

## Meeting Minutes: Advisory Committee for Farmed Cervidae Rule Amendments

Date: 09/21/2020, 1:00 p.m. to 3:00 p.m.  
Minutes prepared by: Dr. Courtney Wheeler  
Location: Virtual Meeting via Microsoft Teams

### Attendance

#### Farmed Cervid Advisory Committee Members

- Michelle Carstensen, Minnesota Department of Natural Resources (DNR)
- Kelly Anderson, Minnesota Department of Agriculture (MDA)
- Dr. Joni Scheftel, Minnesota Department of Health (MDH)
- Dr. Stephan Schaeftbauer, United States Department of Agriculture (USDA-APHIS VS)
- Rich Meech, Minnesota Deer Farmers Association
- Brenda Hartkopf, Minnesota Elk Breeders Association
- Denis Quarberg, Minnesota deer hunters
- Dr. Joel Ihnen, Minnesota cervid veterinarians
- Daryl Simon, Non-native Minnesota Cervidae species producers
- Philomena Kebec, Minnesota Tribal Members
- Amy Cordry, Member of the public
- Dan Miller, Livestock producer
- Steve Notch, Association of Minnesota Counties

#### Minnesota Board of Animal Health staff

- Dr. Linda Glaser, Farmed Cervidae Program Director
- Dr. Courtney Wheeler, Farmed Cervidae Program Director
- Annie Balghiti, JD, Rules Coordinator

## Welcome

Annie Balghiti, Rules Coordinator for the Board of Animal Health (Board) welcomed members of the advisory committee and thanked them for their participation and valuable input related to the Board's proposed rule amendments. She stated that she hoped time during this meeting would allow for more suggestions from committee members, specifically comments on areas where the Board had not considered amendments, but where committee members thought changes were needed.

Ms. Balghiti stated that we are still in the request for comments period of the rulemaking process which has been extended to October 30, 2020. She reminded attendees that the committee doesn't write rules or vote on rules, but that they represent industry partners and stakeholders who will be affected by the rules and the Board will take all comments into consideration when amending.

Dr. Linda Glaser introduced herself as the Assistant Executive Director for the Board and Director of the Farmed Cervidae Program.

Dr. Courtney Wheeler introduced herself, stating that she is a Senior Veterinarian with the Board and assists Dr. Glaser with the Farmed Cervidae Program.

## Proposed Rules Draft Review

Dr. Glaser shared a copy of the Board's proposed rule amendments draft and commented that she would like to begin reviewing at the point at which the advisory committee left off at the last meeting, which was section 1721.0420, Subp. 3, Determining boundaries of CWD endemic areas management zones in the state.

Brenda Hartkopf requested that she be allowed to comment on the Board's proposed Program Surveillance Standards and Dr. Glaser asked her to proceed. Ms. Hartkopf requested that the Board further consider the proposed impact for herds related to failure to test. She pointed out that under the current proposal, failure to test 1 animal in 20 will "take out" [reduce the status level of] over 90% of the [cervid] herds in the state. Mr. Hartkopf also requested that the Board add program surveillance standards to rule rather than enforcing them solely in policy. She added that "we [Minnesota Elk Breeders] do not want the Board to be able to change the requirements at will and we believe the program is important enough to have in rule."

Brenda Hartkopf also requested that we review 1721.0420, Subp. 2, quarantine procedures; specifically, she requested an explanation of why the Board included language that states a herd owner must depopulate if a farmed Cervidae herd is determined to be infected with or exposed to CWD. She pointed out that the language in statute refers to herds in which CWD is detected and the rule language should not include exposed herds.

Dr. Glaser responded that during the last meeting she noted that this language was written in error, assuring Mr. Hartkopf the next public draft will reflect a correction.

Ms. Hartkopf inquired if the Board will be adding back in points A, B and C under Minn. Rule 1721.0420, Subp. 2 so that it is apparent how the Board will deal with CWD exposed herds.

Dr. Glaser confirmed that the Board will add language under Subp. 2 to describe how CWD exposed herds will be addressed but wouldn't specifically be reinserting A, B and C.

