June 17, 2019

To the URGENT attention of:
Rt. Hon. Prime Minister Trudeau
Hon. Marie-Claude Bibeau
Hon. Ralph Goodale
Hon. Ginette Petitpas Taylor
Hon. Catherine McKenna
Hon. Carolyn Bennett
Hon. Seamus O’Reagan
Hon. Jim Carr
Hon. Bill Morneau

Government of Canada
House of Commons
Ottawa, Ontario
K1A 0A6

Dear Rt. Hon. Prime Minister Trudeau, and Honourable Ministers,

Protecting the health and wellbeing of current and future Canadians is entrusted as the highest priority of our governments. It requires comprehensive analysis of dynamic ecosystems, communities, and economies that scale from local to global. Carefully crafted, well-enforced laws, with monitoring and adaptation can prevent or contain crises, protect our wellbeing, and ensure a favourable and opportune future.

There has been no greater threat to health and wellbeing than infectious diseases—and risks are amplified by the intensity and speed of globalized economies. In 2003, even without infection of people, finding a single cow infected with bovine spongiform encephalopathy (BSE) or ‘mad cow’ in Alberta triggered devastating trade restrictions with multi-billion dollar consequences across Canada. Our governments learned from the UK’s official BSE Inquiry (2000), and enacted aggressive measures to contain the epidemic, protect consumers, and safeguard our economy.

Today, we need a comparable response to a vastly larger epidemic of a sister prion disease called CWD, or “chronic wasting disease.” Like BSE, the epidemic of CWD is relatively new and largely manmade. Both are invariably fatal, with no adequate live animal tests, no preventive vaccines, and no treatments; but CWD is far more virulent because it is highly contagious between living animals.

CWD is currently afflicting members of the deer family, where it has repeatedly jumped species barriers and many strains have evolved. It was declared a “State of Emergency” by the U.S. Secretary of Agriculture in 2001. Transmission is facilitated via infective (misfolded) prions that are amplified, shed, and present in saliva, feces, urine, blood, lymphoid, and muscle tissue. CWD prions are extremely resilient, can persist in the environment indefinitely, and can spread animal to animal, or via soil, plants, agricultural products, and from contaminated surfaces or equipment. As such, CWD presents profound threats to wildlife and the environment, to agriculture and international trade, to Indigenous rights, traditions, treaties, food security, and, potentially, to human health.

Evidence documenting the severity of the CWD crisis and the necessity of vital responses is clear, compelling, and uncontested. Consensus extends across disciplines, sectors, jurisdictions, departments, agencies, and among virtually all experts, vital interests, and stakeholders—as was reaffirmed at the 2018 One Health Congress, at an Assembly of First Nations meeting last December, at a February 2019 conference of agri-food representatives, and at a comprehensive conference on CWD convened by the Ontario Federation of Anglers and Hunters in March.
The primary driver of all known prion disease epidemics has been intensive agriculture: as scrapie in domestic sheep, TME on mink farms, BSE from “ruminant feed” (feeding cows to cows), and CWD spread widely through schemes to privatize and exploit ‘captive wildlife’ (on game farms). As scientists had warned, CWD was imported to Canada in captive cervids from the U.S. and repeatedly spilled through fences to infect wildlife. Failure to contain the CWD epidemic has allowed continued growth and spread—now confirmed in 26 states and 3 Canadian provinces. Studies in wild deer populations confirm severe impacts and possible extinctions that present catastrophic threats to Canada’s biodiversity, our economy, cultural identity, and food security.

While no human cases of CWD have been confirmed, scientists note that while low, the risk is not zero—and it is evolving. Evidence suggests that CWD conversion is more adaptive than BSE, and following efficient transfer to a second species of non-human primates, Health Canada advised that “CWD has the potential to infect humans.” Thousands of CWD-infected animals are being consumed by hunters and their families across North America every year. Even a single transfer to a person—proving that humans are susceptible—would bring catastrophic consequences with limited options. The potential threat to our blood supply cannot be ignored, as demonstrated when BSE cost the UK access to their domestic plasma supply. All of this underscores the need for precautionary measures and preparation of an emergency plan.

