Scott Marshall, DVM
Rhode Island Department of Environmental Management
Division of Agriculture
235 Promenade Street
Providence, Rhode Island 02908

RE: Public Notice of Proposed Rulemaking
Rules and Regulations Governing the Importation of Domestic Animals
250-RICR-40-05-1

Thursday, January 30, 2020

Introduction
The American Kennel Club (AKC) is America's only not-for-profit all-breed dog registry devoted to the study, breeding, exhibiting, and advancement of purebred dogs.

Founded in 1884, the American Kennel Club is a private, not-for-profit organization that demonstrates its commitment to responsible dog ownership and breeding through a variety of educational programs, humane programs, a multi-million-dollar commitment to canine health research through the AKC Canine Health Foundation, and by conducting thousands of kennel inspections each year. We advocate for the purebred dog as a family companion, advance canine health and well-being, protect the rights of dog owners, and promote the ideals of responsible dog ownership.

In 2018, the last year for which information is available, the American Kennel Club licensed and sanctioned 62 events in the state of Rhode Island, in which more than 9,200 dogs participated. The AKC thanks the Rhode Island Department of Environmental Management (DEM) and State Veterinarian Scott Marshall for drafting the proposed comprehensive update to the Rules and Regulations Governing the Importation of Domestic Animals (250-RICR-40-05-1). In our view, the risks of zoonotic disease transfer, especially as a consequence of the international and interstate trafficking of dogs for retail distribution at shelters and rescues, is significant and warrants continued administrative oversight to address those risks.
Under AKC’s Rules Applying to Dog Shows (Chapters 10 and 11), dogs attending AKC-sanctioned events must be in good health and free from communicable diseases. Furthermore, to ensure competitiveness, AKC event exhibitors ensure their dogs are appropriately healthy. We believe this principle reduces the chances of disparate impacts on Rhode Island’s visiting dog show exhibitors. The American Kennel Club is grateful that the proposal seeks to waive the certificate of veterinary inspection (CVI) requirement for dogs temporarily imported in Rhode Island for shows.

The AKC is pleased to offer the following specific comments regarding the Department of Environmental Management’s proposed changes to the rules and regulations governing the importation of domestic animals (250-RICR-40-05-1).

- Regarding proposed section 250-RICR-40-05-1.22, F, 3 – Due to several influences, including fluctuations in the show calendar, it must be understood that responsible parties may not be able to provide an accurate expected number of animals that will be in attendance at an event. It is common that the timeframe between entry deadline and the actual event is two-and-a-half weeks or less, which is significantly shorter than the 60-day notification requirement of the expected number of animals attending the event. In practice, responsible parties may be able to provide only a good-faith estimate of the number of animals that will attend, usually based on the number of dogs entered in the previous year’s event and that may vary considerably from the actual number of the current year’s event. We recommend 1.22, F, 3 be amended to allow good faith estimates regarding the number of animals that may be in attendance at the 60-day mark, with reporting of the actual number of entries when known, or some variation thereof.

- Regarding proposed section 250-RICR-40-05-1.22, F, 4 – Under this section, responsible parties must maintain a list of all animals imported for the purpose of show; and the list must include the animals name and description (i.e., age, breed, color, and sex).

Dogs entered in most AKC events are identified by AKC registered name, AKC registration number, breed, date of birth, sex, sire, dam, name of breeders, and name of owners. This information is published in the required show catalog, which lists all event entries and is catalogued by groups, breeds, varieties, and classes thereof. This information is already readily reportable to state officials.

In almost all AKC-sanctioned events, color is not a reported description of an entered dog. However, we believe that when considered with the identification requirements in proposed 250-RICR-40-05-1.22, K, color (as cited in the proposed rule as subtype of
“description”) is not necessary to positively identify particular dogs. Instead, we believe that the reported descriptions of each dog imported for show, based on the information required by AKC and published in show catalogs, is appropriate. For these reasons, we encourage proposed section 250-RICR-40-05-1.22, F, 4 be amended to make clear that the subtypes of “descriptions” listed are illustrative only.

- Regarding proposed section 250-RICR-40-05-1.22, G, the AKC understands the reasons why certain symptoms would raise questions of fitness for show. Unfortunately, we have also learned of some enforcement officials making unsubstantiated health claims about certain breeds. For example, an Azawakh or other similar sighthounds may appear emaciated to the untrained eye, but are actually healthy, naturally lean dogs that regularly display some ribs and hip bones. To prevent unsubstantiated health claims from being made, the AKC encourages all enforcement staff to be appropriately trained in breed-identification and health standards. The AKC is happy to provide DEM with breed information and identification resources to assist with this effort.

- Regarding proposed section 250-RICR-40-05-1.22, K, the AKC agrees that animals should be identified, but believes that, as worded, the requirement is vague. AKC encourages the Department of Environmental Management and the State Veterinarian clarify what may satisfy this requirement.

The American Kennel Club thanks the Rhode Island Department of Environmental Management and State Veterinarian Scott Marshall for consideration of these comments. Questions may be addressed to the following AKC Government Relations staff:

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