



Adam J. Langer, DVM, MPH, DACVPM  
Acting Chief  
Quarantine and Border Health Services Branch  
Division of Global Migration and Quarantine  
National Center for Emerging and Zoonotic Infectious Diseases

Dear Dr. Langer

As the Executive Director of the Canadian Kennel Club (CKC), I appreciate the opportunity to comment on the response you recently provided to a petition regarding CDC's dog importation regulations. The Canadian Kennel Club is enacted by federal legislation to act as the primary registry for purebred dogs in Canada and maintains one of the world's oldest and most accurate registries. CKC members, many of which are purebred dog breeders subscribe to the CKC Code of Ethics and represent a high degree of integrity and compliance with exemplary standards of practice and quality. We are also the strongest voice on canine issues in Canada – speaking out in support of virtually every dog and every dog owner in the country so this issue is of keen interest to us.

Firstly, I commend you on the informative reply to address the concerns as presented and for offering your position and rationale so frankly.

You said that CDC takes several factors into account to issue a confinement agreement and ensure that it will not be violated or that inadequately immunized dogs will not pose a threat to public health. Key factors considered that you cited included:

- (1) Whether the number of dogs presented for import is consistent with the purposes of the dog confinement agreement;
- (2) Whether the frequency of dogs being imported is consistent with the purposes of the dog confinement agreement;
- (3) Whether there is a past history of non-compliance with confinement agreements;
- (4) The prevalence of rabies in country of origin (country where the dog has lived during the 6 months prior to arrival, or since birth if the dog is less than 6 months of age); and
- (5) Other risk factors as determined by the CDC Director.

The first three items speak for themselves as it relates to the recipient of dogs imported.

With respect to item (4), we can understand why blanket permissions may compromise the risk assessment process – particularly when Canada is not the country of origin for the puppy. Given that Canada is diligent in the fight against rabies and can boast advanced and well reputed veterinary practices, it seems obvious that a Certificate of Health from a qualified Canadian veterinary practitioner is a powerful source of assurance that should be added as favourable criteria for consideration.

I would also like to suggest that we can offer additional support with item (5). As mentioned, CKC members subscribe to the CKC Code of Ethics and represent a high degree of integrity and compliance with exemplary standard practice and quality. There is opportunity to support your work by validating the status of CKC members wishing to import dogs into the US that could provide valuable assurances for all parties involved.

I would very much welcome an opportunity to start a dialogue that promotes mutual respect and support for our goals. I can be reached at (416) 674-3675.

Sincerely,

Lance Novak  
Executive Director,  
Canadian Kennel Club

CC: CKC Board of Directors  
CKC membership  
Mr. J. Am Rhyn, Chief Executive Officer, Canadian Veterinary Medical Association