

PETITION TO THE FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION TO STOP USING URTD TESTING ON GOPHER TOROISES

This petition is being presented to the Florida Fish and Wildlife Conservation Commission with the intent of stopping the current policies of using ELISA tests for *Mycoplasma agassisii* for the purpose of determining whether or not individuals or local populations of gopher tortoises are to be destroyed under a TAKE permit or treated in a fashion different than those that are not tested under any regulations, rules, guidelines or permits of this regulatory agency. The supporting reasons for action include:

The test is not designed for this purpose and was intended for clinical use in evaluating an individual tortoise's health status. The test is designed to determine exposure of a tortoise to *Mycoplasma agassisii* or other species of Mycoplasma that may cross-react with the test. It cannot distinguish between pathogenic and nonpathogenic strains of this microbe. It is best used in conjunction with a thorough physical examination and other tests to determine the health of a tortoise. It should never be used as the sole means for evaluating the health status of an individual tortoise.

It is not clear how effective the test results are on what appears to be several taxa of the Mycoplasma that infect gopher tortoises. It is also not known which of these cause death in numbers detrimental to the existence of local populations or under what environmental conditions this may occur.

One test simply is a snapshot of the status of a tortoise and the antibody levels at the moment of testing. It does not indicate future results or the health status of tortoises in the wild.

There are many diseases and parasites found in gopher tortoises, many may have the ability to cause death in individuals and in local populations. However, wild populations for the most part, especially in good habitat with proper forage, appear to be healthy throughout the state despite possible exposure to mycoplasma. The range of pathogens affecting wild populations of gopher tortoises needs to be established.

No training on how to take and handle testing materials is required by FWC thus clearly opening the way for testing error through mistakes and mishandling.

Indications are clear that tortoises move long distances on their own and through assistance by well meaning people are moved frequently and in many natural and protected areas throughout the state. These movements naturally will move pathogens throughout populations.

There are no treatments that will effectively eliminate Mycoplasma treatments that will effectively eliminate Mycoplasma from the nasal cavity of tortoises. Once the nasal cavity is colonized, it may be colonized for life. However, nonpathogenic strains

may prevent pathogenic strains from becoming established on the nasal mucosa. Likewise, no effective treatment is known for iridovirus, a recently recognized viral pathogen of gopher tortoises, box turtles, and other chelonians.

We(I) recommend that FWC establish a policy that requires a relatively simple health assessment be made on any tortoises being moved from a donor site and that no sick or dying tortoise be moved from that site into another tortoise population. Guidelines for health assessment need to be established and utilized in evaluating gopher tortoises to be moved.

We (I) recommend that relocations off and on site are done in a fashion that will help to insure that the vast majority of tortoises will remain on the site whether these relocations are for conservation, education, or humanitarian reasons.

Name

Date

Organization

Address

Zip