



National Association of State Departments of Agriculture
4350 North Fairfax Drive
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September 6th, 2023

Centers for Disease Control and Prevention
Division of Global Migration and Quarantine
1600 Clifton Road NE, MS H16-4
Atlanta, GA 30329

Re: Docket # CDC-2023-0051

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to submit the following comments on the Center for Disease Control and Prevention (CDC)'s Department of Health and Human Services (HHS) proposed rule to amend foreign quarantine regulation to provide additional clarity and safeguards to address the public health risk of dog-maintained rabies virus variant (DMRVV) associated with the importation of dogs into the United States.

NASDA represents the Commissioners, Secretaries, and Directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs, including food safety, conservation, and fostering the economic vitality of our rural communities. Combating the spread of animal disease is also among our chief responsibilities. State departments of agriculture regulate and oversee animal health programs in their states to protect against animal disease outbreaks and secure our food supply. NASDA is committed to working with intergovernmental agencies and industry stakeholders to foster a collaborative approach to animal health and disease prevention initiatives.

NASDA supports the Healthy Dog Importation Act – legislation to ensure all canine imports undergo a thorough health screening to verify they are healthy and free of disease and parasites before entering the United States. The risk of disease introduction and transmission is too high under current import regulations. The Healthy Dog Importation Act would establish commonsense health and vaccination requirements for all dogs imported into the U.S. and promote interagency coordination to address the current gaps in regulatory authority over such imports. Many components of the Healthy Dog Importation Act are reflected in the CDC's proposed rule for dog imports, including requiring proof of rabies vaccination, permanent identification for all imported dogs, and new standards for addressing dogs imported with fraudulent documentation.

NASDA supports the funding and resources needed to maintain a robust state and federal animal health infrastructure necessary to facilitate early detection, surveillance, response, and control activities to prevent and mitigate both domestic and foreign animal diseases. NASDA believes federal animal disease control programs and coordination across all federal agencies are essential



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to eradicate or prevent the introduction of foreign animal diseases. State departments of agriculture also recognize that the prevention, containment, and eradication of foreign animal diseases requires a robust collaborative effort among federal and state partners, industry, and academia.

If you have questions, please contact Stephanie McBath, Associate Director of Public Policy for NASDA (Stephanie.McBath@nasda.org).

Sincerely,

A handwritten signature in black ink that reads "Ted A. McKinney". The signature is written in a cursive style and is positioned over a light gray, dotted rectangular background.

Ted McKinney
Chief Executive Officer