

## Damaged Science

EHD outbreak summer 2021. The stench of death came in waves as I walked my property which led to me contacting the North Dakota Game and Fish in an attempt to assist with “engagement from stewards of the land.”

EHD was slaughtering yet attention was all about CWD.

We made calls to North Dakota Game and Fish in May 2022, messages left and no return call. May 20, 2022, a certified letter with formal questions, was then sent to Mr. Williams, Director and Mr. Peterson, Deputy Director, in an attempt to get responses to our questions. A response letter was returned June 6, 2022, from Mr. Bahnson, DVM.

The questions that were posed included:

statistics for CWD cases, testing methods, lineage to CWD research being utilized by NDGF, nutrition programs, and funding of research.

It was the **statistics** portion of the responses that got my attention along with **research** and **nutrition** on CWD.

After reviewing the responses to my questions, I then requested to be on the CWD task force that is working on the revised plan. I later found out that the timing of this task force was due to federal Bill HR-5608 which became SB-4111 (\$420 million) in which the USDA would appropriate grant funds based on Best Management Practices which is the AFWA. Therefore, the NDGF must use the AFWA, which is federally funded, to receive monies.

SB-4111 is centered on research and management that states:

the more positive cases, the more money received, new outbreak areas, more funds allotted, stronger management plan, more money given.

See the circle appearing?

<https://www.congress.gov/bill/117th-congress/house-bill/5608/text>

Obviously, I was denied a position on the North Dakota CWD task force due to, “the task force is made up of Department employees to research into other states plans..”

Inter-department task force, huh. The circle tightens. The second part of the NDGF answer made more sense when I had asked if they had conducted North Dakota CWD research and the answer was, “No”.

**Statistics:**

No where in any of the NDGF publications, are the CWD statistics available for the public in simple terms.

Testing for CWD, in North Dakota, began in 2002.

First detection in 2009.

Baiting restriction implemented in detected unit in 2010 (unit 3F2)

40,000 deer have been tested and the majority are deer that hunters harvested so certainly, they were healthy harvested deer.

70 deer have tested positive (over 20 years).

1 deer was found dead in a row of trees (reported) and tested positive. It was deemed death by CWD because it had an empty stomach therefore, speculation cause of death.

Because of this one speculated death by CWD in 2019, the NDGF, USFW and wildlife groups, swooped into Williston, ND and slaughtered 50 deer to test and all were negative for CWD. The meat was then discarded.

20 years of testing  
40,000 deer tested  
70 positive tests  
0 confirmed Death by CWD  
50 deer slaughtered by Agencies

While attending three of the 2022 CWD meetings (Fargo, Dickinson, Minot), not once did the NDGF say the number 70 positives yet were quite diligent to mention numbers out of Wyoming and Colorado.

Side note: at these meetings, attendees were instructed to not speak during the presentation yet would be allowed at the conclusion, to approach NDGF personnel individually, with questions. Why can't questions be posed to the entire group at a public meeting? Is this why there were 15 NDGF personnel at the Fargo meeting with only 40 public in attendance? 28 in attendance at Dickinson and 10 NDGF and Minot had 13 NDGF with 36 attendees. (page 87 in the AFWA states that agencies should ensure openness, honesty, and transparency)

Why is the NDGF abandoning unit 3F2 after pounding that area for over 10 years and now focusing on the northeast region? Could it be a "new outbreak area" which has trails back to SB-4111?

**Research:**

By now it is clear that the NDGF have **no** personal research projects that pertain to North Dakota and rely fully on the use of the AFWA document.

Association of Fish and Wildlife Agencies, Washington D.C. (AFWA).

Put together in 2017 yet most of the pieces are from early 2000s. As indicated, the entire nation uses this Government document: (link and statement is from NDGF site) *'This is a common sense approach, backed by robust science and used by wildlife management agencies across the country'*

111 page document compiled by 30 federally funded entities and full of opinions.

I can strongly state this by looking at the 162 times words such as: apparent, appears, believed, can, can be, could, could be, could potentially, have been shown, have the potential, implicated, indicates, likely, likelihood, may, may not, might, most, most likely, possibly, potentially, probably, reasonable to infer, suggests, suggesting, typically, unlikely and widely considered, appear.

These are words of opinion, not science.

Since the NDGF are bound to the AFWA document, it does make methods of decision making for the ND herds and people a bit clearer. Although the AFWA is a bit more translucent than clear, due to being outdated, full of opinions, and solely federally funded of ideas of prevention, surveillance and management represented.

For instance, questioning if a deer can live with CWD and for how long:

Page 6 Paragraph 1 AFWA

A long incubation period (16-18 months to 5 years or longer for some genotypes of deer and elk) between acquiring the infection and showing clinical signs.

(2014)

Mr. Bahnson NDGF DVM, "Deer die with 12-22 months of acquiring CWD and it is always fatal" (Fargo CWD, 8/2022)

Yet current research states:

CWD incubation period is 17 months to over 4 years, which is long enough that most animals die from hunters, predators, or cars before they get to the point of lameness caused by CWD. <https://anilogics.com/stop-the-cwd-madness/> (2017)

2023, live, privately funded research states this:

Deer are living to 9 years old with CWD and die of old age. (2023, ACW)

**NDGF seem to look at the document and pick which "management" practice would best be tolerated by North Dakota.**

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When I requested the lineage to the direct peer-reviewed research that lead to the management practice of restricting baiting, I was given a link to 420 studies. I then asked for the specific study that the NDGF felt was the heavy weight to their decision to place a baiting restriction, a response was not received.