Ms. Hartkopf commented that Minnesota Elk Breeders would be looking forward to reviewing the Boards added language.

Michelle Cartensen inquired if there will be specific language that talks about cleaning and disinfection, i.e. is there anything that has to happen for a CWD infected herd beyond maintaining fencing for five years.

Dr. Glaser responded that we [the Board] require disposal of potentially infectious materials and cleaning and disinfection of the enclosure to the extent possible which is in the herd plan that the producer enters into with the Board.

Ms. Carstensen inquired if the Board will propose any amendments to increase the 5 year fencing requirement based on Dr. [Jerry] Torrison's comments e-mailed to the committee related to uncertainty about survival of CWD prions in the environment.

Dr. Glaser responded that Dr. Torrison didn't provide an alternate proposed timeline and that we [the Board] will need to follow up with Dr. Torrison and the VDL [Veterinary Diagnostic Laboratory].

Brenda Hartkopf commented that 'it makes sense to coincide with USDA requirements.

Dr. Glaser responded that "that's where the 5 year timeline comes from." She added that if the suggestion is that the amount of time is variable based on multiple environmental factors, we need more concrete information before amending the time period.

Amy Cordry commented that in Dr. Torrison's memo to the committee, he does provide another number, pointing out that Scrapie in sheep was detected on land over 16 years after depopulation of the flock. Ms. Cordry insisted that numbers are available in research that is accessible. She added, "I don't think that the deer farm next to my property should be allowed to repopulate, it's putting livestock and natural resources at risk. Research should be considered."

Dr. Glaser commented that we [the Board] will look to the University for more information regarding that specific [Scrapie] study, adding that her understanding is that the results were representative of only one premises.

Philomena Kebec commented that in a previous iteration of USDA [farmed Cervidae] program standards, 3 alternatives to depopulation including movement to slaughter were discussed. She added that her organization has further discussion with USDA partners who commented that there are no testing requirements for farmed Cervidae at slaughter and therefore they cannot assure the safety of human health. Ms. Kebec continued her comments by stating that the tribes have been requesting that all animals from these [Cervidae] farms are tested for CWD before they enter the human food chain and that there is a prohibition on meat from CWD infected farms so that that may not enter the food supply. An example of existing regulations that she would consider consistent are requirements for exclusion of SRM's [specified risk in material] in cattle processed for food related to BSE [bovine spongiform encephalopathy]. Ms. Kebec added that another important point for consideration is labeling for products that are intended for public consumption. She asked that her points be generally considered by the Board, Department of Health and MDA [Minnesota Department of Agriculture].

Dr. Glaser responded to Ms. Kebec's comments stating that some of the suggestions she made are outside of the Board's scope of responsibility. MDA and FSIS [Food Safety and Inspection Service] deal directly with animals

in slaughter channels and preparation of meat for human consumption. Dr. Glaser added, “that being said, in Minnesota all animals that die or are harvested are required to be tested for CWD [Chronic Wasting Disease].” FSIS recently came out with regulations that carcasses must be retained until [CWD] negative results are received. Dr. Glaser added, however, that CWD testing is not mandated for farmed Cervidae in all states in the country. We [the Board] have not had a situation where CWD positive or exposed animals have moved to slaughter. In 2012 some animals [from a CWD infected herd] moved out of Ramsey county to slaughter and all were tested for CWD. Dr. Glaser requested that if Ms. Kebec had specific language that she thought may help the Board better address her concerns, she should please let us [the Board] know.

Rich Meech commented, addressing the length of quarantine after a CWD infected herd has been depopulated. He stated that USDA states that any longer than 5 years is “construed as a taking.” He added that, in response to the referenced 16 year timeline for environmental contamination, his understanding was that this was a Scrapie investigation adding that as far as he is aware, when flocks are depopulated in response to Scrapie, animals can immediately be repopulated on the same premises.

