



NATIONAL ASSOCIATION of STATE PUBLIC HEALTH VETERINARIANS, INC.

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Comments from the National Association of State Public Health Veterinarians (NASPHV) on “Proposed Revision of HHS/CDC Animal-Importation Regulations”

Response to Section 1, “Dog, Cat, and Ferret Regulations”

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The National Association of State Public Health Veterinarians (NASPHV) strongly supports extending the importation regulations to include cats and ferrets, additional requirements for a minimum age for importation, international health certificate, rabies vaccination and waiting period prior to entry, permanent unique identification and tracking, 30 day quarantine, close inspection of importation documents, restriction to importation at designated entry sites, or at a minimum, revising and improving regulations in order to better protect public health and safety by preventing the introduction of newly emergent and previously recognized zoonotic diseases. The NASPHV makes the following recommendations to HHS and the Centers for Disease Control and Prevention:

1. HHS/CDC should extend these animal importation regulations to include cats and domesticated ferrets.
2. HHS/CDC should establish a 6 month old minimum age at importation for dogs, cats, and ferrets.
3. All imported dogs, cats, and ferrets must have proof a current rabies vaccination prior to entry.
4. All imported dogs, cats, and ferrets must have an international health certificate issued by a veterinarian within 10 days prior to entry.
5. All imported dogs, cats, and ferrets must have a permanent unique identifier (e.g., microchip) prior to entry and verification at port of entry for validation and tracking purposes.

6. All imported dogs, cats, and ferrets should be required to undergo a documented minimum of 30 days in quarantine in an approved facility where veterinary supervision is present and records are maintained. Animals in quarantine that develop illness or die should undergo diagnostic testing as determined by U.S. import authorities. Such testing should be done to determine, for example, if a potential disease threat may exist to those people exposed to the animal, or to determine if other animals in a shipment are safe to import. The quarantine can be done in the country of origin or in the U.S., at the discretion of U.S. import authorities, prior to release to importers in the U.S.
7. Imported dogs, cats, and ferrets must be restricted to only enter the United States at designated ports of entry with designated facilities to safely confine and hold animals and where specially trained personnel are available to identify the species, preliminarily assess the health status of every importation, and inspect and verify the required documentation.
8. A national database should be established to monitor and track all imported dogs, cats, and ferrets. Information about imported animals should be shared with state officials on a timely basis so that local agencies may follow-up on imported animals.

The NASPHV has recognized that the current CDC dog importation regulations are inadequate to prevent zoonotic disease importation and adequately protect public health in the United States (see 2007 NASPHV Rabies Compendium). The United States was recently declared free of canine variant rabies and has drastically reduced the number of human rabies deaths through widespread mandatory vaccination programs, education and awareness, management of exposed animals, and robust surveillance programs. It is imperative that additional restrictions and precautions related to dog, cat, and ferret importation are adopted to maintain this canine rabies free status and adequately protect the nation's health.

The NASPHV is concerned about the recent reports of large numbers of puppies being imported for re-sale and the problems that have arisen from this practice, including questionable validity of information supplied on the importation notices, inadequate resources to inspect imported dogs at time of entry, reliance on the owner to confine unvaccinated animals, lack of resources to track and follow-up on imported dogs, and threats to animal and public health. In addition, the NASPHV is concerned about the large numbers of dogs that are currently imported in the country for which no inspection or notice to dog importers is issued (primarily at land borders).

Minimum Age

A minimum importation age for dogs, cats, and ferrets should be established to ensure that the animal is old enough for initial rabies vaccination prior to importation and to allow for verification of age at time of importation. NASPHV recommends a minimum age of at least **6 months** old to ensure: 1) the animal was old enough to have been vaccinated for rabies, 2) at least 90 days or more have elapsed since initial vaccination, and 3) for humane reasons to prevent importing very young animals (see USDA regulations requiring minimum importation age of 8 weeks). The official age estimation must be performed by a licensed veterinarian and the age must be stated on the health certificate in addition to the estimated age at time of rabies

vaccination. While a minimum importation age cannot completely prevent importation of a rabid animal, establishment of a minimum age in combination with rabies vaccination, confinement, and veterinary health certificate, and inspection at port of entry will greatly reduce the risks of rabies importation. The following is a listing of documented imported rabid pets into the United States in the past 21 years by State, species, the age at time of importation, and country of origin:

