

DEER PROTECTION PROGRAM OVERVIEW



Ver. 1/6/2022

The manufacturers of urine-based scent products participating in the Responsible Hunting Scent Association's (RHSA) Deer Protection Program (the RHSA DDP Program) are taking proactive steps to limit the potential of their products contributing to the spread of Chronic Wasting Disease (CWD). Through this program, participating scent manufacturer members are committed to using urine from facilities that are taking steps in addition to those required by the APHIS Herd Certification Program to further reduce the potential of CWD being present in their deer herds. The urine-based scent manufacturers, facilitated by RHSA, have developed a program that extends substantially beyond federal requirements in order to substantially safeguard deer populations in and around these facilities. Oversight of this program will be the responsibility of RHSA with assistance from an Oversight Advisory Working Group and will be performed in accordance with Appendix A (included below).

Participating manufacturers guarantee, through their participation in the RHSA DDP Program, that the cervid urine utilized in their products comes only from facilities that are also participating in the RHSA DDP Program and that strictly comply with the following measures:

- 1) **Federally Approved CWD Program** – All cervid urine collection farms participating in the RHSA DDP Program must demonstrate that they have received herd certification and are currently in compliance with the APHIS Herd Certification Program and/or a federally approved state CWD certification program and are currently in compliance with all quarantines and/or restrictions related to that program.
- 2) **Cervid Movement** – Facilities participating in the RHSA DDP Program will be closed to the importation of live cervids (except as noted in Measure #2a) until such time as there is a federally approved live animal test for CWD. Participating facilities will ensure that, to the best of their ability, all live cervids leaving their facility are tested for CWD when they die or are slaughtered, euthanized or harvested (see Measure #3a below).
 - a) **Catastrophic Loss & Herd Replenishment** – Herd replenishment may be necessary when herds are harmed by a natural disaster (i.e., fire, or storms), health issues (i.e., EHD, Pneumonia) or other unplanned events or death losses where a significant amount of the cervids die unexpectedly. In the event a facility participating in the RHSA DDP Program needs to restock or add new cervids, these new cervids can only come from:
 - i) other facilities operating in full compliance within the RHSA DDP Program requirements,
 - ii) facilities not operating in full compliance with the RHSA DDP Program requirements that can document their compliance with;
 - (1) Measure #1 for at least the last 10 years, and
 - (2) Measure #2 regarding incoming cervids for at least the last 5 years,
 - iii) or, a combination of the above and/or other measures that are approved by the RHSA with recommendations by the advisory committee or impacted state wildlife agency.

Prior to restocking any new animals, an application for the use of Catastrophic Loss Clause must be submitted and approved by the RHPA board. Documents required:

- (1) Reason for replenishment including explanation of impacts on the facility/herd
 - (2) Past 5 years documentation of herd size and annual death losses
 - (3) History of CWD test results for all mortalities for the past 5 years
 - (4) Replenishing farm documentation for the past 5 years including:
 - (a) USDA/State CWD Herd Certification
 - (b) Verification of compliance with CWD testing of all cervids 12 months and older that die
 - (c) Documentation of annual herd inventories to include live animal shipping records
 - (d) Review of perimeter fencing (with documentation) to ensure compliance with the Deer Protection Program (including double fencing if the facility is within 30 miles of a confirmed CWD positive cervid)
- 3) **Continual CWD Monitoring** – All facilities participating in the RHPA DDP Program must maintain current Federal CWD testing protocols and records (or Federally approved state CWD testing protocols) on all cervids that die or are culled 12 months old or older which designates a “low risk status” or comparable designation within the Federal/State CWD herd certification program standards that indicates no occurrence of confirmed CWD positive animals from the facility.
- a) All cervids that are transferred or sold from a facility participating in the RHPA DDP Program must be transferred under a RHPA approved contract/sales reporting form stating that the receiving facility will, to the best of their ability, test all cervids received for CWD when they die or are slaughtered, euthanized or harvested. Such contract will also require the receiving facility to report back annually to the participating facility regarding the status of the cervid received.
 - b) The RHPA approved contract/sales reporting form for each animal transferred or sold from a facility participating in the RHPA DPP must be provided to the RHPA DPP administrator. Annually a copy of the final pathology report verifying CWD was not detected for each animal moved must also be submitted to the RHPA DPP administrator until all animals sold or transferred are accounted for.