Dr. Glaser continued her review of the Board’s proposed amendments explaining changes to section 1721.0420, Subp. 3, Determining boundaries of CWD [endemic areas] management zones in the state.

Dr. Glaser reminded the committee that the Board proposed eliminating language previously referring to a CWD endemic area 10 miles around a CWD positive wild animal, instead inserting “The board shall determine the area of the management zone when CWD is confirmed in wild Cervidae in the state. The board shall designate the geographic areas of the state as part of a CWD management zone that are necessary to prevent the spread of CWD.” Dr. Glaser then explained the Board’s amendment that would require a herd that has been identified as included in a CWD management zone, to demonstrate that they have met requirements for preventing commingling of farmed and wild Cervidae for at least 36 months to be considered outside of the zone.

Amy Cordry inquired if this change would affect the way the DNR designates a management zone.

Dr. Glaser responded that the Board’s management zone applies only to farmed Cervidae, and the Board’s designation has nothing to do with us managing wild cervids, but management zones are designated based on CWD detections in wild deer.

Amy Cordry asked if the Board would work with the DNR to designate the area.

Dr. Glaser responded that we would consider information received from the DNR. For example, our current designation of 15 miles is based on information we received from the DNR regarding wild deer movements.

Michelle Carstensen relayed a question “about the Board’s method to prevent commingling,” inquiring if there was anything besides double fencing that is considered acceptable.

Dr. Glaser explained that we use the term “exclusionary fencing” to refer to fencing that prevents nose to contact between wild and farmed Cervidae. This can include solid or cloth materials, electrical fencing and double fencing. Dr. Glaser added that the Board has historically provided this information to the DNR for comment.

Brenda Hartkopf commented that Minnesota Elk Breeders is opposed to proposed amendments in the entire section. She explained further stating that, “taking out the definition of the number of miles for designating an

endemic area and leaving it open ended is not reasonable.” She added that we [cervid producers] need to have the distance defined and if that number is going to change, it needs to be “publicly vetted,” i.e. put in front of the BAH citizen board.” Ms. Hartkopf added that she wanted the Board to reconsider its elimination of the 180 day exception, stating that “people in the area are immediately put out of business through no fault of their own [when a CWD endemic zone is designated] and they need time.” She further commented that “36 months is excessive when people [farmed Cervidae producer] are negatively impacted through no fault of their own.”

Dr. Glaser commented that we eliminated the 180 day exception because once CWD has been detected in an area, the Board cannot confirm how long the disease has been there.

Daryl Simon voiced that he did not think it was right to force producers to depopulate their animals without indemnity.

Rich Meech commented that he didn’t see any problems allowing producers an exemption to the rule if they double fence; posing the question, “how many farms have become infected that had double fencing in an endemic zone?”

Annie Balghiti acknowledged that a member of the public was raising his hand to comment, reminding everyone that “the public will be heard at the end of the meeting, during the last 15 minutes.”

Daryl Simon directed a question to Dr. Glaser, “Am I correct in saying that, since last year, Minnesota has lost about 25% of its registered deer farmers?”

Dr. Glaser responded that roughly 80-90 herds have elected to leave the industry in the last year; adding that in 2004, 900 herds were registered illustrating that the number of registered has been decreasing over time.

Daryl Simon commented that “it seems that we are regulating ourselves [farmed cervid herds] out of business. I’m starting to think the goal is to regulate us so much that a person can’t have a farmed cervid herd in Minnesota anymore. We know that in a couple of years there will be another discussion and more regulations. My opinion is that if all the deer farmers would disappear in Minnesota, you wouldn’t hear another thing about CWD.”

Annie Balghiti thanked Mr. Simon for his comments.

Dr. Glaser stated that if everyone had a chance to comment on Minn. Rule 1721.0420, Subp. 3, that completes the board’s proposed amendments. She requested that committee members comment on how they would like to proceed.

Brenda Hartkopf inquired if the Board considered adding any language related to the Authorized CWD Sample Collector Program as the program is quite involved.

Dr. Glaser responded that the Board had not added language related to this program, but will consider it.

