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16 March 2019

Subject: Alaska Wild Sheep Foundation Comments on Current M.ovi Efforts

Dear Chairman Spraker and members of the Board,

Thank you for the opportunity to offer input to the ongoing Board of Game process surrounding the health and well-being of our Alaskan wild *Caprinae*. As stewards of Alaska's wild *Caprinae*, the Alaska Wild Sheep Foundation remains committed to the long-term health of our Dall sheep, Rocky Mountain goats and muskox populations and the recognition of factors most likely to affect these unique species on a population level.

Our ongoing efforts continue to focus on the respiratory bacteria *Mycoplasma ovipneumoniae* (M. ovi), as it remains the single greatest threat to the long-term health and viability of Alaska's wild *Caprinae*. Deadly strains of M.ovi continue to cause progressive bronchopneumonia and significant declines in wild sheep populations across the western US. It would be a case of gross negligence if we failed to act in a timely manner to prevent the transmission of such pathogens to Alaska's wild *Caprinae*.

To this end we urge the Board to support initiatives to make M.ovi screening part of the import requirements for domestic sheep and goats and to add M.ovi to the reportable disease list. We also commend and solicit your support for the current ADF&G Administration's more collaborative approach to understanding the threat from M.ovi and development of mitigation strategies.

Border Screening

It is imperative that Alaskans come together and recognize the importance of preventing new strains of M.ovi from entering Alaska. This can be accomplished through M. ovi screening when importing new domestic *Caprinae* (sheep/goats) into Alaska. Failure to do so will mean we are knowingly accepting an increased risk.

While there are over two hundred known strains of M.ovi in the US, there are no good strains. Even less lethal strains may have a detrimental effect on our wildlife. It is recognized that some strains are more virulent than others and similar to the flu pandemic, just because you survive one episode of the flu doesn't mean you are not susceptible to another more lethal strain.

The pending Yukon Control Order may well prevent ground transportation of untested Caprinae through the Yukon, however most imports come to Alaska via air transport.

Ultimately we must work together to improve existing import regulations to require M.ovi screening as part of importation. We urge the Board of Game to support the efforts of ADF&G and other agency staffs in this effort.

Reportable Disease List

Another step towards minimizing the risk to wild Caprinae is to add M. ovi to the reportable disease list. The reports, maintained by DEC, are for "certain disease conditions that pose or may pose significant threats to animal health, public health, the environment, or the food supply". M. ovi clearly qualifies under this statement of purpose and should be added to the list alongside existing reportable diseases/pathogens.

Another way to look at this action is that adding M.ovi to the reportable disease list clearly states to all that we take the threat from this foreign pathogen very seriously.

By adding M. ovi to this list our State Veterinarian will have visibility of when and where M. ovi is found in domestic livestock. This will facilitate the tracking of program effectiveness, management reporting, and the ability of the State Veterinarian to work directly with owners on effective livestock management options.

M.ovi - State of Knowledge Relating to Alaska

We are extremely fortunate there has been no evidence of any epizootic die offs in Alaskan wildlife as of yet due to respiratory disease.

From research experiments carried out on wild sheep, we know that some strains of M. ovi cause severe cases of respiratory disease and even death, while some strains lead to a milder case of respiratory disease. A few M. ovi strains have been found in seemingly healthy bighorn or mountain goat populations. While we don't see evidence of any large scale respiratory disease in Alaska, we cannot say it has not occurred on a small scale especially given hunter reports of coughing sheep over the years.

Recent M. ovi sampling has brought to light two separate but related problems in Alaska.

- Alaska's domestic sheep/goats have been identified through a voluntary testing program as a known reservoir of M. ovi with 4-5% testing positive, and 26% of farms/facilities having at least one positive. Despite being tested over a year ago, that has been no release of information concerning the number and types of M.ovi strains present in Alaska. Without some form of mitigation this known reservoir of M.ovi will continue to pose a threat to wildlife.
- We now have verified M. ovi positives in our wildlife with 7-9 positives between the Nelchina and Fortymile caribou herds and one positive with a TMA ram (verified through expanded DNA testing of harvested animals). According to the lab at

Washington State University, these wildlife positives have all been determined to be the same strain. Further this strain is a common strain in domestic sheep and goats. The identification of this single strain thus far indicates a single source spillover/transmission event. While these wildlife share overlapping range, the finding in two wide ranging caribou herds is concerning.

