



CANADIAN KENNEL CLUB®
CLUB CANIN CANADIEN^{MD}



AMERICAN
KENNEL CLUB®

July 17, 2024

Mandy K. Cohen, MD, MPH

Director for the United States Centers for Disease Control and Prevention
Administrator of the Agency for Toxic Substances and Disease Registry (ATSDR)
(submitted via email)

Dear Director Cohen,

On behalf of the Canadian Kennel Club (CKC) and the American Kennel Club (AKC), we would like to express our sincere appreciation to the U.S. Centers for Disease Control and Prevention (CDC) for its efforts to protect the health and safety of people and dogs through its recently finalized *Importation of Dogs and Cats* rule that is to go into effect on August 1, 2024. We welcome measures that address the serious health threats posed by the irresponsible importation of unhealthy dogs using fraudulent veterinary/import paperwork and prevent the reintroduction of Dog-Maintained Rabies Virus Variant (DMRVV) that threatens the public and animal health and our countries' DMRVV-free status.

CKC and AKC remain concerned, however, that banning the import of all dogs younger than six months of age into the United States is overly burdensome to responsible and law-abiding Canadian and American dog owners who register their dogs, collaborate on breed health and preservation activities, and participate in CKC and AKC events. Breeders and enthusiasts who carefully manage their personally-owned dogs and litters from birth and register them with AKC or CKC, do not present the serious public health threats posed by the irresponsible importation of unhealthy dogs for resale that CDC cited in its justification announcing the finalized new rule.

ABOUT CKC and AKC

The Canadian Kennel Club is incorporated under and governed by the [Animal Pedigree Act](#) and is the primary registry body for purebred dogs in Canada. The *Animal Pedigree Act* is a federal statute under the auspices of the Ministry of Agriculture and Agri-Food Canada. The purposes of this Act are to promote breed improvement and to protect persons who raise and purchase animals. CKC is authorized by the Ministry to register and identify purebred dogs under the Act that the Minister considers having significant value. CKC maintains robust record keeping for purebred dogs and must follow a government-approved process for breed recognition and registration. CKC also develops canine event rules and regulations, policies, and forms. CKC recognizes 187 dog breeds and has approximately 20,000 individual members and over 700 breed clubs across Canada.

Founded in 1884, the American Kennel Club is America's only not-for-profit all-breed dog registry devoted to the study, breeding, exhibiting, and advancement of purebred dogs. AKC registers both litters and individual dogs that meet AKC's strict pedigree parentage requirements and whose owners meet AKC's compliance, care and ethics standards. AKC demonstrates its commitment to responsible dog ownership and breeding through a variety of educational, public service, animal welfare, and scientific programs; a multi-million-dollar commitment to canine health research through the AKC Canine Health Foundation; and by conducting thousands of private kennel inspections each year to assure the well-being of the animals and compliance with AKC record keeping requirements. AKC recognizes over 200 dog breeds. More than 5,000 national, regional, and local AKC dog clubs are comprised of hundreds of thousands of individual members dedicated to dog sports and responsible breeding.

Canada and the United States maintain a special relationship that permits the free flow of goods, pets, and people across the Canada-U.S. border, which is essential to both countries' economies. CKC and AKC, and the dogs and breeds that CKC members and AKC breeders have dedicated their lives to, benefit from this relationship. For approximately 140 years, our organizations have partnered in the development, improvement, and protection of purebred dogs in North America. Today, that partnership is evidenced in the daily trade and travel across our shared border by our breeders and breed enthusiasts as they collaborate on breeding, share in ownership, and participate in competitive dog sports and activities like dog shows and field trials.

OUR SHARED CONCERNS

Personally-owned purebred dogs registered with CKC and AKC represent a low risk for the introduction or transmission of DMRVV. These dogs must already meet rabies vaccination and microchipping mandates by various levels of government on both sides of our border and those required for air travel. Moreover, they must be healthy to be part of breeding programs and compete in dog events, and by extension, to travel across the border for those reasons.

