

ALASKA STATE LEGISLATURE



REPRESENTATIVE GERAN TARR

10.30.20

Shannon Miller
Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501
shannon.miller@alaska.gov

RE: Proposed Changes to Animal Health Regulations
Department of Law file number 2020200381.

Dear Ms. Miller,

The adoption of the proposed changes to animal health regulations relating to sheep, goats, and *Mycoplasma ovipneumoniae* (M. ovi) seem premature, if necessary, at all. These regulations would put additional requirements on a person who intends to import sheep or goats to test for M. ovi. There are already requirements to obtain a health certificate or certificate of veterinary inspection as well as testing for certain priority diseases to ensure the animals are healthy. Implementation of the proposed addition to these regulations of M. ovi testing will impose a great expense to farmers when there is no proven need for the testing in Alaska and no official diagnostic test authorized.

The link between M. ovi in wildlife and domestic sheep and goats is not well understood. M. ovi has been found in wildlife across Alaska, including remote areas of Alaska where there is no way for the wildlife to interact with domestic animals. Furthermore, this is not new. M. ovi was found in wildlife back in 2004 and Alaska has seen no wildlife die-offs associated with M. ovi. Testing has shown a similar prevalence of M. ovi in wildlife and domestic animals, and it is endemic to North America. Wildlife that have M. ovi do not necessarily suffer the pneumonia outbreaks association with the pathogen.¹

M. ovi has been associated with polymicrobial pneumonia in bighorn sheep in the western United States, where die-offs have occurred, however there is not conclusive evidence that M. ovi is the cause of the die-offs. Other pathogens are commonly found in bighorn sheep pneumonia including lungworms (*Protostrongylus* species), *Fusobacterium*

¹ "Domestic/Wildlife Interactions, *mycoplasma ovipneumoniae* in Alaska" Bob Gerlack and Kimberlee Beckman, January 2020 Presentation. file:///C:/Users/lhscjtb/Downloads/livestock-wildlife-interactions-movi-in-ak.pdf

necophorum, *Trueperella pyogenes*, and members of the Pasteurellaceae bacterial family.² In other words is not yet understood what is killing the bighorn sheep in the western United States and what, if any role, *M. ovi* plays in the die-offs.

Research to establish whether domestic sheep and goats are responsible for transmitting *M. ovi* to wildlife, and if *M. ovi* is responsible for die-offs of bighorn sheep, is ongoing. This includes a risk assessment being overseen by the United States Department of Agriculture. The risk assessment is not yet complete but should be done soon. Given the ongoing research and inconclusive scientific link between *M. ovi* and bighorn sheep die-offs in the lower 48, these regulations are not needed. It would make sense to wait until the risk assessment is done, it is scientifically proven that *M. ovi* is a big enough threat to be classified as a priority pathogen and an official diagnostic test is established before implementing this expensive mandate.

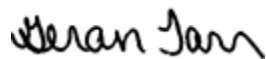
With so little known about *M. ovi* and the correlation between the presence in domestic animals and wildlife, now is not the time to put an extreme financial burden on Alaska farmers and require testing of imported sheep and goats. Testing for *M. ovi* is extremely expensive and is estimated to cost \$100 per animal according to the Alaska Farm Bureau.³ This fee could potentially drive farmers out of business. At the very least farmers will be forced to pass on this fee to consumers, further elevating the cost of Alaska Grown products. The importance of food security is becoming more and more apparent and now is the wrong time to increase the cost of locally produced farm products, especially when it is not even understood if it is necessary.

In the Yukon, farmers are reimbursed for expense of testing for *M. ovi*.⁴ If Alaska decides it must move forward with this mandate, at the very least public funds should be allocated to cover expenses until the necessity of testing is established.

In conclusion it is not necessary to mandate testing at this time and if the State of Alaska decides to go forward with these regulations, the cost of testing should be covered until there is conclusive scientific evidence that it is necessary to prevent the die-off of wildlife in Alaska.

Thank you for considering my comments.

Sincerely,



Geran Tarr
Alaska House District 19

² “Mycoplasma ovipneumoniae” USDA Animal and Plant Health Inspection Service, September 25, 2020. https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/sa_animal_disease_information/sheep-goat/movi/mycoplasma-ovipneumoniae

³ Alaska Farm Bureau fact sheet on proposed *M. ovi* regulations. <https://www.alaskafb.org/m-ovi-regulations/>

⁴ <https://yukon.ca/sites/yukon.ca/files/emr-sheep-goat-control-order-fact-sheet.pdf>