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Regulatory Analysis and Development, PPD

APHIS

Station 3A-03.8

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RE: Docket No. APHIS-2014-0095

The Wyoming Brucellosis Coordination Team (WBCT) was formed in 2004 to chart a course for brucellosis management and control in elk, wild bison, and cattle. The WBCT agrees with the Advanced Notice of Proposed Rulemaking recommendation to remove *Brucella abortus* from the Department of Health and Human Services (HHS) and United States Department of Agriculture (USDA) list of Select Agents and Toxins.

The last remaining reservoir of *Brucella abortus* in the United States is in wildlife of the Greater Yellowstone Area (GYA) which poses exposure and transmission risks to cattle in the states of Idaho, Montana, and Wyoming. The presence of the organism in nature would indicate that including it on the Select Agent list would not preclude others from acquiring and potentially using field isolates. Anyone with enough knowledge to weaponize this organism would also know that it is present in thousands of elk and bison in the GYA.

Listing *B. abortus* as a select agent seriously restricts the ability of states, livestock industries, and researchers to address brucellosis in the United States. There is a critical need to develop vaccines, therapies, and diagnostic tools necessary for disease surveillance, control measures and eventual eradication of this disease in the GYA. Research should be allowed in appropriate laboratory and field settings so that brucellosis can eventually be contained or eliminated in susceptible populations. The current inability to conduct such research and develop mitigation strategies is resulting in continued economic costs and losses to a variety of stakeholders in the region.

Removal of *B. abortus* from the Select Agent and Toxin list would not eliminate the need for continued high quality safety precautions when handling this biological agent. It would continue to require biosafety level 3 precautions as it would remain an important public health concern.

Brucella abortus would make a poor choice as a bioterrorism agent. There is a long incubation period before clinical symptoms appear, a very low mortality rate in humans, the disease is readily treatable with currently available antibiotics, and human to human transmission is rare.

We urge HHS and USDA to implement a science-based decision-making process and remove *B. abortus* from the Select Agent and Toxin list. This will allow vital research to be performed to bring the livestock, wildlife, and human diseases it causes under control. To allow this disease to remain endemic in nature while restricting research on the agent is entirely counterintuitive.

Sincerely,

Francis D. Galey, D.V.M., Ph.D.

Chair, Wyoming Brucellosis Coordination Team