



September 1, 2020

The Honorable John Cyrier
Chairman
Texas Sunset Commission
PO Box 13066
Austin, Texas 78711

Dear Chairman Cyrier:

By way of introduction, my name is Dr. John Davidson, and I am the Sr. Associate Director of Beef Cattle Professional Service Veterinarians for Boehringer Ingelheim Animal Health (BIAH). It is my pleasure to provide the following statements in support of the Texas Animal Health Commission (TAHC). In my 19 years as a licensed Texas veterinarian, I have worked as a private practitioner, large animal clinician at Texas A&M's College of Veterinary Medicine, and, for the last decade, as an industry veterinarian. In these capacities, I have worked closely with TAHC personnel supporting many critical efforts to address diseases of significance for our state and nation's cattle resources.

Please accept my written testimony on behalf of BIAH and all of its sectors as we pursue solutions to animal health, animal well-being, and ensuring residents of the state of Texas are free from the impacts of all zoonotic diseases. BIAH is dedicated to the well-being of animals and people, inspired by the unique and inextricable bonds that connect them. Our 3,000+ U.S. employees offer value through innovation with some of the most respected and widely used therapeutics, vaccines and parasite-control products for dogs and cats, horses, cattle, swine and poultry. BIAH works to ensure that no animal suffers from a preventable disease and seeks to create a healthier tomorrow for animals and people. BIAH, is the second largest animal health business in the world, with a presence in more than 150 markets. As the lives of animals and humans are intertwined, our 10,000 global animal health employees are dedicated to enhancing the well-being of both animals and people – through science and innovation.

To that end, BIAH has a history of helping protect animals and people in Texas. In 1995, authorities in south Texas began distributing an oral wildlife rabies vaccine made by BIAH to fight rabies in infected coyotes before they could enter human population centers. The Texas Department of State Health Services distributes 1.1 million doses a year of RABORAL V-RG along the U.S.-Mexico border in conjunction with the Wildlife Services unit of the USDA's Animal and Plant Health Inspection Service (APHIS). That program resulted in the rapid decline and elimination of the canine rabies virus variant from Texas coyote populations. Authorities continue to distribute RABORAL V-RG in south Texas each year to protect against backtracking

and ensuring those gains continue to be realized. We have also assisted communities in west Texas through an oral rabies vaccination program using RABORAL V-RG that started in 1996 that has essentially eliminated rabies in the gray fox population near the New Mexico state line. We are very proud of those results and look forward to continuing those successful programs.

Boehringer Ingelheim manufactures RABORAL V-RG in Athens, Georgia. The Wildlife Services unit of the USDA's APHIS and other agencies distribute that wildlife rabies vaccine in other parts of the United States as well to vaccinate wild animals, such as raccoons and coyotes. That helps protect people and pets by preventing the spread of rabies into new areas and by reducing the risk of rabies transmission from wild animals to people, pets or livestock.

My testimony submitted for the record is to highlight issues through this Sunset process that we, at BIAH, would be very excited to assist in improving efficiencies, further protecting public health, strengthen the livestock and poultry economy, and ultimately save taxpayers of our state money.

Cattle

I will start by focusing my written comments specifically to address topics contained in either the Sunset Commissions report or the TAHC self-evaluation report prepared for this process. First, BIAH would like to discuss the use of two of the world's most proven parasiticides used in cattle today – LongRange and Ivomec - specifically the use of these two parasiticides to control Cattle Fever Ticks (CFT) which have devastated parts of the cattle industry in Texas.

BIAH is the global leader in animal health parasiticides and uniquely positioned to provide additional support for the US cattle industry with pioneering products such as Ivomec and LongRange. Our platform for this unflinching industry support is *Cattle First*. Central to our *Cattle First* philosophy is the belief that no animal should suffer from a preventable disease.

Cattle fever is a protozoal disease of cattle caused by a microscopic blood borne parasite known as Babesia. The disease is spread in cattle herds by these ticks, known scientifically as *Rhipicephalus annulatus* and *R. microplus*. Together, these parasites represent substantial threats to cattle well-being and the livelihoods of ranchers entrusted with their care. The on-going issues and the difficulties faced by the stakeholder agencies in addressing the CFT are identified in the TAHC Self-Evaluation and Sunset Commission summaries.

The Texas CFT represents a threat of increasing significance to cattle movement and commerce. Currently, the CFT Quarantine Zone (QZ) represents over 1 million acres and thousands of cattle. Program regulations require cattle to be tick free to be eligible for commerce outside of the QZ. Tick infested cattle and wildlife have been found outside of the QZ on numerous occasions, which speaks to the challenges presented to the current methods of control. Treatment of cattle in the QZ includes surface treatment accomplished using dipping vats, one authorized injectable endectocide, and administration of treated feed products utilizing ivermectin.

