

May 9, 2007

To: AVMA President Dr. Roger Mahr
Members, AVMA Executive Board
Dr. John Smith, Chairman AALC

Dear Drs.

There are 29-30 veterinarians employed by State and Federal agencies in the 11 western states with major populations of bighorn sheep whose primary job is the diagnosis, prevention and treatment of diseases in wildlife. The agencies are our clients and employers, the wild animals they are responsible for are our patients. Most of us have one or more graduate degrees or board certification and we are quite aware of advances in research in our areas of expertise.

Thus we were taken aback when we read the following news put out by the American Veterinary Medicine Association:

JAVMA News, May 3, 2007 Wildlife-livestock interactions policy adopted

The AVMA has adopted a policy encouraging government agencies to be guided by science in their policies on interactions between wildlife and livestock. The Executive Board approved the policy "Wildlife-livestock interactions," recommended by the Animal Agriculture Liaison Committee, which reads:

The AVMA encourages relevant federal and state agencies that deal with wildlife and domestic animal interactions to require the use of science-based evidence and peer-reviewed research to direct their health and resource management policies.

Bighorn sheep in the western states are a sensitive species prone to large-scale die-offs. According to the AALC, policies imposing grazing limitations for sheep and cattle appear to be inconsistent with existing scientific information concerning disease, especially information about bighorn sheep mortality. In particular, *Mannheimia haemolytica* infections in bighorn sheep are different from those found in domestic species.

The AALC is concerned that public policy is being developed and implemented on the basis of speculation rather than scientific information and peer-reviewed research.

Now that the board has approved the policy, the AVMA committee, along with the American Sheep Industry Association, will contact and encourage use of the policy by agencies with jurisdiction over livestock and wild sheep health and population management in the western United States.

Source: <http://www.avma.org/onlnews/javma/may07/070515j.asp>

Although the new AVMA policy itself may be acceptable, the full statement above is not and appears to set a dangerous precedent of AVMA and its AALC taking sides in what may become a professional dispute between wildlife veterinarians and veterinarians who support woolgrower perspectives. It is even more dangerous because it is misinformed

and did not involve any consultation we can identify with wildlife veterinarians or those who hold views outside the agricultural community.

In our experience the relevant government agencies that deal with wildlife have been guided by science based evidence, much of it coming from peer reviewed research. It has been our job to oversee this, and any suggestion by the AVMA or its Animal Agriculture Liaison Committee (AALC) to the contrary is professionally inappropriate and untrue. Further, any efforts on the part of AVMA and its AALC to offer conflicting advice to our clients/employers outside the normal regulatory process or to criticize the manner in which we have been practicing wildlife veterinary medicine is unacceptable and could be seen as a breach of ethics and professional conduct.

We wonder whether AVMA and AALC would support such a position if the controversy involved state and federal agriculture agencies, their veterinarians and the development of livestock disease management plans. If the controversy involved feedlot medicine, we wonder if AVMA and AALC would try and stop colleagues from separating calves potentially infected with, carrying or capable of transmitting *Mannheimia haemolytica* or *Pasteurella multocida* from potentially susceptible animals. Vaccination and antibiotic treatment are not yet applicable to free-ranging bighorn sheep so separation and best management practices, which together are believed to be critical for managing shipping fever and calf pneumonias, are the primary tools we have. Why would anyone try and keep us from using them, if, in our veterinary judgment they are needed and beneficial?

The statement, "Bighorn sheep.....are a sensitive species prone to large-scale die-offs...", suggests that this is an inherent quality of the species. That is very simplistic and possibly misleading

Implying that free-ranging bighorn sheep pneumonia dieoffs have nothing to do with domestic sheep contact does not agree with experiences some of us have had, the experimental evidence, or published papers in peer reviewed journals. Among the peer reviewed papers pertinent to potential risk of respiratory disease transmission between the two species are Foreyt, W.J. 1989. *Pasteurella haemolytica* pneumonia in bighorn sheep following direct contact with normal domestic sheep-an experimental study, AJVR 50:341; Callan et al 1991, Development of pneumonia in desert bighorn sheep after exposure to a flock of exotic wild sheep and domestic sheep, JAVMA 198:1052; and Onderka et al. 1988, Experimental contact transmission of *Pasteurella haemolytica* from clinically normal domestic sheep causing pneumonia in Rocky Mountain bighorn sheep. J. Wildl. Dis 24:663. These and subsequent experiments by Foreyt, have shown that, when allowed to pasture together all or most bighorn sheep die of pneumonia and domestic sheep do not show signs of illness. To our knowledge no one has ever conducted trials like this and gotten a different result and/or published conflicting results. This does not happen when cattle, llamas, elk, deer or mountain goats are substituted for domestic sheep. How can AALC and AVMA discount unrefuted articles published in its own journals?