**There is no published scientific data regarding the risks of CWD transmission associated with supplemental feed** (<http://www.americancervidalliance.org>)

Then I looked into the avenue of genotypes to manage CWD.

Page 4 paragraph 1 (AFWA 2014)

Some genotypes, currently believed to be rare in wild populations, may exhibit varying incubation periods; however, no genotype is fully resistant.

Mr. Bahnson, NDGF DVM *Your Talk Radio* 10/19/2022. CWD Genetic Work.  
“I don’t put a lot of faith in genetic evolution as a way to address the disease”  
(9:30)

“Not a super useful tool” (10:20)

“No faith in a long term solution” (10:35)

“There is value in looking at it but I wouldn’t hang my hat in that exclusively.”  
(13:03)

Current research:

“Genome Resistance is working. We have a ranch that is working with us, that follows the same protocols and substances. They took a section of their hunting ranch, which was getting CWD positives of 60-70%. They cleared out the area, put in the proper resistant deer and in a totally contaminated area of CWD, left them for 2 years. As of now, every deer is still CWD negative. The genome study we are working on is proving to be 100% successful.” (ACW, 2023)

**Again, there is a huge resistance, by the NDGF to go beyond the AFWA no matter what.** Yes, we attempted to share our findings with the NDGF and were shut down time and time.

**I have come to the conclusion after hundreds of hours of personal research by which most is driven and funded by private funds and non-federal entities, that the AFWA is ineffective:**

A review of the literature based on recent data, rather than predictive models, clearly shows that any past combination of quarantines, containment zones, surveillance zones, depopulation, elective harvest, increased harvest limits, supplemental feeding bans, baiting bans, bans on the importation of live cervid species, bans on the importation, of carcasses, bans on the importation of trophies, and bans on urine based lures, *have not* been effective in preventing, controlling, or eradicating CWD in any State.

These programs have cost in excess of \$100,000,000 of public funding and the killing of thousands of deer without any measurable positive results. ([www.americancervidalliance.org](http://www.americancervidalliance.org))

### **Nutrition:**

My final question to the NDGF was if they have researched, studies or implemented any nutrition programs that relate to CWD. The answer: The Department has not.

CWD is a prion disease so that seemed to be the key word to start searching as to how this disease works.

In my conversation with Dr Larsen, Assistant professor in the Department of Veterinary and Biomedical Science, University of Minnesota, and MINPRO, he explained that prions are like a Slinky and at the end are hooks that carry copper and various body tissues. The prion goes to the liver and picks up copper. When copper is low, or manganese is high, the manganese gets stuck in the hooks and causes the hooks to bend with each ends folding in (misfolded prion). These hooks will stick to normal prions and knock off the copper ions off. The manganese will now replace the copper as it duplicates and the process starts over as misfolded prions. These hooks latch together and form chains with hooks sticking out which tears holes in the brain, that are the *trademark of CWD*.

Therefore, a copper deficiency is a major issue with the formation of CWD

Additional hours of conversation with private entities in Texas exposed that there are over 25 years of private funded research topics that prove that inadequate nutrition is a catalyst for CWD, and proper minerals have been proven to stop CWD.

The House Energy and Natural Resource Committee was able to hear testimony from one of the largest deer farms in the United States that realized these same mineral deficiency facts and have been performing live researching with Humic Acid to provide nutrition to the soil and deer. The success has been noted and they are stopping the progression of CWD in deer and destroying the CWD prion in the ground. They are developing herds that are 100% CWD genome resistant. They are in the midst of the required 5-year research stint and will soon be publishing their findings. Again, another private funded project.

The current Management choices for the NDGF is: restrict the hunter when they are about to pull the trigger to harvest a deer that is standing over supplemental feed, carcass moving restriction and more testing. What do any of these restrictions do FOR the herds of North Dakota?

The hypocrisy of the baiting restriction, entirely because of CWD spread, is mind blowing:

Currently, one can place supplemental feeding anywhere, any amount, any way and any time they want yet, in the restricted units (9 have CWD detections and 20 have been restricted because they are within 25 miles) you cannot HUNT OVER the feed. So, for the split second that you pull the trigger to harvest a deer, it is illegal to have feed out for the deer, all in the name of spreading CWD?

How about we supplement FOR the deer of North Dakota?

How about we actually look at the research that is outside of the tunnel vision of the National Agencies and see that nutrition and genome avenues are working?

I have to wonder, if there was a grant for the Wildlife Agencies to distribute or encourage nutrients, would that change the narrative? My gut and research says, yes.

CWD is not devastating the deer herds of North Dakota. It is not going to. Deer are not born with CWD, they get it from the landscape and we obviously have some soils inadequacies and there is an answer- humic acid and minerals (copper). Harsh winters, predators, depleted terrain, car accidents, and EHD take far more of the ND deer population than CWD has and ever will.

Test to your hearts content, NDGF. You will find positives because the deficiencies are out there on the terrain yet the deer are not dying from CWD.

**There is not one confirmed DEATH BY CWD in the nation.**

Even the NDGF can agree with me on this. It is time to do what the motto of the NDGF says and ‘protect the herds’ and the methods would be way more successful if they would work WITH the people of North Dakota instead of in-sighting restrictions TO the sportsman of North Dakota.

The sportsmen are the greatest stewards of the land and they are NOT seeing what the NDGF are telling us we should see in regard to CWD.

How about North Dakota be the state that is about NUTRITION and IMMUNITY for the herds.

In SUPPORT of HB1151

-Pat Backer, Center, N

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