

Safeguarding Public Health – The Healthy Dog Importation Act of 2021

As our nation seeks to prevent the introduction and spread of dangerous diseases in the U.S., lax importation regulations and enforcement should not be overlooked.

Problem: The U.S. demand for pet dogs –without accounting for population growth – is more than 8 million dogs annuallyⁱ. To meet this demand, the U.S. Centers for Disease Control and Prevention (CDC) estimates that up to 1.245 million dogs are imported into the U.S. each year.ⁱⁱ *Exponential growth in dog imports from a wide range of overseas sources has resulted in recent incidents of dogs with non- native parasites and zoonotic diseases such as rabies, viral infections, canine influenza, brucellosis and others, being imported and passed onto the general public.* Current pet import oversight mechanisms established prior to the exponential growth of imports are unable to protect against this public and animal health threat. CDC announcedⁱⁱⁱ on June 14, 2021 that they would temporarily suspend dog imports from over 100 countries to protect the public health against the reintroduction of canine rabies virus variant (CRVV) into the United States and to ensure the welfare of dogs being imported into the U.S. The suspension does not address diseases other than rabies, and applies to only 6% of imported dogs.

Solution: The Healthy Dogs Importation Act provides the U.S. Department of Agriculture (USDA) with additional tools to monitor and safeguard the health of dogs being imported into the U.S. This will ensure that all dogs entering the country are healthy and not at risk to spread dangerous diseases that could adversely impact animal and public health. Specifically:

- The Secretary of Agriculture is provided authority to determine which vaccinations and other health information is required for entry of dogs into the U.S. This authority will be carried out by USDA’s Veterinary Services (VS) division.
- Every dog entering the U.S. must be accompanied by a certificate of veterinary inspection (health certificate), issued by a licensed veterinarian accredited by a competent veterinary authority recognized by the Secretary. The health certificate must certify that the dog has received all required vaccinations and demonstrated negative test results.
- Health certificates must be submitted to USDA, which will maintain a centralized, publicly available data base. Required documentation may be submitted electronically. All submitted information will be made available to the secretaries of Health and Human Services (CDC), Commerce, and Homeland Security (CBP) to promote interagency coordination and facilitate verification upon arrival in the U.S.
- All dogs imported must be permanently identified.
- The Secretary of Agriculture may set fees for the issuance of importation permits to offset costs for increased monitoring and oversight.

Current Federal Oversight of Dogs Imported into the United States

CDC estimates that up to 1.245 million dogs are imported into the U.S. each year.^{iv} For the estimated 113,000 imported from countries that are at a high-risk for rabies transmission, CDC requires a rabies vaccination certificate, but no other health documentation or identification. For the 950,000 imported from rabies-free or low-risk countries, CDC requires no documentation or vaccination. A visual inspection provided by Customs and Border Protection personnel at the first port of entry is the only screening required for these dogs.

USDA-APHIS has separate regulatory authority over dogs imported for resale, which is defined as “dogs imported for sale in wholesale channels, at retail, and for adoption after arrival in the United States”. USDA’s import requirements are more stringent than CDC’s, unfortunately they apply to only half of a percent of all imported dogs (35 dogs in 2017; 2,021 dogs in 2018; and 6,263 dogs in 2019 were subject to USDA’s import requirements).^v

Health Concerns Related to the Importation of Dogs

An increasing number of unhealthy dogs entering the U.S is alarming public and animal health officials.

- May 2019 – CDC announced a temporary ban on dogs from that Egypt, “citing multiple instances of dogs that contracted rabies in Egypt being brought to the U.S. in recent years.”^{vi}
- March 2019 – Scientists at Cornell University’s Animal Health Diagnostic Center identified a strain of canine distemper virus never before reported in North America, determining that the source was likely a dog from a Korean meat market. These scientists also attributed a 2015 Chicago area outbreak of canine influenza to dogs imported from Korea and estimated that dog owners have spent \$75 million on diagnostic testing and vaccinations to combat the outbreak.^{vii}
- November 2019 – An article in the Journal of the American Veterinary Medical Association raised concerns about importation of dogs from certain regions of the world, including China, stating that, “Veterinarians with state governments are concerned that dogs and their carriers could bring with them pathogens, especially the African swine fever virus responsible for killing whole pig herds in China and Eastern Europe.”^{viii}
- June 2021 – CDC halted imports from over 100 countries and launched a multistate public health investigation after a dozen people were in contact with an imported dog that tested positive for rabies.^{ix}

The ongoing fight to combat the COVID-19 pandemic has crystalized public health officials concern regarding zoonotic diseases, which can be spread between animals and humans. The CDC reports that 60 percent of all infectious diseases and 3 out of 4 emerging diseases such as coronaviruses can be spread from animals to humans.^x Dr. Megan Jacob, Associate Professor and Director of Diagnostic Laboratories, North Carolina State University College of Veterinary Medicine highlighted public health concerns regarding the transmission of diseases from imported dogs to other dogs, animals and humans, stating that “In addition to bringing viruses or bacteria that may be transmissible to other dogs, there is certainly a risk that the animals—any animal—could carry an infecting agent that could be passed to people or other animal species.”^{xi}

ⁱ Washington Post, <https://www.washingtonpost.com/news/animalia/wp/2017/02/08/does-america-have-enough-dogs-for-all-the-people-who-want-one/>²

ⁱⁱ <https://www.federalregister.gov/documents/2019/01/31/2019-00506/guidance-regarding-agency-interpretation-of-rabies-free-as-it-relates-to-the-importation-of-dogs>

ⁱⁱⁱ <https://www.cdc.gov/importation/bringing-an-animal-into-the-united-states/high-risk.html>

^{iv} <https://www.federalregister.gov/documents/2019/01/31/2019-00506/guidance-regarding-agency-interpretation-of-rabies-free-as-it-relates-to-the-importation-of-dogs>

^v USDA, Report on Importation of Live Dogs into the United States, June 25, 2019

^{vi} <https://www.federalregister.gov/documents/2019/05/10/2019-09654/notice-of-temporary-suspension-of-dogs-entering-the-united-states-from-egypt>

^{vii} Cornell University College of Veterinary Medicine, <https://www.vet.cornell.edu/news/20190318/new-strain-canine-distemper-virus-arrives-north-america>

^{viii} Journal of the American Veterinary Medical Association, *State Authorities See Disease Risk in Imported Dogs*, November 14, 2019,

<https://www.avma.org/javma-news/2019-12-01/state-authorities-see-disease-risk-imported-dogs>

^{ix} <https://www.washingtonpost.com/health/2021/06/19/dog-rabies-azerbaijan/>

^x CDC, <https://www.cdc.gov/onehealth/basics/zoonotic-diseases.html>

^{xi} <https://www.federalregister.gov/documents/2019/05/10/2019-09654/notice-of-temporary-suspension-of-dogs-entering-the-united-states-from-egypt>