

From: [Rebecca Schwanke](#)
To: [Miller, Shannon D \(DEC\)](#)
Cc: [Brune, Jason W \(DEC\)](#)
Subject: Comments on Animal Health Regulations
Date: Friday, October 16, 2020 10:55:00 AM

Dear Ms. Miller and Commissioner Brune,

I want to commend you for taking the long-overdue action of addressing *Mycoplasma ovipneumoniae* (Movi) in your Animal Health Regulations for the State of Alaska. I don't mean to take away from the other additions to these health regulations, as I see several good changes such as adding contagious foot rot to the Reportable Disease List.

I will try to make this brief. As a lifelong Alaskan hunter, with friends in the domestic ag community here, I understand your concerns for not wanting to overburden domestic owners with new testing requirements. As a biologist however, I want to strongly encourage you to move forward with implementation of requiring Movi testing for ALL age sheep and goats prior to import. The rationale is simple. It's common knowledge that many of our imports are less than 8 weeks old because of the ease of shipping them up here. If you could ensure these young kids and lambs were pulled at birth, bottle raised, isolated and kept away from harmful pathogens present in their herds/flocks, I could fully understand the 8 week / 2 month recommendation. Your veterinary staff however, knows just as well as I do that we as a state cannot ensure this, and thus at this time, we cannot be assured that these young imports are not coming into our state carrying Movi and other potentially harmful pathogens. Given readily available published research, we know that young sheep lambs and goat kids can and do carry Movi. There's no reason whatsoever to exclude these young animals from Alaskan import testing. For 18 AAC 36.125 and 18 AAC 36.135, the only responsible action is to strike the language pertaining to the age limit for Movi testing "~~(5)-if over 2 months of age,~~ has tested negative for *Mycoplasma ovipneumoniae* within 60 days of import."

Secondly, I recognize the details of testing information is purposely left out of regulation, however, in this case it would be extremely helpful for those looking to import sheep/goats for it to be abundantly clear that testing must occur at an accredited diagnostic lab (AAVLD). There have been too many unclear results per Movi in this state over the last few years to last a lifetime, most of which came out of the USDA research lab. There are research labs all over the country, but they don't do Movi testing on a regular basis, they're not fully versed in the latest science of Movi genetic testing, and they don't have to meet the same high standards that AAVLD labs do. That said, we all know there are only a couple AAVLD labs in the country currently doing the bulk of trusted high-concurrence Movi tests. It's simple, these tests must be robust, address a significant portion of base pairs in order to make an accurate diagnosis to the species level, and follow accepted lab protocol to avoid contamination and false results. It is incumbent on DEC to require owners to seek testing through these labs to ensure the highest quality test results. This will save everyone time, money and frustration.

Thirdly, while it's good to see Movi finally make the Reportable Disease List, it's incredibly disingenuous to include it so far down the list in 18 AAC 36.215 (e), where: "A person set out in (a) of this section shall, not later than the fifth working day of each month, report to the state veterinarian the first case of any of the following diseases as diagnosed by a laboratory performing testing or diagnostic procedures on any animal during the previous month". This is the same section where contagious ecthyma (EC) is listed, a disease with no domestic or wild population limiting effects whatsoever. This is clearly not the place for Movi. Placing Movi in this section could delay reporting for over a month, offering owners ample opportunity to move or give away these animals carrying Movi. This is unacceptable given the high risk this pathogen, particularly certain strains, pose to our wild Caprinae populations. **Bringing these bacteria into the state and then moving them around freely is the worst thing we can do to get a handle on this disease risk.** This will subvert the importance of this pathogen and it is unacceptable. Knowing the devastating and fatal impact some strains of Movi can have on wild Caprinae, including Dall sheep from previous published accounts of exposure in a zoo setting, the only responsible thing to do is to add Movi to 18 AAC 36.215 (b), where: "A person set out in (a) of this section shall, on the day of discovery, report by telephone, electronic mail, or facsimile transmission to the state veterinarian the

discovery of, the existence of, or the suspected existence of any of the following foreign or eradicated diseases". Movi is a pathogen that for all practical purposes should be considered a "foreign disease" for purposes of this section, as virulent strains of this pathogen have been clearly and repeatedly shown to have catastrophic effects on captive Dall Sheep and wild bighorn sheep populations following spillover.

This pathogen comes in many strains (hundreds already identified), and there's only one way to ensure we don't have a spillover of a deadly strain. We need to address these positive results head on, the State Vet needs to work closely with the domestic owners and work collaboratively with them (and willing NGO's like AKWSF offering funding support) to mitigate any threat their animals may pose to Alaskan wildlife.

The domestic sheep and goat industry in Alaska is small but vibrant. I don't want to see them go away, I want to see them strengthened through increased testing and biosecurity measures. If we could get to a point where our Alaskan domestic herds and flocks are all Movi-free, that would be phenomenal and drastically reduce the threat of severe respiratory disease impacting our wild Caprinae. The fact is, our wild Dall sheep, mountain goat and muskoxen populations far outweigh the value of our domestic herds/flocks, they always will. Several thousands of hunters pursue these animals in the field annually, yet Movi has the potential to ruin this for decades to come. Hands down, the sustainability of these wild populations will continue to offer far more food security for the people of Alaska than our domestic herds/flocks. Stopping the import of new strains of Movi and elevating the importance of this pathogen throughout the state are simply the best, most efficient first steps in ensuring our wild Caprinae avoid devastating pneumonia outbreaks.

The fact that ADF&G/WADDL has identified a single strain from Alaskan Dall sheep and caribou as far back as 2004 indicates that a spillover of Movi has happened in the past. While we don't know the full effect of this spillover, it should serve as a stark reminder that another spillover could happen, and it could be much worse depending on the strain. The fact that DEC/WADDL has identified 10 different strains of Movi from only 11 domestic sheep/goat samples from within Alaska should be extremely alarming, and should be ample evidence of the potential risk.

Given the current technology to strain type this bacteria, it must be recognized that any future spillover can be traced back to the source. I don't want our domestic owners to constantly be burdened with this concern, I want them to work pro-actively to bring in clean disease-free animals and work to ensure their herds/flocks are free from Movi as well as other important diseases/pathogens. I have dedicated hundreds of hours to helping Alaskan domestic owners go Movi-free, and it's an amazingly simple process. We test and cull, and the end result is a strong, clean and healthy herd/flock.

Let's continue to work collaboratively, and get to a better place for our domestic community and our wildlife community. We are all Alaskans, we all want healthy animals. We can make this happen and keep the burden as low as possible on our Alaskan ag community. Thank you for taking these critically important first steps.

Sincerely,
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