting heritage. This mission is specific to wild white-tailed deer, not those genetically altered, artificially created and human-habituated. QDMA believes that growth and expansion of the captive deer breeding industry could threaten North America's wild white-tailed deer and

the deer-hunting heritage. QDMA is responding to aggressive moves to legalize deer breeding in several new states and to loosen regulations in others. Previously, such efforts were limited to just a few states annually (which QDMA also opposed). However, during the 2012 legislative season,

this number swelled to 10 states. Simply stated, QDMA believes the potential negative implications warrant our actions.

Isn't this a private property rights issue?

QDMA has a long history of supporting private property rights, especially those which do not infringe on our members' rights to hunt healthy, wild, white-tailed deer on the properties they own, manage or hunt. Under the North American Model of Wildlife Conservation and the Public Trust Doctrine, wildlife, including white-tailed deer, are collectively owned by all citizens rather than individuals. We contend that captive deer breeding facilities infringe upon the tenets of the North American Model. Thus, we see this as a resource issue (use, access, and allocation) rather than a private property rights issue.

Isn't this just dividing hunters?

The underlying ethics of North America's hunting heritage were well artic-

ulated by early conservation pioneers such as Teddy Roosevelt and Aldo Leopold. We believe that to the vast majority of hunters, deer hunting is the pursuit of wild deer produced without direct human contact or artificial manipulation that are hunted and harvested in an ethical manner. We adhere to Webster's definition of “wild” as follows: “living in a state of nature not ordinarily tame or domesticated.” Therefore, we don't agree we are dividing hunters, but rather distinguishing between hunting and shooting based on whether or not the quarry is wild. While practices such as Internet shooting, poaching, and canned shoots involve killing of animals, the hunting community, as well as the majority of the non-hunting public, widely reject these practices as hunting.

What are some of QDMA's primary concerns with this industry?

1. *Erosion of the North American Model of Wildlife Conservation and the Public Trust Doctrine*

The North American Model of Wildlife Conservation is recognized globally as the premier model for wildlife conservation and management. We believe the captive deer breeding industry undermines important tenets of this model, notably that wildlife is a Public Trust resource owned collectively by the people, not individuals.

2. *Loss of public support for hunting*

Multiple surveys have confirmed that a wide majority of hunters and non-hunters alike support ethical hunting and venison consumption. Therefore, we have concerns that expansion of rearing or shooting of artificially manipulated deer may erode public support for our deer-hunting heritage.

3. *Unnatural and extreme manipulation of white-tailed deer*

This industry routinely produces bucks with unnatural, often grotesque antlers through controlled breeding, often of closely related animals. In fact, some breeders have produced bucks with antlers so large they can barely keep their heads off the ground. During this process, there

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has been minimal focus on other genetic traits important to long-term health and survival. Basic genetics shows that focusing on a single trait such as antler size often is highly detrimental to a species in the long-term.

4. Potential spread of disease and other biological agents

Any time an animal is moved, any disease or parasite associated with that animal also is moved. With an estimated 10,000 deer breeding facilities in North America, including many in states which can import and/or export deer to other states, the potential for spread of disease is undeniable. Some diseases of concern include chronic wasting disease (CWD), bovine tuberculosis and brucellosis, though certain internal and external parasites also could threaten the health of wild deer.

While there has yet to be conclusive evidence related to transmission of CWD from captive to wild deer, most states and Canadian provinces where CWD has been documented in wild deer also are home to captive deer facilities. This poses tremendous risks with respect to CWD since the most reliable test for this disease can only be performed on dead animals. CWD incubation time in whitetails can be several years, and therefore unidentified CWD-positive deer can be unknowingly transported across state lines and/or among captive facilities. Despite a lack of conclusive evidence confirming transmission of CWD from captive to wild deer,

there have been some suspicious cases. For example, CWD was discovered in a captive deer facility in Missouri in 2010, and in two wild bucks within two miles of that facility in 2012. Numerous disease experts agree the distribution map of CWD suggests that CWD likely arrived in several new states through transportation of live deer or deer parts (either legally or illegally) and not spontaneously or through natural deer movements.

5. Lack of benefits for wild deer or the vast majority of deer hunters

For the overwhelming majority of deer hunters in North America who will never be a deer breeder nor have the resources or inclination to shoot an artificially manipulated, human-habituated buck, there are numerous risks and no tangible benefits of the captive deer-breeding industry to them or wild deer.

