



July 26, 2024

Honourable Mark Holland
Minister of Health
Address Locator 1801B
Ottawa, ON
K1A 0K9

Sent by e-mail to hcmminister.ministresc@hc-sc.gc.ca

Re: CDC Dog Importation Rule

Dear Minister Holland,

On behalf of the Canadian Kennel Club (CKC) and our nearly 20,000 members across Canada, I'm writing to thank you and the staff at the Canadian Food Inspection Agency (CFIA) for your recent efforts over the past weeks to negotiate a grace period with the Centers for Disease Control (CDC) regarding their new dog importation rule. We have been meeting with the CFIA over the past couple of months regarding this issue and have appreciated their collaboration on this issue. We understand the need to protect the health and safety of people and dogs regarding the potential spread of Rabies and the CKC supports the intent of the new CDC rule. While we are pleased with the grace period, we remain concerned about the ban on importation of dogs under six months of age into the United States. This negatively burdens our members and the positive activities that support accountable breeding and preservation of purebred dog breeds in both Canada and the United States.

Since 1888, the Canadian Kennel Club has been incorporated under and governed by the *Animal Pedigree Act* and is the primary registry body for purebred dogs in Canada. We have a long history of working with the Ministry of Agriculture to achieve our mission and to promote breed improvement and protect people who raise and purchase purebred dogs. CKC is authorized under the Act to register and identify purebred dogs and we actively promote the health and well-being of purebred dogs through responsible and accountable breeding. In addition to our mandate under the Animal Pedigree Act, CKC has by-laws, policies, codes of ethics and practices, and a robust tribunal process that ensures accountability across our membership. CKC also develops canine event rules and regulations, policies, and forms. CKC recognizes 187 dog breeds and has over 700 breed clubs across Canada in addition to our large membership base.

On July 17, 2024, the CKC sent a joint letter with the American Kennel Club to Mandy Cohen, Director of the CDC. In this letter, we explained how CKC registered dogs are an extremely low risk for rabies. These dogs must already meet rabies vaccination and microchipping mandates by various levels of government on both sides of the border and those required for air travel. We also outlined how the 6-month minimum age rule is unreasonably punitive to responsible dog breeders and enthusiasts, for whom the 4 – 6 month age window is a crucial period for facilitating bonding with new owners, and in-person evaluations to determine future suitability for participation in dog events, working dog careers, and responsible breeding programs. Furthermore, this rule will not only have both economic implications for Canadian breeders, but



it will also impact health promoting breeding practices that facilitate genetic diversification, access to health testing and veterinary care, and the potential reduction of health issues in purebred dogs over time. We have included our letter to the CDC for your reference.

Dogs registered under the Animal Pedigree Act by the Canadian Kennel Club are easily identifiable for border crossing through CKC documentation and are an extremely low risk regarding rabies. **We request your assistance in advocating for an exception to the current U.S. import requirement of a 6-month minimum age for dogs.** Our member breeders and registered dogs should not be unnecessarily penalized while conducting beneficial and accountable breeding practices that have a positive impact on the health, well-being and preservation of breeds in Canada. Our members will be able to demonstrate rabies immunity, good health, ISO microchipping, and a permanent residence in the U.S.

We appreciate your consideration of our request and recognition of the unique nature of purebred dog registration and our members. We remain committed to continue working with CFIA and supporting solutions to reduce risks to public health including the irresponsible importation of dogs, while minimizing the regulatory impact on responsible CKC members who register their dogs, and work across borders to improve canine health, diversify breeding programs, utilize veterinary services, and participate in sporting and goodwill events.

Best Regards,

Jeff Cornett
Executive Director

Cc: Paul MacKinnon, President, Canadian Food Inspection Agency
Dr. Sarah Thompson, Veterinary Program Specialist, Canadian Food Inspection Agency