NOTE: Measure #3a of the RHPA DDP Program is included to ensure that all cervids from facilities participating in the RHPA DDP Program are tested for CWD when they die. While it is understood that cervids can die on a facility and never be located (especially on larger facilities), it is also understood by the facility participating in the RHPA DDP Program and, by contract, the receiving facility that the specific cervids in question are to be tested if they are killed or harvested and “to the best of their ability” if they die of natural causes or otherwise and can’t be located. Therefore, the phrase “to the best of their ability” is to be used sparingly and out of necessity rather than out of convenience or for financial reasons.

- c) Facilities participating in the RHPA DDP Program must maintain records of the following information when selling or transferring live cervids:
 - i) Official identification tag numbers of all cervids sold or transferred.
 - ii) Name, address, and contact information of the receiving facility.
 - iii) Receiving facility’s ID Premises Number.

- iv) Date the cervids were sold or transferred and the date they were moved.
- 4) **Additional Facility Inspections** - Facilities participating in the RHSA DDP Program submit to an annual inspection by an accredited veterinarian. The accredited veterinarian will be responsible for documenting (through the use of the "RHSA Scent Manufacturers Deer Protection Program Facility Inspection Form") that the participating facility is complying with the requirements of the RHSA DDP Program. If possible and at no additional expense to the participating facility, a representative of the state veterinarian office will be invited to participate in these inspections. Among other things, this documentation will include;
- a) A check of paperwork confirming that the cervid facility is in good and current standing with all State and Federal testing programs.
 - b) A review of annually-reconciled herd inventories. This review will document that at least 20% of the animals were checked and verified that they match annual census paperwork and an overall headcount will be conducted to help verify the inventories/paperwork match.
 - c) The performance of an onsite verification of herd health.
 - d) The performance of an inspection of facility shipping records including a reconciliation of live cervid shipments and the results of their subsequent CWD tests as required in Section #3a above (once the animal is euthanized, harvested or dies).
 - e) The performance of a perimeter fence inspection to ensure that it complies with Item #7 below and that it is capable of preventing the ingress / egress of cervids.
 - f) A review and verification to ensure that the facility has all appropriate CWD certification documents and that they are current.
- 5) **Physical Herd Inspection** - Every third (3rd) year the participating facility will have all cervids over 12 months of age physically inspected for tag identification and verification and overall health of the herd. This will be conducted by an accredited veterinarian during the tuberculosis reaccreditation testing process. Participating facilities which are not in the tuberculosis accreditation program must have a comparable physical inventory status herd certificate every third (3rd) year.
- 6) **Urine Testing / Screening** – Every lot/batch of cervid collected urine used in scent products will be tested by a qualified RHSA approved laboratory for the presence of chronic wasting disease prions via the Real Time Quaking Induced Conversion (RT-QuIC) assay and determined that no prions are detected in the product prior to distribution by the manufacturer. No product containing untested urine manufactured prior to this requirement may be distributed by RHSA DPP scent manufacturers after December 31, 2021. Detailed records must be kept by the scent manufacturer including test result(s) for every lot of urine used in each lot/batch of finished product. CWD Evolution is currently the only RHSA approved laboratory to conduct this testing. Testing technology developments and/or additional qualified laboratories will be considered in the future and subject to RHSA approval.
- 7) **Advancing the Science** – Facilities participating in the RHSA DDP Program are committed to supporting the advancement of sound science related to CWD. Options for involvement include supporting research for live tests, urine tests, vaccines, supporting the CWD Alliance or other causes or research to advance knowledge and the science relating to CWD.
- a) In the case of any voluntary experimental testing at or on a participating facility, it is understood that any test results or findings from these types of experiments or testing would have to be verified/proven before any resulting actions are taken against the urine collection facility.