6. Public cost

Where deer breeding exists, wildlife and agricultural agencies have considerable oversight responsibilities related to permitting, testing, surveillance and enforcement. Collectively, this consumes considerable time and resources from already depleted budgets. This is hunter and taxpayer money that we believe would be far better spent providing public hunting access, technical assistance to landowners, and wildlife law enforcement. Also, when CWD or other diseases which require state/provincial-mandated action are confirmed,

the cost to taxpayers often runs in the millions of dollars. Also, unlike some other diseases, there is no way to decontaminate an area after CWD is identified. It remains present in the soil with the ability to infect deer that come in contact with it in the future. This presents a tremendous long-term risk to wild deer, sportsmen and our state wildlife agencies.

7. Devaluation of the intrinsic value of deer and the hunting experience

We believe the proliferation of the captive deer breeding industry and related shooting facilities are negatively affecting public perceptions of wild deer and related hunting experiences. Further, we are concerned that the widespread availability of captive-reared, abnormally large-antlered “shooter” bucks could alter hunter expectations and change the fundamental hunting experience, thus exacerbating hunter declines and associated economic contributions.

Conclusion

We believe the time is now for engagement and solutions to this complex issue. It is QDMA's hope this will lead to a long overdue nationwide discussion on this topic and development of safeguards to protect North America's 32 million wild white-tailed deer, 16 million whitetail hunters and our hunting heritage from potential risks.

DISEASE DANGERS OF CAPTIVE DEER

By December 2012, Chronic Wasting Disease (CWD) had been identified in 22 states, two provinces and Korea (see map on page 17). In 2012, there was a flurry of activity relating to captive deer legislation and advocacy work by QDMA staff, Branches and members.

Ten states debated legislation initiated by the deer breeding industry to enable introduction of captive deer breeding operations or expansion of these practices – Georgia, Indiana, Mississippi, Missouri, New Jersey, New York, North Carolina, Ohio, Tennessee and West Virginia. QDMA opposed each piece of legislation and issued a national press release in February urging hunters to do the same (Thankfully, efforts by sportsmen's groups resulted in the defeat of nearly all of this legislation).

Following the press release, QDMA issued answers to frequently asked questions about our stance on captive deer breeding (see www.QDMA.com) to provide additional information on the risks of this industry and to elaborate on some points in our initial press release. The potential spread of disease and other biological agents is only one risk associated with the captive deer breeding industry, but it is one that warrants further discussion. This article provides a quick summary of our current knowledge of CWD and the dangers of transporting deer.

Quick Review

CWD is an always fatal neurological disease that affects deer, elk and moose. There is no vaccine or cure for CWD, and this contagious disease is likely spread via urine, feces, saliva, blood, antler velvet, and contact with diseased carcasses and contaminated environments.

According to Dr. Christopher Johnson, a scientist with the U.S. Geological Survey's National Wildlife Health Center, prions (the infectious proteins causing the disease) are not killed by most detergents, cooking, freezing, or by autoclaving (a method used to sterilize medical instruments). Dr. Johnson also states that when prions are released into the environment by infected deer, they can stay infectious for many years, even decades.

Interestingly, University of Alberta researchers reported that prions are still

viable after being incinerated at 1,562 degrees Fahrenheit.

Current Status

According to the Centers for Disease Control and Prevention (CDC), as of March 2012 CWD had been identified in approximately 100 captive herds in 15 states, provinces and in South Korea. One such depopulated facility, Buckhorn Flats near Mount Horeb, Wisconsin, holds the distinction of having the highest CWD prevalence rate ever detected in any facility – 60 of 76 deer (77 percent) on this farm were CWD positive.

Each CWD-positive facility presents a major problem. Research clearly shows our inability to decontaminate a site after CWD is identified, as healthy deer have contracted the disease after being exposed to water, feed buckets and bedding used by CWD-positive deer. CWD was first identified at Colorado State University's Foothills Wildlife Research Facility in 1967. Since then, there have been several attempts to decontaminate the deer pens, and they have been unsuccessful every time. When new animals are brought in they still contract CWD, so it is a big issue for people and wild deer living near any CWD-positive facility. Importantly, numerous disease experts agree the distribution map of CWD suggests the disease likely arrived in several new states through transportation of live deer or deer parts and not spontaneously or through natural deer movements.

CWD Incubation Period

Dr. Elizabeth Williams (now deceased) from the University of Wyoming's Department of Veterinary Sciences reported that CWD has a prolonged incubation period with a minimum of 16 months and likely averaging two to four years. Also, the Michigan DNR and Department of Agriculture's CWD response plan states the incubation period for CWD ranges from 16 to 60 months or more in individual cases. This means a deer could be carrying the disease for years – and shedding infective prions in its environment or wherever it is moved to – without showing any signs of having the disease or alerting farm owners, deer managers, authorities,

or potential buyers.

