

## **Impact assessment – draft Zone Regulation**

### *Prohibition on the movement of live cervids out of the zone*

Consequences of the ban for reindeer should be small because of the exceptions concerning grazing and moving directly to slaughter. Moving of semi-domesticated reindeer in other situations is rare e.g. reindeer given as a gift. The consequences will therefore be small when it comes to semi-domestic reindeer. The consequences will be greatest for those wanting to move deer out of the zone e.g. operators with farmed deer. The Norwegian Food Safety Authority (hereafter abbreviated to FSA) is aware that some farmed deer businesses have slaughterhouses, and we hope that the industry inside the zones can organize themselves so that the ban has minimal consequences. The FSA believes that the ban will only affect a few businesses in the zone and the consequences will therefore not be great.

### *Prohibition on the movement of whole or parts of dead cervids out of the zone*

The Norwegian Veterinary Institute needs to get test material, and in some cases whole carcasses, out of the zone so that the analysis can be performed in the laboratory. This may also apply to other research institutions, e.g. NINA. This is taken into account in the draft through an exception so that the impact of the ban for research facilities should be limited. The same applies to by-products that are removed from the zone for disposal in agreement with the FSA.

The prohibition to take carcasses and offal from the mountainous regions of Northern Mountains Zone will have some consequences. Because the hunting of wild reindeer takes place in the mountains and all that is transported out of the mountains, often needs to be carried, hunters do not always take more than edible parts with them. This is especially true in areas far from roads. In other areas, where roads are within a reasonable range, whole or parts of the carcass are carried or transported to the road by the hunter or with the use of a horse or motorized vehicle. Further cutting and deboning of meat usually takes place in the mountains, in areas bordering to the mountains or outside the defined zone.

It is possible to debone the meat at the hunt site, and we believe that this is the best solution for reindeer hunted in the mountainous area of the Nordfjella Zone. This is because CWD positive animals have been found in this specific area, and it is preferable that the least amount of hunted animals leave the mountain. However, we see that this is not always viable. We therefore propose that cutting and deboning may be in a different place than the location the animal was shot, but still within the mountainous area. In this way it can be prevented that by-products are left in the lowlands (still within the Nordfjella Zone) and potentially infect cervids in the border zone around the Nordfjella wild reindeer range. The consequences of the ban for reindeer hunters but should still be feasible even though the hunt will be more laborious for some. In comparison to the risk of spreading CWD, the benefits of the ban should quite big. For those who usually carry the whole carcass down to the lowlands to cut down the carcass, this ban entails major consequences. It will on the other hand be possible to bring the whole carcass out when negative test results are available. This means that hunters in some cases must expect to wait longer than usual before they travel to the lowlands with the carcass. Currently, results from CWD tests are usually delivered within a few days. We therefore believe that the ban should not entail any significant financial consequences.

For deer hunting in the area around the bare mountains in Nordfjella and in Selbu area, it will not lead to serious economic consequences to refrain from taking the offal and carcasses out of the relevant municipalities. In some cases, where the hunt took place in a zone-municipality and hunters want to handle/dress the carcass in a municipality outside the zone is desired, this must be reorganized so that it is carried out within the zone. We consider that this is feasible, and thus will not result in serious economic consequences for the hunters. It

will be possible to bring the whole carcass out of the zone when negative test results are available. As mentioned above, the test results are available relatively quickly.

*Prohibition on taking lichen and plant material out of the zone to be used as feed for cervids outside of the zone*

Reindeer moss from both southern Norway and Finland are picked and used as feed for semi-domesticated reindeer in northern Norway. If CWD spreads to northern Norway and the reindeer industry, the economic and social consequences will be enormous. It is important that feed that is gleaned from other areas of the country than where the animals normally graze, come from areas with equal or better health status when it comes CWD. The requirement should not lead to much additional work for the reindeer owners. We consider that the need for feed can be met by collecting fodder from other areas than in those municipalities where CWD has been found. The consequence of a ban in a restricted area will not be very big. It is expected that the ban has no significant financial consequences.

*Prohibition on lick stones for animals*

Lick stones that are laid out result in the congregation of animals over time, and cervids can therefore be infected both by contact with other cervids and passively through contact with the infectious agent on licks and around lick stones. Cervids will be attracted by licks put out for all species of animals, including sheep. Mapping lick stone areas in Nordfjella and Forollhogna shows that reindeer and other animals congregate where licks are laid out for sheep. This represents a great risk of infection, and salt from the stones will drain into the ground and reindeer will also eat the vegetation surrounding the lick stone. The infectious agent is highly resistant and will be in the environment for many years.

It is common to send sheep and cattle out to pasture in summer and lick stones for animals grazing on the mountain primarily used to gather animals, not because of nutritional needs. A risk of mineral deficiency could be prevented by inserting a bolus in the animals before grazing season. There are bolus for both sheep and lambs. The lick ban should therefore not have any welfare or health consequences for the animals, but the bolus will entail an additional expense for the farmer. We consider that the expense will not be large in comparison to other operating expenses during the year.