- 8) **Facility Management** – Facilities participating in the RHSA DDP Program within a 30-mile radius of a confirmed CWD positive cervid will maintain a minimum 8-foot double fencing around the perimeter of the facility. Facilities seeking to participate in the RHSA DDP Program which are within a 30-mile radius of a confirmed CWD positive cervid which do not yet maintain a minimum 8-foot - double fenced will be allowed a phase in period not to exceed 12 months from the date that a CWD positive cervid was confirmed within this 30-mile radius. For participating facilities that are currently not within this 30-mile radius of a confirmed CWD positive cervid, this double fencing measure is “recommended” but not required.
- 9) **Loss of Program Status** – The following will be reasons for expulsion from the Program.
- a) The occurrence of a CWD positive animal.
 - b) The loss of State or Federal certified status.
 - c) Failure to comply with these additional measures.
 - d) Failure to maintain membership in the Responsible Hunting Scent Association.
 - e) RHSA may reinstate an expelled Program participant if the cause or resulting impact of noncompliance does not put the integrity of the program at reasonable risk.
- 10) **New Participants in the RHSA DDP Program** - New facilities wishing to participate in the DPP Program must document compliance with the requirements of the RHSA DDP Program for at least a 12-month period prior to entering the RHSA DDP Program. Additionally, New Participants also are required to have maintained a closed herd for at least 5 years prior to entering the program or have acquired animals from a CWD certified facility that itself was closed for at least four years prior to receiving animals and were then held in compliance with the requirements of the RHSA DDP Program by the applicant for at least a 12-month period prior to entering the DPP Program.
- Provided, however, that current DPP members in good standing may expand or subdivide an existing herd and facilities currently participating in the program and shall not be treated as a new participant as defined in this paragraph. Expansions or subdivision of a DPP member in good standing, however, must maintain and adhere to all DPP program requirements, including herd closure requirements, governing the parent DPP member.
- 11) **Program Review** - Because of both known and unknown potential for expenses, hardships and consequences, the participating scent manufacturers, urine collection facilities, partner groups (retailers and state wildlife agencies) and the Oversight Advisory Working Group will review these requirements annually.

Appendix A below

RHSA Deer Protection Program

Appendix A

Implementation & Oversight Plan

Implementation of the RHSA Deer Protection Program includes the official approval of Program Participants; outreach and assistance for RHSA Members; and outreach to Hunting Scent Retailers and Consumers.

Program Participant Approval:

Program Participant approval will be made annually based on either initial program application or upon annual request for continued participation. Initial approval will occur during the first year following application to the program. After initial approval, approvals will be made annually following a request for continued participation and after inspection and approval of annual requirements.

Initial Program Application

Program Participant approval for urine providers will be based on existing documentation and RHSA staff inspections (or an inspection by an approved alternate – see #10 below). The existing documentation required for approval will include:

- 1) Written documentation from the facility owner that the facility intends to contract with a veterinarian who is accredited in their state to perform an inspection of the facility sufficient to complete RHSA Deer Protection Program Annual Inspection Report (attached).
- 2) CWD Certification documents sufficient to show that the facility is in compliance with the APHIS Herd Certification Program and/or a federally approved state CWD certification program and that the facility is currently in compliance with all quarantines and/or restrictions related to that program.
- 3) Written documentation from the facility owner acknowledging that the facility is closed to the importation of live cervids (unless the facility has suffered a catastrophic herd loss).
- 4) If the facility has suffered a catastrophic loss since January 1, 2015, or has imported live cervids since January 1, 2015, documentation of RHSA approved application for the imported cervids.
- 5) Documentation that the facility is complying with Federal CWD testing protocols on all cervids that die or are culled which are 12 months old or older.
- 6) If the facility has exported live cervids, documentation of where the animal was transferred to.
- 7) Written acknowledgement from the facility owner that any future live cervid transferred from the facility will include an obligation (as a part of the sales/transfer contract) that the receiving facility (to the best of their ability) will test transferred animal for CWD when that animal dies, or is slaughtered, euthanized or harvested.
- 8) Documentation of annual herd inventories and any live animal shipping records.
- 9) Review of perimeter fencing (with documentation) to ensure compliance with the RHSA Deer Protection Program (including double fencing if the facility is within 30 miles of a confirmed CWD positive cervid).
- 10) An “alternate” for documentation inspection or on sight inspection by an RHSA staff might include a similar inspection by a scent manufacturer who is a Participant in the RHSA Deer Protection Program that operates independently from the urine provider being inspected or other designated proxy.