Dr. Williams also reported that within CWD endemic areas, more than 97 percent of CWD cases in free-ranging deer and elk detected in the course of surveillance activities were subclinical – meaning the animals showed no outward signs of having CWD.

In 2004, researchers Michael Miller and Margaret Wild of the Colorado Division of Wildlife reported on the epidemiology of CWD in captive white-tailed and mule deer. They stated, “[CWD] affected white-tailed deer died or were killed because of terminal CWD at age 49 to 76 months.” Thus, some of these animals lived for over six years in a captive facility after being exposed to CWD.

This problem is further exacerbated by the lack of a practical live-animal test for CWD. Currently, the most effective test used is on the brain stem of a dead deer. Live deer can be tested using a tonsil biopsy, and the test is pretty accurate, but it requires anesthetizing the animal and removing a portion of the tonsils – an option that is more costly than testing the brain stem. Because it is costly to anesthetize deer, costly to run the test, and you risk infection to deer following the tonsil biopsy, this technique has only been used under research conditions. No state or federal agency requires this test, no deer farms administer this test, and CWD-positive deer can therefore unknowingly be moved between or among facilities.

Industry Travel Standard

Most states require five years of disease monitoring for interstate commerce, but at least one (South Dakota) only requires three years. As stated earlier, some CWD-positive deer live longer than five years without showing any signs of having the disease. Thus, unfortunately regulations currently allow movement of animals that could unknowingly be CWD-positive. Additionally, the CDC reported that CWD testing among states varies considerably in scope from mandatory testing of all dead animals to voluntary herd certification programs or mandatory testing of only animals suspected of dying of CWD.

Documented Escapes

Expansion of “alternative agriculture” sounds like a great opportunity for farmers and rural landowners. However, whitetails are not cows, and nothing in the livestock industry (other than possibly bovine tuberculosis) presents as large a risk to free-ranging whitetails as CWD. Since CWD can unknowingly be moved among captive facilities, live deer can carry and spread the disease without showing outward signs of infection, and captive deer escape on an all-too-frequent basis.

For example, the Wisconsin DNR reported in March 2003 that 671 deer had escaped from game farms, including 436 that were never found. The DNR also estimated that captive deer had escaped from one third of the state’s 550 deer farms over the lifetime of the operations. In 2004, Michigan, another CWD-positive state, documented 456 previously unreported escapes. Between 2006 and 2009 another 595 escapes were reported in Wisconsin, including 266 whitetails, 78 elk, and 251 exotics. We realize the owners of these animals have a vested interest in prevent-

ing escapes. However, people leave gates open, vandals cut fences, and trees fall on fences. Whatever the reason, captive deer routinely escape.

Compelling Evidence

Currently there is no proof that captive deer have ever spread CWD to wild deer, and disease experts agree there is no “smoking gun” case. However, there is compounding circumstantial evidence and we’ll share two compelling cases.

Missouri was CWD-free until February 2010 when a deer at a captive facility tested positive. Another deer at a nearby captive facility (same owner) tested positive in October 2011. Then in January 2012, the Missouri Department of Conservation (DOC) reported two free-ranging whitetails tested positive for CWD. The deer were harvested by hunters during the fall 2011 firearms season within 2 miles of the captive facilities where CWD was initially found. There is no proof those facilities had anything to do with the two wild deer contracting the disease, but it sure is suspicious that the DOC had tested more than

34,000 free-ranging deer for CWD from all parts of the state since 2002 and the only CWD-positive deer they’ve found were within 2 miles of the captive facilities, and they found them shortly after deer in both facilities tested positive for the disease.

Finally, an ear-tagged deer that escaped from a Walworth County, Wisconsin deer farm roamed freely for at least six months before sharpshooters killed it on October 22, 2002. That deer tested positive for CWD. Thus, that escapee exposed wild deer to infective CWD prions directly for at least 6 months, and indirectly for years via urine, feces, etc. deposited in the environment. How many wild deer contracted, or may still contract, CWD from that animal? We’ll never know. Some claim there is no proof and nothing to worry about from a disease perspective. Based on the totality of the scientific evidence, we strongly disagree.

QDMA is standing up for 16 million deer hunters and all future deer hunters. We’ll do all we can to ensure the future of wild white-tailed deer, wildlife habitat and our hunting heritage.