Although it is some time since these experiments occurred, we know of no statute of limitations on peer reviewed science, and the suffering and death these experiments cause, and animal welfare issues alone, argue against regularly sacrificing dozens of bighorn. However, it is our understanding that these types of trials may be repeated at Washington State University in the next year or so using marked *Mannheimia* spp. organisms to better allow tracing between contact animals. Nobody is more interested in the advancement of research in this area than wildlife veterinarians, but unless or until different results are obtained we must assume that if domestic sheep are allowed to mix with bighorn sheep serious fatal pneumonia epidemics may result and that this mixing represents a measurable risk to bighorn sheep populations.

Circumstantial evidence and field observations over several decades have shown that free-ranging bighorn sheep that share contact with domestic sheep and at times, domestic goats, also can experience large scale pneumonia die-offs. Published references documenting this and other references we use in considering potential disease interactions can be found as Attachment 1 (200 citations).

There are a number of published papers that attempt to define the normal respiratory flora of bighorn and domestic sheep. There are indeed a few *Mannheimia haemolytica* isolated from bighorn sheep that are biochemically different from those identified so far in domestic species, but these have not been shown to be a primary cause of disease. S. Safae et al. 2006. Microbial diversity in bighorn sheep revealed by culture-independent methods, J. Wildl. Dis 42:545, recently used molecular rather than culture techniques and showed that dozens of species of bacteria including a number of species of *Pasteurella* may reside in the tonsils of bighorn sheep. However, finding some different species of *Pasteurella* or *Mannheimia* in bighorn or domestic sheep does not change the fact that bighorn frequently die of pneumonia after coming into contact with domestic sheep under experimental and range conditions.

We question the basis for the conclusion by AALC and AVMA that “policies imposing grazing limitations for sheep and cattle appear to be inconsistent with existing scientific information concerning disease”? What evidence was provided? Were any publications not included in the 200 we make use of (Attachment 1) provided? Who told AVMA or AALC that grazing limitations on cattle with regard to bighorn sheep were under consideration? It appears that the American Sheep Industry Association or whoever represented them may have presented some very biased, misleading or incomplete information.

Why was a committee only representing agriculture allowed to bring a policy statement that by its very title involves wildlife to the AVMA Executive Board (EB) with no wildlife veterinary input? It appears that there has been clear break with normal operating procedures since no consultation occurred between AALC and AVMA Committee of Environmental Issues (CEI), despite the fact that CEI has previously considered this problem, and this policy, itself fairly benign, has major environmental implications if AALC and American Sheep Industry Association intend to use it in the

manner the May 3 article suggests. Why was no effort made to contact or discuss this issue with the American Association of Wildlife Veterinarians?

We feel AVMA needs to immediately run a news item similar to that run on May 3 that clarifies the previous posting. We would suggest the following: “Wildlife-livestock interactions policy clarified : In stating “The AVMA has adopted a policy encouraging government agencies to be guided by science in their policies on interactions between wildlife and livestock” the AVMA and its Animal Agriculture Liaison Committee did not mean to imply that wildlife veterinarians advising and formulating policy for western US Federal and State wildlife agencies were not already using good science, nor did AVMA mean to imply that wildlife veterinarians should not use their best professional judgment in diagnosing, preventing and treating diseases of wildlife, including attempting to keep potentially infectious animals separated from susceptible animals, in particular bighorn sheep.”

We would like to see this clarification issued within 5 days of receipt of this letter. Without this clarification, AVMA will be exacerbating some potentially serious problems and setting dangerous precedent with regard to our practice of veterinary medicine, ones we and our wildlife management agencies would be bound to try and neutralize. We hope that in the future, if AVMA or its committees have concerns about wildlife, conservation or environmental issues that they will consult with wildlife veterinarians through the AVMA CEI or the AAWV.

After AVMA has clarified its position on its Wildlife-Livestock Interactions Policy we would appreciate an additional written response and some answers to the questions we have posed above. These should be addressed to Dr. Kirsten Gilardi and Dr. Dave Jessup as per locations shown below.

In closing, a number of wildlife and conservation oriented veterinarians have served, been honored by, and supported AVMA. AAWV has over 200 members. The undersigned are a few of the wildlife veterinarians who could be quickly contacted and that are concerned with the issues in this letter. Within the ranks of the AVMA, you might be surprised how many veterinarians see themselves as conservation and environmentally oriented. As wildlife health professionals, we must be able to rely on AVMA as the umbrella organization dealing with veterinary medicine, to be supportive of our work and consult with us on critical wildlife related issues. If AVMA doesn't recognize our unique expertise and professionalism and support us, how can we continue to help and support AVMA?

Sincerely,

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