NEW YORK CITY BAR

REPORT BY THE ANIMAL LAW COMMITTEE RECOMMENDING THAT THE CENTERS FOR DISEASE CONTROL AND PREVENTION'S 2024 DOG IMPORT RULES BE REEVALUATED

I. OVERVIEW

On August 1, 2024, new rules issued by the U.S. Centers for Disease Control ("CDC") went into effect regulating the importation of dogs into the United States ("2024 Dog Import Rules"). All dogs entering the country – both existing pets and dogs for sale or adoption – must satisfy the relevant requirements, which vary depending on whether the country of origin is deemed low-risk or high-risk for rabies transmission.[1] The federal regulations are intended to prevent the spread of dog-maintained rabies virus variant in the United States.[2]

The 2024 Dog Import Rules are elaborate, as summarized below. The more burdensome components apply to foreign-vaccinated dogs and dogs originating from high-risk countries for rabies transmission. However, healthy dogs presenting no meaningful rabies risk are affected as well. Advanced planning is generally recommended if traveling to the United States with a dog. For a subset of dogs, compliance may necessitate re-vaccination, traveling to one of six U.S. cities with a CDC-registered animal care facility and even quarantine for 28 days.[3] Detailed veterinary records may also be required.

The regulations impact large numbers of people and animals. Roughly 1.2 million dogs enter the United States each year, and of those an estimated 113,000 are imported

[1] "New CDC dog importation requirements: FAQs for veterinarians". https://www.avma.org/resources-tools/animal-health-and-welfare/animal-travel-and-transport/new-cdc-dog-importation-requirements-faqs-veterinarians (All websites last accessed on Sept. 4, 2025).

[2] These rules were put into place on the heels of the COVID pandemic which saw an increased interest in purchasing dogs from international sources and a diversion of resources at airports that made it more difficult to verify vaccine documentation. "A Proposed Rule by the Health and Human Services Department on 07/10/2023", CDC Docket No. CDC–2023–0051, https://www.federalregister.gov/documents/2023/07/10/2023-14343/control-of-communicable-diseases-foreign-quarantine-importation-of-dogs-and cats#:~:text=DATES:,4%2C%20Atlanta%2C%20GA%2030329.

[3] "Importing a Foreign-Vaccinated Dog into JFK", https://arkjfk.com/cdc-overview.

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from countries considered high-risk for rabies transmission.[4] Although they have broad application in certain ways for canine populations, the 2024 Dog Import Rules are limited from a different angle: they do not apply to other species that can transmit rabies to people. Nor do they regulate other dangerous zoonotic disease in dogs, such as leptospirosis, salmonella and tuberculosis.

Now that the regulations have been in existence for almost a year, the time is ripe to evaluate their impact, including challenges on animal welfare organizations, extra costs to travelers, and the medical implications for dogs. In the interest of promoting animal welfare, we highlight some of the rules' shortcomings and recommend specific improvements for the benefit of travelers, their canine companions and rescue organizations.

II. RABIES IN THE U.S. VS. GLOBALLY

While the 2024 Dog Import Rules have an admirable goal of preventing the spread of rabies, that concern is mitigated when placed in further context. Canine rabies transmission to people in the United States is extremely rare. Canine rabies has been eradicated from the U.S. since 2007.[5] In 2022, no human rabies cases were reported in the United States.[6] In other recent years, only one to two people in the country have been reported to die from rabies.[7] These statistics indicate that the existing pre-COVID dog import rules were not in need of an overhaul.

Rabies predominantly affects marginalized populations abroad who cannot afford or do not have access to the effective rabies vaccine.[8] Most deaths from rabies are due to inadequate access to public health resources and preventative treatment.[9] Approximately

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[4] "Grassley, Smith Reintroduce Legislation to Prevent Spread of Foreign Animal Diseases", Feb. 17, 2023. https://www.grassley.senate.gov/news/news-releases/grassley-smith-reintroduce-legislation-to-prevent-spread-of-foreign-animal-diseases.

[5] "In North America, molecular evidence was used to confirm the declaration that USA was free of canine rabies in 2007." Taylor LH, Nel LH. Global epidemiology of canine rabies: past, present, and future prospects. Vet Med (Auckl). 2015 Nov 5;6:361-371. doi: 10.2147/VMRR.S51147. PMID: 30101121; PMCID: PMC6067664. https://pmc.ncbi.nlm.nih.gov/articles/PMC6067664/#b28-vmrr-6-361.