As we move forward, we must work collaboratively to improve our understanding of this pathogen, its prevalence, and strain types. The use of confirmatory testing based on expanded DNA techniques (more base pairs), multiple labs, and open communication is imperative.

This collaborative approach extends beyond our borders. As individual M. ovi strains present in Alaska are identified, collaboration with other wildlife professionals experienced with M. ovi and respiratory disease becomes increasingly important. It is imperative that we learn from others in our efforts to stay ahead of the threat.

We commend the new ADF&G Administration for fostering this collaborative approach.

Wild and Domestic Sheep Working Group

After nearly 3 years of meetings on the threat of M.ovi, the wild and domestic sheep working group met twice this winter with a professional facilitator in an attempt to achieve some consensus on the issue.

The Alaska Farm Bureau formed a caucus with the representative group of producers that they had been working with for three years, and AK WSF put together a wildlife caucus that included SCI, AOC, APHA and RHAK.

From the beginning, the wildlife caucus had concerns that the individual producers did not represent organizations or groups of producers and therefore would be not be able to bind the livestock/producers to agreements that might come out of the working group. Regardless, we agreed to come to the table to negotiate in good faith.

The meetings were well facilitated and the wildlife caucus felt both sides took it seriously and worked to maintain proper decorum and reach an agreement(s).

The proposals concerning outreach and education and a greater understanding of biosecurity were readily agreed to by both sides, but we had never had any disagreement with those actions. The proposals were that the state prepare the necessary materials and fund these programs.

Beyond the agreement on more outreach and education we could not come to any agreement on action items that would require change on behalf of livestock owners/producers, even in light of availability of private funding, concessions on confidentiality of livestock records and support for IA program development.

While there was positive discussion on continuing and expanding M. ovi testing for domestics, the wildlife caucus members were not willing to commit to substantial financial resources without some type of over-arching agreement to protect their investment.

It is an extremely challenging negotiation environment when one side needs change and the other side wants status quo. This is not meant as a statement of right or wrong but a simple fact that explains a major impediment to effective negotiation.

Ultimately the wildlife caucus as a group did not feel like we were making sufficient progress to warrant continued meetings. We had agreed as a caucus that we would need to have an unequivocal agreement on screening for M.ovi prior to import and the addition of M.ovi to the reportable disease list to continue the discussions. Although some of the domestic caucus members supported the importation screening, their stated proposal included that they would agree only if ADF&G and DEC agreed and someone else paid for it. There was no agreement on the reportable disease list.

Continuing Efforts

Since the working group meetings, AK WSF has continued to work with Agency staff on solutions as well as privately with individual producers through our M. ovi Free Program (MFP). While our State Veterinarian declined to work with us on this project, Dr. Besser from WSU is an active participant. It appears that a number of Alaskan producers are willing to move towards a disease free goal for their own herds/flocks but it would be almost impossible for them to maintain that status when the other herds with which they must interact for breeding and acquiring new animals are not in an M.ovi Free status.

Summary

In summary we ask the Board to support initiatives to require testing for M.ovi prior to importation of domestic Caprinae into Alaska, add M.ovi to the reportable disease list and encourage the current administration's efforts at a more collaborative scientific approach to understanding and mitigating this threat.

Epizootic respiratory disease is not something we can afford to experience in our wild *Caprinae*. AK WSF will remain focused on M. ovi and other potential threats and the development of potential mitigation strategies. As long as M. ovi poses a significant risk to Alaska's wild *Caprinae* we will continue to work towards increasing awareness and discussion surrounding this issue.

Kevin J Kehoe President Alaska Wild Sheep Foundation