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State of Alaska
Department of Environmental Conservation
555 Cordova Street
Anchorage, Alaska 99501
Attn: Shannon Miller

Subject: Proposed Changes to 18 AAC 36 – Animal Health

Ms. Miller,


The Safari Club International Alaska Chapter (SCI-AK) supports, in general, the proposed changes to the regulations under 18 AAC 36 - ANIMAL HEALTH (ANIMAL CARE, ANIMAL IMPORTATION, AND DISEASE CONTROL). The proposed changes by the Department of Environmental Conservation (DEC) would require a unique trackable and traceable number to animal health certificates and certificates of veterinary inspections, add goat and sheep *Mycoplasma ovipneumoniae* testing requirements prior to animal import, update disease reporting requirements, and update the American Veterinary Medical Association's Guidelines, that are adopted by reference.

SCI-AK applauds DEC's efforts to protect Alaska's wild sheep and goat populations from MOVI. As DEC is aware, this disease has devastated wild herds of sheep in the lower-48. Entire populations have been lost to MOVI. The steps DEC is taking now will pay huge dividend in the future. With that said, SCI-AK does recommend several changes to the proposed regulations that we believe are necessary to ensure Alaska's wild sheep and goats are protected from MOVI.

The proposed regulations as currently written would exempt domestic sheep and goats under the age of 2 months. It is our understanding these young animals can still carry MOVI which then could spread to adults and then on to wild sheep. Therefore, **it is our recommendation that testing be required for all domestic sheep and goats entering Alaska regardless of age.** Furthermore, it is our recommendation that all testing be done by an **accredited diagnostic laboratory** and paid for by the importer. This is common practice when bringing other animals into Alaska. In addition, DEC should **add Movi to the Reportable Disease List**, which requires same-day reporting

Thank you for your efforts to protect Alaska's wild sheep and goats and the opportunity to comment.

Best regards


Jeff Garness
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