

United States Senate
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COMMITTEES:
APPROPRIATIONS
BUDGET
HEALTH, EDUCATION, LABOR,
AND PENSIONS
VETERANS' AFFAIRS

July 30, 2024

Mandy K. Cohen, MD, MPH
Director
Centers for Disease Control and Prevention
1600 Clifton Road
Atlanta, GA 30329

Re: Control of Communicable Diseases; Foreign Quarantine: Importation of Dogs and Cats

Dear Director Cohen:

I write today to express my concerns about the Centers for Disease Control and Prevention's (CDC) final rule, *Control of Communicable Diseases; Foreign Quarantine: Importation of Dogs and Cats* (89 Federal Register 41726). I am calling on the CDC to delay implementation of the final rule, which is effective August 1, 2024, until the agency can adequately address the concerns of Americans living in border communities and pene-exclaves, such as my constituents in Point Roberts, Washington, and especially those with dogs under six months old. I share the CDC's commonsense goal of preventing the spread of rabies in the United States but want to ensure the agency is taking these unique considerations into account.

Point Roberts, Washington is a pene-exclave just south of Vancouver, Canada, on the tip of the Canadian Tsawwassen Peninsula. Point Roberts residents are separated from Washington state, and the continental U.S., by a 23-mile drive through British Columbia, or must travel via boat or plane. Many of my constituents who live in Point Roberts often cross the Canadian border multiple times a day to go to work, attend school, and conduct other daily activities, and many have dogs or puppies who accompany them. The new CDC final rule failed to take into consideration the burdens on these citizens—as well those living in other border communities—who need to frequently cross the border with their pets, particularly those with vaccinated dogs who are younger than six months old, and for citizens who have service dogs, as the rule does not provide any exemptions for personal pets or service dogs at land ports.

I appreciate CDC's clarifications to the rule released on July 22, simplifying the process for dogs that have been in dog rabies-free or low-risk countries, and allowing the *CDC Dog Import Form* to remain effective for 6 months, rather than requiring pet owners to fill out a new form each time they cross the U.S. border. However, this form is only currently available in English, which is not accessible for those with limited English proficiency.

Further, I remain concerned about the six-month age requirement for dogs entering from rabies-free or low-risk countries. In addition to filling out the form, the rule also requires dogs to appear healthy upon arrival, be at least six months old at the time of entry into the U.S., and have a microchip that can be detected with a universal scanner to identify them. CDC's prior temporary dog importation rule (86 FR 32041), implemented in June 2021, only applied to "high-risk countries." While Canada was excluded under this temporary rule, as were personal pets, US-Canada border crossings and personal pets would be subject to the new regulations under the 2024 final rule, which is a major operational difference. I understand that there are risks associated with unvaccinated puppies arriving to the U.S. from high-risk countries, but if puppies are younger than six months—yet vaccinated against rabies and coming from a rabies-free country like Canada—there is no reason why they should not be allowed to enter.

This six-month age requirement poses immense burden. There are no veterinarians in Point Roberts, so for my constituents who live there and have a dog under six months old, they have to cross the border in order to access veterinarian care. This would include traveling to a veterinarian to get the rabies vaccination and the microchip as required under the rule, or even getting just the verification of these safeguards from a veterinarian in order to have the correct paperwork required to cross the border. If someone were to cross the border with their puppy under six months old to visit a veterinarian, they would not be able to cross back into Point Roberts and return to their home. Moreover, if someone in Point Roberts has a dog that goes into labor and sees a veterinarian in Canada, those puppies from the litter would not be able to enter back into the U.S. This rule makes it difficult for any of my Point Roberts constituents to get a puppy, as they would not be able to cross the border to bring it back home or receive veterinarian care. This also potentially applies to Americans returning home with their dogs from postings abroad, including members of our military and their dogs.

Given the many potential negative consequences from implementation of this new rule as currently written, I request that the CDC delay the August 1, 2024 implementation of the final rule until the agency can adequately address the concerns of the citizens of Point Roberts and other exclaves within the U.S. who may be unduly burdened by this new rule, citizens living in other border communities, as well as the needs of puppy owners, individuals with service dogs, and members of our military returning from abroad.

Thank you for your work to protect the public health of the nation and I look forward to working collaboratively with you to ensure this rulemaking does not adversely affect Washington state residents.

Sincerely,



Patty Murray
United States Senator