QDMA supports the legal, ethical pursuit and taking of wild deer living in adequate native/naturalized habitat in a manner that does not give the hunter an unfair advantage and provides the hunted animals with a reasonable opportunity to escape the hunter. QDMA does not oppose high-fence operations that meet the above conditions. We are concerned about the captive deer breeding industry, especially in regard to animal welfare, human health/safety, disease, compliance with regulations, and our hunting heritage.

Therefore, to gauge the relative size of this industry, and to gain a better understanding of its current practices as they relate to our concerns, in 2012 we surveyed all 48 contiguous state wildlife agencies and all provincial wildlife agencies in Canada. The majority of western states did not respond to our data requests, so we limited our U.S. reporting and analysis to the 37 states comprising the Midwest, Northeast and Southeast. The five pages that follow summarize the data collected from this survey.

BREEDING FACILITIES, SHOOTING PRESERVES AND WHITETAILS

We asked state and provincial wildlife agencies for the number of breeding facilities and shooting preserves and the number of whitetails enclosed in each in 2012. Some states reported exact numbers, some provided estimates and others reported that information was unknown. Data in the attached table should be viewed as a minimum estimate for each state and province.

The three regions in the U.S. included at least 5,555 captive whitetail breeding facilities and another 795 whitetail shooting preserves. The Southeast has the most breeding facilities (2,282) followed closely by the Midwest (2,091) and distantly by the Northeast (1,182). No Canadian provinces reported a single breeding facility. Eight of 11 Southeast states (73 percent) have breeding facilities, and they range from 18 in Mississippi to 1,332 in Texas. Texas led the nation in this category. Only Georgia, South Carolina and Tennessee reported

In a survey of 37 state wildlife agencies in the Midwest, Northeast and Southeast, and all provincial wildlife agencies in Canada, the three U.S. regions reported at least 5,555 captive whitetail breeding facilities and another 795 whitetail shooting preserves. Meanwhile, no Canadian provinces reported a single breeding facility.

no breeding facilities in this region. Nine of 10 Midwest states (90 percent) that provided information have breeding facilities, and they range from five in South Dakota to 642 in Ohio. Illinois did not know how many were present, and Iowa reported the number in their voluntary CWD surveillance program. Conversely, only five of 13 Northeast states (38 percent) have breeding facilities as eight states do not allow them for whitetails. Four of the five states that allow them have few facilities (10 to 37) while Pennsylvania contains at least 1,100; although this number includes all captive whitetail facilities and does not distinguish breeding facilities from shooting preserves. Texas and Pennsylvania alone contain nearly half (44 percent) of all breeding facilities reported from the three regions.

States reported far fewer shooting preserves. The Southeast again has

the most (405), followed by the Midwest (287) and Northeast (103). In Canada, only Saskatchewan has shooting preserves, but it has more (108) than the entire Northeast. Michigan leads the U.S. with 150 whitetail shooting preserves, followed by Mississippi (108), Florida (90) and New York (90).

There were 163,001 whitetails enclosed in breeding facilities in the three U.S. regions with Texas reporting 100,000 of them. Texas alone was responsible for 61 percent of the three-region total. Other states with large captive numbers included Pennsylvania (23,000), Mississippi (9,000), Wisconsin (8,900) and Michigan (7,500). There are 22 states in the U.S. with Chronic Wasting Disease (CWD), and four of the top five states for captive whitetails are CWD-positive.

There were another 25,467 whitetails enclosed in shooting preserves in the three U.S. regions, and 6,200 whitetails in Saskatchewan. Numerous states reported “unknown” for this number – a fact that’s very unsettling to deer managers. Michigan and Wisconsin reported the most at 18,000 and 7,000 whitetails, respectively. These two states accounted for 98 percent of the total number of whitetails reported in shooting preserves in the three regions. Notably, both states have CWD, as does Saskatchewan, which reported the third largest number of whitetails in these facilities.

The captive deer breeding industry claims there are more than 10,000 white-tailed deer breeding and/or shooting facilities in the U.S. We were unable to obtain data from western states, but the number claimed appears high based on our survey.