Annie Balghiti asked Ms. Hartkopf if she had a specific suggestion to which she responded that she did not at this time.

Rich Meech inquired as to why the Board was adding a definition of terminal hunt facility if we already have a route for animals to go to slaughter.

Dr. Glaser clarified that the Board is proposing adding a definition for terminal hunt facility as a means to allow animals within a management zone an additional opportunity to move.

Rich Meech questioned that if a producer has a hunt facility tied to a breeding facility, it is considered one facility. Would this meet the definition of a terminal hunt facility?

Dr. Glaser responded by saying, we [the Board] want to clarify that animals in these facilities must die. We wouldn't want an animal from the management zone, which we consider high risk, to move to a facility where they could potentially expose other animals.

Rich Meech commented that with these proposed amendments, "we are showing that we have no confidence in our testing program, specifically, by restricting movements from a herd in the management zone with a good testing history."

Dr. Glaser commented that the Board must take into consideration our concerns about CWD in the area [management zone].

Rich Meech inquired why there are preserves that are regulated by the DNR that do not have to follow regulations for possessing farmed Cervidae adding that "if these facilities are fenced, shouldn't they be regulated by the Board?"

Dr. Glaser responded that as far as she is aware, these facilities are not fully fenced. She requested that Michelle Carstensen with the DNR comment further.

Michelle Carstensen confirmed that "they are partially fenced and the owner or someone with permission from the owner has to have a hunting license to remove the animals legally, therefore they are not deer farms."

Rich Meech inquired again as to why these facilities are allowed to operate and why are they not regulated by the Board. He added that whether or not deer are in a complete enclosure, they are habitual, pointing out the only difference is that our [farmed cervid producer's] deer are behind a fully enclosed higher fence.

Michelle Carstensen responded that because the Board doesn't license these types of facilities, this appears to be a side topic and invited Mr. Meech to contact her outside of the committee meeting to discuss.

Brenda Hartkopf commented in reference to Minn. Rule 1721.0380, Subp. 3, requesting that the Board add an exception for natural disasters to the requirement for a fencing reinspection fee, and other causes beyond a producers of control.

Rich Meech requested an addition to add vandalism.

Dr. Glaser inquired if there were any additional questions or comments on Minn. Rule 1721.0380, Subp. 2, registration.

There were no questions, comments or proposed edits.

Dr. Glaser inquired if there were any additional questions or comments on Minn. Rule 1721.0380, Subp. 3, inspections.

Amy Cordry commented that one of the comments from the OLA [Office of Legislative Auditor] was for the Board to improve how they monitor field staff performance. Ms. Cordry asked if Dr. Glaser could address how this [field staff performance] will be monitored moving forward.

Dr. Glaser commented that she recently provided our Board members with an update to our changes in response to OLS comments. She explained that one of the ways in which we make inspectors more responsible is by assigning individual inspectors to each herd which helps office and field staff know who to go to with questions or concerns. At the end of the year, records are pulled to ensure inspections have been completed at least annually. For any herds that have not been inspected, this information will be forwarded to the inspector's supervisor.

Amy Cordry asked what the consequences are for incomplete or inadequate inspections.

Dr. Glaser commented, again, that this information will be forwarded to supervisors.

Ms. Cordry asked if she could access consequences for inspectors, i.e. is this information public?

Dr. Glaser replied that the Board has not outlined specific consequences, that would be left to the employees' supervisor to decide.

Ms. Cordry commented, "Haven't you always had an inspector assigned to inspect an individual herd?"

Dr. Glaser commented that this is different because historically inspections have been assigned to teams who would then decide who would complete each inspection. Now the work is assigned to individuals up front.

Amy Cordry clarified her understanding by stating, "you've always been able to figure out who did the inspection and now you have a more detailed process in place?"

Dr. Glaser stated that there has always been oversight of inspectors, but now it is more specific to the program.

Amy Cordry commented that she would like to see some more consequences for inadequate inspections.

Brenda Hartkopf requested clarification on language requiring "inspection of all perimeter fencing and verification that all animals are tagged," specifically asking what "tagged" means.