[6] Ma, X., Boutelle, C., Bonaparte, S., Orciari, L. A., Condori, R. E., Kirby, J. D., Chipman, R. B., Fehlner-Gardiner, C., Thang, C., Cedillo, V. G., Aréchiga-Ceballos, N., Nakazawa, Y., & Wallace, R. M. (2024). Rabies surveillance in the United States during 2022. *Journal of the American Veterinary Medical Association*, 262(11), 1518-1525. Retrieved Jan. 13, 2025, from https://avmajournals.avma.org/view/journals/javma/262/11/javma.24.05.0354.xml.

[7] "All mammals are susceptible to rabies", AVMA. https://www.avma.org/resources-tools/one-health/rabies.

[8] "Rabies", Jun. 5, 2024, https://www.who.int/news-room/fact-sheets/detail/rabies.

[9] "Rabies", https://www.woah.org/en/disease/rabies/#:~:text=Rabies%20control%20programmes,coordinated%20strategy%20against%20the%20disease.

59,000 people suffer rabies-related deaths globally per year according to the World Health Organization ("WHO").[10]

III. SUMMARY OF NEW REGULATIONS

The 2024 Dog Import Rules apply to all dogs, including service animals and dogs that leave the United States and return.[11] They affect travelers with wide-ranging demographics: military families, people with disabilities, people rescuing animals and others returning home with their canine best friend. The rigor of the regulations depends on several criteria.

a. Rabies-Free or Low-Risk Countries for the last six months

If a dog has been in a rabies-free or low-risk country for the past six months, there are four requirements to gain entry to the United States: (i) the dog must be at least six months old, (ii) the dog must "appear" healthy on arrival, (iii) the dog must be microchipped in a manner that can be detected with a universal scanner and (iv) a CDC Dog Import Form must be completed and signed. This form solicits responses regarding biographical information about the importer, characteristics about the animal, the purpose of the pet and travel information.[12]

Notably, the CDC does not mandate proof of rabies immunity for dogs who have been in a rabies-free or low risk country. Nor does the CDC require a record of rabies vaccination. According to the American Veterinary Medical Association, which endorsed the regulations, a rabies vaccination is not required, but it is "strongly recommended" in these circumstances.[13]

b. High-Risk Countries for the last six months

The CDC has designated over 100 countries as high risk.[14] If a dog has been vaccinated domestically *and* has been in a high-risk country in the prior six months, two main documents must be provided: (i) a CDC Dog Import Form and (ii) a valid certification of U.S.-issued rabies vaccination form completed by an accredited veterinarian and submitted to the U.S. Department of Agriculture ("*USDA*") for endorsement.[15] In addition,

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[10] Ibid.

[11] "Bringing an Animal into the U.S.", CDC. https://www.cdc.gov/importation/bringing-an-animal-into-the-us/index.html.

[12] Ibid.

[13] Golab, Gail, DVM, PhD, MANZCVS, DACAW. "New and Recently Updated CDC Dog Import Regulations", Jul. 31, 2024, https://www.avma.org/sites/default/files/2024-08/CDC-Import-Regulations_20240731.pdf.

[14] CDC Importation, High-Risk Countries for Dog Rabies, available at https://www.cdc.gov/importation/dogs/high-risk-countries.html.

[15] Until July 31, 2025, travelers may substitute a USDA-endorsed export health certificate for this form.

these dogs must satisfy a six-month age requirement, appear healthy upon arrival and have a microchip. To be valid, the microchip must be implanted before rabies vaccination.

For foreign-vaccinated dogs, a record of rabies vaccination must be in English or have a certified English translation. Such dogs can only enter through an airport with a CDC-registered animal care facility where the dog has a reservation. If the dog does not have a valid rabies serology titer, the dog can be admitted after it has been quarantined for 28 days. To have a valid rabies serology titer, a veterinarian must draw the blood sample at least 30 days after the dog's first rabies vaccination and at least 28 days before entry to the United States. The veterinarian must submit the blood sample to a CDC-approved rabies serology laboratory. All costs incurred at CDC-registered animal care facilities are borne by the importer. These include examination, revaccination and quarantine (if required).[16]

Finally, if the dog originates from a high-risk country in the past six months and is not vaccinated, the dog will not be allowed to enter the United States.[17]

IV. DISCUSSION AND ANALYSIS

A bipartisan group of 14 U.S. Senators wrote to the Director of the CDC on July 14, 2024, cautioning that the dog import rules would be "overly broad" and "onerous."[18] We echo those assertions with five primary concerns that we would like to see addressed.

a. The 2024 Dog Import Rules make it more difficult to rescue dogs internationally

The regulations adopted in the summer of 2024 make it more challenging and complex to rescue dogs internationally. The policy change exacerbates a difficult situation in shelters. By some accounts, the rule will leave helpless dogs stranded in their countries of origin where they face uncertain futures.[19] Projects that save the lives of dogs face disruption.[20]

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[16] Singler, Emily, VMD. "Update: CDC enacts new documentation requirements for US dog imports, with relaxed requirements for dogs from low-risk rabies countries", Jun. 13, 2024 (updated Jan. 2, 2025). https://www.aaha.org/newstat/publications/cdc-enacts-new-documentation-requirements-for-us-dog-imports/.

