

Impact assessment – draft amending the CWD Regulation

Many of the rules are a continuation of current rules or an implementation of Decision (EU) 2016/1918. The following impact assessment focuses only on new or more stringent clauses.

Authorisation requirement for movement of semi-domesticated reindeer between counties

The authorisation requirement for movement of semi-domesticated reindeer between counties in Norway, including previous exemptions, is continued. New limitations on the movement from south to north in Norway (see border within Norway indicated in new Annex 2) is introduced. The border is drawn in the centre of the country where natural waterways separate semi-domesticated reindeer and where there is minimal mixing of reindeer herds. The limitation may have consequences for the movement of semi-domesticated reindeer that does not happen in connection with grazing or slaughter e.g. the moving of reindeer in connection with marriage or where reindeer are given as gifts. When these consequences are compared with the enormous economic and cultural consequences the spread of CWD will have for those in the reindeer industry, a restriction on the movement of reindeer in these few cases is seen as small.

Prohibition on the movement of other live cervids than semi-domesticated reindeer between counties in Norway.

The ban will initially effect the farmed deer industry, especially those that use deer from other parts of Norway to avoid inbreeding. After meeting with the industry in October 2016, we have understood that part of the industry organizes operations so as to avoid both the use of captured wild deer and relocated bucks from other counties. The fact that parts of the industry rely on captive wild deer from the surrounding areas and the movement of breeding animals over long distances, means that the infection status of farmed deer herds will be uncertain. There will also be numeral contact herds which could have serious consequences if CWD is detected in a herd. The FSA considered a ban on the capture of wild deer, but this could be very restrictive when parts of the industry is based on the capture of wild deer. When it is clear that some parts of the industry are able to organize themselves without moving the deer between counties or moving deer from south to north across the border in Annex 2, the consequences could be reduced by the individual operators through planning. Compared with a spread of CWD to large parts of the industry through the movement of cervids, it is a minor consequence to prohibit the movement of farmed deer. The ban could effect those parts of the industry that are unable to reorganize their operations. Those who choose to take in deer from neighboring counties will not be able to move deer out of the herd for five years, except where the animals are sent directly to a slaughterhouse. However, we have understood that some farmed deer operators also have their own slaughterhouses. The restriction on moving deer from the receiving herd should help to prevent the rapid spread of the disease to other herds.

Prohibition of feedingstations and use of lick stones for wild cervids in Norway.

The current prohibition is extended to the whole of Norway, with exemptions where the FSA may authorise feeding if strict requirements are fulfilled.

Lick stones for wild cervids are primarily used to attract the animals, not because of nutritional needs. The ban should therefore have no welfare consequences for animals. Lick stones for wild cervids have also been used during hunting or where people want to attract cervids e.g. in order to take pictures. The financial consequences in relation to hunting and small businesses are considered small.

The feeding ban could lead to damage to forests and other fodder that is left out (such as easily accessible hay bales), as the animals will search for feed where available. The ban can therefore provide economic consequences for some farmers and the forest industry. When the ban is extended to the entire country, the ban will have consequences for even

more than before. At the same time, herds of cervids are in some places larger than naturally sustainable, and the problems (re. bales and plantations) can be alleviated by reducing the numbers of cervids. Lick stones and feeding places are highlighted by scientists as one of the biggest risks for spreading the disease, and the ban should therefore be expanded to the whole of Norway. Even after extensive testing in 2016 we still do not know enough about the prevalence of CWD in Norway and can not define any areas or populations of cervids as free from CWD.

