



27 October 2020

Department of Environmental Conservation  
Office of the Commissioner  
P.O. Box 111800  
Juneau, Alaska 99811

**RE: Comments on the Alaska Department of Environmental Conservation proposed regulation changes in Title 18 Chapter 36 of the Alaska Administrative Code, Animal Health**

Commissioner Brune,

The Alaska Wild Sheep Foundation (AK WSF) commends your efforts to improve the health and safety of domestic and wild animals in the State of Alaska through these proposed regulation changes. We sincerely appreciate the opportunity to comment on the proposed regulatory changes.

The proposed regulation is an excellent start but there are two areas that should be changed to guarantee that we are doing everything possible to prevent additional strains of Movi from entering the State. We feel strongly that **all** domestic sheep and goats regardless of age must be tested for the pathogen prior to import. Additionally, the tests for Movi should be performed by an American Association of Veterinary Laboratory Diagnosticians (AAVLD) certified diagnostic laboratory. There are numerous AAVLD certified diagnostic laboratories available throughout the United States. We also support the inclusion of Movi in the Reportable Disease List although we think the reporting criteria should be changed. Our specific comments on the proposed regulatory changes and supporting information are reflected below.

It is imperative that **All** domestic sheep and goats regardless of age be tested for Movi prior to import. We understand that most of the 20 to 30 domestic sheep and goats that are imported annually are under two months of age because of the reduced shipping rates. If the two-month criteria were to remain, you can expect that virtually all importers would ensure they met the two-month criteria to avoid the testing requirement. It could easily result in a situation where no or very few animals were tested prior to import which would be in direct contravention to the intent of the revised regulation.

There is no scientific evidence proving that *Mycoplasma ovipneumoniae* (Movi) cannot be carried by goats or sheep under 2 months of age. As currently stated by the leading Movi diagnostic testing lab in the country "*M. ovipneumoniae* infection of domestic sheep and goats is typically associated with mild disease, most often a 'coughing syndrome' of lambs and kids under 6 months of age. Less frequently, *M. ovipneumoniae* is associated with severe or fatal pneumonia in domestic lambs and adult and kid goats." <https://waddl.vetmed.wsu.edu/animal-disease-faq/mycoplasma-ovipneumoniae-diagnostics-in-domestic-and-wild-sheep-and-goats>. While lambs and kids may "typically remain uninfected with *Mycoplasma ovipneumoniae* for a considerable amount of time after birth", scientific studies have shown that kids and lambs under two-months can and do get infected and they can also be carriers of this pathogen even in the absence of a clinical infection.

The key action in the effort to prevent other strains of Movi from entering Alaska is accurate testing. It is therefore imperative that the testing be performed by American Association of Veterinary

Laboratory Diagnosticians (AAVLD) accredited laboratories. There are several of these labs throughout the United States which will provide the importer with options. Use of AAVLD accredited laboratories will ensure the accuracy, reliability, and repeatability of tests with data accepted by the mainstream scientific community.

Based on the above recommendations for **18 AAC 36.125(a)(5)**, ADEC should strike the language restricting testing to domestic goats 2 months of age and older and include the statement about use of AAVLD accredited laboratories.

**18 AAC 36.125. Goats.** (a) ... includes certification that each goat...; **and (5) if over 2 months of age, has tested negative for *Mycoplasma ovipneumoniae* by an AAVLD accredited diagnostic laboratory within 60 days of import.**

The same changes would be applied to **18 AAC 36.135(a)(6)**, ADEC should strike the language restricting testing to domestic sheep 2 months of age and older.

**18 AAC 36.135. Sheep.** (a) ... includes certification that each sheep...; **and (6) if over 2 months of age, has tested negative for *Mycoplasma ovipneumoniae* by an AAVLD accredited diagnostic laboratory within 60 days of import.**

In specific reference to changes included in **18 AAC 36.215**, we support each addition/removal to the Reportable Disease list with one recommendation; Movi should be moved up in the regulation to 18 AAC 36.215(b) which would require reporting of pathogen knowledge on the same day as discovered. As proposed (in 36.215(e)), a positive Movi case might not be reported for as many as 36 days. While Movi is not likely to cause sickness or death to an entire domestic herd (like other pathogens in 36.215(b)), it is highly contagious amongst domestics, and it certainly has the ability to cause sickness or death to an entire wild Caprinae population if exposed, therefore it must be moved up to section (b) in this regulation. There is clear evidence that a pathogen of this nature should be dealt with as soon as possible. The sooner Movi positive animals are identified, the sooner the State Veterinarian can work with the owner to mitigate the threat. If reporting isn't required immediately, there is a very real chance Movi positive animals will be given away or otherwise disappear before the Vet has any chance to address the situation.

In summary, we applaud the ADEC for initiating these long overdue changes to the regulation to help ensure that new strains of Movi are not imported into the State of Alaska. Following all-age die-offs of bighorn sheep across the west in every jurisdiction between British Columbia and New Mexico, research consistently comes back to pneumonia, with the dominant initiating pathogen being Movi. With over 200 known strains of Movi, and more being identified by the day, it is clear there are no good strains of this pathogen. The single most important thing we can do at this time to protect the health and safety of wild Caprinae in Alaska is to preclude any new strains of Movi from coming into the state with imported domestic sheep or goats.

Alaska's domestic sheep and goat industry is a small but vibrant part of Alaska life and these proposed changes will help ensure the long-term health and viability of this hobby/business while simultaneously helping to protect Alaska's wildlife at the same time. To help defray some of the initial costs to importers, AK WSF reiterates our offer to pay for the lab testing at a specific AAVLD certified lab, WADDL, for up to 30 animals per year over the next four years.

Sincerely,



Kevin J Kehoe  
President, Alaska Wild Sheep Foundation