Number of Breeding Facilities and Shooting Preserves

State/ Province	# of Breeding Facilities (BF)	# of Shooting Preserves (SP)	# of Deer in BF	# of Deer in SP
Illinois	Unknown	2	Unknown	Unknown
Indiana	400	4	2,500	120
Iowa	103***	10	3,460	Unknown
Kansas	*	*	*	*
Kentucky	*	*	*	*
Michigan	370	150	7,500	18,000
Minnesota	*	*	*	*
Missouri	277	27	9,000	Unknown
Nebraska	0	0	0	0
North Dakota	24**	0	870**	0
Ohio	642	34	Unknown	Unknown
South Dakota	5	0	156	0
Wisconsin	270	60	8,900	7,000
Midwest Total	2,091	287	32,386	25,120
Connecticut	10	0	>=30	0
Delaware	0	0	0	0
Maine	0	0	0	0
Maryland	0	0	0	0
Massachusetts	0	0	0	0
New Hampshire	0	1	0	Unknown
New Jersey	15	2	371	347
New York	20	90	Unknown	Unknown
Pennsylvania	1,100**	n/a	23,000**	n/a
Rhode Island	0	0	0	0
Vermont	0	2	0	Unknown
Virginia	0	4	0	Unknown
West Virginia	37	4	900	Unknown
Northeast Total	1,182	103	24,301	347
Alabama	90	0	Unknown	0
Arkansas	31	10	1,332	Unknown
Florida	313	90	Unknown	Unknown
Georgia	0	53	0	Unknown
Louisiana	260	70	Unknown	Unknown
Mississippi	18	108	708	Unknown
North Carolina	23	0	274	0
Oklahoma	215	46	4,000	Unknown
South Carolina	0	28	0	Unknown
Tennessee	0	0	0	0
Texas	1,332	0	100,000	0
Southeast Total	2,282	405	106,314	
3-Region total	5,555	795	163,001	25,467
Alberta	0	0	0	0
British Columbia	0	0	0	0
Manitoba	0	0	0	0
New Brunswick	0	0	0	0
Nova Scotia	0	0	0	0
Ontario	0	0	0	0
Quebec	0	0	0	0
Saskatchewan	0	108	0	6,200

*data not provided

** includes total for breeding facilities and shooting preserves

*** includes number in voluntary CWD surveillance program

CO-MINGLING AND TAGGING

It's well known that a number of economically and culturally important diseases are spread among deer through transmission of feces, urine, saliva, blood, antler velvet, and parasites. It is also a serious concern to mix farm-raised and native deer, especially if they cannot be distinguished via prominent ear tags. Therefore, we asked state and provincial wildlife agencies whether pen-raised whitetails could be co-mingled with native deer in breeding facilities or shooting preserves, and whether deer released into captive facilities were required to be visibly and permanently tagged.

In the Midwest, none of the reporting states allow co-mingling in breeding facilities or shooting preserves, and nine of 10 states (90 percent) require visible and permanent tagging. Only Illinois does not require tagging.

In the Northeast, none of the reporting states allow co-mingling in breeding facilities and only Virginia allows it in shooting preserves. For states that allow captive whitetails and answered the tagging question, three of six states (50 percent; New York, Vermont and West Virginia) require visible and permanent tagging.

In the Southeast, three of 11 states (27 percent; Alabama, Florida and Mississippi) allow co-mingling in breeding facilities and four of 10 states (40 percent; Alabama, Florida, Mississippi and Texas) allow it in shooting preserves. Five of eight states (63 percent) that allowed captive whitetails require visible and permanent tagging. Alabama requires internal (vs. visible) tagging.

In Canada, no provinces allow co-mingling in breeding facilities or shooting preserves, and all provinces reported that tagging is required (or the question was not applicable to them).



Tagging is required by 17 of the 24 states and all provinces that allow captive whitetails.

WHERE CO-MINGLING IS ALLOWED AND TAGGING IS REQUIRED

State/Province	Co-mingling in Breeding Facility	Co-mingling Shooting Preserve	External Tags Required?
Illinois	No	No	No
Indiana	No	No	Yes
Iowa	No	No	Yes
Kansas	*	*	*
Kentucky	*	*	*
Michigan	No	No	Yes
Minnesota	No	No	Yes
Missouri	No	No	Yes
Nebraska	*	*	*
North Dakota	No	No	Yes
Ohio	No	No	Yes
South Dakota	No	n/a	Yes
Wisconsin	No	No	Yes
Connecticut	No	No	No
Delaware	n/a	n/a	n/a
Maine	n/a	n/a	n/a
Maryland	n/a	n/a	n/a
Massachusetts	*	*	*
New Hampshire	n/a	n/a	n/a
New Jersey	No	No	No
New York	No	No	Yes
Pennsylvania	*	*	*
Rhode Island	*	*	*
Vermont	No	No	Yes
Virginia	n/a	Yes	No
West Virginia	No	No	Yes
Alabama	Yes	Yes	No
Arkansas	No	No	No
Florida	Yes	Yes	No
Georgia	n/a	n/a	n/a
Louisiana	No	*	Yes
Mississippi	Yes	Yes	Yes
North Carolina	No	n/a	Yes
Oklahoma	No	No	Yes
South Carolina	n/a	n/a	n/a
Tennessee	n/a	n/a	n/a
Texas	No	Yes	Yes
Alberta	n/a	n/a	n/a
British Columbia	n/a	n/a	n/a
Manitoba	No	n/a	Yes
New Brunswick	No	No	n/a
Nova Scotia	n/a	n/a	n/a
Ontario	n/a	n/a	n/a
Quebec	No	No	Yes
Saskatchewan	No	No	Yes

