

## Post Cebra Brief Response

[Dr. Cebra's response](#) to the 07/03/24 Western Association of Fish and Wildlife Agencies (WAFWA) Final South American Camelids (SAC) Brief addresses WAFWA's advocacy for granting conditional access for llamas to wild sheep ranges based on disease testing. His statement highlights this advocacy as lacking historical information and being out of context regarding llama disease history.

The WAFWA brief is based on two assumptions: 1) There is not adequate data regarding diseases carried by llamas. 2) There is not enough history regarding disease transference between llamas and other species known to carry diseases that affect wild sheep. WAFWA made these assumptions without consulting the llama veterinary research/clinical community or llama producers. Over the last six years our ad hoc committee has pointed this out and repeatedly attempted to provide the Wild Sheep Initiative (WSI) (formerly Wild Sheep Working Group-WSWG) the information they lacked regarding llama veterinary medicine and natural history. That information has never been responded to or acknowledged by WSI.

The same information and perspective Dr. Cebra provides in this letter has been presented in our responses to the previous WSI briefs. We gleaned that information from Dr Cebra's retired contemporaries: [Dr. Murry Fowler](#), [Dr. LaRue Johnson](#), and [Dr. Gregg Adams](#) who studied llamas as disease threats to other species, wild and domestic. This topic emerged 30 years ago when the National Park Service (NPS) attempted to ban llamas as a disease threat to desert bighorns in Canyonlands National Park Service-South East Utah Group (Canyonlands NP). Dr. Cebra simply restates, focuses, and amplifies that information, specifically to address this current brief. He does so with a high degree of credibility as the leader of international llama research and veterinary medicine.

-Llamas are not new to North America, in fact it's their place of origin, specifically western North America (NA). WAFWA and the wild sheep community have always referred to llamas as South American camelids and non-native. Cattle and horses are never referred to as European bovids and European equids and are afforded quasi-native acceptance, though relatively recently introduced to western NA. As Dr Cebra notes, they are markedly less adapted to the altitude and dry conditions of western NA in which llamas thrive because it's their place of origin. To ignore cattle and horses as disease threats to wild sheep while seeking conditional access for llamas is arbitrary as Dr. Cebra notes.

-Llamas have been commingled with sheep, domestic and wild, for eons with only isolated and terminal disease crossover, usually involving llamas being atypically infected by sheep predictably carrying ruminant pathogens. These ruminant pathogens comprise the list of diseases the RISK ASSESSMENT ON THE USE OF SOUTH AMERICAN CAMELIDS FOR BACK COUNTRY TREKKING IN BRITISH COLUMBIA (CCH '17) ascribed to llamas and characterized by WAFWA as the most current list of pathogens for llamas. Dr Cebra notes that llamas harbor no endemic disease, specifically the ruminant diseases named in CCH'17. This list has no relevance to llamas.

This echoes the [summary statement](#)\* from the 1995 Canyonlands veterinarians who conducted the Canyonlands summit addressing llamas as a disease threat to desert Bighorn Sheep. Additionally, the [2020 AASRP](#)\* statement from the 1000+ practicing and research veterinarians comprising their membership specifically name the diseases in the CCH'17 and dismiss llamas as a threat to carry or communicate any of the listed diseases to wild sheep. We have provided these statements to WAFWA in several of our responses and discussions without acknowledgement or discussion.

-Dr. Cebra notes that llama exposure to disease pathogens typically elicits an immune response resulting in a blood titer. If isolated infection occurs, the llama typically clears the infection or succumbs quickly. They do not harbor the disease nor communicate it within their own population or to other species. WAFWA's recent brief acknowledges this phenomenon as curious. Uninformed by historical observations and documentation that show this to be normal, WAFWA attributes it to uncertainty that needs to be resolved through testing. Page 2 of the WAFWA Final Brief *"To date, no peer-reviewed literature exists on confirmed disease transmission from SACs to any mountain ungulates; however, given the environmental and health risks wild sheep currently face and the ability for diseases to be transmitted from other domestic animals to wild sheep (e.g. domestic sheep and cattle), a preventive approach should be taken."*

-Llamas have been under direct human control and observation for thousands of years and no endemic diseases have been identified. How does WAFWA employ a narrative that counters thousands of years of observation corroborated by 50+ years of modern veterinary management based on their recent conjecture that ignores the preponderance of evidence?

-Llamas are noted to have a robust immune system and the emphasis in llama disease research is focused on researching and trying to develop a means of replicating this immunity in other species. This emphasis and effort validates the previous three assertions. Researchers and scientists have observed the historic lack of endemic disease and the lack of disease transference in llamas and are putting a lot of effort and money into understanding and replicating the unique aspects of their immunity. The promise of using llamas' immunity to cure/prevent disease in other species including humans has created a lot of excitement. It completely undermines WAFWA's position that llamas require testing because they are new to veterinary observation and research, and are without documented history.

Wild sheep have a notoriously weak immune system that leaves them vulnerable to the polymicrobial pneumonia that devastates entire flocks. Would it not make sense for WAFWA to investigate the possibility of developing vaccines or palliative treatments from the template of llama antibodies?