Dr. Glaser replied that this is a good suggestion. She then inquired if anyone had questions or comments on Minn. Rule 1721.0380, Subp. 4, herd inventory.

Rich Meech asked for clarifying language to be added that allows farmers to conduct their physical inventory every 36 months and for the inventory to coincide with tuberculosis and brucellosis testing.

Dr. Glaser commented that the Board already allows producers to align these.

Mr. Meech suggested adding, "aligned with other testing" so that producers do not have to handle animals any more than they have to. He commented that he didn't like the idea that the Board could request a producer to conduct a physical inventory at any time.

Dr. Glaser commented that the Board wants to retain authority to request another physical inventory if verification of a producer's inventory is needed for compliance purposes.

Brenda Hartkopf addressed the group, stating that when we talk about physical inventory and annual inventory, we are talking about two different things. She requested that the Board consider adding a definition for physical inventory, adding that this type of inventory is much more involved, animals are touched, and often run through a chute.

Dr. Glaser replied that the Board is in agreement, we do want to include “physical inventory” in the definitions to clarify that we want to physically visualize all identification tags, adding that a routine annual inventory doesn’t have the same requirements.

Brenda Hartkopf commented that 2 separate definitions makes sense.

Steve Notch asked what percent of cervid farmers in Minnesota have violations every year.

Dr. Wheeler responded that in the Board’s annual report, the number and type of violation by program is documented and that this is available to the public. This information should be available soon. She added that she currently can’t break this down to a percentage of producers without doing additional calculations, but it’s very few.

Mr. Notch inquired, are they [cervid farms] inspected every year?

Dr. Glaser responded, “Yes”.

Dr. Glaser continued presenting the Board’s proposed rule changes, reading through section 1721.0380, Subp. 5, fencing. She read through the language regarding high tensile fencing and redundant gating, pointing out that this is taken from the amended farmed cervid statutes. She acknowledged that the Board recognizes that the goal of the amended statute language is to prevent ingress of wild cervids and egress of farmed cervids, sharing that there have been many suggestions about adding to fencing height or allowing for materials that are not high tensile. She stated that the Board will take these comments under consideration while keeping the main goal in mind.

Brenda Hartkopf inquired if the Board had thought about defining what a redundant gate is. She commented that her understanding is that you have to be able to fit all equipment in between both gates and have them closed and wondered if the Board considered including this language in rule.

Dr. Glaser replied that we [the Board] have discussed this.

Annie Balghiti added that we have received additional comments from the general public requesting a definition for redundant gating.

Denis Quarberg commented in reference to fencing requirements, stating that someone from the Board made a previous comment about double fencing. He added that there was a lot of discussion during the first meeting regarding double fencing, but he hasn’t seen any of those comments incorporated.

Dr. Glaser reminded Mr. Quarberg that this is still a first draft and he won’t see any changes until the next version is released. She stated that if we look at the intent of fencing for the program, we need to determine if double fencing is needed to accomplish this.

Denis Quarberg stated that we need to consider the definition of commingling,

Dr. Glaser responded that preventing commingling is not included in the statutory language pertaining to fencing although we recognize that the disease [CWD] has been identified in wild deer.

Denis Quarberg stated that he was unclear on where the 180 day requirement that was discussed earlier was coming from.

Dr. Glaser replied that our current version suggests removing the 180 day requirement.

Dr. Glaser continued her presentation of the Board's proposed rule amendments, referencing section 1721.0380, Subp. 6, running at large prohibited. She stated that we [the Board] suggest no amendments to this section.

Brenda Hartkopf suggested further defining that farmed Cervidae running at large are livestock, commenting that whether we're referring to a cow, dog, pig or horse, the animal still belongs to the owner. Animals running at large are livestock and remain the property of the rightful owner. If the animal is taken by someone who is not the owner, the carcass needs to be returned for sampling which is performed differently in domestic animals than wild cervids. Ms. Hartkopf requested that an amendment be made so that the agency that oversees farmed animals, the Board, is notified first, prior to the DNR.