* data not provided

ACREAGE AND HABITAT REQUIREMENTS AND STOCKING DENSITY

We asked state and provincial wildlife agencies whether they have a minimum acreage for white-tailed deer breeding facilities or shooting preserves, whether they have any habitat requirements for captive deer facilities, and whether they have any regulations regarding stocking density of pen-raised deer in captive facilities.

In the Midwest, two states (Missouri and Wisconsin) have acreage minimums for breeding facilities and four states (Iowa, Missouri, Ohio and Wisconsin) do for shooting preserves. Only Indiana reported having habitat requirements, and those included the need to provide windbreaks, shelters and supplemental feed if natural vegetation was inadequate. Two states (Minnesota and Missouri) reported having stocking density regulations.

In the Northeast, two states (New York and West Virginia) have acreage minimums for breeding facilities and three states (New Jersey, New York and West Virginia) do for shooting preserves. Only West Virginia reported having habitat requirements and those included ground cover and clean free water. Two states (New York and West Virginia) reported having stocking density regulations.

In the Southeast, only North Carolina has an acreage minimum for breeding facilities, and six states (Arkansas, Florida, Georgia, Louisiana, Mississippi and Tennessee) do for shooting preserves. Four states reported having habitat requirements. Arkansas requires 60 percent forested area in shooting preserves, Florida requires a minimum of 200 acres with at least 100 acres in woody vegetation for shooting preserves, Mississippi requires at least 50 percent of the area be suitable deer habitat, and Oklahoma requires natural or man-made shelters. Two states (Florida and North Carolina) reported having stocking density regulations.

In Canada, no provinces have breeding facilities, and only Saskatchewan has shooting preserves. Saskatchewan does not have an acreage minimum for shooting preserves or habitat or stocking density requirements for captive facilities.



Out of the 37 states surveyed, only six have habitat requirements for captive deer facilities – Arkansas, Florida, Indiana, Mississippi, Oklahoma and West Virginia.

ACREAGE, HABITAT AND STOCKING DENSITY REQUIREMENTS

State/Province	Min. Acreage in Breeding Facility	Min. Acreage Shooting Preserve	Habitat Requirements?	Stocking Density?
Illinois	None	None	No	No
Indiana	n/a	n/a	Yes	Unknown
Iowa	None	320	No	No
Kansas	*	*	*	*
Kentucky	*	*	*	*
Michigan	0	0	No	No
Minnesota	*	*	No	Yes
Missouri	0.01	320	No	Yes
Nebraska	*	*	*	*
North Dakota	None	None	No	*
Ohio	None	80	No	No
South Dakota	n/a	n/a	No	No
Wisconsin	0.5	80	No	No
Connecticut	None	None	No	No
Delaware	Don't Allow	Don't Allow	No	n/a
Maine	Don't Allow	Don't Allow	n/a	n/a
Maryland	n/a	n/a	n/a	n/a
Massachusetts	*	*	*	*
New Hampshire	n/a	n/a	n/a	n/a
New Jersey	None	50	No	No
New York	0.34	10	No	Yes
Pennsylvania	*	*	*	*
Rhode Island	*	*	*	*
Vermont	None	None	No	No
Virginia	n/a	n/a	No	No
West Virginia	0.11	300	Yes	Yes
Alabama	n/a	n/a	No	No
Arkansas	n/a	500	Yes	No
Florida	<=2000	200-10000	Yes	Yes
Georgia	Not Legal	640	n/a	n/a
Louisiana	*	300	*	*
Mississippi	<=5 Acres/Pen	300	Yes	No
North Carolina	0.22	*	No	Yes
Oklahoma	None	*	Yes	No
South Carolina	n/a	n/a	n/a	n/a
Tennessee	n/a	20	No	n/a
Texas	None	n/a	No	No
Alberta	n/a	n/a	n/a	n/a
British Columbia	n/a	n/a	n/a	n/a
Manitoba	n/a	n/a	Yes	n/a
New Brunswick	0	0	n/a	n/a
Nova Scotia	n/a	n/a	n/a	n/a
Ontario	n/a	n/a	n/a	n/a
Quebec	none	none	No	No
Saskatchewan	none	none	No	none

