

DEC Regulation revision (18AAC.de.oi5) comments from the Alaska Wildlife Conservation Association. Oct 19, 2020 Comments on proposed regulatory changes.:

WITH ONE EXCEPTION, THE ALASKA WILDLIFE CONSERVATION ASSOCIATION (AWCA) SUPPORTS THE PROPOSED REGULATORY CHANGES TO 18AAC 36.015. These regulatory changes should prove effective in limiting introduction of pathogenic *Mycoplasma ovipneumoniae* (*M. ovi.*) to Alaska's wildlife. HOWEVER, THE 2-MONTH EXEMPTION FOR DOMESTIC LAMBS AND KIDS SHOULD BE DELETED. It is not consistent with the known biology, and compromises the remaining efforts to limit import of *M. ovi.*

The AWCA supports demonstration, via the best testing available, that ALL imported domestic animals, particularly domestic sheep and goats, be certified as *M. ovi.*-free prior to import.

The current draft regulations provide for a "two month exemption" for domestic kids and lambs. This exception should be removed because it places the efficacy of the rest of the *M. ovi.* prevention program at risk. Here's why:

The notion that kids and lambs less than two months old arose from preliminary test data at Washington State University that suggested kids and lambs under the protection of maternal antibodies were (or could be managed to be) *M. ovi.*-free. Subsequent research showed this preliminary impression was incorrect. Kids and lambs under two months of age can carry *M. ovi.*

Consequently, testing to prevent pathologic strains of *M. ovi.* from import to Alaska in domestic sheep and goats should require *M.-ovi.* free certification for ALL domestic sheep and goats.

The AWCA supports the rest of the proposed regulations as written.

The Alaska Wildlife Conservation Association (AWCA) is dedicated to maintaining healthy populations of Alaska's wildlife for use as set forth in the Alaska Constitution, Article VIII and the Functions of the Fish and Game Commissioner defined in Alaska Statutes Title 16. The mission of the. Department of Environmental Conservation is similar on the larger

environmental scale. The introduction of exotic diseases is a threat to achievement of these constitutional and statutory goals.

The AWCA realizes the path to the proposed regulations has been difficult, and respects the efforts of those involved in crafting the regulations. However, the AWCA strongly suggests deletion of the “two month exemption” for domestic lambs and kids. It basically nullifies the intent of the other proposed regulations by leaving an open window for pathologic *M. ovi.* import.

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