The feeding ban is a measure to prevent the spread of the disease. The ban also has a road safety element to it as CWD effects the sight of infected cervids. It is therefore more probable to find CWD in road kill and dead wild cervids. Feed and licks for wild deer are used partly to lead the wild deer away from roads and railway tracks. Many consultative bodies commented on traffic safety during the consultation of the draft CWD Regulation summer 2016 and December 2016. The Environment Agency has given FSA advice when it comes to the feeding of wild cervids. The Environment Agency has repeatedly stated that the feeding of wild cervids also increases populations, thus increasing the risk of accidents. In December 2016 the Environment Agency commented that the aim of feeding cervids can be to increase or congregate cervid populations and this may be related to hunting or other issues concerning the cervid population. Feeding can also have the objective of diverting cervids from roads and railways in order to prevent collisions, alter land use and reduce damage to forests. The Environment Agency wrote that "Achievement varies with different factors and is not scientifically clear ... Many feed cervids to reduce the number of collisions, but there are few who have directly studied the effect of feeding on collisions. Feeding to keep deer from roads and railways are often carried out in combination with other measures. This is one of the reasons that there is little knowledge about the effects of the feeding itself. In the areas that are engaged in extensive feeding in Norway, we can not predict the effect of stopping feeding." The last consultation statement from Environment Agency refers to the importance of the number of animals hunted when it comes to road safety, "The number of traffic accidents with cervids correlates with the population size. In Norway, it is primarily the killing of deer through hunt that regulates the population size. We can therefore assume that the number of hunting licenses in combination with the number hunted can affect the number of collisions over time. The possibility of increased populations as a result of the winter feeding will in such circumstances probably be of less importance when compared to the number of animals killed during hunting." The Environment Agency shows then that "An increase in number of animals killed during hunting can occur in several ways, for example through the intensification of hunting, more hunters or through increased quotas. The municipality determines the minimum number of moose, deer and roe deer that may be hunted, and approves plans (which has a bearing on how many animals may be killed). Both municipal game management and property owners who prepare plans may consider the need for an adjustment in the light of a revised CWD regulation ". The FSA therefore believes that the expansion of the feeding ban entails that the municipal wildlife management and land owners in the country must consider existing plans, and possibly revise the plans to reduce the number of wild cervids to be adapt to the natural grazing areas available. A reduced cervid population will also lessen the consequences of the feeding ban with regards to road safety. Increased hunting will have an economic impact on landowners and municipalities. Those selling hunting experiences will earn less when the number of cervids is reduced. On the other hand, the number of cervids will decrease in the long term if CWD spreads.

For more information on consequences related to the feed and lick stone ban, please see the VKM-report: <http://vkm.no/dav/66fc31f0ba.pdf>

and the letter published by the FSA in connection with the consultation of the draft regulation:

https://www.mattilsynet.no/dyr_og_dyrehold/dyrehelse/dyresykdommer/skrantesjuka_cwd_/horingsbrev_endring_av_cwdforskriften.25952/binary/H%C3%B8ringsbrev:%20Endring%20av%20CWD-forskriften

Requirement concerning feed for semi-domesticated reindeer and farmed deer

Instead of continuing the ban against laying out feed for semi-domesticated reindeer (in seven counties) the draft replaces it with a requirement that semi-domesticated reindeer (in the whole of Norway) are fed in a way that ensures that wild cervids can not access the feed. We understand that feeding can happen where the animals are fenced in and that it is otherwise possible to portion out and distribute the feed so that it is consumed quickly. It is also possible to lay out the feed in lines so that the reindeer get fed at the same time. The reindeer industry must consider how this can be done in the best possible way. The industry has a vested interest in preventing that CWD spreads to semi-domesticated reindeer, and the industry should strive to ensure that residues do not remain after feeding. The FSA therefore concludes that the negative consequences of the new requirement should be limited, although feeding way will be more laborious. The new requirement should be easier to handle than the ban that currently applies in seven counties.

The draft also introduces the requirement that farmed deer should be fed in a manner that ensures that wild cervids can not access the feed in the whole country. Farmed deer should be in walled areas in which the operator can survey the feed that is laid out. The consequences of the requirement should therefore be small for that industry.

The new requirement that the semi-domesticated reindeer and farmed deer from areas without CWD should not be fed with forage gathered from areas with CWD, is extremely relevant. Likewise for the prohibition on feeding such reindeer with fodder from areas south of the border specified in Annex 2 for use north of that border. Today reindeer lichen is collected from southern Norway and Finland is used as feed for reindeer in northern Norway. If CWD were to spread to northern Norway, where the reindeer industry is dominant, the economic and social consequences would be enormous. It is important that feed that is gleaned from other areas than where the animal normally graze comes from areas without CWD. The areas can not be pre-defined, because new CWD cases may be detected in new areas. When the new Zone regulation is established, "areas with Chronic Wasting Disease" will in general be interpreted as zones in the Zone Regulations. If CWD is discovered in a new place in Norway the zone regulation will have to be amended, but this may take some time. The new discovery site and surrounding municipalities, will also be considered as "areas with Chronic Wasting Disease" before the regulation is updated. The feed, e.g. reindeer lichen, must comply at all times with the information on where CWD is discovered. The FSA regularly updates information on CWD findings on the Authority's website. The information is therefore easily accessible and the requirement should not lead to much additional work for the reindeer owners.

Duty to notify

An extended duty to notify the FSA of sick and dead cervids is not considered to have any significant consequence. The notification can be done very easily by notifying the FSA via an electronic form on the Internet or by contacting the FSA by phone.