May 27, 2022

Dear Director Williams and Associate Director Applegate,

Re: Request for Information on the Highly Pathogenic Avian Influenza (HPAI) H5N1 virus and its associated Impacts to Native American Cultural Practices

The Native American Fish & Wildlife Society (NAFWS), is a non-profit organization whose mission is to assist Native American and Alaska Native Tribes with the conservation, protection, and enhancement of their fish and wildlife resources. The NAFWS supports 574 Federally recognized Tribes through charitable, educational, scientific and cultural purposes, and as such, we are seeking information and guidance relating to the Highly Pathogenic Avian Influenza (HPAI) H5N1 virus and the effects and/or impacts HPAI will have to cultural and traditional practices of Native American and Alaska Native Tribes throughout the United States. We are aware of the May 4, 2022, memorandum issued by the National Eagle Repository; however, other questions remain unanswered. In recent months, NAFWS staff have received numerous requests for information from Tribal natural resource managers, wildlife biologists, land managers, conservation officers and Tribal aviary/rehabilitation personnel regarding HPAI, including, but not limited to:
1. Will a 5-10% Chlorine (Cl) bath/spray inactivate the HPAI virus on eagle feathers? Understanding it is not for the entire carcass.

2. Is the Ethylene Oxide (EtO) autoclave process an option for decontamination and/or will it compromise the integrity of eagle feathers?

3. Will guidance and protocols be established for the handling and processing for Tribal aviary/rehabilitation personnel in the event that a bird tests positive for HPAI in their facilities?

4. Will there be a protocol set forth for Tribal personnel to be able to perform the testing for HPAI in the field? Is there the capacity for all personnel to do this testing or is this strictly a USDA and DOI activity?

This request for information is submitted in hope of finding alternative solutions to the “simple” destruction of eagle feathers and eagle parts as that process does not suit the ideology of Native American culture and traditions.

Your timely response in this important matter is greatly appreciated.

Sincerely,

[Signature]

Julie Thorstenson, PhD
NAFWS Executive Director

Cc: Bryan Newland, Assistant Secretary for Indian Affairs
    U.S. Department of the Interior
    1849 C Street NW
    Washington, DC 20240