[17] "Bringing an Animal into the U.S.", CDC.

[18] Letter to CDC Director Mandy K. Cohen, Jul. 17, 2024 from Senators Susan Collins, Amy Klobuchar, et al., https://www.collins.senate.gov/imo/media/doc/24-07-17_collins-klobuchar_letter_to_cdc_re_dog_importation_rule_final.pdf.

[19] "Stop the CDC's Restriction on Dogs Under Six Months Entering the U.S." https://www.change.org/p/stop-the-cdc-s-restriction-on-dogs-under-six-months-entering-the-u-s?recruiter=534497879&recruited_by_id=f82097d0-0e10-11e6-b3b7-790248bf0d22&utm_source=share_petition&utm_campaign=psf_combo_share_initial&utm_term=psf&utm_medium=whatsapp&utm_content=washarecopy_490054870_en-US%3A8.

[20] Cima, Greg. "US suspends dog importation from 100-plus countries", Aug. 15, 2021, https://www.avma.org/javma-news/2021-08-15/us-suspends-dog-importation-100-plus-countries.

A formidable path awaits a dog from one of the high-risk jurisdictions. These dogs can only enter at one of *six* cities with a CDC-registered animal facility center: Atlanta, Los Angeles, Miami, New York City, Washington, D.C. and Philadelphia.[21] Foreign-vaccinated dogs in a high-risk country are not allowed to enter the United States at a land border crossing.[22] Owners and animal welfare organizations are often forced to book connecting flights and make other travel arrangements to arrive at their ultimate destinations – creating additional cost burdens - when budgets are limited or short. A reservation at the animal care facilities is needed; reportedly, at least 45 days in advance at one of the nation's busiest airports.

Once the dog arrives at the airport, other challenges loom: the 28-day quarantine period and potential revaccination requirements could be harmful for the dog's well-being. Rabies revaccination has been reported at certain animal facility centers even though certified foreign veterinary paperwork is in order - according to at least one international rescue organization - with the cost borne by the rescue and no practical recourse to dispute the vaccine administration.

b. The 2024 Dog Import Rules focus on dogs without mitigating rabies risks posed by other species

The 2024 Dog Import Rules do not meaningfully reduce the risk of rabies posed by wild animals and other species to the U.S. public. Only dogs are required to comply with new *CDC* rabies requirements. Most cases of rabies occur in *wild* animals, mainly skunks, raccoons, bats, coyotes and foxes. In 2022, 3,234 wildlife tested positive for rabies in the United States, and only 345 domestic animals tested positive for rabies (of which 50 were dogs).[23]

While they are not regulated by the CDC restrictions, non-canine domestic species are a source of rabies exposure to humans.[24] Domestic rabies vector species include (but are not limited to) dogs, cats and ferrets.[25] The singling out of dogs to implement new CDC rules regulating rabies stands out given recent multi-agency responses to an isolated instance of rabies in a kitten. As reported in a recent report in the *Journal of American Veterinary Medical Association*, the identification of a raccoon rabies virus variant in a kitten in Nebraska generated rapid state and federal responses, including the Nebraska Department of Health and Human Services, the CDC, the USDA and the Nebraska

[21] "CDC-registered Animal Care Facilities", May 8, 2024, https://www.cdc.gov/importation/dogs/approved-care-facilities.html.

[22] "Bringing an Animal into the U.S.", CDC.

[23] S*upra* note 6.

[24] Fehlner-Gardiner C, Gongal G, Tenzin T, Sabeta C, De Benedictis P, Rocha SM, Vargas A, Cediel-Becerra N, Gomez LC, Maki J, Rupprecht CE. Rabies in Cats-An Emerging Public Health Issue. Viruses. 2024 Oct 19;16(10):1635. doi: 10.3390/v16101635. PMID: 39459967; PMCID: PMC11512395.

[25] "AVMA Model Rabies Control Document", https://www.avma.org/sites/default/files/2023-03/avma-model-rabies-control-document-230303.pdf.