1986 – New York – Dog, 4 months old, West Africa

(<http://www.cdc.gov/mmwr/preview/mmwrhtml/00000874.htm>)

1987 – New Hampshire – Dog, 5 months old, Mexico

(<http://www.cdc.gov/mmwr/preview/mmwrhtml/00001275.htm>)

1987 – California – Cat, unknown age, Mexico

(<http://www.cdc.gov/mmwr/preview/mmwrhtml/00001275.htm>)

1995 – California – Dog, 4 weeks old, Mexico

2003 – California – Dog, 3 months old, Thailand

2007 – Alaska / Washington – Dog, 3 months old, India

Rabies Vaccination

A current rabies vaccination, administered by a licensed veterinarian and accompanied by a valid rabies vaccination certificate, should be a mandatory requirement for all dogs, cats, and ferrets entering the United States. Licensed rabies vaccines are available for all of these species and have been shown to be effective and safe (see NASPHV 2007 Rabies Compendium). An example of a model rabies vaccine certificate can be found at NASPHV Form #51 (Rabies Vaccine Certificate) and must include animal identifying information (including permanent unique identifier), owner information, veterinarian information, date of vaccination, type and lot of rabies vaccine administered, age of animal at time of vaccination, duration of vaccination, and whether it is a primary vaccination or booster. Serologic evidence of immunity is not recommended to be required in addition to vaccination since we recommend that animals cannot be imported within 90 days of initial vaccination in addition to the other recommended requirements listed in this response. With rabies having an average incubation period of 2-3 months, requiring a 90 day waiting period after vaccination reduces the risk of importing an animal incubating rabies.

Animals should receive a rabies vaccination when they reach the minimum age per vaccine label and receive boosters per vaccine label. An animal that has only received one rabies vaccine should not be imported until at least 90 days following the vaccination. An animal that has received two or more rabies vaccinations per vaccine label would not require additional waiting time provided that the animal is currently vaccinated.

Health Certificate

An international veterinary health certificate, such as the European Union Form 998, must be a requisite for animal importation. Such a requirement will reduce the importation of ill animals infected with zoonotic pathogens. In several of the recent imported rabid animal cases (see above), imported animals were noted to have been exhibiting clinical illness prior to embarkation

and during transit. Few of these animals had obtained a health certificate or veterinary examination prior to transit. While a veterinary examination and health certificate cannot detect or prevent against importing animals that are incubating zoonotic diseases, this requirement as part of additional requirements is a critical safeguard in preventing importation of ill animals.

Animals showing any sign of illness, wounds, or exposure to a possibly rabid animal in the past 6 months should not receive a health certificate. The health examination should specifically assess for rabies, screwworm, leishmaniasis, and intestinal and external parasites. The health certificate must include the permanent unique identifier and be issued no more than 10 days prior to importation. These certificates must contain additional validation measures such as an official stamp, official form, or other security measures to prevent fraudulent certificates.

Permanent Unique Identification and Tracking

Permanent unique animal identification will significantly reduce the likelihood of fraudulent vaccination and health certificates since it provides a way to cross-reference individual animals, track them, and associate them with an owner and importation event. Permanent unique identifiers will also assist local health officials and animal agencies during follow-up investigations and enforcement actions by allowing individual animal identification and verification compared to the current method of simple observation of breed, age, and color. Imported animals could be tracked across multiple encounters (similar to postal packages) including embarkation point, transfer during transit, point of entry, and follow-up encounter at final destination.

International microchip standards and registries already exist. Specifying particular microchip standards or requirements to established international systems will maximize unique identifiers and compatibility with readers in the U.S. The imported pet should be scanned at all U.S. ports of entry, airlines, sea ports, land border stations, and by local health and animal control agencies. An alternative would be to tattoo or have some external permanent marker but these methods are less effective.

A national database of all imported animals should be created and maintained by CDC. This standard registry would facilitate multiple local agencies to access and query animal information (identification, owner, importation date, country of origin, notes) ad hoc on a timely basis.