Under current import rules, personally-owned registered dogs (not for transfer) that have valid health and rabies documentation may be imported/enter the United States at four months of age. None of the dogs meeting these criteria have been associated with irresponsible imports or the fraud that undermines public health. We recognize the value CDC places on ease of enforcement with a blanket 6-month minimum age rule. However, we believe this approach is overly broad and unreasonably punitive to responsible dog breeders and enthusiasts, for whom the 4-6 month age window is a crucial period for facilitating bonding with new owners, and in-person evaluations to determine future suitability for participation in dog events, working dog careers, and responsible breeding programs.

The Canadian Kennel Club has been meeting regularly with the Canadian Food Inspection Agency (CFIA) to provide input and feedback regarding the impact of the new rule on CKC members and all Canadians. Due to the short timeframe between the announcement of the final rule and the date it goes into effect, CFIA reports that it has not had sufficient time to design its nationwide certification process in Canada to facilitate compliance with CDC's new rules by those traveling to the U.S. with dogs and is concerned with an array of potential impacts.

The new importation requirements also fail to recognize that due to constraints of veterinary availability, Canadian and U.S. dog owners who live in the border region often must rely on veterinary services across the border for dogs less than six months requiring routine or emergency care.

OUR REQUEST

As our organizations continue to work together to promote and protect purebred dogs, CKC and AKC will continue to partner with CDC in its ongoing efforts to protect our countries from DMRVV and other public health threats and to educate dog breeders and owners about the new importation requirements. However, due to the nature of our concerns, **we respectfully urge a minimum six-month delay in enforcement of the rule to allow CDC and responsible importers time to address the concerns outlined in this letter and by other stakeholders.** Such an extension would:

- Allow time to consider a possible exception, along the lines of current age requirements, for those who travel with and import a personally-owned dog that has demonstrated low risk for rabies.
- Allow time for additional public comment by stakeholders impacted by the rule.
- Allow time to reduce the resource burden the new certification process will place on the U.S. and Canadian veterinary communities, particularly as related to the Canadian certification process.
- Allow time for individuals who travel with and import a personally-owned dog to adequately prepare, or who may have already planned a trip prior to the announcement of the new rule.
- Allow time for Canadian breeders and U.S. residents to receive their personally-owned puppies from CKC member breeders for litters already being born and contracts already in place prior to the new CDC rule.
- Allow time for airlines to update their data systems to ensure that personally-owned dogs presenting low-risk profiles can continue to be imported into the U.S.

- Allow time to ensure that appropriate adjustments may be considered to protect the freedom of individuals who use a personally-owned service dog to mitigate a disability.

We further urge you to consider an exception, similar to current U.S. import requirements, that allows import of dogs at 4 months of age, for AKC and CKC registered dogs that can demonstrate rabies immunity, good health, ISO microchipping and a permanent residence in the U.S. CKC and AKC dogs can be verified through registration documentation that would be provided by each organization's members at point of entry. Additionally, we urge you to consider a potential limited and temporary exception for personally-owned dogs less than 6 months of age requiring emergency care at a specific licensed veterinary care facility.

Thank you for your consideration of the longstanding relations between Canadian and U.S. counterparts, the unique nature of purebred dog registration and our membership, as well as our requests for changes. CKC and AKC are committed to working with CDC on solutions that will both reduce the risk to public health from the proliferation of irresponsible imports, and also minimize regulatory impact on responsible dog enthusiasts and who register their dogs, and work across borders to improve canine health, diversify breeding programs, utilize veterinary services, and participate in sporting and goodwill events.

Best regards,



Jeff Cornett
Executive Director
Canadian Kennel Club



Sheila Goffe
Vice President, Government Relations
American Kennel Club

Cc: Secretary Xavier Becerra, U.S. Department of Health and Human Services
Paul MacKinnon, President, Canadian Food Inspection Agency
Dr. Nelson Aboleda, Director, Office of Global Affairs, U.S Department of Health and Human Services
Sean McCluskie, Chief of Staff, Department of Health and Human Services
Dr. Sarah Thompson, Veterinary Program Specialist, Canadian Food Inspection Agency