Department of Agriculture.[26] Over 750 raccoons were vaccinated, and 18,000 oral rabies vaccine baits were distributed across Omaha to prevent possible transmission.[27]

c. The 2024 Dog Import Rules impose a questionable six-month age requirement

Any dog entering the United States, regardless of the country of origin and likelihood of rabies transmission, must be at last six months old.[28] By imposing a six-month bright line rule, there is risk of creating a misperception among the public that rabies is primarily a concern for dogs during the early stages of a life, and that rabies prevention is less important for older dogs. The vaccine needs to be readministered every 1-3 years.

It is often challenging to identify the precise age of a dog. A rabies canine vaccine can be administered as early as 12-16 weeks of age. In New York City, the law requires a dog's vaccine be given no later than three months of age with the second within a year of the first.[29]

The CDC elected to apply the age requirement for *all* dogs in part because the agency has "documented cases of importers moving dogs too young to be vaccinated effectively from countries with a high risk of canine rabies to low-risk countries to avoid rabies vaccination requirements."[30] The CDC asserts that the age requirements ensure imported dogs are old enough to be vaccinated, the vaccine has time to confer immunity and protection can be verified (as dogs are not considered fully vaccinated until 28 days after vaccination).

In some respects, the six-month age requirement is not new as the USDA historically prohibited the importation of dogs younger than six months for *commercial* purposes, which includes transfer of ownership through sale or adoption. However, the CDC rules extend the six-month cut-off to all dogs (including existing pets) and do not distinguish if the puppy arrives from a low-risk or high-risk country.

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[26] Carpenter, A., Price, E. R., Stein, S. R., Beron, A. J., Divis, A., Mix, S., Hess, A. R., Nelson, K. M., Wetzel, C. T., Fredrick, J., Huse, L., Horn, A., Loy, D. S., Loy, J. D., Morgan, C. N., Rodriguez, S. E., Shelus, V., Gigante, C. M., Hutson, C. L., Orciari, L. A., Swedberg, C., Boutelle, C., Chipman, R. B., Donahue, M., Wallace, R. M., & Buss, B. F. (2025). Identification of raccoon rabies virus variant in a stray kitten: the role of veterinary practitioners in detection and reporting of a non-native zoonotic pathogen—Nebraska, 2023. *Journal of the American Veterinary Medical Association*, 263(2), 149-152. Retrieved Mar 24, 2025, from https://doi.org/10.2460/javma.24.08.0542.

[27] Ibid.

[28] "Bringing an Animal into the U.S.", CDC.

[29] "What Pet Owners Need to Know About Rabies Vaccinations in New York State", https://www.health.ny.gov/diseases/communicable/zoonoses/rabies/docs/pet_owners_fact_sheet.pdf.

[30] "New CDC dog importation requirements: FAQs for veterinarians".

d. Canine immunity status is not verified by the CDC in the vast majority of cases

For over one million dogs each year, the CDC rules impose barriers to entry but do not address the rabies issue head-on. The procedures do *not* confirm rabies viral status for the vast majority of dog import cases. Notably absent from the CDC Dog Import Form is a question about rabies, although there are questions about a dog's age, sex, breed, markings and microchip number. If the foundation of the rules is rabies prevention, one would think the form would contain a question about whether the incoming dog is vaccinated, but it does not.

Nor do the 2024 Dog Import Rules address the duration of immunity, despite the fact that being current on the vaccine is the best way to protect a pet.[31] The rabies vaccine lasts one to three years.[32] After the first vaccine, a booster must be administered within one year.[33] While the CDC regulates immunity for high risk country imports, the most common manifestation of the new rules – the microchip requirement, CDC Dog Import Form and six month age requirement – do not alert authorities that a dog has not been vaccinated.

e. The 2024 Dog Import Rules complicate pet transportation

Feedback from both the public and Congress show the rules complicate pet transportation.[34] In the summer of 2024, the CDC rules prompted multiple airlines to stop allowing dogs to travel to the United States.[35] In addition, for those crossing from Canada and Mexico, the rules create hardship. In their letter to the CDC director, certain U.S. Senators voiced the concern that the rules would have "a disproportionate effect on border communities in our states."[36]

For a person with a disability, the strenuous travel requirements raise particular concerns. The CDC rules explicitly apply to "service dogs" as defined in U.S. regulations at 14 CFR 382. Foreign-vaccinated dogs, including service dogs, are required to have a reservation at, and go to, an CDC-registered animal care facility upon arrival (unless the

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[31] "Rabies", https://www.avma.org/resources-tools/one-health/rabies.

[32] Bales, Liz, VMD. Jun. 12, 2019. "Does My Dog Need a Rabies Vaccine Every Year?" https://www.petmd.com/dog/care/does-my-dog-need-rabies-vaccine-every-year.

