

Developing a program for importation of canines into the United States.

In the United States, the movement of canines both into the United States and within the U.S. has been regulated primarily by local jurisdiction and based primarily on rabies control requirements within. Their lack of regulation into and out of the US is their unique status as a household item or private possession, traveling with an individual owner, in contrast to the shipment of livestock, traveling as an economic commodity. The horse enjoys a status somewhere between the dog and livestock, but due to its history as an economically important commodity, regulations for its import and movement more closely resemble those applied to livestock.

The dog in this country is not looked at as a commodity, so the dog or pet industry is not protected in the manner that the livestock industry is protected.

In order for us to try and promulgate legislation or regulations using traditional routes it is very important that we clearly understand this distinction and develop a compelling argument as to why the dog industry needs to be protected from foreign import.

Supporting arguments can be made that this is also a public health issue (CDC) and a consumer issue (Commerce), but those departments should be used as supporting witnesses for our case, not as the department in which the regulations reside.

Reasons:

1. USDA is the only one of the departments already set up to deal with the process of animal quarantine.
2. USDA already has in place regulation for determining health and care status for animals.
3. USDA already has inspectors at every international port of entry.
4. USDA already has quarantine laws in place that can be used as a frame work to build on.
5. USDA already issues sanitary permits animal importation and has agreements in place with foreign countries for inspections at port of entry. .

Problems to consider when making an argument that we need regulations to stop or control dogs from coming into this country:

1. We don't want to establish a system that results in great expense for persons wanting to import animals for themselves.
2. Quarantine only becomes an economic burden to **third world countries if it is done at a US facility**. The cost has to be in US dollars to be prohibitive. Also, the paperwork from most TWC would be suspect as to its accuracy. **(Is this quarantine done in home country or US?)**
3. We don't want to give argument that the AR's or persons who are against dogs can use as evidence as why dogs may present a danger to our health and especially the health of our children. An example was the attempt that was made to make dogs look like a health threat due to possible exposure of children to

- round worms. That never went anywhere, but given a more exotic, scary disease potential, they could capture the headlines and do even more to keep dogs out of public places.
4. We want to insure that regulations stay within the framework of federal quarantine so authority is not given to federal inspectors to get involved in domestic sales and transport of dogs. This would have ramifications far greater than any PAWS bill. Need to make sure interstate movement can not be regulated under this authority.
 5. Quarantine is based on a country of origin framework. If we want to stop import from certain countries, we need a plan and compelling argument for that country or region. Needs to be designed so animals cannot simply be shipped to a non regulated country to gain entry.
 6. Dogs, despite reality, are not considered an industry of economic importance. This is the primary perception that needs to change for us to be successful. We need to then be vigilant to prevent the problems that will arise from that perception by the general public and guide that perception to a warm fuzzy feel. Otherwise, the perception will be demonized by our enemies and used against us. This is already happening, but without a lot of support from the public. This would also be an opportunity to turn the tide of public sentiment to the perception that the pet industry is good. Dog people may resist this, as the indoctrination against dogs being a business is strong, but this needs to change if we are to prevail. If we do not begin to see an animal that generates billions of dollars to the US economy as an industry that benefits the American public, than our enemies will use it to turn the public against us. Last year I heard one piece of public testimony from an AR that brought up that fact as proof that we needed more regulation and the red flags went up in my brain as to their next possible tactic. I also saw the horse industry introduce arguments on their value to the US economy to support protection they were seeking. We need to follow the lead of the horse industry.
 7. I think we may want to address disclosure at the point of retail sale with Commerce. (This could have positive results) Possibly a disclosure of the risks of possible zoonotic diseases from the countries of origin and what testing was done to insure there is not exposure of those diseases to the end user. People may not want to buy pups from Mexico if they understand the risks or at least realize the pup wasn't born in the US.

Quarantines are established to protect an industry from economic harm due to the introduction of disease from foreign sources. The USDA is primarily, despite the thrusting of the AWA upon it, primarily developed to protect the agricultural industry, not the animals within. In reality, even the AWA ultimately is protecting the research industry, not the public. Ultimately, PAWS would do the same, protect the commercial puppy industry. Everything ultimately turns out this way because this is the culture upon which USDA is based. They don't know how, and have no interest in learning, how to do things, any other way.

