



Matthew Bershadker
President & CEO

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Dr. Rima F. Khabbaz, MD
Director, National Center for Emerging and Zoonotic Infectious Diseases
Centers for Disease Control and Prevention
1600 Clifton Road
Atlanta, GA 30329

Dear Dr. Khabbaz,

On behalf of the American Society for the Prevention of Cruelty to Animals (ASPCA) and our over two million members, I am writing regarding the Center for Disease Control and Prevention's (CDC) June 16th policy, 86 Federal Register 32041, which temporarily suspends dog imports from countries that are high-risk for rabies. The ASPCA is grateful for the CDC's interest in preventing the emergence of rabies in the United States during the COVID-19 pandemic and preventing unscrupulous breeders abroad from smuggling unvaccinated (and sometimes underage) puppies into the country under false pretenses. However, we are also concerned that the June 16th policy will have negative ramifications for rescue organizations working to place homeless dogs from foreign countries in loving American homes, and for Americans abroad seeking to bring their canine family members home.

Founded in 1866, the ASPCA was the first animal welfare organization to be established in North America and today serves as the nation's leading voice for vulnerable and victimized animals. One of the ASPCA's policy priorities is ending the cruel commercial breeding of puppies and disrupting the pipeline that connects unwitting consumers with cruelly bred animals. While we are primarily a domestic organization, we are concerned that irresponsible breeders and dealers abroad are exporting puppies, to the United States. In addition to proliferating a cruel breeding industry, this business model causes major welfare issues when puppies arrive in the United States without adequate documentation or with fraudulent paperwork. We appreciate that the CDC has been tracking this issue and looking for solutions to prevent these inhumane outcomes.

However, we are concerned that the CDC's June 16th policy is overly broad and may hinder the efforts of animal welfare organizations to safely and responsibly place fully-vaccinated, homeless dogs from countries categorized as high risk for rabies. For example, the blanket ban would appear to cripple efforts of rescue organizations, like Mission K9, devoted to bringing working dogs home to the United States after these animals are retired from years spent protecting American service members abroad. Likewise, other rescue organizations, such as Nowzad, remove dogs from war-torn areas and, despite their strict pre-travel procedures, testing, and perfect record, may be unable to utilize current exemptions to provide these dogs a chance for a new home in the United States. The CDC's policy therefore fails to take into account that many such organizations already adhere to high standards of disease control, conducting pre-transport veterinarian care and testing, and have never imported a rabies-positive dog. The policy will also make it more difficult for Americans, including service members, to bring dogs they adopted while living abroad home with them. In some cases, the policy may create a hurdle that will leave dogs stranded, once again homeless. While the policy

creates certain exemptions for service dogs and dogs imported for science, education, exhibition, or law enforcement, it does not allow the issuance of import permits for dogs intended for adoption or transfer of ownership, in addition to resale.

As we approach the implementation date of this temporary policy, we urge you to consider the significant negative and unintended consequences this policy will have for vast numbers of homeless dogs overseas and the rescue organizations working to save them, and we offer our assistance in helping the CDC revise the policy as necessary going forward.

Thank you for your consideration. We would welcome the opportunity to meet with CDC officials to further discuss these concerns and potential solutions to prevent the spread of zoonotic disease, as well as avoid tragic outcomes for imported dogs.

Sincerely,



Matthew Bershadker
President & CEO
American Society for the Prevention of Cruelty to Animals

Cc: Dr. Robin Ikeda, MD, MPH – Associate Director for Policy and Strategy
Dr. Jay C. Butler, MD – Deputy Director for Infectious Diseases
Dr. Clive M. Brown, PhD – Quarantine and Border Health Services Branch Chief