Amy Cordry suggested that we should consider adding language that addresses the level of concern based on the level (disease status) of where that animal had come from [escaped from]. For example, the Board would place more urgency on a cow running at large from a brucellosis positive herd or a turkey from an AI [avian influenza] infected flock.

Dr. Glaser asked Mr. Cordry to further clarify.

Ms. Cordry replied that we should be more concerned about an escape from a level 1 facility over a level 6 facility that is following all rules and keeping their animals healthy.

Dr. Glaser requested that Ms. Cordry submit suggestions for language amendments

Amy Cordry commented that a herd with more compliance issues may present a higher risk so we should consider how or who gets that animal or carcass back.

Dr. Glaser responded that right now, if an animal escapes, the Board has access to the carcass and pays for testing.

Rich Meech inquired, for clarification purposes, how many level 3 herds or lower are in the state.

Dr. Glaser replied that less than 10 herds are under level 6.

Michelle Carstensen commented that we [DNR and the Board] have a shared protocol for handling escapes, and we work closely together. The producer is not always the one who reports the escape, often we find out because an animal is spotted by a member of the public. She added that the DNR discusses with the Board the level of risk, based on compliance, status level, and escape history in an effort to conserve resources if possible, as the DNR is not reimbursed for taking an escaped animal. Ms. Carstensen added that she believes 9 herds in the state of Minnesota had achieved a status level 6 by the time they were identified as positive, illustrating that status level is not a guarantee that a herd is free from disease.

Rich Meech commented that we do not seem to have a problem with deer that are crossing borders, i.e. we don't put the same emphasis on movement of wild deer as we do on producer owned animals.

Dr. Glaser continued her presentation of the Board's proposed rule amendments referencing section 1721.0380, Subp. 7, Removal of wild Cervidae, Subp. 8, Sales of farmed Cervidae and meat products, and Subp. 9 slaughter of farmed Cervidae.

There were no questions, comments or proposed edits regarding these sections.

Dr. Glaser continued, referencing section 1721.0380, Subp. 10, Record keeping.

Stephan Schaeffbauer inquired if there is a timeline outlined elsewhere in the rules for when someone has to report to the Board that an animal has been moved.

Dr. Glaser confirmed that there is, referencing Minnesota Statute 35.155, Subd. 11.

Rich Meech directed the group back to Michelle Carstensen's earlier point about 9 herds with CWD in Minnesota that were at a status level 6. He questioned the epidemiology for the index herd that those herds were traced from, stating that we need more information to identify the source of infection for the index herd before pointing fingers at these herds.

Amy Cordry stated that she strongly disagreed, adding that if a level 6 herd has a positive animal, that's a problem. It speaks to the fact that a level 6 herd is not what the public would expect from that herd. Ms. Cordry reminded the group that there are 5 Cervidae producer related folks and one citizen representative on this committee, so she must speak up about public opinion on the program.

Dr. Glaser stated that level 6 herds have followed our current testing requirements to get to a level 6 and it is apparent based on history of CWD in the state that this system is not allowing us to be more confident that these herds do not have CWD.

Stephan Schaeffbauer stated that she thought the group was confusing what certification means. Certification means that these herds have met all requirements over the years. It is exhibition of disease risk status; it does not mean "disease freedom." Dr. Schaeffbauer used the example that tuberculosis (Tb) accredited herds are not "free from tb." Status level 6 is not meant to make the public think that these herds are CWD free.

Rich Meech agreed with Dr. Schaeffbauer's statement but reiterated his point that we don't know how these level 6 herds became infected with CWD.

Annie Balghiti warned the group that 2 minutes were remaining before the meeting became open for public comment.

Dr. Glaser continued to present the farmed Cervidae rule amendment draft, referencing section 1721.0390, animal identification.

Brenda Hartkopf suggested that we conform to national program standards and require 2 forms of identification, adding that Minnesota elk breeders provided amended language for this section to the Board.

