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Centres for Disease Control and Prevention
(submitted via email: CDCExecSec@cdc.gov)

October 17, 2024

Dear Dr. Jernigan,

On behalf of the Canadian Kennel Club (CKC), thank you for your recent letter in response to our joint letter with the American Kennel Club (AKC). We value the special relationship between Canada and the United States that permits the free flow of goods, pets, and people across the Canada-U.S. border and the important work of the U.S. Centers for Disease Control and Prevention (CDC) to protect the United States from health, safety and security concerns.

While we appreciate CDC's efforts to protect the health and safety of people and dogs against the spread of dog-rabies, we remain concerned that the ban on the importation of dogs under six months of age into the U.S. is disproportionately impacting CKC members who responsibly own, train and breed their Canadian born, CKC-registered dogs in Canada. We understand that CDC has encountered inaccurate vaccination records from animals imported from high-risk countries. We also recognize that CDC has documented cases of rabid dogs from high-risk countries having entered the United States, including one through a rabies low-risk/rabies-free country. However, we must reiterate that **Canadian born, CKC-registered dogs pose an extremely low risk for the spread of dog rabies** for the following reasons:

- CKC personally-owned, registered dogs are born and raised in Canada – a country where, dog rabies is not currently present, [according to the Canadian Food Inspection Agency \(CFIA\)](#).
- CKC registered dogs must already meet rabies vaccination and microchipping mandates by various levels of government in Canada and those required for air travel.
- CKC registered dogs are easily identifiable for border crossing through CKC official documentation (registration certificates available upon request).
- An official Canadian Kennel Club registration certificate is a record of dog pedigree/parentage with CKC, Canada's primary registry body, incorporated and governed by the [Animal Pedigree Act](#), under the auspices of the federal Ministry of Agriculture since 1888.
- Owners and breeders of CKC registered dogs are subject to CKC by-laws, policies, procedures, codes of ethics and practices, canine event rules and regulations, and a robust tribunal process that ensures accountability across our membership.
- CKC members who travel with or transport their dogs to the U.S. will be able to demonstrate rabies immunity, good health, ISO microchipping, and a permanent residence in the U.S.



Your letter states that the 6-month minimum age requirement would better protect the health of people and animals, by preventing high-risk dogs with falsified or unverified veterinary documentation from entering the U.S. through rabies-free and low-risk countries. In addition, your letter states that the new CDC rule would align with the U.S. Department of Agriculture's regulations under the *Animal Welfare Act* which require dogs imported for resale to be at least six months old on arrival. Unlike high-risk dogs imported for resale, personally owned dogs that are Canadian-born, and CKC-registered, managed by breeders and enthusiasts from birth, are not high-risk, and do not present the public health threats posed by importers of unhealthy dogs for resale that CDC cited in its justification when announcing the new rule.

CKC member breeders and their low-risk, Canadian-born, registered dogs should not be adversely impacted while conducting beneficial and accountable breeding practices that have a positive impact on the health, well-being and preservation of purebred dogs. Therefore, **we urge you to recognize the unique and low-risk profile of Canadian-born, CKC-registered dogs and grant an exception to the current U.S. import requirement of a 6-month minimum age for dogs.**

We are committed to continuing to work with CDC, with the support of CFIA, on solutions to reduce risks to public health including the importation of unhealthy dogs, while minimizing the regulatory impact on responsible CKC members who travel with/transport their Canadian-born, CKC registered dogs, and work across borders to improve canine health, diversify breeding programs, utilize veterinary services, and participate in sporting and goodwill events. We appreciate your consideration of our request and recognition of the unique, low-risk profile of Canadian-born, CKC registered dogs and CKC members, and would welcome a meeting to discuss this important matter further, in support of human and canine health and well-being. We look forward to hearing from you.

Sincerely,

Jeff Cornett
Executive Director

Cc: Mandy K. Cohen, MD, MPH - Director for the United States Centers for Disease Control and Prevention, Administrator of the Agency for Toxic Substances and Disease Registry (ATSDR)
Paul MacKinnon, President, Canadian Food Inspection Agency
Dr. Sarah Thompson, Veterinary Program Specialist, Canadian Food Inspection Agency