The need for special licks for animals in areas with radioactivity will be so little that it can be resolved through placing licks that are not available for cervids.

There will be an exception for the use of lick stones where the lick stone is not accessible for cervids. Licks for animals on cultivated pastures will therefore not be included in the ban if the cervids do not have access to the licks. The industry must consider whether there are good ways to insure against cervids accessing licks.

The ban will not have any impact on milk goats that will return to cultivated land daily.

Licks are rarely used for horses, and there is no nutritional need for lick stones for this species. The provision therefore entails no consequences for the horse industry.

Other practical consequences of the ban are that the animals will wander over longer distances, which may make it more challenging with supervision of the animals during the grazing season. A dispersion of the animals can have both a positive and a negative effect when it comes to CWD infection. The animals will probably congregate less, but may meet animals that they otherwise would not come in contact with because they will travel further. There is also an exception for the short term placement of lick stones during controlled collection of animals. Brief use of lick stones in connection with the management of herds

can reduce the consequences of the ban.

The ban can have a somewhat limited effect in the beginning of the grazing season because the animals will seek out places where lick stones tend to be, but we expect that this behavior will diminish over time.

A ban on use of lick stones on uncultivated land and in the mountain zones will mean new licks can not be placed out this year and that existing licks must be removed or secured so that they are not accessible for cervids. This will entail quite a lot of effort in the mountain as old licks must be removed. On the other hand, these stones are in places where the farmers would have had to go to put out new licks. Licks are often transported to uncultivated fields early in the year. These are supplied in large drums with lids and the individual stones are then placed out. Elsewhere there are machines with several stones which open. In purely practical terms, it will be possible to leave the lids on the barrels and not open the machines, which entails little extra work. The burden of retrieving old licks is small when compared to the need to limit the spread of CWD and the economic impact that the spread of disease will cause.

The FSA believes that the economic consequences of the lick stone ban in the zones should be minimal.

Enforcement of the feed ban and lick stone ban will have a financial and administrative impact on the FSA. These consequences must nevertheless be compared to the financial and administrative consequences the spread of CWD has for the FSA as an emergency/contingency organization. The FSA has already spent significant resources on managing CWD the last year. The amount of resources used in the future will be even greater if the disease spreads to other areas in Norway. It will therefore require less resources to enforce the feeding and licking stone bans than to deal with a possible spread of infection.

#### *Prohibition and mandatory measures in relation to feed that can be consumed by wild cervids*

The ban in the zone regulation applies to the feed on uncultivated land if wild deer can gain access to the feed.

Feeding of horses or sheep on uncultivated land does not happen on a large scale, either in the lowlands or in the mountains. If there is need for such feeding, the feed must be secured so that wild deer can not access the feed. The burden of securing feed is outweighed by the consequences that would result from the infection of wild deer on the fringes of Nordfjella.

There are farmed deer in the municipalities in the Nordfjella Zone (about 10 companies), but these animals are kept in fenced areas where the operator can survey the feed that is laid out. The consequences of the ban in uncultivated areas should therefore be small for the farmed deer operators. The requirement to safeguard feed from wild cervids on cultivated land will have an impact for the industry. Seeing as CWD also can infect farmed deer, it is in industry's interest to ensure against infection from wild cervids. Infection can spread through the available feed, and it is expected that the industry is able to find solutions so that feed laid out for farmed deer is not available for wild cervids. We expect that the requirement will only have a small economic impact on farmed deer operators.

Feed stored on cultivated land in the zones that is visited by wild cervids, must be secured. This will have implications for animal owners in the zones. One way to ensure the feed cannot be accessed by cervids could be to fence it in, or regularly make sure that the plastic around the bales is intact. The economic consequences for farmers should be small. Feed consumed by wild cervids also has a cost which will be lower if the feed is protected better.

*Mandatory cleaning and disinfection of hunting equipment used in the zone*

Hunters often hunt in several areas and participate in several types of hunting during a hunting season. It is therefore possible that the infectious agent may be brought, through equipment, from an infected area to a non-infected area, cf. experiences from North America. It should be common practice to clean hunting equipment before traveling to another hunting area. The cleaning requirement will entail a certain effort for the hunter, but the burden is less when in the zones, than if the requirement is expanded to more areas of Norway if new infected areas are discovered. In addition, the consequence is substantially less than the general consequences if the infection is transferred to another area and new animals are infected.

*Mandatory covering of offal/by-products in left in remote areas in the mountain*

The conditions in the mountains can be such that it is possible to cover the by-products being left, for example with stones. This will provide good, infection prevention in that other animals will not have direct contact with infected by-products. Hunters must register map references for where the cervid was killed and by-product location and give information to the authorities upon request. This means that the hunter must keep track of where animals were killed and carved up. This should not be difficult for the hunters, as they will bring a map or GPS. The Norwegian Environment Agency will facilitate electronic reporting of the site where animals are killed via [www.settogskutt.no](http://www.settogskutt.no), which will make it easy for the hunter to register where the animal was killed.