30 Day Quarantine in Approved Facility

Imported dogs, cats, and ferrets should be quarantined in an approved facility for 30 days to help reduce the possibility that they are infected with diseases of concern to public or animal health. Because dogs, cats, and ferrets are not exotic species foreign to the U.S., the regulatory agencies may approve quarantines either prior to or after import, provided that they occur before release of the animal to the public. If the quarantine is conducted overseas prior to import, the health examination for the veterinary health certificate will take place in the quarantine facility, which may improve the quality control for those examinations. Animals that become ill or die during quarantine may need to undergo diagnostic testing. The need for testing should be determined by

the U.S. quarantine authority, and should be based on assessment of the situation. Sick animals commingled with other animals in a shipment should have appropriate testing to determine whether the other animals may have been exposed to a communicable disease. It may also be necessary to determine the cause of illness or death to protect people who have been exposed to the animal during shipment and/or quarantine. The quarantine authority should require the importer to complete appropriate testing, including necropsy if indicated, prior to releasing other animals from quarantine.

Limitation of Importation to Designated Ports of Entry

HHS/CDC should restrict the importation of dogs, cats, and ferrets to only those ports of entry staffed by HHS/CDC personnel. This restriction would limit the number of entry ports and provide for direct examination of the animal and inspection of required documentation (vaccination certificate, health certificate, etc.). In addition, importation paperwork can also be issued on a consistent basis and information can be entered into the national database. For the imported rabid dogs in 1995, 2003, and 2007, no CDC notice to dog importers (CDC form 75.13) was issued even though the 2003 and 2007 cases arrived at a CDC quarantine station. The 1995 imported rabid dog was imported across the Mexico – California border and no CDC forms are issued at land border stations. Therefore, adequate staffing at these ports, consistent inspection of every imported animal, and completion of every importation notice is critical for the success of these regulations.

For example, the California Department of Public Health (CDPH) receives individual dog importation notices from CDC quarantine stations (primarily LAX and SFO). The numbers of documented imported dogs received by CDPH annually are: 263 (2001), 460 (2002), 862 (2003), 3128 (2004), 3024 (2005), 1416 (2006), 981 (2007 YTD). This data does not include animals imported across the Mexico border because no importation notices to dog owners are issued at these ports. In 2005-2007, animal control officials in California monitored importations of dogs across the San Diego – Mexico border for a 2 week period each year. Approximately 500 dogs/week were identified in each of the 3 sampling years. This represents a minimal estimate of the thousands of dogs that are imported annually into the U.S. where no dog importation notices are ever issued.

Exemptions

USDA licensed and inspected research facilities should be able to apply for an exemption to the mandatory rabies vaccination requirements provided that the imported animals remain in confinement within a bonafide research institution and are not subsequently re-distributed.

Exemptions should be allowed for returning animals provided that the animal has a current rabies vaccination, a unique identifier, a current health certificate, is healthy at time of entry, and the owner declares that the animal has not been potentially exposed to rabies while on travel.

Post-Importation Actions

In addition to the above recommendations for entry requirements, standardized protocols and

follow-up actions must be addressed to ensure compliance with these regulations and to provide notification to receiving jurisdictions of imported animals. Provisions should be made for local enforcement actions (current regulations limit local enforcement actions), timely notifications and copies of importation documents sent to receiving state/jurisdictions, and local agency access to the national animal importation database.

Conclusion

The NASPHV recommends limiting the number of imported dogs, cats, and ferrets to those that are able to comply with the recommendations stated above. These basic safeguards will greatly reduce the risk of importation of rabies and other zoonotic pathogens into the U.S. The NASPHV strongly urges CDC to implement the recommendations above to reduce the potential for the introduction of both recognized and emerging zoonotic diseases into the country that could threaten not only human health but the health of domestic and wild animals.

References:

1. NASPHV 2007. Compendium of Animal Rabies Prevention and Control, 2007. Available at <http://www.nasphv.org>, accessed November 1, 2007.
2. NASPHV 2007. NASPHV Form #51 – Rabies Vaccination Certificate. Available at <http://www.nasphv.org>, accessed November 1, 2007.