United States Department of Agriculture

United States Department of Agriculture

Marketing and Regulatory Programs

Washington, DC 20250

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SUBJECT: Request for Emergency Approval of a New Information Collection for Identifying Risk Factors of *Mycoplasma bovis* in American Bison

The Animal and Plant Health Inspection Service (APHIS) is submitting to the Office of Management and Budget (OMB) an information collection request for an emergency 6-month approval for a case control survey of *Mycoplasma bovis* emergence in bison herds. Bison producers need this information immediately to mitigate risk for this rapidly spreading pathogen. Mortality losses from this pathogen are high and recurring, creating significant economic losses for producers, cultural losses for Native American tribes, and threatening conservation of the National Mammal. No effective treatments or vaccines currently exist for this pathogen. Therefore, the best option APHIS and bison producers have is to identify risk factors and develop mitigation strategies based on these factors.

In December 2021, the USDA Office of Tribal Relations asked for a rapid response from APHIS on behalf of Native American tribes to address these multiple *Mycoplasma bovis* outbreaks. APHIS has identified collaborators and resources needed for immediate data gathering in March and April 2022 to identify risk factors and mitigate future outbreaks. APHIS will collect data via telephone and email surveys. APHIS will solicit study participation from a list of National Bison Association members and from affected producers who consent to having their identifications turned over by diagnostic laboratories.

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APHIS' main mission is the prevention, control, and eradication of animal diseases to safeguard animal health. Disease detection and prevention is the most effective method for maintaining a healthy animal population and for enhancing the United States' ability to compete globally in animal and animal product trade. APHIS has determined that in this situation, traditional information collection and rulemaking procedures could further cause public harm, is contrary to the public interest, and that there is good cause under 5 U.S.C. 553.

USDA first recognized *Mycoplasma bovis* as an emerging pathogen in bison in 2013. Since that time, only a few premises have been affected until 2021. In 2021 there was a substantial increase in new affected premises and herds. These affected herds are experiencing 10 to 50% herd loss in multiple age classes, with reproductive aged cows suffering the most significant losses. Despite the unique and significant burden of this pathogen in bison, little information exists on the sources of infection to naïve herds. Once affected, bison producers report significant recurrent losses in subsequent years. For instance, producers first affected in 2013 continue to experience significant losses, particularly in 2021. No diagnostic testing is currently able to identify animals infected but not shedding the bacterium. This means that these animals can serve as a hidden source of infection during subsequent years. Therefore, to limit additional herds becoming infected in the 2022 season, is it critical for APHIS to develop information on the potential sources of new infections in naïve herds.

To develop the prevention and control recommendations that bison producers need, APHIS needs to identify differences in management practices, environmental conditions, and herd-level factors between affected and unaffected herds. This information is a critical component to protect the industry and tribal and conservation herds. Bison serve as a growing economic industry, and a critical food source, particularly for Native American tribes, where bison also serve important cultural and spiritual roles. This native species is of unique conservation importance on public and private lands alike and carries significant and unique importance to the American public and wildlife enthusiasts. Prevention and control measures are desperately needed to stem further economic losses and threats to the conservation of this wildlife species that has already experienced significant loss of genetic diversity when it was hunted to near extinction.

Thank you for your time and consideration.

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