* data not provided

CLASSIFICATION, MINIMUM RELEASE TIME AND CONSUMPTION

We asked state and provincial wildlife agencies how captive whitetails in shooting preserves were classified (wildlife, livestock or other), whether there were minimum release times before whitetails could be shot in shooting preserves, and whether it was legal to consume meat from whitetails killed in shooting preserves. The consumption question is important as some drugs commonly used on captive whitetails have potential human health concerns.

In the Midwest, Missouri and Ohio consider whitetails in shooting preserves as wildlife or wild animals and six states consider them livestock. In general, captive deer regulations tend to be more liberal in states where whitetails are considered livestock as opposed to wildlife. No state reported a minimum release time although Ohio does not allow deer to be shot as they are released (for example, while stepping off a trailer), and all states that reported data allow whitetails killed in shooting preserves to be consumed. The lack of minimum release time is troubling and this is exacerbated by allowing deer to be consumed without any record of drug usage and necessary withdrawal times.

In the Northeast, no states consider whitetails in shooting preserves as livestock, New York considers them domestic game animals, and New Jersey, Vermont, Virginia and West Virginia consider them wildlife. No state reported a minimum release time before white-tailed deer could be shot in a shooting preserve, and six of seven states allow consumption of deer killed in shooting preserves; only Vermont prohibits it.

In the Southeast, six of nine states consider whitetails in shooting preserves as wildlife, Louisiana and Oklahoma consider them livestock, and Alabama considers them game animals. Four states reported minimum release times. Florida requires one day, Alabama and Texas require 10 days, and Mississippi requires more than 10 days before hunting season for bucks with antlers. Eight of 10 states allow consumption of deer killed in shooting preserves; only Alabama and Tennessee prohibit it.

In Canada, only Saskatchewan has shooting preserves and it considers whitetails in these facilities as domestic game farm animals. Saskatchewan does not have

a minimum release time before these deer could be shot and it does allow them to be consumed. Quebec reported having no shooting preserves but said deer in them would be eligible for consumption.

Twenty-four of the 37 states surveyed and two Canadian provinces reported that it is legal to consume meat from whitetails killed in shooting preserves.



CLASSIFICATION, MINIMUM RELEASE TIME AND CONSUMPTION OF CAPTIVE CERVIDS

State/Province	Captive Whitetails Classification	Min. Release Time (Days)	Legal to Consume?
Illinois	Livestock	None	Yes
Indiana	Not Sure	n/a	Yes
Iowa	Livestock	None	Yes
Kansas	*	*	*
Kentucky	*	*	*
Michigan	Livestock	0	Yes
Minnesota	Livestock	*	Yes
Missouri	Wildlife	0	Yes
Nebraska	*	*	*
North Dakota	Livestock	None	Yes
Ohio	Wild Animal	0	Yes
South Dakota	n/a	n/a	Yes
Wisconsin	Livestock	No Rules	Yes
Connecticut	n/a	n/a	Yes
Delaware	n/a	n/a	n/a
Maine	n/a	n/a	n/a
Maryland	n/a	n/a	n/a
Massachusetts	*	*	*
New Hampshire	n/a	n/a	Yes
New Jersey	Wildlife	None	Yes
New York	Domestic Game Animals	0	Yes
Pennsylvania	*	*	*
Rhode Island	*	*	*
Vermont	Wildlife	None	No
Virginia	Wildlife	n/a	Yes
West Virginia	Wildlife	0	Yes
Alabama	Game Animals	10	No
Arkansas	*	n/a	Yes
Florida	Wildlife	1	Yes
Georgia	Wildlife	n/a	Yes
Louisiana	Livestock	*	Yes
Mississippi	Wildlife	>10 Days Before Season	Yes
North Carolina	n/a	n/a	n/a
Oklahoma	Livestock	0	Yes
South Carolina	Wildlife	n/a	Yes
Tennessee	Wildlife	n/a	No
Texas	Wildlife	10	Yes
Alberta	n/a	n/a	n/a
British Columbia	n/a	n/a	n/a
Manitoba	n/a	n/a	n/a
New Brunswick	Illegal	*	No
Nova Scotia	n/a	n/a	n/a
Ontario	*	n/a	n/a
Quebec	Other	0	Yes
Saskatchewan	Domestic Game Farm Animals	0	Yes