-Dr. Cebra addresses the error of WAFWA characterizing disease titers as indication of infection. Antibody blood titers are an indication of llamas' predictable and dependable immune response. It also highlights the constant presence of ruminant pathogens that elicit those titers.

-He points out the arbitrary reality of zero tolerance/precautionary principle applied to llamas and not to other species. This is particularly relevant to this circumstance where llamas, documented not to carry or transfer disease, are targeted for conditional access to sheep ranges while other species (specifically horses, cattle and humans), documented to carry all or some of the listed pathogens, are allowed unconditional access to those same ranges.

-He characterizes the "absence of evidence is not evidence of absence" statement as unrealistic and paralyzing in the real world. To apply this axiom as guidance for wildlife/wilderness management would require a total shut down of all activity.

The lack of transparency and adherence to scientific decorum by WSI and the administration of WAFWA undermines and calls into question their mission statement:

**Advancing Collaborative, Proactive, Science-Based  
Fish and Wildlife Conservation and Management Across the West.**

The current brief we are commenting on was prefaced with a [cover letter from Dr. Zach Lowe addressed to committee member, Scott Woodruff](#). Our committee had submitted a response to WSI's 04/10/23 final brief on 05/16/2024 as requested by WSI chairman Daryl Lutz. Daryl wanted to discuss that response prior to presenting it at the June WAFWA-WSI meeting. Without that discussion occurring, another *Final* Brief dated 07/03/24, was issued, accompanied by a cover letter from WAFWA executive director, Zach Lowe who stated "This final version addresses many of the concerns you brought forward this past spring." Thus begins the string of contradictions that define this brief.

It addressed none of the many issues we raised in our response and in fact raised new issues. He further stated, "Careful consideration" by the WAFWA BOD and executive committee resulted in the approval of this brief. We doubt the BOD was even aware of our response this new brief was directed toward. This laundered and vague statement depends on nuance that triggers opposition only from those with knowledge and understanding of the issue.

We asked Dr. Lowe for signatures and the research supporting the new 07/24 brief contents. We received a defiant refusal to reveal any supporting documentation or attribution of those who wrote the brief or BOD members who contributed input or approval. We were informed the brief was final and not open to discussion. Consult the [attached email chain](#) to follow this bizarre sequence characterized as transparent science.

Zach informed us the brief would not be posted on the WAFWA website but would be made available to anyone requesting it. Then he sent the brief to Daryl who in turn sent it to all the members of WSI and Wildlife Health Committee (WHC) who were free to distribute it. We assume the brief has passed through WAFWA and their contacts as well as the wildlife agencies WSI contributors work for. This explains our broad distribution of Dr. Cebra's letter as we attempt to factually counter Zach and Daryl's distribution of the brief.

Analysis of the brief presents many head scratching moments. None of the supporting background information they provide proves valid against the facts and background Dr. Cebra presents in his letter. Based on their uninformed assumptions and projections, WAFWA concludes the only solution is to require testing of llamas to gain information that has been in existence for decades, in some cases centuries.

After making this recommendation for testing that would lead to a required passport for llamas to have conditional access to wild sheep ranges, WAFWA makes this statement: **"WAFWA's WSI or WHC has no official position concerning disease or pathogen transfer risk from SACs to wild sheep."** This statement disqualifies their simultaneous call for required testing before access to federal land.

Another interesting recommendation is the **"Suggested Next Steps"**: *The WSI and WHC recommend a facilitated collaborative forum with leaders from the SAC community, domestic animal and wildlife health professionals, wild sheep and land managers, and conservation organization representatives with the goal of learning and sharing perspectives.*

How does this work against the backdrop of Zach's email refusing to identify signatories authoring the brief or documentation of references supporting their position, and declaring the subject decided and closed? We don't feel collaboration really describes what WAFWA is proposing.

WAFWA talks about collaboration and discussion; ... *engage with domestic livestock owners and users that share the same landscapes inhabited by wild sheep.*  
*Mission Statement, Revised January 2020*

So why have they avoided every exchange scheduled with our committee over the last 6 years as they initially pursued an outright ban and now pursue a testing protocol? WAFWA has used proposed discussions as a pretext to get our input and subsequently issued a peremptory revised brief, using our comments to edit their response and present it as a new brief.

WAFWA-WSI/WHC has never responded directly to our comments on any of their 3 briefs. There has been no interaction, just editing and resubmission to better defend their suppositions. Zach stated this brief addressed most of our committee's concerns. The brief addressed none of our concerns.

Our response to the 04/10/23 brief was a comprehensive treatment of the issue of llamas as a disease threat to wild sheep starting with the **1995 Canyonlands Summit/CSU Summary Veterinary Statement**. That 1995 statement echoed Dr. Cebra's current observations regarding llama disease. Though focused on Johnes disease, Canyonlands findings supported the llama veterinary health history that included no endemic diseases and no transmission to other livestock or wildlife. The letter was signed by CSU veterinarians: Dr. LaRue Johnson DVM, Leading llama researcher 1980-2010, Dr. Frank Garry DVM Johnes research in dairy cattle, Dr Dave Getzy DVM, Director Diagnostic Lab, and Dr Terry Spraecker DVM, Diagnostic Laboratory Wild Sheep Pathologist. It is significant that 30 years later there are no new or emerging disease considerations as confirmed by Dr Cebra's recent letter.

