

United States Senate

WASHINGTON, DC 20510

July 17, 2024

Mandy K. Cohen, MD, MPH
Director
Centers for Disease Control and Prevention
1600 Clifton Road
Atlanta, GA 30329

Dear Director Cohen:

We write to express concerns regarding the Centers for Disease Control and Prevention's (CDC's) recently finalized rule on the importation of dogs into the United States. As Senators representing states that border Canada, a country considered rabies-free for canine rabies by the CDC, we have heard from many constituents in our states who are concerned about the burdensome effects of this rule. In order to give affected parties more time to comment on proposed changes and for the CDC to consider much-needed adjustments, we request that the CDC grant an extension of the August 1, 2024, effective date until a regulation can be drafted that both appropriately protects public health and allows the importation of dogs from Canada and other low-risk countries.

While we support the CDC's stated goal of preventing the spread of canine rabies, the rule is overly broad and would be onerous for dog owners, breeders, truckers, and sportsmen and women who frequently cross the U.S.-Canadian border for work, veterinary care, canine events, breeder collaborations, or simply to visit friends and family. The unprecedented requirements included in the final rule, such as the six-month minimum age requirement for dogs to enter the United States and the need for a microchip before a rabies vaccination and additional documentation and certification, would create significant barriers to low-risk entry from Canada into the United States and have a disproportionate effect on border communities in our states.

Prior to this rulemaking, the CDC's importation policy appropriately focused on high-risk countries for dog rabies and aimed to avoid unnecessary burdens on dog owners and importers of dogs from countries not considered high risk. Instead of maintaining this distinction, the final rule applies restrictions to all dogs.

Notably, the final rule also differs significantly from the proposed rule and there was no opportunity yet for a second comment period. The proposed rule included a limited exception to the six-month minimum age requirement that would allow owners to import a maximum of three personal pet dogs under six months of age in the same calendar year, if arriving via a land port through Canada or Mexico, and if the dog had not been in a high-risk canine rabies country. This limited exception was intended to reduce the burden on travelers who frequently travel between the U.S. and Canada. In fact, the proposed rule explicitly stated, "CDC notes that both Canada and Mexico are currently DMRVV-free countries, and a limited exception to accommodate personal pet owners who travel by land between the U.S. and Canada or Mexico is unlikely to threaten the public's health." The final rule, however, does not maintain this critical exception.

Affected groups have also expressed concern that the CDC's use of the term "import" to refer to all transit of dogs across borders will be misunderstood by the general public based on the more common interpretation of the term to mean a single, permanent relocation. This lack of clarity means that many travelers who regularly cross the border with their animals, including cross-border commuters, did not understand that the rule would affect their activities, and therefore did not weigh in with their comments. We are concerned that the CDC's analysis of the economic effects of the rule does not consider the views of these stakeholders.

Additionally, as recently expressed in a formal letter to the CDC from the airline industry, the CDC's final rule will significantly affect airline passengers who travel with service animals, particularly those who live in and are traveling directly from no-risk countries like Canada. Under the final rule, a passenger seeking to travel to the United States on short notice, such as to obtain medical care, without the requisite sequencing of microchip and then rabies vaccination or certified forms would not be permitted to travel with their service animal despite posing little to no risk of importing a dog-maintained rabies virus variant. The Canadian Truck Association also formally expressed concerns about potential impacts on truck drivers who travel with their dogs while carrying goods into the U.S.

CDC's final rule would have unintended, detrimental consequences. The financial and regulatory burdens this new rule would place on U.S. and Canadian dog owners would undoubtedly restrict travel between the two countries, particularly to U.S. exclaves. The economies of the United States and Canada are highly intertwined in border areas. The new requirements for entry could affect participation in significant events held in our states, such as major sledding competitions, that contribute to our regional economies. Sled dogs are often transported through Canada to participate in races in various parts of the United States, and the new restrictions could make it more expensive and difficult to travel to these races. Sporting enthusiasts would also be prohibited from bringing puppies into the United States at the prime age to begin training, and Canadian breeders would be unable to release young puppies to American owners prior to vaccination, which would limit development of skills learned at a young age. Truck drivers who travel with their dogs while carrying goods into the U.S. could also face difficulties in meeting these regulations.

We formally request that the CDC not implement the flawed final rule as planned on August 1, 2024, and instead work with interested parties to consider workable solutions to address the concerns of responsible dog owners and visitors who demonstrate little risk of importing canine rabies.

Thank you for your attention to this important matter.


Sincerely,



Susan M. Collins
United States Senator



Amy Klobuchar
United States Senator



James E. Risch
United States Senator



Jeanne Shaheen
United States Senator



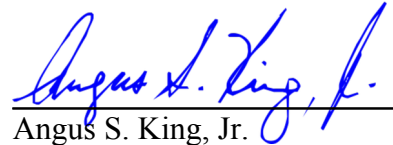
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United States Senator



Kevin Cramer
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Peter Welch
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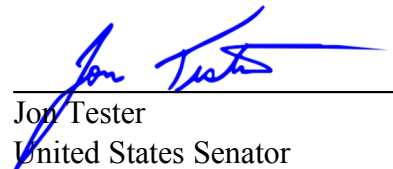
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