

National Assembly of State Animal Health Officials

Attached please find a letter with comments respectfully submitted by the National Assembly of State Animal Health Officials. Please feel free to contact me if you have any questions. I am the Secretary of the National Assembly and will be able to connect you with the President of the group if needed. Thank you. Dr. Heather L. Hirst (302) 698-4560



NATIONAL ASSEMBLY of STATE ANIMAL HEALTH OFFICIALS

President Annette Jones DVM 1220 N Street Sacramento, CA 95814 916-900-5000 annette.jones@cdfa.ca.gov	Vice President Tony Frazier DVM 1445 Federal Drive Montgomery, AL 36107 334-240-7253 tony.frazier@agi.alabama.gov	Treasurer Dustin Oedekoven DVM 411 South Fort Street Pierre, SD 57501 605-773-3321 dustin.oedekoven@state.sd.us	Secretary Heather Hirst, DVM 2320 S Dupont Hwy Dover, DE 19901 302-698-4560 Heather.Hirst@delaware.gov
---	--	--	---

Comments on 18 AAC 36.125 and 18 AAC 36.135

The National Assembly of State Animal Health Officials (National Assembly) is an organization comprised of state and territorial animal health officials from the United States. Our mission is to work collectively to safeguard animal and public health as well as the food supply. We accomplish this by working with federal, state, and industry partners to develop science-based policies to address issues that affect public, animal and environmental health, food safety, and commerce. We strive to use the best available science to formulate our positions and to reach consensus among all members whenever possible.

In that spirit, we humbly request that you consider our comments on the proposed change to the Alaska Department of Environmental Conservation (DEC) animal import regulations. The new regulation will add a requirement that all sheep and goats over two (2) months of age entering the state of Alaska must be test negative for *Mycoplasma ovipneumoniae* (M. ovi) within sixty (60) days of importation.

Our consensus comments are limited to testing technology and the epidemiologic rationale.

Testing:

- Limited options: Washington Animal Disease Diagnostic Laboratory (WADDL) and Kansas State Veterinary Diagnostic Laboratory (KSVDL)
- No standard, validated test: there is no standardized, validated PCR test that can be used to prove freedom from M. ovi. This means that different test results could be obtained depending on which laboratory is used.

Epidemiology:

- Studies by Alaska Fish and Game from 2017-2019 have shown that M. ovi is already present in the wildlife populations in Alaska. Many of the animals tested were not showing signs of illness at the time of sampling (hunter harvest). It is therefore possible that M. ovi is part of the normal microbiologic biome of the species that were tested.
- Strain typing conducted on M. ovi indicated that the strain in Alaskan wildlife is different from the strain in domestic Alaskan sheep and goats. This provides evidence that there has not been significant cross-over transmission of M. ovi between domestic and wild species.



Summary:

Respiratory disease is a complex problem associated with the interaction of a variety of pathogens, environmental stressors, and other factors. It is our opinion that the proposed regulation is unlikely to reduce the distribution of *M. ovi* or reduce the risk of transmission between wild and domestic species. The accepted best practice to prevent the spread of pathogens from domestic livestock to wildlife is to maintain separation by any practical means available. Requiring an importation test for *M. ovi* as a method of preventing disease spread from domestic sheep to wildlife is currently not scientifically supported. The National Assembly believes that all regulatory requirements and decisions should be based on sound, valid, and peer reviewed science and common sense disease mitigation practices.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "A. Jones".

Dr. Annette Jones
President