Dr. Helen Schwantje was negligent not to consult the Canyonlands Summary and the veterinarians writing it before she initiated her own questionable, independent testing of llamas in 2001. Her undisciplined interpretation and presentation of her test results further compromised her work. This current llama disease issue could have been avoided if she had only employed some professional decorum and consulted the llama research community.

In view of this gaffe, it is incredible that WAFWA is attempting to force the llama industry into another round of ill-advised testing without substantiated disease occurrence or identification. It's even more incredible that WAFWA is attempting to require testing for the diseases Helen Schwantje's hypothetical Risk Assessments (RA) identified and that Dr. Cebra just disqualified. Beyond amazing is the fact that WAFWA included Dr. Schwantje in writing and editing the 3 unsupported briefs they have issued advocating testing llamas. Since the CCH'17 Dr Schwantje has failed to defend her work and has downplayed its significance as was documented in our previous comments.

In the preceding 30 year span of unchanging llama disease status, a number of issues have been created by WSF and WSI pursuing llama bans and testing to support the Wild Sheep Foundation (WSF) llama banning agenda. Despite Zach's characterization of WAFWA's response addressing our concerns, these concerns still remain unaddressed:

1. Provincial wildlife veterinarian Helen Schwantje, DVM received funding (\$25,000) from the British Columbia (BC) agency The Ministry of Forests, Lands, Natural Resource Operations and

Rural Development (FLNROD) to create the CCH'17 to provide retrospective scientific support for their 2016 legislation banning llamas in a northern BC province for hunting. WAFWA failed to vet the RA's against US veterinary science, allowing BC research lacking peer review to influence U.S. wildlife and land use policy.

2. Allowing anti-llama WSF members serving on WSI to write policy recommendations and to participate in writing the briefs advocating testing of llamas.
3. Failure to respond to documentation of WSF control of the llama ban narrative. The paper, "**Still Hasn't Found What She's Looking For**", was included with our response. Besides showing Dr. Schwantje's substantial role in supporting the WSF llama ban campaign, it shows WSF's THINHORN SHEEP SUMMIT II SYNTHESIS & SUMMARY 2017 (THS'17) as a WSF collaboration to establish a basis for banning llamas
  - a. Dr Schwantje's advocacy for using "domestics" as a pejorative term selectively applied to sheep, goats and llamas as disease threats while not including other domestic species.
  - b. Quid pro quo offer from WSF (Thornton/Hurley) to **fund WSWG/WAFWA projects from tag auction funds (Chairman, Mike Cox) at WSF's THS'17**
  - c. Collaboration with Non Government Organizations (NGO's) to advocate llama bans.
  - d. Advocating political influence to effect llama bans.
  - e. Crafting the CCH'17 to effectively cast llamas as a disease threat.
  - f. WSF and WSI dual member **Kevin Hurley's Comment letter to ANWR** on behalf of WSF advocating llama ban based on the false information in CCH'17.
4. Not responding to our calls for financial accountability regarding tag auction funds (public funds) being controlled and allocated by WSF, a private industry lobbying group. Public funds need to be controlled by public institutions.
5. Ignoring input from U.S llama researchers, vets, and vet schools regarding Helen's RAs and her lack of scientific discipline. \* **Dr. LaRue Johnson, Dr. Murray Fowler, and Dr. Gregg Adams.**
6. Intentionally citing the Chugach National Forest Draft ROD that proposed banning llamas instead of the Final ROD that allowed llamas, that we submitted.
7. Intentionally misquoting an Alaska Department of Fish and Game (ADF&G) letter with the implication the agency was continuing to watch llamas as a disease threat when in fact they said they were no longer considering them as a disease threat.
8. Calling the **Foreyt** pen studies outdated and inconclusive when they are in fact foundational to current understanding of sheep disease.
9. Arbitrarily not considering research studies published prior to 2010 though most WAFWA citations of isolated disease in llamas predate 2010.
10. Failing to respond to our concerns regarding the stress and disease transmission potential of WSI's current "test and remove" strategy as well as the program's ineffectiveness.
11. Failure to address our comments highlighting the reduced impacts of using llamas for backcountry packing (especially for sheep hunting) to reduce the impacts of equine stock used by WSF OG's

We've attached original copies of the **WAFWA 04/10/2023 brief** and a copy of **our response 05/16/24.** This is the exchange that resulted in the **current Final WAFWA 07/03/2024 brief** that ignores all the points we raised in our response. This provides the full context of this exchange to appreciate the obstructive and dismissive attitude WSI maintains while calling for llama testing. WAFWA and State wildlife agencies need to address the abuse of science that WSI has allowed while trying to limit llama access to wild sheep ranges in favor of WSF commercial hunting interests.