



July 27, 2022

Mr. Kevin Shea, Administrator
Animal Plant Health Inspection Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20520

Re: Docket ID APHIS-2022-0035-0001, APHIS Strategic Plan Framework

Dear Administrator Shea:

The National Animal Interest Alliance (NAIA) greatly appreciates the opportunity to submit comments on the USDA-APHIS Strategic Plan Framework.

NAIA is an association of business, agricultural, scientific, and recreational interests dedicated to promoting animal welfare, supporting responsible animal use and strengthening the bond between humans and animals. Our members are pet owners, dog and cat clubs, obedience clubs and rescue groups as well as breeders, trainers, veterinarians, research scientists, farmers, fishermen, hunters, and wildlife biologists. The membership roster of NAIA includes some of America's most respected animal professionals, advocates, and enthusiasts.

NAIA endorses the development and advancement of high standards of care for pets, livestock, lab animals, and animals used in sport, recreation, and education. NAIA also promotes scientifically-based wildlife management, sustainable development and use of resources, and agricultural practices that consider humans and livestock as an integral part of the environment.

Specifically, NAIA wishes to comment on the threat of foreign disease introduction and spread posed by dog imports. According to data from USDA and the Centers for Disease Control and Prevention (CDC), over 1 million dogs are imported to the U.S. each year. Those dogs are subject to varying requirements through USDA, CDC and U.S. Customs and Border Protection (CBP) depending on the purpose of import and country of origin. USDA-APHIS has robust health standards in place for dogs imported for resale, but under the current regulatory framework less than one percent of canine imports are subject to these requirements.

Imported dogs have been responsible for the introduction and transmission of a suite of diseases and pests including rabies, a new strain of canine influenza, leptospirosis, melioidosis, onchocerosis, and screwworm. An alarming increase in the number of rabies-positive dogs entering the U.S. prompted the CDC last year to suspend imports from over 100 countries to prevent re-entry of the canine rabies variant. That suspension has now been extended to January 2023. There is also a growing concern

within the livestock industry that imported dogs and even their crates and bedding could transfer African Swine Fever (ASF). We commend APHIS for the August 6, 2021 federal order establishing additional requirements for dogs imported into the United States for resale from countries where ASF exists, and support further efforts to ensure ASF is not transmitted by any imported dogs.

These recent actions by CDC and APHIS are welcome, but unfortunately cover only 10% of imported dogs. To ensure that animals entering the country are healthy enough to travel and free of disease and parasites that threaten animal and human health, NAIA supports strengthened federal oversight of canine imports as well as increased resources to fund oversight activities. Further, NAIA encourages USDA to coordinate with CDC and CBP to ensure that proper health and safety standards are met.

Stronger oversight of imported dogs supports APHIS' Vision Statement to ensure the health of animals and humans and goals 2, 3, 4 and 6 of the Strategic Plan.

- Goal 2: Deliver science-based solutions that reduce the impacts of zoonotic and emerging diseases and ecosystem changes.
- Goal 3: Protect agriculture from plant and animal diseases and pests.
- Goal 4: Maintain and expand the safe trade of agricultural products.
- Goal 6: Promote the welfare of animals.

NAIA welcomes the opportunity for continued partnership with APHIS to ensure these goals are met.

Thank you,

A handwritten signature in blue ink that reads "Patti Strand". The signature is written in a cursive style.

Patti Strand, President
National Animal Interest Alliance