The biology of the fever tick enables this organism to utilize other hosts, e.g. white-tailed deer, which effectively renders cattle-only approaches incomplete. For this reason, alternative drug

delivery mechanisms such as treated corn and lick tubs were developed to deliver treatment to cattle and other animal hosts. A few years ago, this method of delivery was threatened when the United States Food & Drug Administration (FDA) required a 'Right of Reference' letter for the continued use of Ivomec (ivermectin) in this manner. While BIAH was under no obligation to authorize the FDA required reference to our ivermectin product, we elected to grant the required access because it was the right thing to do for the livestock resources and ranchers in the Rio Grande Valley. These actions demonstrate our belief that no animal should suffer from a preventable disease.

Currently, there is only one injectable product authorized by the TAHC for the treatment of cattle in the quarantine zone. In 2011, the FDA approved an advanced extended release injectable parasiticide for cattle known as LongRange. Not long after introduction into the U.S. marketplace, company representatives approached stakeholders to validate the substantial observational data that LongRange was effective against ticks in the RGV. More recently, I have worked with the USDA ARS, Texas A&M Agri-Life Institute for Infectious Animal Disease (IIAD) and the TAHC to validate alternative means of CFT control to expand the options available to the producers struggling with current prescribed treatment options in the quarantine zone. Navigating the complexities of interagency agreements and conflicting priorities have delayed our efforts to bring alternative solutions to aid the ranchers dealing with the CFT. While we are making progress, these on-going efforts are not keeping up with the needs of the industry.

BIAH wants to affirm our support and willingness to assist the sustained efforts of the TAHC in eradicating the CFT. As an innovator in animal health, BIAH and our team of livestock veterinarians pledge our on-going commitment to the acceleration of solutions available to the South Texas ranchers producing cattle in the harshest of environments. Many of these same ranchers are demanding that the industry provide more solutions to assist them in their battle against this fastidious enemy. Completed trials and rancher testimonials have provided clear evidence that other tools can, *and should*, be employed. We are asking that these solutions be made available sooner than later.

Poultry

Boehringer Ingelheim is also concerned with the risk of introduction of several other avian diseases in the state of Texas. The shared border with Mexico presents an additional challenge regarding poultry disease control and prevention in Texas. Virulent Newcastle Disease and Avian Influenza are consistent threats to poultry health and require diligence and occasionally unique partnerships when it comes to prevention, detection, and response. BIAH is also very committed to supporting poultry health and disease prevention in Texas.

With that in mind, BIAH would like to address a few areas that TAHC has identified as concerns in the current poultry health programs and evaluate the feasibility of BIAH/TAHC partnerships with respect to these concerns. We understand that the agency is responsible for diagnosis, control, and eradication of infectious diseases affecting domestic and exotic poultry. This responsibility includes monitoring for and responding to outbreaks of infectious disease,

promoting biosecurity, and developing disease control and eradication plans. The BIAH U.S. poultry technical service team possesses a unique combination of skills and capabilities that we can offer to TAHC in the planning and evaluation of these respective programs and plans.

The BIAH U.S. poultry technical service team is currently composed of 7 veterinarians with over 80 years of combined training and experience. Areas of focused expertise include virology, immunology, research, laboratory medicine/diagnostics, regulatory medicine/foreign animal disease response, biosecurity, food safety, animal welfare, data management, and education/outreach that could be made available to assist with many challenges facing the poultry industry in the state. Thousands of jobs rely on a vibrant and healthy poultry sector and we are here to be of service to ensure the goals of Texas poultry industry are achieved.

The PT testing program was also identified as a need area. We are willing to engage with TAHC leadership in an effort to evaluate potential solutions in this area. We would welcome a dialogue in this area.

At BIAH, we believe prevention works, and continue to serve our communities by improving human and animal health. We look forward to working with the TAHC to ensure a robust animal disease prevention and response system is in place to ensure the protection of animal health and safeguard the livelihood of livestock and poultry producers in the state.

In closing, let me state for the record my firm belief that our state and nation owes much to the men and women of the Texas Animal Health Commission for their commitment to the livestock and poultry industries of the Lone Star State. Let us work together to provide the necessary support to ensure the TAHC, in collaboration with industry partners such as BIAH, to deliver these critically needed solutions.

If you have any questions or would like to discuss any of this information further, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "John M. Davidson, DVM". The signature is written in dark ink on a white background.

John M. Davidson, DVM, Dipl. ABVP (Beef Cattle)

Sr. Associate Director, Beef Cattle Professional Services
Boehringer Ingelheim Animal Health