It is vital to note, however, that threats to agricultural economies do not require human transfer. The capacity to spread CWD to susceptible species of deer all over the world via agricultural crops has already resulted in trade actions. On October 24th, 2018 Norway banned imports of hay or straw from any state or province with CWD. This could easily expand to other products and spread to other economic regions seeking, not just to avoid the threats, but to leverage tens of billions of dollars per year in competitive advantage. Economists describe the prospects for such outcomes as “probable” and the consequences as “severe and probably recessionary, with cascading effects and few immediate remedies.” As recent events have shown, these threats extend to investment markets.

Despite the lessons of BSE and the dire threat posed by CWD, official policy still allows translocation of live animals, products, and equipment from cervid farms, movement of hunter carcasses, and continued human exposure—in violation of basic principles of science, public trust, and professional ethics.

We urge the federal government, in collaboration with provinces and territories to immediately mandate, fund, and undertake emergency directives to:

1. Contain the geographic spread of CWD. Enact and enforce an immediate ban on the movement of all live cervids, all potentially CWD-infected carcasses, animal parts, products, exposed equipment, or other sources of infectious materials. Enact measures to ensure proper disposal of infected carcasses. Eliminate cervid farms with a plan for compensation and/or transition of operations to acceptable alternatives. Contain, mitigate, and where possible, eradicate CWD in wild populations by developing and implementing rapid response plans.

2. Prevent human exposure. Prevent transfer and/or amplification of CWD via food and feed chains by mandating and implementing convenient, cost-free, rapid testing of all animals harvested from CWD-affected areas. Provide hunters and communities with guidance and means for risk reduction. Mandate that all food banks only accept venison following negative test results.

3. Maintain and strengthen the current federal program of human prion disease surveillance and develop a preparedness plan for the possible emergence of human CWD in Canada, including possible impacts to our blood supply.

4. Initiate and fund an independent, interdisciplinary approach dedicated to comprehensive, collaborative, international, nation to nation, science and evidence-based initiatives to:
   - Prevent transfer and/or amplification of CWD via food and feed chains;
   - Contain, mitigate, and where possible, eradicate CWD in wild populations;
   - Ensure Canadians’ future wellness by protecting wildlife, ecosystems, communities, safe, nutritious, sustainable food, and economies; and
   - Invest in research and innovation to support Canadian efforts to better understand and advance scientific, economic, and biomedical insights and opportunities, while reducing threats.
We have assembled a multi-sector coalition of experts and vital stakeholders to support these measures, to inform prudent public policy, and engage in collaborative efforts going forward.

The following signatories implore you to recognize the dire nature of this epidemic, of your acknowledgement of the public trust, and the responsibilities of your office. We stand in support of your announcement of the government of Canada’s urgent undertaking of all necessary actions to meet these challenges and protect Canadian interests.

Yours truly,

Dr. Neil Cashman, Professor, Department of Medicine, University of British Columbia (former) Scientific Director, PrioNet Canada

Dr. Hermann Schaetzel, M.D., Dr.med./PhD, Professor, Prion Biology and Immunology, University of Calgary

Dr. Sabine Gilch, Associate Professor, Canada Research Chair in Prion Diseases, University of Calgary

Dr. David Swann, FRCP, MLA (Retired)

Dr. Arthur W. Clark, Physician Professor Emeritus, Pathology & Laboratory Medicine and Clinical Neurosciences, University of Calgary

Alastair R. Lucas, QC, Professor of Law, Senior Research Associate, Canadian Institute of Resources Law


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Dr. Richard Gray, Professor and Grain Policy Chair,
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Bill Bosch, President, BC Wildlife Federation

Brian Dingreville, President, Alberta Fish and Game Association

Clark Schultz, President, Saskatchewan Wildlife Federation

David Pezderic, Saskatchewan Wildlife Federation

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Kelli Miller Kickhom, President, PEI Wildlife Federation

Andrew Bouzan, President
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Serge Lariviere, Director, Quebec Federation of Anglers and Hunters

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Rick Bates, Canadian Wildlife Federation