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OP-ED

Will the lights stay on? Or is deer farming headed to darkness?

OP-ED Chairman, Zoo Pharma Dynamics

The first day of 2026 and I'm sitting at my ranch wondering if my deer farm will continue or will this be the year deer farming gets officially closed in Texas. TPWD is coming out of the gates with the first commissioners' meeting in January attempting to implement more changes regarding deer farmers and making TPWD the sole authority with all power.

"(G) In compliance with the requirements of Government Code, §2001.0221, the department has prepared the following Government Growth Impact Statement (GGIS). The rules as proposed, if adopted, will: (5) not create a new regulation or repeal an existing regulation, but will modify existing rules to accommodate the cessation of TAHC involvement in the management of CWD efforts with respect to native wildlife" Executive Summary: Staff seeks adoption of proposed amendments to rules governing chronic wasting disease (CWD) detection, response, and management. The proposed amendments would function collectively to acknowledge and accommodate the decision of the Texas Animal Health Commission (TAHC) to cease cooperative efforts with Texas Parks and Wildlife Department (TPWD) with respect to the management of CWD in wildlife resources.

I was opposed to all the lawsuits that have been filed regarding CWD rules and regulations as it has caused a political firestorm in which the only loser could be the deer farmer. If you keep poking a sleeping bear, the bear will eventually wake up and wipe you out. Is this where we are today? If not, we are really close. The science has been forgotten and it's all about politics now. I will give credit to State Senator Bob Hall for his attempts to help the deer breeding industry, but he is one person and we need many of our politicians to take a stand but there is a problem.

<https://senatorbobhall.com/unfortunately-tpwds-unofficial-mission-is-to-eradicate-all-of-the-deer-breeder-herds-in-texas/>

The Governor appoints the TPWD Commissioners and next to no state politician will go against TPWD because they will likely need the Governors endorsement for reelection and one should not piss off the Governors friends. The deer farmer is in a very difficult position when trying to defend its business. A state agency should not have the sole ability or the power to financially devastate any business in Texas that has committed no

crime. The current CWD rules and regulations are putting deer farmers into financial ruin with absolutely no representation. I believe there are many TPWD personnel that don't approve of the senseless killing of deer herds and are only following instructions given to them.

The real question is? Who is behind the scenes pushing TPWD to end deer farming in Texas. I'm going to go out on a limb and probably get sued for what I am about to say but if I get sued that will bring out information I have to the public. I compare it to the group of Doctors that went before the government to bring back Ivermectin to treat Covid and were oppressed and much later the truth came out that Ivermectin could have saved many lives. All about politics and money.

Let's go back in time to set up the narrative. If you were to go hunt trophy deer in Texas decades ago. You would be headed to South Texas if you could afford it because that's where the big deer were. The landowners in South Texas had the market cornered for a long time making big money. They were doing well. Moving slightly forward in time, the first deer breeder's permits were issued and the pens and facilities were built. The deer farmer now needed deer for their pens. The deer farmer went and paid for deer from South Texas to start their breeding operations and the landowners in South Texas gladly took the deer breeders money. You might say the landowners in South Texas got to actually double dip for several years between the deer farmer and hunting. They were doing really well.

As the years progressed and breeding operations got more sophisticated, a market that was once cornered was starting to be left behind as new hunting opportunities opened up across Texas with larger deer than South Texas has ever produced. The South Texas hunting market started to shrink along with the revenues from hunting in South Texas. Direct Quote from South Texas Landowner "You deer farmers are taking money out of my pocket from distributing deer where trophy deer don't belong" Reply "You had no problem taking my money 30 years ago for my breeding operations"

Deer farming has increased land values, increased the number of non-resident hunters and has fueled growth in rural Texas. My ranch is in South Texas, and I love where I live but I asked myself if I was coming to Texas to hunt would I go to the rocks and cacti of South Texas or the beautiful Hill Country. The Hill Country wins that argument in most cases. Deer farming has opened up trophy hunting in every section of the State and that has been good for economics. As with everything, some people don't like change and want it back to the way it was, a cornered market.

There are 2 groups supporting TPWD and their decisions regarding CWD rules and regulations.

Texas Wildlife Association (TWA) has actively worked to block legislative attempts that would eliminate or weaken TPWD's regulatory authority over the deer breeding industry. Rules and regulations are passed by state and federal government agencies (e.g., TPWD) through legislative and regulatory processes which involve input and testimony

from various non-governmental organizations and stakeholders like TWA and the National Deer Association (NDA).

The NDA and TWA are using CWD against the deer farming industry in Texas. There are motives between the 2 groups with NDA having a much bigger end game. In my opinion TWA supports TPWD because they are represented by the landowners in South Texas that want the market back as it was before deer farming.