*Data not provided

MOVEMENT OF CAPTIVE DEER

We asked state and provincial wildlife agencies whether it was legal to import and export deer to/from other state/provinces into breeding facilities or shooting preserves. In the Midwest, nine of 11 states allow whitetails to be imported and exported, and only Minnesota and Nebraska prohibit their movement. In the Northeast,

only two of 11 states (New York and Vermont) allow whitetails to be imported while five of 10 states (Connecticut, Delaware, New Jersey, New York and West Virginia) allow them to be exported. Surprisingly, Vermont allows deer to be brought into the Green Mountain State but does not allow them to leave. In the

Southeast, only four of 11 states (Florida, Louisiana, North Carolina and Oklahoma) allow deer to be imported, while seven of 10 states (Alabama, Arkansas, Florida, Louisiana, Mississippi, North Carolina and Texas) allow them to be exported.

Where is it Legal to Import and Export Deer?

State/Province	Import Allowed?	Export Allowed?
Illinois	Yes	Yes
Indiana	Yes	Yes
Iowa	Yes	Yes
Kansas	*	*
Kentucky	*	*
Michigan	Yes	Yes
Minnesota	No	No
Missouri	Yes	Yes
Nebraska	No	No
North Dakota	Yes	Yes
Ohio	Yes	Yes
South Dakota	Yes	Yes
Wisconsin	Yes	Yes
Connecticut	No	Yes
Delaware	No	Yes
Maine	No	No
Maryland	No	No
Massachusetts	No	*
New Hampshire	No	No
New Jersey	No	Yes
New York	Yes	Yes
Pennsylvania	*	*
Rhode Island	No	No
Vermont	Yes	No
Virginia	No	No
West Virginia	No	Yes
Alabama	No	Yes
Arkansas	No	Yes
Florida	Yes	Yes
Georgia	No	No
Louisiana	Yes	Yes
Mississippi	No	Yes
North Carolina	Yes	Yes
Oklahoma	Yes	*
South Carolina	No	No
Tennessee	No	No
Texas	No	Yes
Alberta	No	No
British Columbia	No	No
Manitoba	No	No
New Brunswick	Yes	Yes
Nova Scotia	No	No
Ontario	No	No
Quebec	Yes	Yes
Saskatchewan	Yes	Yes

* data not provided



Across all three U.S. regions surveyed, 15 states allow the importation of deer into breeding facilities or shooting preserves. A total of 21 states allow the exportation of deer.

Based on results of QDMA's 2012 wildlife agency survey we are concerned by the lack of consistency in breeding facility and shooting preserve regulations as they relate to our concerns for animal welfare, human health/safety, disease, compliance with regulations, and our hunting heritage. Thus, we believe the time has come for a nationwide discussion on these topics among all relevant stakeholders to identify and implement necessary safeguards to protect North America's wild white-tailed deer and our hunting heritage.



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25th Anniversary - A proven past, a promising future

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NIGHT EVENTS!

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THURSDAY-SUNDAY**



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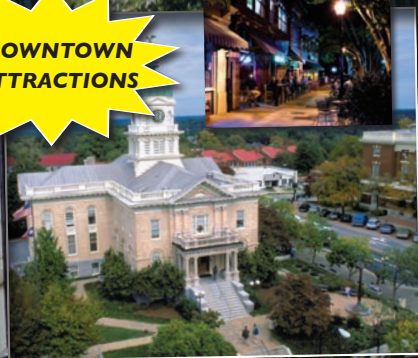


AUCTIONS & RAFFLES



PRO TALKS!

DOWNTOWN ATTRACTIONS



Athens, Georgia, nestled in the foothills of the Blue Ridge Mountains and only a little more than 60 miles east of Atlanta, is known as the "Classic City" and has an eclectic culture with a little bit of everything for everyone – a world-renowned music scene, unique shopping, a range of top-notch cuisine, lively nightlife, college athletics, outdoor recreation, history museums, performance arts and much more! Athens is also home to the University of Georgia Deer Lab!

ATHENS PHOTOS PROVIDED BY VISITATHENSGA.COM

REGISTRATION OPENS IN FEBRUARY. CHECK QDMA.COM FOR UPDATES!

FOR INFO, CALL QDMA AT (800) 209-3337 OR GO TO QDMA.COM