

**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Crisis management in food, animals and plants  
**Director**

Brussels,  
SANCO/G4/LC/is (2016)

Dear Dr Ebner,

**Subject: Raising the awareness of hunters on the risk of importing deer urine lures from certain countries**

You may be aware that three cases of Chronic Wasting Disease (CWD) have recently been detected in Norway, in a wild reindeer and in two wild moose. It is the first time in history that CWD cases are detected on the European territory, which is of course a cause for concern to us.

While we have no indication of how this disease has been introduced into Norway, our discussions with Member States on this issue brought to our attention the fact that certain hunters in the EU and in the EEA countries purchase on the Internet deer urine for use as hunting lures. When such deer urine originates from Canada or from the USA, where CWD has been present for several decades, such imports represent a risk of introducing and spreading CWD in the European territory, given that environmental contamination with urine (as well as saliva and faeces) of infected cervids is a well known route of transmission of the disease, and given that urine intended for hunting lures is not processed.

In this regard, we are seeking your assistance as we would like to raise the awareness of hunters of such a risk and of the existing import prohibition for such products.

Indeed, according to Article 3(20) of Regulation (EC) No 1069/2009<sup>1</sup>, unprocessed urine from farmed deer falls into the definition of manure, and the import into the EU of manure is prohibited by Article 41(2)(c) of that Regulation. In practice, it seems that there is often no evidence as to whether the urine originates from wild or farmed deer – in such cases, the stricter rule applies, i.e. the import is prohibited.

---

<sup>1</sup> Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002 (Animal by-products Regulation) (OJ L 300, 14.11.2009, p.1).

European Federation of Associations for Hunting and Conservation (FACE)  
Dr Ebner, President  
Rue F. Pelletier 82  
1030 Brussels  
[info@face.eu](mailto:info@face.eu)

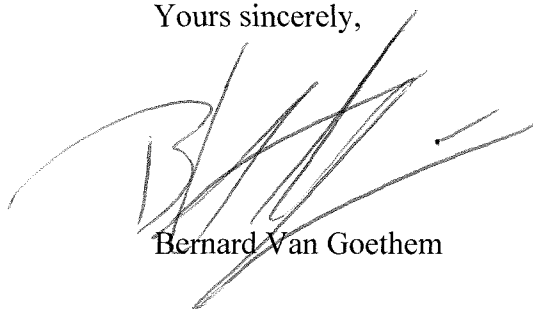
Furthermore, according to Decision 2007/275/EC<sup>2</sup> and Regulation (EC) No 206/2009<sup>3</sup>, deer urine for hunting lures, which falls under customs code CN 0511, must be systematically subjected to veterinary checks at a Border Inspection Post (BIP) upon entry of a personal consignment into the EU territory, and given the above mentioned prohibition, the import into the EU would be rejected at the BIP.

We therefore invite you to bring this information to the attention of your members, for dissemination to hunters, in order to avoid that products representing an animal health risk for European cervids be imported into the EU.

As regards surveillance of the EEA and EU cervid populations for CWD, as you are aware, Norway, Sweden and Finland have already taken steps to increase their CWD surveillance, and cooperation between hunters' associations and the competent authorities of these countries is already established, as indeed hunters play a key role in helping to collect samples of those wild cervids that are targeted under CWD surveillance activities. At EU level, the Commission has asked the European Food Safety Authority (EFSA) whether enhanced CWD surveillance in the EU and EEA countries which have reindeer and/or moose populations should be considered and according to which sampling plan. EFSA's opinion is expected to be adopted in December 2016 and, depending on the outcome of this EFSA opinion, the Commission may in 2017 launch discussions with the Member States on introducing harmonised surveillance requirements for the concerned Member States. If this is the case, the involvement of hunters' associations in those Member States will be of key importance.

We look forward to a fruitful cooperation with you, as I am sure that the recent CWD cases are also a concern for your association.

Yours sincerely,



Bernard Van Goethem

c.c.: M. Scannell, K. Van Dyck, E. Strickland, E. Zamora Escribano,  
E. Thévenard, A.-E. Füssel, P. Langhammer, B. Saimour,  
P. Bernorio, M. Klemencic, L. Carrouée, DG SANTE

---

<sup>2</sup> Commission Decision of 17 April 2007 concerning lists of animals and products to be subject to controls at border inspection posts under Council Directives 91/496/EEC and 97/78/EC (OJ L 116, 4.5.2007, p.9)

<sup>3</sup> Commission Regulation (EC) No 206/2009 of 5 March 2009 on the introduction into the Community of personal consignments of products of animal origin and amending Regulation (EC) No 136/2004 (OJ L 77, 24.3.2009, p. 1)