Annie Balghiti informed members of the committee that the meeting would now be opened to members of the public for comment.

## Public Comments

James Byrne with Minnesota Elk Breeders commented on section 1721.0380, Subp. 4, herd inventory, asking for additional discussion on individuals who verify the accuracy of the herd inventory. He noted that the amended language references two individuals, including either a veterinarian or an agent of the Board. Mr. Byrne stated that there is no provision in statute [Minn. Statute 35.155, Subd. 11] for anyone to verify the inventory but an accredited veterinarian.

John Zanmiller with Bluffland Whitetails Association submitted a written comment, “with regard to the boundaries [relate to the CWD management zone] shouldn’t we let the science dictate the distance on quarantine?”

Dr. Glaser responded that, even with the way the rule is written now, we let science dictate that distance when we extended the distance from 10 to 15 miles based on information regarding wild deer movement from our DNR partners. In the future we would consider multiple scientific factors when determining those [management zone] areas.

Mr. Zanmiller posted a written question, “Is there a different kind of hunt facility? Is there such a thing as a “non-terminal” hunting?”

Dr. Wheeler and Dr. Glaser confirmed that there are other types of hunt facilities and the purpose of a terminal hunt facility is that everything in the facility would be harvested. No cervids in a terminal hunt facility can be removed.

Mr. Zanmiller posted, “Is it conceivable that a deer could not be tagged if it is sold and/or moved every year?”

Dr. Glaser responded that all farmed Cervidae are required to be officially identified before movement.

Mr. Zanmiller inquired as to why the Board wouldn’t bifurcate the rules for cervids that are not found in the wild of Minnesota.

Dr. Glaser replied that she didn’t fully understand the intent of Mr. Zanmiller’s question and asked that he clarify.

Mr. Zanmiller submitted another written comment, “Shouldn’t we have inspectors that have no financial or business ties to the farms they regulate? Hiring a local vet to conduct inventory? how is someone with a business relationship be impartial?”

Dr. Glaser replied that we do not have enough regulatory inspectors in the state or country to perform this [government] work, and in response have developed an accreditation program for private veterinarians. Accredited veterinarians are acting in a regulatory capacity when working with producers, and they conduct many activities on behalf of the government that require them to remain impartial.

John Zanmiller suggested that the Board “add “appointed persons” who are not vets to do the inventory.”

John Zanmiller submitted another written comment, “I want to challenge the board to think more “global”, think the State of MN not just the producers.”

Shawn Schafer, Executive Director of the North American Deer Farmers Association, directed his question to the definition of “terminal hunt facility.” He noted that the definition required animals to be removed annually and asked if all terminal hunt facilities in Minnesota are required to zero out their inventory every year.

Dr. Glaser responded that we [the Board] have not historically identified or defined hunt facilities. The purpose of doing so here is to provide an additional opportunity for producers within the management zone to move animals.

Shawn Schaefer suggested that we remove the requirement to remove all animals annually as this seems restrictive and harsh for all hunt facilities in the state.

Dr. Glaser replied that this definition would apply to movement of animals from the restricted area of the state only; other hunt facilities can continue to operate how they see fit.

Denis Quarberg if a there could be a situation at a terminal hunt facility where the animal from the zone is dispatched, but other animals could move back out.

Dr. Glaser responded that no animals in the facility could be moved back out. All animals need to be treated the same, all must die.

Denis Quarberg requested a more detailed definition stating that any animal in the facility must be dispatched by the end of the year.

John Zanmiller posted a comment, “to clarify (not asking the question for the whole group but to Dr G.), but my point on the bifurcation; why not bifurcate the rules for whitetails and other cervids where there are no native populations?”

There was not sufficient time to address Mr. Zanmiller’s final comment.

## **Adjournment**

Annie Balghiti adjourned the meeting, letting committee members know that she would be e-mailing them a survey to select a time for the next meeting.

## **Next Meeting**

Date: October 8, 2020

Time: 10:00 a.m. – 12:00 p.m.

Location: Virtual Meeting via Microsoft Teams