



ALASKA FARM BUREAU, INC.

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Commissioner Jason Brune
Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

Re: Opposition to Proposed Changes to Animal Health Regulations (18 AAC 36) to require testing for *Mycoplasma Ovipneumoniae* (M. ovi)

Dear Commissioner Brune:

The Alaska Farm Bureau is urging the Alaska Department of Environmental Conservation to reconsider enacting the proposed changes to 18 AAC 36 that would regulate *Mycoplasma ovipneumoniae*.

The Alaska Department of Environmental Conservation (ADEC) and Alaska Department of Fish and Game (ADF&G) had been working with stakeholders for several years to gather more data and better understand impacts and risk of M. ovi in Alaska and find an agreeable approach to maintaining healthy herds. Western states and Canada have been continuing research to better understand the relation between M. ovi, pneumonia outbreaks in bighorn sheep populations and contact with domestic sheep and goats. In recent years, these studies have produced results that contradict previous assumptions as well as raising awareness of extreme knowledge gaps in the understanding of M. ovi.

Since Alaska has not experienced M. ovi-associated die-offs in its wildlife, the fear around M. ovi is based on western states' bighorn sheep issues. Circumstances between bighorn sheep in the lower 48 and Alaska's Dall Sheep differ significantly. Bighorn sheep habitat has been drastically reduced through urban development. Long-term droughts and wildfires in the west are also severely reducing available forage for big horn sheep. These issues, along with other stressors (predation, overpopulation, harsh weather, handling, etc.) factor into the strength of an animal's immune system. The higher the stress load, as seen with bighorn sheep, the more susceptible animals are to disease.

Even among bighorn sheep populations the impact of M. ovi differs greatly. Some M. ovi positive herds have experienced population-limiting pneumonia outbreaks while others are thriving. Some M. ovi negative herds have experienced pneumonia

outbreaks while others thrive. Some of the bighorn sheep herds that experienced respiratory disease outbreaks had contact with domestic sheep/goats while others did not.

Alaska should be practicing science-based management over its wildlife resources. The current facts and science do not support taking any regulatory action over *M. ovi*, including mandatory testing of imported sheep and goats. Other wildlife and livestock authorities as well as subject matter experts are not recommending mandatory testing of *M. ovi* as part of a management plan; there are no official diagnostic test available and the science does not support such action.

There are still many knowledge gaps in understanding *M. ovi* and its impact on animals. There are still questions around which species are susceptible to disease and which are carriers of *M. ovi*. It is also unclear what the relationship is between strain types and development of disease as well as what role *M. ovi* vs other factors play in a disease outbreak.

In Alaska, *M. ovi* has been found in wildlife across the state, including areas where there are no livestock. There have been wildlife samples as far back as 2004 that tested positive for *M. ovi*. While the strain of *M. ovi* in wildlife and livestock appear to be different it is not known if the strain in our Dall Sheep is less virulent or Dall Sheep have adapted to the pathogen. With the areas of the state *M. ovi* is found in, and wildlife and livestock having different strains, it would seem that 1) our farmers and ranchers are doing a great job at maintaining separation, and 2) *M. ovi* comes from other sources than just domestic sheep and goats.

Given the knowledge gaps around *M. ovi* and respiratory disease, the lack of science to support mandatory *M. ovi* testing and the lack of official diagnostic testing, the Alaska Farm Bureau strongly recommends ADEC remove *Mycoplasma ovipneumoniae* from the proposed regulation changes to 18 AAC 36. We highly recommend ADEC and ADF&G collaborate with stakeholders on science-based management strategies as well as continuing research on *M. ovi*.

Working together we can have healthy wildlife and a robust agriculture industry. Thank you for your consideration on these comments.

Respectfully,



Scott Mugrage, President
Alaska Farm Bureau