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September 21, 2020

Shannon Miller  
Department of Environmental Conservation  
555 Cordova Street  
Anchorage AK 99501

**RE: PROPOSED REVISIONS TO ANIMAL CARE, ANIMAL IMPORTATION, AND DISEASE CONTROL**

Dear Ms. Miller,

Thank you for the opportunity to comment on the proposed regulations Department of Environmental Conservation (DEC), ANIMAL HEALTH (18 AAC 36): PROPOSED REVISIONS TO ANIMAL CARE, ANIMAL IMPORTATION, AND DISEASE CONTROL. I am providing comments on behalf of the Alaska State Veterinary Medical Association (AKVMA). AKVMA is comprised of 170 veterinarians that represent the broad spectrum of veterinary medicine, including, but not limited to small animal, agriculture animals, exotic, wildlife, aquatic, and equine practice, and those veterinarians working in research, academia, military, and other government capacities. The AKVMA is committed to helping protect the health, safety, and welfare of Alaskans, advocating for veterinarians to provide safe, competent professional veterinary services to consumers, and supporting scientifically based regulations that support these goals.

Regulations, and resources to enforce compliance of those regulations, should be correlated to the highest priority diseases of concern, based on impact to human or animal health, and in consultation with state and federal domestic and wildlife agencies, public health agencies, and other relevant associations and stakeholders. Animal health regulations should be grounded in scientific evidence, with a One Health approach to protecting human, animal, and environmental health in our state.

AKVMA supports the adoption by reference of the American Veterinary Medical Association's Guidelines for the Euthanasia of Animals 2020 Version, 18 AAC 36.500 (f). This document is based on a significant amount of research and collaboration. This update to the DEC regulations reflects the most current methods and protocols related to humane euthanasia.

AKVMA supports the addition of *Mycoplasma ovipneumonia* (Movi) to the reportable disease list. *18 AAC 36.215 (e) (30) Mycoplasma ovipneumonia in any cloven hoofed species.* This will provide additional information about the disease, with minimal impact to state resources or to individual producers.

AKVMA does NOT support the addition to *18 AAC 36.135. Sheep (a) (6) if over 2 months of age, has tested negative for Mycoplasma ovipneumoniae within 60 days of import.* Testing for Movi prior to import does not protect human health, nor does it protect domestic or wild animals. Research up to this point indicates that domestic and wild sheep and goats in Alaska both have an estimated prevalence of 4-6%. Movi is present worldwide. There is no standardized test nor testing protocols. No other state animal health agency nor wildlife health association has identified import testing of Movi as a meaningful way to control respiratory disease in wild sheep or in domestic livestock.

Preventing the transmission of disease between wild and domestic animals should be a broad focus on separation of these species, rather than a narrow focus on one pathogen. Respiratory disease, particularly in wild sheep, is a multi-factorial process, resulting from multiple pathogens and stressors.

Limited state resources will be better spent on surveillance for Movi in domestic and wild sheep and goats, as well as other species, and a bigger educational outreach effort on biosecurity and maintaining separation between domestic and wild animals. This separation decreases the risk of transmission of many pathogens, not just Movi.

Establishing testing requirements for any species for any pathogen that is not scientifically defensible, and not recommended by the agencies that have expertise in the area, sets a poor precedent for the future of animal health and disease management in our state.

In summary, AKVMA supports the addition of *Mycoplasma ovipneumonia* to the reportable disease list; supports the adoption of the AVMA Guidelines for the Euthanasia of Animals 2020 Version; and does NOT support the mandatory testing of domestic sheep and goats for *Mycoplasma ovipneumonia* prior to import into Alaska.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'McKayla Dick', written over a horizontal line.

Dr. McKayla Dick, President-Elect AKVMA

***“Promoting excellence and professionalism of Alaska Veterinarians in advancing the health and well-being of animals and the public.”***