

From: [Katharina Gambill](#)
To: [Miller, Shannon D \(DEC\)](#)
Subject: Commenting on 18 AAC 36.125, 18 AAC 36.135 and 18 AAC 36.500 (f)
Date: Tuesday, August 18, 2020 4:22:35 PM

Dear Commissioner Brune:

I am writing in opposition of the proposed changes to 18 AAC 36.125 and 18 AAC 36.135 that would require testing of *M. ovi* for importing sheep and goats.

With *M. ovi* being a pathogen that is already found in Alaska's wildlife, testing animals before they come into the state will have no impact on whether this pathogen gets into wildlife. This regulation will increase the cost of doing business for Alaska's farmers, and increase the cost of sheep and goat products (meat, dairy, fiber, etc.).

In addition, it limits the availability of new genetics to a mere handful of breeders in the lower 48 willing to test for *M. Ovi*. Testing is very expensive and most farmers do operate on a very narrow profit margins, if on any profit at all.

Due to the time additional testing will take, It will effect the shipping window by airline on many breeds due to their size and weight restrictions.

Availability and cost of AI is extremely limited and many breeds don't offer any frozen semen due to the wide availability of bucks/rams in the lower 48 so it is not an alternative option aside of its cost.

To keep a healthy, thriving and genetically diverse stock in Alaska, we rely on imports.

We should be finding ways to support Alaska's farmers and ranchers and encourage growth instead of imposing costly and burdensome regulations. **Especially with the current COVID 19 situation locally grown food has gathered a lot of interest.**

We all know how dependent we are in our food to outside sources. We should explore more options for more locally grown food to provide an level of food supply security that goes past 3-5 days of available food. Sheep and Goats are are easily kept and have proven to adjust well to our climate. They are excellent sources for meat and milk and can thrive on local hay and barley.

I urge you to reconsider implementing regulations that would impose any required testing for *M. ovi*, this pathogen is endemic in North America and needs more research conducted to better understand it. The focus should be on more cost-effective and efficient strategies that maintain separation between livestock and wildlife.

I am however in support of the regulation change for:

- **18 AAC 36.500 (f): amended by updating from the 2013 to the 2020 version of the adopted by reference American Veterinary Medical Association's (AVMA) Guidelines for Euthanasia of Animals.**

Methods on non chemical dispatching of sick or injured animals should be made available to our local vets. Especially for euthanasia of larger livestock, as it is a humane way to do so. In addition, this will keep the meat untainted and available to be used as feed for sleddogs, our wildlife parks and bird TLC to only name a few local groups.

Animals euthanized through injection need to be buried or are often hauled to the landfill, where they endanger the health of some of our local wildlife that chooses to reside there due to the ease of food access. They will also adversely draw in more animals to these areas.

Respectfully,
Kat Gambill

Sent from my iPad