



RULES
OVERSIGHT
AGRICULTURE

Congress of the United States
House of Representatives
Washington, DC 20515-3223

July 8, 2024

Ms. Mandy Cohen, M.D., M.P.H.
Director
Center for Disease Control & Prevention
295 E. Street, S.W.
Washington, DC 20024

Dear Director Cohen,

I am writing to express concerns regarding the recently finalized rule on the importation of dogs by the United States Centers for Disease Control and Prevention (CDC). While I appreciate the CDC's efforts to ensure public health and safety, the new rule's broad application has raised significant concerns among dog owners, breeders, and hunters who frequently cross the U.S.-Canadian border for canine events, veterinary care, and breeder collaborations.

One main concern is that strict requirements, such as the minimum age for importation, may disproportionately affect low-risk importations without commensurate public health benefits. For example, the fact that dogs must be at least six months old imposes logistical challenges for owners of younger puppies who are fully vaccinated and have resided exclusively in rabies-free or low-risk countries. These requirements hinder timely access to critical socialization, training, and veterinary care for young, imported puppies, which are essential for their well-being and integration into new homes.

Furthermore, the introduction of the CDC Dog Import Form has elicited widespread concern due to its delayed public availability and potential for confusion among dog owners. Clear and accessible guidance on form submission requirements, including the specifics of documentation and procedural clarity, is essential to facilitate compliance and mitigate disruptions in lawful canine activities across international borders.

I'm also concerned that during the public comment period, the lack of clarity may have artificially depressed comment and have resulted in a skewed response – or lack of one – from groups who did not believe they would be impacted. For example, several options for exceptions for personally-owned dogs (not for transfer) were discussed in the proposed rule but later removed.

Other impacted groups have expressed concerns that the use of the term “import” to refer to all transit of dogs across borders was misunderstood due to the more common understanding of the term to mean a single, permanent relocation. This lack of clarity may also have depressed

comment by impacted travelers who regularly cross the border with their animals including truckers, cross border commuters, and others whose daily activities may span the borders.

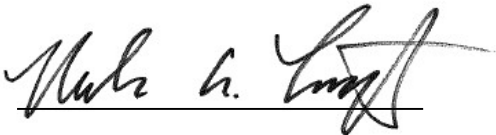
In addition, there are concerns regarding implementation of various specific requirements. Will U.S. competition dogs currently overseas that were vaccinated for rabies prior to leaving the U.S be required to obtain an additional, medically unnecessary rabies vaccine from a USDA accredited vet to streamline future travel? Is there a way to streamline the process for animals who, with their owners regularly cross the border, sometimes daily or more often, due to the nature of their employment or geographic location? Clarity on these matters is crucial to ensure fair evaluation and consistent application, especially for dogs that meet all other entry requirements.

I urge you to delay implementation of the blanket requirements that impact low-risk dogs personally owned by individuals who wish to remain compliant with important public health protocols but also not incur undue burden in their daily activities. **Specifically, I strongly request that the CDC implement an 18-month delay to this rule.**

I also encourage you to work with the American Kennel Club and other concerned groups that support the goal of improved oversight but have specific concerns about the disproportionate impact on low-risk, responsible dog enthusiasts.

Thank you in advance for your attention to these pressing matters. I urge the CDC to consider adjustments and delay the implementation of this rule to accommodate the needs of responsible dog owners and breeders while upholding rigorous public health standards. I look forward to your prompt response.

Respectfully,

A handwritten signature in black ink, appearing to read "Nick Langworthy", written over a horizontal line.

Nick Langworthy
Member of Congress

CC:
The Honorable Alejandro Mayorkas
Secretary of Homeland Security