



CDC PROPOSES ANIMAL IMPORTATION REGULATIONS

The Issue.

The Centers for Disease Control and Prevention (CDC) published an Advance Notice of Proposed Rulemaking (APRN) to solicit comments prior to the Agency's drafting revised regulations governing the importation of dogs and cats and potentially expanding the regulations to include other animals such as ferrets, African rodents and "other pet animals." The proposed changes would be designed to prevent the introduction of zoonotic diseases into the United States.

The Impact.

Currently, CDC, an agency within the U.S. Department of Health and Human Services, regulates the importation of dogs and cats into the U.S. to prevent the entry of zoonotic diseases. Dogs and cats are subject to inspection at ports of entry for evidence of infectious diseases transmissible to humans. If a dog or cat appears to be ill, inspectors may further require examination by a licensed veterinarian. Currently, imported dogs are required to have been vaccinated for rabies or if not are subject to 30-day confinement (quarantine) post vaccination upon arrival in the U.S.

CDC noted that there are reports of large shipments of puppies being imported for immediate sale with the majority of the animals being below vaccination age. Additionally, current regulations do not require that a dog be accompanied by a standard international health certificate signed by a licensed veterinary authority in the country of origin. Also, rabies vaccinations for cats and ferrets are not required. Zoonoses, diseases transferable from animals to humans, pose a great threat because of new human diseases that can arise from animal sources. In 2003, the introduction of SARS was linked to cats sold in China and that same year an outbreak of monkey pox occurred in the United States that was ultimately traced back to the importation of African rodents.

CDC also noted that the importation of wild animals poses a great health risk because most species are not screened prior to shipment for infectious diseases, and no testing is required for entry into the U.S., which creates the opportunity for widespread exposure to humans. High mortality rates among some animals, such as rodents, are common and current U.S. regulations do not require importers to have examinations performed to determine whether the mortality is from a disease that could have an adverse effect on public health. CDC believes a number of approaches could limit the transmission of zoonotic diseases. Some suggested solutions include the following:

- Screening animals with reliable laboratory tests;
- Treating animals experimentally for known diseases; or
- Quarantining the animals upon entry into the U.S. for an incubation period or duration of transmissibility.



However, CDC recognizes that most of these suggestions are not feasible because of the large number of imported animals, and control measures cannot prevent new diseases for which there is no treatment. CDC claims that the majority of imported animals are wild-caught, not captive-raised

Recommended Action.

CDC is seeking comments from a wide array of stakeholders: the pet industry, pet owners, animal breeders, retailers, distributors, importers, veterinarians, epidemiologists, physicians, animal-welfare and conservation groups, zoos, transportation companies, etc. as well as Federal, state, and local agencies.

The CDC is specifically requesting information on the economic, regulatory management, as well as the social, health and political impact of any changes that might be recommended. **PIJAC is requesting members of the pet trade to forward such information to PIJAC as soon as possible to ensure that it is encompassed in PIJAC's comments. PIJAC will only be submitting data in the aggregate (individual members' information will not be provided to the agency).** You should also forward your comments directly to CDC.

As noted, CDC believes that the current regulations may not be sufficient to prevent the entry of canine strains of rabies and other diseases into the United States. CDC believes that many animals imported into the United States for the commercial pet trade present a risk to human health, and the agency is seeking public input on a number of questions, pertaining to dogs, cats, ferrets and other animals.

Specific areas of interest to CDC include:

Dogs, Cats and Ferrets

- Should the current dog/cat import regulations be modified to require
 - International health certificates
 - Serologic evidence of immunity
 - The effective timeframe for vaccinations
- Which disease should be covered by a required health certificate?
- Are such requirements economically feasible?
- Are there benefits or shortcomings to a health certificate requirement reflecting the animal's "true health status?"
- Are such certificates easily falsified?
- Are there other methods that could be utilized to demonstrate the health status of the animal?
- Should each animal have a unique identifier (i.e. tattoo, microchip) and if so what are the difficulties in implementing such a requirement, including reading the device or identifier and the maintenance of a database?
- What are the cost implications of such a requirement?
- Are there alternative identification methods?
- Can one be assured procedures are properly administered in another country?
- Should importation be limited to ports of entry where CDC personnel are located and quarantine stations are located (20 cities in US, Hawaii and Puerto Rico)?
- Should animals traveling with their owners be exempted?
- What other types of examinations would be appropriate?