The NDA is where it gets very interesting. Both groups are using CWD, but the NDA has a much bigger goal. NDA has been successful in eliminating the supplemental feeding of wild deer in several states through their efforts. Along with deer farms being accused of propagating the spread of CWD they insist that supplemental feeding by the use of feeders also propagates the spread of CWD because it congregates the deer.

<https://deerassociation.com/about/position-statements/>

The National Deer Association (NDA) generally does not support supplemental feeding of wild deer. The NDA supports providing adequate food and cover for deer through habitat management programs.

What does that mean if supplemental feeding becomes illegal? You can ask about most feed stores. Who is their worst customer? The cattle farmers don't spend much. Who is their best customer? Deer farmers and game ranches. If the feed store loses its best customers than you will see feed stores closing for good across the state which would have a negative economic impact.

There are many sides on how to handle CWD but the senseless killing of healthy deer through the assumption that they are infected is unethical and inhumane. I have seen the deer being slaughtered at a deer facility because there was a CWD positive deer in the facility. There have been thousands of deer killed that were negative with CWD. You might ask where the Humane Society is, aren't they supposed to protect all animals from senseless slaughter. The Humane Society is not showing up at any Texas Deer Facility, they wouldn't want to compromise any grant opportunities.

"Houston Humane Society (HHS) has received a grant from the Texas Parks and Wildlife Department (TPWD) in 2023 for \$67,725."

There are viable options and solutions to stop the spread of CWD.

The study finds that hunting can be an effective form of disease control when enacted consistently at high levels over many years.

The study's authors examined chronic wasting disease trends in 10 different mule deer herds across central and eastern Wyoming, which varied in hunting pressure. They analyzed 20 years of data gathered by Wyoming Game and Fish Department to understand whether increasing hunting pressure was effective at controlling the disease.

"We found that harvesting a high proportion of the adult males in the herd – around 40% every year for 20 years, is expected to keep chronic wasting disease infections at low numbers," **said Wynne Moss, lead author and USGS scientist.** If this high level of hunting pressure is applied consistently (over 20 years), less than 5% of the males on average are expected to be infected. On the other hand, a lower level of hunting pressure, such as 20% of adult males harvested per year, would result in a much higher prevalence of around 30% infected.

The study also showed that harvesting a high number of males over a shorter period – 3 years in a row – still slowed the rate of disease spread within a population but was not as effective as harvesting high numbers over a multiple decade.

<https://www.usgs.gov/news/national-news-release/new-study-finds-deer-hunting-can-help-keep-chronic-wasting-disease-check>

The origin of CWD has endless possibilities of its source. My theory is that if it wasn't already on the landscape then the importation of sheep brought it to the landscape. Sheep have the oldest known origin of the prion disease, (scrapies) in 1732. If you take the map of 1904 showing the importation sheep into the United States and take the current USGS CWD hot zones map and overlay them they line up perfectly, including Canada. CWD did not originate in a deer pen from deer farming. CWD is a disease of wild deer that made its way into the deer pen, likely from scavengers frequenting the deer pens. There is absolutely nothing a deer farmer did to propagate CWD.

The prions enter through the mouth of the deer, and the initial infection process starts quickly (minutes to hours in the mouth/nasal area), the prions stay in the local tissues and lymphoid system for a prolonged period (months) before they efficiently spread throughout the body and cause a disease, a journey that takes a very long time. The subclinical prion infection means a host (deer) carries infectious prions and can transmit them but shows no outward systems of prion disease for a long time or potentially their entire life.

Deer eats dirt (a behavior called geophagy) to get essential minerals like sodium, calcium, and iron, which are missing from their plant-based diet, and also to introduce beneficial gut microbes for digestion, especially important for fawns. This helps them supplement nutrients and fight plant toxins, often occurring at natural or artificial mineral licks, though it carries risks like ingesting pathogens like CWD prions.

We are convinced that the deer are becoming infected with CWD through the consumption of dirt and the prions harbor in the mouth for a lengthy period of time which provides a window to destroy the prion before it enters the system of the deer. Over the last 10 years we have been conducting research and development on the prion disease that causes CWD. We formulated and manufactured a feed additive to destroy the prion inside the system of a deer, especially the mouth/nasal area. If the prion comes into contact with our additive the prion is destroyed, especially in the mouth. Our collaborative research has provided proof of effective use of our additive. We are in the new drug approval process with FDA/CVM for our additive. We

manufacture the additive at our South Texas Research Facility in which we mix the additive into our feed mix and produce the pellets from our pelleting mills. We then utilize the pellets containing the additive in our field trials to prevent CWD. The ingredients we use in our patent pending additive were confirmed by the Prion Research Laboratory.

We are working very hard at Zoo Pharma Dynamics to keep the lights on for the deer farming industry in Texas. If you would like more information, please email us at info@zoopharmadynamics.com.