

From: [Schwanke Corey](#)
To: [Brune, Jason W \(DEC\)](#); [Miller, Shannon D \(DEC\)](#)
Subject: Comments on Animal Health Regulations
Date: Thursday, October 29, 2020 5:21:52 PM

Commissioner Brune,

Thank you for the opportunity to offer comments on the 18 AAC 36 Animal Health Draft Amendments 2020. It is refreshing to see DEC come out with an updated set of amendments that finally seek to address a pathogen that's often present in domestic sheep and goats, but could have detrimental effects on Alaska's wildlife. *Mycoplasma ovipneumoniae* (Movi) is an incredibly dangerous pathogen that has proven to be catastrophic in bighorn populations throughout the western US and Canada. Once a fatal strain of Movi get's in, there's no treating it. There's two options, let a population languish for years, or kill them all and start over. This is happening in our western states, but here in Alaska, we actually have an opportunity to avoid this type of catastrophe.

Our wild Dall sheep populations are expansive and largely contiguous. Knowing that caribou can also carry Movi is even more reason to ensure we don't allow a fatal strain to get into our Dall sheep, mountain goats, muskoxen or or even caribou. Sure we have one strain in our wildlife, we should consider ourselves incredibly lucky no major die-offs occurred. We have more than 40,000 Dall sheep in this state, that's 40,000+ reasons to work together and keep fatal strains of Movi out.

The first step is to capitalize on our state's unique geography, and stop new strains of Movi from being imported. The only way to ensure this, is to require Movi testing on **every** domestic sheep and goat being imported. If they have Movi, whether 6 weeks or 6 years old, they should not come into Alaska. If we can close our system now, then we might have a chance. We all know that lambs and kids are imported as young animals under 2 months of age because they're small, cheaper to import. What are you doing trying to exempt these animals from testing? It appears to be an attempt to appease the Ag community, but it would negate the effectiveness of this regulation. As a biologist, it took me about 5 minutes to find a recent peer-reviewed study where domestic lambs were allowed to be raised with their Movi positive mothers, it's no surprise the lambs picked up Movi as early as a few days old. They are certainly not immune, so there's no reason to exempt them from this regulation. **DEC must require testing of ALL AGE domestic sheep and goats for Movi prior to import. If you want to be particularly responsible, you will require a 2nd negative test once they arrive following the stress of travel. Given the recent advancements in testing methods, you would also be well advised to offer guidelines on trusted testing methodology if you want any semblance of quality test data. At the very least, require AAVLD lab results.**

I am a long-time sheep hunter, and I hope my son gets the opportunity to continue hunting sheep for many years. The only way we do this is to stay vigilant and ensure that our wildlife populations are protected from deadly pathogens and diseases we can't treat or cure.

Right now, Movi is the single most dangerous pathogen we know of when it comes to wild sheep. It would be incredibly negligent to ignore the piles of evidence from our western sheep managers. They fight this pathogen day in and day out, and many have been doing this for 10-15 years with no end in sight. I don't know why it's taken Alaska so long to pay attention. DEC must do the right thing here, and stop new strains from being imported into Alaska, and help protect Dall sheep for the benefit of all Alaskans. There's a reason we don't allow fish farming in our state. The risk of pathogen transmission to wild stocks is so incredibly high, it's not worth the risk. This is not much different than the effect Movi could have if the wrong strain found its way into wild sheep. DEC can do the responsible thing now with Movi.

The final consideration I want to cover is the addition of Movi to the Reportable Disease List. This is a great move, but not down at the bottom. The other pathogens and diseases in this section are much milder and have no chance whatsoever of causing any population level declines in wildlife. Movi can devastate a wild sheep population. There's no reason it should not be at the top of this list. **Require same-day reporting of Movi in domestic sheep and goats. This is the only way to ensure the State**

Vet has an immediate opportunity to work with owners if/when they find out one of their animals carries Movi. This has to happen quick, otherwise the positive result will not likely be taken seriously.

Thank you for your time,
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