Program Participant approval for scent manufacturers which are not urine providers will be based on existing documentation and RHSA staff inspections. The existing documentation required for approval will include:

- 1) Written acknowledgement from the manufacturer that the cervid urine used for their products comes only from urine production facilities participating in the RHSA Deer Protection Program.
- 2) Written acknowledgement from the manufacturer that they will maintain a file on their urine providers which includes the documentation required for those facilities to maintain their Participant status in the RHSA Deer Protection Program.
- 3) Written acknowledgement from the manufacturer that they will allow RHSA staff to review their documentation at a level sufficient to ensure compliance with the RHSA Deer Protection Program.
- 4) Written disclosure of, if any, or acknowledgement that the manufacturer does not own operate or have a family or similarly close relationship with owners or operators of a cervid facility.
- 5) If Participant owns, operates, or has any similarly close relationship with any live cervid facility, approval of scent manufacture participation requires that facility must either be an approved program participant under collection facility program requirements, or submit an annual signed inspection report from a state accredited veterinarian verifying that said facility does not, and is not set up for, any cervid urine collection.

Program Participation Annual Renewal

Participant approval for urine providers after initial acceptance into the Deer Protection Program, will be based on maintaining all required documentation and current RHSA membership including annual inspections performed by a veterinarian who is accredited in the state where the facility is located sufficient to complete RHSA Deer Protection Program Annual Inspection Report. A copy of the completed Annual Inspection Report (including copies of CWD certification documents) must be provided and approved by the RHSA.

Participant approval for scent manufacturers after initial acceptance into the Deer Protection Program, will require that the manufacturer ensure that their cervid urine providers are current participants in the RHSA Deer Protection Program. The scent manufacturer will maintain a file on their urine providers which include the annual RHSA/DPP certificate for those facilities to maintain their current Participant status in the RHSA Deer Protection Program. Annually, the scent manufacture will provide the RHSA the following:

- 1) Written acknowledgement from the manufacturer that the cervid urine used for their products comes only from urine production facilities participating in the RHSA Deer Protection Program.
- 2) Written acknowledgement from the manufacturer that they are maintaining a file on their urine providers which include the annual RHSA/DPP certificate for those facilities to maintain their current Participant status in the RHSA Deer Protection Program.
- 3) Written acknowledgement from the manufacturer that they will allow RHSA staff to review their documentation at a level sufficient to ensure compliance with the RHSA Deer Protection Program.
- 4) Written disclosure of, if any, or acknowledgement that the manufacturer does not own operate or have a family or similarly close relationship with owners or operators of a cervid facility.
- 5) If Participant owns, operates, or has any similarly close relationship with any live cervid facility, approval of scent manufacture participation requires that facility must either be an approved program participant under collection facility program requirements, or submit an annual signed inspection report from a state accredited veterinarian verifying that said facility does not, and is not set up for, any cervid urine collection.

Program Oversight

The RHSA will maintain documentation for each approved Participant in the RHSA Deer Protection Program. The RHSA will maintain an Oversight Advisory Working Group with representation from state wildlife agencies and other hunting industry leaders to ensure transparency regarding program implementation and Program Participant approval. The RHSA will work with Program Participants to ensure that appropriate levels of confidentiality are maintained.

2021 Early Phase In for Archery Trade Association Deer Protection Program (ATA DPP) participants into the Responsible Hunting Scent Association Deer Protection Program (RHSA DPP)

During 2021 the administration and management of the Deer Protection Program is being transitioned from the Archery Trade Association to the Responsible Hunting Scent Association. During the transition and until the 2021 Annual RHSA DPP Renewal on April 1st, 2021; qualified RHSA members can temporarily be recognized RHSA DPP participants upon demonstrating they are meeting all requirements of both the ATA DPP and the RHSA DPP, by providing verification of current ATA DPP approval(s) valid until March 31st 2021, having a current RHSA membership, and by being approved by the RHSA. Additional documentation may be required by the RHSA to ensure all requirements of the RHSA DPP are being met. Upon the RHSA DPP annual renewal on April 1st 2021 and at all future RHSA DPP annual renewals, approval will be based on meeting the most current requirements of the RHSA DPP and approval by the RHSA.

The Responsible Hunting Scent Association and the Archery Trade Association are independently operating associations and any approvals or certifications from either association are with that respective association and not part of or with the other.

For information about the RHSA Deer Protection Program contact:

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