

Animal Wellness Action Calls CDC Pet Import Policy 'Costly and Complicated'

Animal Wellness Action demands agency abandon plans to finalize rules

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Two years after the Centers for Disease Control and Prevention (CDC) temporarily banned dog imports from 113 countries, the agency published a Notice of Proposed Rulemaking in the Federal Register this week. Animal wellness groups see this announcement as plans to make complicated and unworkable restrictions permanent. CDC is also adding cats to the rules.

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Animal Wellness Action is calling on CDC to eliminate the requirement for repetitive vaccinations, testing, and other costly mandates that will put Americans overseas at risk of losing their animals, and terribly complicate the work of U.S.-based charities conducting international dog rescue.

Animal Wellness Action will submit comments arguing, among other things, that anything beyond vaccination, microchipping and health certifications is unnecessary. The organization is also questioning the inconsistency of the CDC's requiring such strict mandates for dogs and cats but allowing shipments of other live animals into the U.S., including cattle, horses, pigs, and exotic mammals that pose the similar zoonotic disease risks.

On July 14, 2021, during the COVID-19 pandemic, the CDC, citing a zoonotic threat to Americans due to rabies, shut borders to dog imports from over 100 countries. The decision was predicated on a fact pattern involving just four cases of rabid dogs presented for import to the United States over six years (< one dog a year from 2015-2021). During that same period, there were seven million dogs imported without any sign of rabies. The shutdown of imports from more than half the nations of the world caused chaos and confusion for foreign service members, military personnel, and rescue organizations doing life-saving work from China to South Korea to Morocco, and others.

“The U.S. is not rabies-free,” said Dr. Thomas Pool (MPH, DVM), senior veterinarian at Animal Wellness Action. “It is endemic in multiple wildlife species with constant spillover into our domestic animals, including dogs and cats. Rabies is also endemic in wildlife in Mexico and

Canada. Rabid animals freely cross our borders,” he said. “We firmly believe the CDC’s proposed permanent rules based on four cases of rabies over six years are unjustified, unscientific, expensive, and unforgivably cruel.”

According to rabies data published in [the Journal of the American Veterinary Medical Association](#) for 2020, there were 4,479 confirmed rabid animal cases in the U.S. including 4,090 rabies-positive wildlife and 389 rabies-positive domestic animals. “All mammals are susceptible to infection with all six rabies virus variants currently circulating in the U.S.,” noted Pool. “In a way, the CDC is confusing people into believing its decision for the ban, and now proposed rulemaking, makes sense. It does not.”

The CDC is now proposing more than ten rules for dogs imported into the U.S. from “high-risk” rabies countries. They include:

- Rabies vaccination and microchip
- Serological blood titer from a CDC-approved laboratory
- Revaccination for rabies at a CDC-approved facility upon arrival to U.S.
- Entry form filled out by “authorized veterinarian.”
- Additional entry form certified by “Official Government Veterinarian” before dog’s departure to U.S.
- Dogs must arrive in the United States by airplane.
- Lengthy, mandatory quarantine if any requirements are not met.

“With exception of the rabies vaccination and corresponding microchip, these proposed rules are unreasonable and serve no purpose,” says Pool. “The CDC is targeting a tiny percentage of dogs and making it almost impossible to bring them home.” Statistics prove that screening protocols were working to control imports of dog rabies before the ban and those safeguards were sufficient.

The proposed rules create roadblocks that will prevent streamlined processing for family pets entering the country. Many countries don’t have CDC-approved laboratories or easy access to official government veterinarians. “The end result is that many treasured pets of our foreign and military service and U.S. citizens will be abandoned because it’s simply too expensive with these incredibly complex and unwarranted import standards,” says Pool.

And it doesn’t stop there. “Requiring dogs to arrive by air is absurd,” says Jennifer Skiff, Director of International for AWA. “Since the suspension, we’ve worked with military families and others who’ve had to quarantine dogs in Canada for six months, pay for multiple rabies vaccinations, and then had to pay for air transport when their homes were half an hour’s drive over the border. No one should have to pay an extra \$2-5,000 to bring their dog over the border when all the rabies requirements have been met.”

The 162-page rulemaking announcement by CDC to make policies permanent is bad news for everyone, including animal rescues, say animal rescue groups. “Since the suspension, CDC’s

serology requirements, quarantine, and other mandates have added \$550 to the already high cost of transport,” says Jeffrey Beri, founder of No Dogs Left Behind, a non-profit that rescues dog meat trade survivors from Asia. “The costs include repeat testing that is expensive and not good for the dogs. It’s overkill, cruel, unnecessary, and unfair.”

As the CDC “temporary” dog import suspension moves into proposed federal rulemaking, AWA remains steadfastly opposed to the agency’s bad policy. The animal welfare organization is recommending the agency keep rabies vaccination requirements but drop rabies serology testing requirements and restrict imports of dogs only from countries that don’t conform to procedures and have a history of importing rabid dogs and/or falsifying rabies and other health records.

While Animal Wellness Action has successfully worked to see the CDC pare down restrictions for imports, the organization believes the proposed mandates are an overreaction to a bad policy decision. “The agency should acknowledge its error and stop trying to justify the dog import ban. Solidifying this ill-conceived policy by a final agency rule would be a huge mistake,” said Skiff.

The Notice of Proposed Rulemaking will be available for public comment in the Federal Register starting July 10 and until September 8, 2023. You can submit comments [by going to www.regulations.gov](https://www.regulations.gov), entering the Docket Number (CDC-2023-0051) into the search box, and following instructions to comment or by mailing comments to the CDC at the address provided in the Proposed Rule.

Actions:

Since the dog import suspension was implemented in July 2021, Animal Wellness Action’s veterinarians and experts have:

- [Initiated a letter](#) from Congress led by Representatives Ted Deutch and Brian Fitzpatrick and signed by 57 other members who requested the ban be lifted.
- Presented at the 2021 Rabies in the Americas Conference in Brazil on a panel with the CDC, pointing out flaws in policy and outlining the global chaos it was causing.
- Worked with our allies in Congress to assist the CDC by engineering the passage of a \$3 million dollar House amendment to fund and streamline the dog import inspection process.
- Worked with Representative Dean Phillips to create the Henry Act to open pathways for government employees to return home from duty with their pets.
- Met with Office of Information and Regulatory Affairs, pointing out the omission by CDC of relevant rabies surveillance and biology facts.

ABOUT

Animal Wellness Action is a Washington, D.C.-based 501(c)(4) whose mission is to help animals by

promoting laws and regulations at federal, state and local levels that forbid cruelty to all animals. The group also works to enforce existing anti-cruelty and wildlife protection laws. Animal Wellness Action believes helping animals helps us all. Twitter: @AWAction_News

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