- What impacts (positive or negative) affecting businesses might occur? What would be the cost impacts in the short, medium and long terms (e.g. 1 year, 10 years, 30 years)?
- How would such requirements impact small entities and how might these impacts be reduced or avoided? Would any reduction of impact on small entities adversely affect the potential effectiveness of the rules?

African Rodents and Other Animals

- Should CDC establish a list of species or categories of high-risk animals for which importation is restricted (i.e. prohibited or subject to some form of tests and controls)? If so, what criteria should be utilized?
- Should listings be limited to large taxonomic groups (i.e. rodents) or directed at specific species?
- Should limits/restrictions be on a limited geographical basis (i.e., specific counties or regions) or more broadly?
- If CDC were to list species or subsets of species, how difficult would it be for inspectors at ports to accurately identify the animals, especially look-alikes?
- Should the revised rules focus on restricting the importation of diseases not already present in US or should they also cover enzootic diseases that may pose a health risk, such as Salmonellosis?
- What data sources should CDC rely upon when developing a prioritized list of covered diseases?
- Should shipments of restricted species be limited to designated ports of entry staffed with CDC personnel? What would be the impact on pet owners, the pet industry, and the scientific research communities?
- What impact would the inclusion of other species have on the U.S. market for rearing these animals domestically?
- What impact would such changes have on the illegal trade of restricted animal species?
- Should CDC impose quarantine periods to cover the risks of diseases that have incubation periods AND allow general health status assessments?
- If animals become ill or die during quarantine, should they be subject to diagnostic tests or necropsies? If so, who bears the cost?
- How would such changes affect current tracking and handling of animals?
- What methods might improve record-keeping for regulating these animals to facilitate more rapid tracking during a public health investigation?
- What impacts (positive or negative) affecting businesses might occur? What would be the cost impacts in the short, medium and long terms (e.g. 1 year, 10 years, 30 years)?
- How would such requirements impact small entities and how might they be reduced or avoided? Would any reduction of impact on small entities adversely influence the potential effectiveness of the rules?

PIJAC recommends that you obtain a copy of the Notice and read it carefully. **The manner in which CDC moves forward with a rulemaking can determine the future of major segments of the pet industry.** CDC is interested in industry's providing revenue and cost impacts that would result from changes to the regulations described in the questions. **This is the opportunity to provide the agency with pertinent data and information, BEFORE the rule is drafted, that can help shape the ultimate regulations!**

Written comments are due to CDC on or before October 1, 2007. However, any data you provide to PIJAC must be received prior to this date to allow PIJAC to incorporate it into its comments.

Read the regulation carefully and submit comments to:

U.S. Department of Health and Human Services
Centers for Disease Control and Prevention
Division of Global Migration and Quarantine
ATTN: Animal Importation Regulations
1600 Clifton Road, NE (E03)
Atlanta, GA 30333.

NOTE that comments may also be submitted:

- electronically via <http://www.regulations.gov>, or
- by email to animalimportcomments@cdc.gov.

Copies of the Advance Notice of Proposed Rulemaking can be found on CDC's website at www.cdc.gov/ncidod/dq (click on Foreign Quarantine Regulations, Advance Notice of Proposed Revision under News and Highlights).

If you have any additional questions about this rulemaking or how to respond, contact PIJAC's Marshall Meyers via email at mmeyers@pijac.org or Michael Maddox via email at mmaddox@pijac.org. You may also reach PIJAC by phone at 202-452-1525.