Sheila Goffe
Vice President
Government Relations

November 27, 2023

Docket No. APHIS-2022-0014
Regulatory Analysis and Development
PPD, APHIS, Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

RE: American Kennel Club Supports Formalization of *Importation: Live Dogs for Resale From Regions Where African Swine Fever Exists or is Reasonably Believed to Exist*

The American Kennel Club (AKC) thanks the United States Department of Agriculture's Animal and Plant Health Inspection Service (USDA APHIS) for proposing to formalize African Swine Fever (ASF)-Related Import Requirements for Dogs Intended for Resale in Animal Health Protection Act regulations.

Founded in 1884, the American Kennel Club is America's only not-for-profit all-breed dog registry devoted to the study, breeding, exhibiting, and advancement of purebred dogs. AKC demonstrates its commitment to responsible dog ownership and breeding through a variety of educational programs, humane programs, and a multi-million-dollar commitment to canine health research through the AKC Canine Health Foundation. AKC is the only national all-breed dog registry with a kennel inspections program, which includes a flexible, comprehensive, performance-based care and conditions policy for the welfare of all dogs. Since 2000, AKC has conducted more than 70,000 inspections of kennels that register their dogs with us.

The American Kennel Club recognizes the value of importing breeding stock from overseas, and ensuring that people may travel with their pets with a minimum of disruption. AKC shares USDA's concerns about increasing documented incidences of the importation of random-source pets into the United States, particularly for transfer, where public and pet health may be inadequately protected. Not only do we support efforts to better understand the impact of large quantities of dogs being imported into the United States, but we also support strengthening efforts to ensure that all dogs imported into the United States are themselves fully immunized; free of infection, parasites, other vectors, or contagious diseases; and are individually certified as such by a qualified veterinarian. We recognize that dogs can shed the ASF virus after consuming infected pork, and carry the virus on their fur and bedding, thereby creating a potential hazard.

To help accomplish these goals, AKC supports the formalization of *Importation: Live Dogs for Resale From Regions Where African Swine Fever Exists or is Reasonably Believed to Exist* that have been in place since August 2021 via federal order. In addition to satisfying all import requirements, we believe that the specific requirements for the importation of dogs for resale from countries where ASF exists or is believed to exist are a reasonable tradeoff in exchange for protecting animal health, including the domestic swine population, pork industry, and food supply

from the virus. We also support the proposed technical change that will provide APHIS with the flexibility to make changes to the list of acceptable identification that will not require a separate rulemaking process.

Please note that AKC's interest in importation regulations is not limited to dogs imported from countries with, or suspected of having, ASF. We also generally support enhanced standards for the importation of dogs for resale/transfer from canine rabies-high risk countries as a means to protect the public and canine health from other communicable diseases. Please see AKC's comment to the Centers for Disease Control and Prevention's (CDC) proposed rulemaking regarding *Control of Communicable Diseases; Foreign Quarantine: Importation of Dogs and Cats* (Docket Number CDC-2023-0051 comment available at https://www.regulations.gov/comment/CDC-2023-0051-1995).

Thank you for you for your consideration of these comments. Please feel free to contact me directly at 919-816-3720 or Sheila.Goffe@akc.org if I may be of further assistance.

Sincerely,

Sheila Goffe
Vice President, Government Relations
American Kennel Club