[33] "Rabies: Protecting Your Pet", NYC Health. https://www.nyc.gov/assets/doh/downloads/pdf/vet/rabies1.pdf.

[34] "Sen. Angus King proposes new bill to lessen complications for dog importation", Sep. 19, 2024, https://www.wabi.tv/2024/09/19/sen-angus-king-proposes-new-bill-lessen-complications-dog-importation/?outputType=amp.

[35] Yancey-Bragg, N'dea. "Strict rules about flying with dogs start Thursday, after months of confusion", Jul. 31, 2024 *USA Today*. https://www.usatoday.com/story/travel/news/2024/07/31/cdc-rules-dog-travel/74510559007/.

[36] Letter to CDC Director Mandy K. Cohen, Jul. 17, 2024 from Senators Susan Collins, Amy Klobuchar, et al., *at* https://www.collins.senate.gov/imo/media/doc/24-07-17_collins-klobuchar_letter_to_cdc_re_dog_importation_rule_final.pdf. The letter was signed by 14 Senators.

dog arrives at a seaport and meets a list of additional requirements).[37] Violations of CDC dog import rules can expose an individual to criminal penalties and fines, including imprisonment for up to one year and a fine of up to $100,000 per violation, if death has not resulted from the violation.[38]

V. RECOMMENDATIONS

The 2024 Dog Import Rules can be adjusted to promote animal welfare without sacrificing U.S. public health.

First, dogs should not face revaccination when their rabies titers are higher than a standardized minimum. Revaccination should be avoided unless foreign veterinary paperwork is inadequate. For dogs traveling from countries considered high-risk, the requirement to enter the country at one of six CDC-registered animal care facilities are overly burdensome. The number of these facilities could be expanded to other airports and land crossings.

Second, exceptions should be introduced to facilitate dog importation where there is a low likelihood of rabies transmission. Vulnerable dogs that are at risk of euthanasia or abuse should be offered exceptions to fast-track their importation, where a responsible U.S.-based organization or person can vouch for the animal's care and certify that the dog will receive appropriate treatment. These exceptions should take into account the reality that a dog *returning* from overseas is less likely to present a public health risk compared to a dog entering initially.

People with family or medical emergencies should also be granted exemptions when the dog is reasonably unlikely to create a public health risk. The same exemptions should be granted for law enforcement and military personnel and their pets. Guide dogs that help visually impaired travelers should also face fewer obstacles given the dogs' vital function and low likelihood of carrying rabies. Similarly, there should be exceptions for Americans that regularly travel internationally and those who live in border states.

In addition, the six-month age requirement should be eliminated, especially for low-risk rabies countries. That change is consistent with Homeward Bound Act introduced by Senator Kevin Cramer (R-ND), which would eliminate the age (and microchipping) requirements.[39] The six-month rule affects significant numbers of pets that may be immunized and healthy, yet cannot gain admission to the United States.

Finally, the CDC Dog Import form should have a question about rabies vaccination status for informational purposes, accompanied by brief warnings about the risks of not having dogs up to date on vaccines. Since the rabies vaccine must be administered every

[37] "Bringing an Animal into the U.S.", CDC.

[38] Ibid.

[39] S.5113 - Homeward Bound Act, https://www.congress.gov/bill/118th-congress/senate-bill/5113/cosponsors. Both the age and microchipping requirements would have been removed, lessening complications for dog importation, by S.5113 (2023-2024).

1-3 years, the best method of ensuring protection for pets is to educate owners of the vaccine's benefits. The CDC materials should be designed to educate pet owners and to encourage rabies vaccination.

VI. CONCLUSION

The 2024 Dog Import Rules have a laudable purpose of limiting the reintroduction of a fatal disease that constitutes a public health threat abroad. Given the limited prevalence of canine rabies in this country, however, the rules should be updated to better balance competing considerations.

Certain aspects of the 2024 Dog Import Rules are overly broad, requiring any dog entering the United States to be microchipped, to appear healthy, at least six months in age and be accompanied by a CDC Dog Import Form. Instead, the rules should focus on encouraging canine vaccination and removing impediments to entry for dogs that do not pose a serious risk for rabies transmission, especially dogs that are in peril of neglect, abuse or euthanasia if they remain in their home country.

Rules to import dogs from high-risk countries should be reevaluated along the lines of the suggestions above, to grant reasonable exceptions where circumstances merit admission. In particular, the requirement for foreign-vaccinated dogs to enter at a CDC-registered animal facility center in one of six cities nationwide creates a logistical challenge and expense for many Americans and welfare organizations. There should be more options and alternatives available for vulnerable pets and their companions.

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October 2025

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