In order to be successful, I think we need to do several things:

1. We need to get USDA, CDC, and Commerce all behind us, with USDA as the lead agency, supported by CDC and commerce as contributing agencies. All concerns can be met through quarantine and sanitary permits.
2. We need to be able to demonstrate that dogs have an economic importance to the US economy and that economy needs to be protected.
3. We need to be able to demonstrate what the economic threats are and the potential loss of revenue.
4. We need to be able to demonstrate the health risks to the canine population as a whole.
5. We need to be able to document the possible human health risks due to introduction of foreign diseases heretofore unknown to exist in this country.
6. We need to be able to document the potential introduction of disease vectors currently not known to exist in the US.
7. We need to be able to have a preliminary list of the countries or regions that pose the greatest risk.
8. We need a proposal that requires proof of origin of birth. This prevents the movement of pups to get around quarantine laws.
9. Our argument would be strengthened through Commerce if we could actually demonstrate an overwhelming statistic contrasting loss in the first 6 months between imports from TWC and countries without rampant disease problems.
10. Our argument would be strengthened if we could actually document an overwhelming human risk. I don't think we can show that. On huge problem that has allowed this industry to prevail is the lack of any disease outbreak, despite concerns to the contrary. Even rabies, miraculously, has not been demonstrated to be a problem.
11. Homeland security from potentially deadly zoonotics could possibly be used to keep dogs out of the US from countries considered to be a terror risk. We would have to show diseases that could be inoculated into the dog and then brought in and readily spread to the human population. I don't know if there are any, nor do I know if we really want to give anyone any ideas, but it would be very compelling. Getting Homeland Security on our side wouldn't hurt. These are pups that would be brought in under the guise of the pet market, but not necessarily disseminated into the pet market.
12. Recognize that even if CDC wants to do the regulation, they have no system in place to enforce. Getting funding for what would basically be a huge, new beurocracy, though possibly appealing to some persons in the department, would be very hard to do. Same holds true for Commerce. If CDC and Commerce want to promulgate regulation, they need to give USDA the authority, plus funding. This type of thing is expensive, much of the cost is defrayed through fees, but not all. It should not really require an increase in man power, since the inspectors are already at ports of entry and quarantine facilities are already in place, though nor very heavily used.

Different methods used to quarantine livestock, depending on country of origin.

1. Border entry points authorized by the Assistant Sec. of Livestock.
2. Sanitary permits required from certain countries.

3. Disease testing to demonstrate lack of exposure to exotic an/or endemic diseases that put the canine and human population in this country at risk.
4. Quarantine and subsequent second testing to rule out latent exposure.
5. Health certificates.
6. Import permits.
7. Marking system to track the animals and insure the animals being imported are the same as the animals inspected.
8. Premise certification.
9. Commercial invoice
10. Vaccination
11. Advanced notification
12. Animals remaining in authorized facilities and subjected to procedures of quarantine, clinical observation, inspection, disinfection, immunization, diagnostic tests, or other as may be deemed appropriate by the regulating parties.
13. Import permits for approved parties or approved countries.
14. Regs have to have enforcing power and penalties for failure to comply; otherwise the whole exercise is useless.
15. Legal remedies for failure to comply.

It would be nice if our introduction includes the point that the problem of importation of dogs is much more serious than anything happening domestically, including, but not limited to the welfare of the animals involved, the economy of the US, and the reduction of health risks to the American public. As such, this issue should be given priority in both enforcement and funding over domestic legislation. Also, we can show that bills such as PAWS are a low priority, since there is obviously not an overpopulation problem if the import trade is so lucrative, but an owner loyalty problem, dogs not in fad being traded in for the flavor of the month. Also need to emphasize that restrictive domestic policy just opens the door for further development of the pet market in third world countries.

Anyway, I hope this is what you had in mind.

Pat