

*Ernie Kuhl*

Our organization appreciates the work in which Senator Barrett and this committee has done to take a closer look at the complexities of Montana's Designated Surveillance Area (DSA) Official Order.

The question with regard to local brand inspector's statutory authority expressed in Mr. Cambell's letter to the Department of Livestock is compelling evidence to us that a modified approach should be considered by the Board of Livestock for enforcement. Such an approach should consider both the statutory authority issue and the employment status liability issue of local brand inspectors.

Any modified approach will require integrated thinking in the development and implementation of an efficient and flexible enforcement strategy. This strategy cannot allow for confusion among ranchers and it has to be well understood by all stakeholders.

We understand the limitations with veterinarians, but perhaps finding a way to utilize the best elements of private sector veterinarians through a public-private partnership with the Department of Livestock could be worth further exploration.

As such, this committee's overall consent to the DSA strategy is essential to our ranchers achieving a longer term policy goal. No, it's NOT fair that ranchers have to bear the burden of this situation. The DSA in our view is NOT the final answer to the brucellosis issue. The DSA is simply the confrontation of the brutal and unpleasant facts of the current situation. Which is, as long as Brucellosis exists in bison and elk, our ranchers will have to adhere to a model of complex surveillance and risk and disease based isolation measures?

This is evidenced by state veterinarians from North Dakota, Nebraska, Wyoming, Kansas and Colorado who say they are not comfortable with the brucellosis "FREE" status of Montana under the old classification standards due to risk from bison and elk. As a result, the Department of Livestock had no other choice than to put forth a clear process for crafting and implementing this DSA framework. Did we get everything we wanted? NO. But we did get an annual review which is fast approaching. Achieving steady improvement or putting forth removal criteria parameters should come through the annual review process of the DSA.

What are the next steps that need to be pursued?

- Resources. The legislature and Congress has the "Power of the purse" and therefore plays a critical role in supporting our goals through resource allocation
- Strategic planning needs to take place for how to achieve the most effective collaboration with FWP and U.S. Fish and Wildlife Services. Just because brucellosis prevalence in wildlife presents its own unique set of management complexities, we should not just ignore finding epidemiologic solutions.
- Strategic planning needs to be developed relative to research regarding brucellosis in the GYA
- The development of appropriate MOU's with all involved entities with regard to brucellosis in bison and elk management needs to begin

We believe that we can reach a higher standard. Which is the standard set by the World Animal Health Organization (OIE). OIE's standards for brucellosis free status for a country include the stipulation that no vaccine has been used in the country for at least three years, which the United States and Montana ranchers will never be able to meet as long as the reservoir of brucellosis in bison and elk remains in the ecosystem. This needs to be the focus of ranchers, the legislature, congress, state and federal government. Thank you.