

**Congress of the United States**  
**Washington, DC 20515**

July 23, 2024

Mandy K. Cohen, MD, MPH  
Director  
Centers for Disease Control and Prevention  
1600 Clifton Road  
Atlanta, GA 30329

Dear Director Cohen:

We appreciate your attention to the border states' letter sent earlier this week, signed by members of the Alaska congressional delegation, as well as others, regarding the Center for Disease Control and Prevention's (CDC) new rule on the importation of dogs into the United States. We write now to highlight the specific ways this rule will have an outsized impact on Alaskans and is unworkable, as written, for our state. We support measures to prevent the spread of rabies, but this rule will significantly impact dogs reentering the United States via Canada. This is a common occurrence for many Alaskans who spend their winters in the Lower 48, as well as for mushers attending dog sled races, and military personnel changing duty stations. We urge the CDC to grant an extension of the August 1, 2024 implementation date, and to adjust the rule to protect public health while permitting the safe transportation of dogs to and from Alaska.

The new requirements including microchipping, comprehensive documentation, and the six-month age restriction, create significant challenges for residents in Alaska, where dogs play a crucial role in our culture and economy. Many Alaskans, seasonal workers, and tourists travel regularly with their pets or sled dogs through Canada, and the new requirements would hinder their ability to re-enter the United States with their dogs. In cases of family emergencies or personal crises, the inability to quickly obtain health certifications under the new regulations could force individuals to leave their pets behind, incurring significant costs to board their pets or face substantial logistical burdens.

Sled dog teams, essential for mushing, tourism, and sometimes used for winter travel, often include dogs bred and trained in Canada. The new requirements impose significant logistical and financial burdens on mushers. For example, the rule requires the use of the International Organization for Standardization (ISO) compatible (15-digit) microchips. However, the Iditarod, an annual tradition commemorating the 1925 mission to Nome to deliver lifesaving vaccines, has relied upon pre-screening protocols requiring each dog to be microchipped with an American Veterinary Identification Devices (AVID) 9-digit chip for the last 30 years. There are thousands of sled dogs in the U.S. and Canada who already have an AVID microchip which the CDC does not consider to be ISO compatible.

In addition to challenges facing sled teams, individuals with service dogs and military personnel are impacted by the new rule. Individuals who require service animals for medical travel have no provisions within the new rule to account for their needs. Military personnel, who typically move to new duty stations every few years, will face additional financial and logistical constraints due to these new requirements, potentially leading to pets being left behind in Alaska and other states.

The proposed rule initially provided an exception which allowed owners to import up to three personal pet dogs under six months of age annually if entering via a land port from Canada or Mexico, provided these animals had not been in a high-risk country. The elimination of this exception presents substantial obstacles for Alaskan residents and veterinarians. The new requirements are nearly impossible for dog owners who frequently make United States – Canada border crossings. Alaska and Canada share many resources, and in some communities, it is not uncommon for residents to travel back and forth for services.

In addition to the increased burdens set on dog-owners, Alaskan veterinarians issue significantly more health certificates than their counterparts in the Lower 48 states, with some issuing over 600 certifications annually. The increased costs and burdens associated with meeting the new requirements, such as individual import forms for each pet, extended waiting periods, potential revaccination, and certification of vaccinations impact dog owners and veterinary practices. This is especially true given the robust lay vaccination programs in Alaska. While recent updates have been made to ease documentation burdens, this rule still creates substantial burdens for Alaskans.

Given these negative impacts on Alaskan pet owners and our unique cultural practices involving sled dogs, we are requesting that the CDC delay the implementation of this rule. A delay would provide additional time to engage with stakeholders, including Alaskan residents, veterinarians, and pet owners, to ensure that their concerns are adequately addressed and that the rule's implementation does not unintentionally harm responsible pet owners and mushers.

We appreciate your attention to this matter and look forward to your response.

Sincerely,



Lisa Murkowski  
United States Senator



Dan Sullivan  
United States Senator



Mary Sattler Peltola  
Representative for All Alaska