

United States Senate

WASHINGTON, DC 20510-1904

July 10, 2024

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

Dear Director Cohen:

I write today regarding the Centers for Disease Control and Prevention's (CDC) final rule relating to importation of dogs into the United States. While I support the CDC's goal of preventing the spread of canine rabies, I have heard from many constituents with significant concerns about the burdensome effects of this rule, particularly for those from border communities in northern and eastern Maine. I also am aware that there were substantial changes made between the proposed rule and the final rule, which may have limited comments from affected parties and led to an incomplete economic analysis.

The final rule includes unprecedented requirements, such as the six-month minimum age requirement for dogs to enter the United States and the need for additional documentation and certification. Both of these requirements will create barriers to low-risk entry from Canada into the State of Maine and have a disproportionate effect on border communities. Maine shares a border with Canada stretching more than 600 miles, with 24 official land border crossings – more than any other state. Residents of border communities live, work, worship, and visit friends and family on both sides of the border, oftentimes with their family pets.

In addition to affecting those who travel across the border frequently, the rule will also affect constituents in northern Maine for whom the closest available veterinary care may be across the border in Canada. One Mainer relayed to me that there is only one veterinary practice within an hour of her home. This practice was so overbooked recently that she would not have been able to vaccinate her young puppy on the intended schedule. She was easily able to go across the border to New Brunswick and get the required vaccines, including the rabies vaccine. Once this rule goes into effect, she and others in similar situations might have to travel long distances for each vaccination. Other Mainers rely on Canadian veterinarians for specialty care, which otherwise might be as far away as Boston.

Residents and businesses on both sides of the U.S.-Canada border also depend on each other for economic success. The significant financial and regulatory burden this new rule places on Canadian dog owners will restrict travel between the two countries. The final rule will also affect participation in the Can-Am Crown International Sled Dog Race, since the majority of participants are Canadian. Can-Am is the longest and highest caliber dog sled race in the eastern United States. The race attracts hundreds of participants, sponsors, and spectators to northern Maine each March and is a major contributor to the St. John Valley region's economy. Hundreds of dogs travel to Fort Kent every year for this race.

Under the CDC's final rule, each Canadian mushing team of approximately 28 dogs will be required to have an ISO-compatible microchip, and owners will need to devote significant time and resources certifying the vaccination records for each of these dogs. Those involved in the dog-sledding community note that veterinarians in the Canadian border region are already struggling to meet the need for domestic veterinary care and will have limited capacity to certify additional records. Given that the Can-Am race requires all participating dogs to be vaccinated against rabies, in addition to employing veterinarians on-site throughout the event, I am concerned the additional certification requirements of this rule impose an unnecessary burden on sled dog teams.

Other individuals I have heard from in Maine are involved in dog competitions and field trials. The removal of limited exemptions for personal pet owners means there can be no dogs under six months of age brought into the U.S. from Canada. Mainers often purchase puppies from Canada at a young age and bring them back to Maine to begin training for competitions – a practice this final rule would disrupt.

I understand that the CDC responded to some stakeholder feedback and has updated its guidance so that the form *Certification of Dog Arriving from DMRVV-free or Low-Risk Country into the United States* will be eligible for the duration of a vaccine, instead of requiring owners to update this form for every entry. This is an improvement. I remain perplexed, however, by the considerable changes made from the proposed rule to the final rule without the opportunity for a second comment period. Most significantly, the proposed rule included a limited exemption for dogs under six months old, primarily to reduce the burden on travelers who frequently travel between the U.S. and Canada. The CDC has decided to withdraw this exemption. While I understand the CDC's concern about bad actors importing dogs fraudulently through Canada and Mexico from high-risk countries, fully removing the exemption for personal pets does not strike the right balance. The CDC's explanations for eliminating the exemption, including the need to create one uniform process between land and air travel and the concern that border agents may be "overwhelmed" by the entry of dogs, were not subject to public comment and may not accurately reflect important considerations.

The changes made in the final rule are significant. Those affected have had limited time to understand the new processes, let alone to comply. Therefore, I request that CDC not implement the *Control of Communicable Diseases; Foreign Quarantine: Importation of Dogs and Cats* final rule as planned on August 1, 2024. I urge CDC to work to revise the rule to address the very real concerns of responsible dog owners and visitors who demonstrate little risk of importing canine rabies. I also request that the CDC consider soliciting additional comments from stakeholders, particularly related to potentially distinguishing between dog entry and importation.

Thank you for your attention to this important matter.

Sincerely,



Susan M. Collins
United States Senator