



AMERICAN
KENNEL CLUBSM

AKC Supports Rule 7 U.S.C. Section 2148

The American Kennel Club (AKC), founded in 1884, is America's only not-for-profit organization devoted to the study, breeding, exhibition, and advancement of purebred dogs.

The AKC is dedicated to promoting the health and well-being of all dogs. In addition to upholding the integrity of the world's largest purebred registry, we work with over 5,000 AKC dog clubs throughout the nation to educate the public about responsible dog ownership. We dedicate millions of dollars annually to humane, canine health and community outreach/educational programs. The AKC Canine Health Foundation is the largest funder of canine health research in the world.

The AKC supports strong enforcement of the Animal Welfare Act and supports the proposed rule for 7 U.S.C. § 2148 (2009) regarding the importation of live dogs for sale, research and veterinary treatment, published on September 1, 2011, by the USDA's Animal Plant and Health Service.

The AKC recognizes that a large number of puppies are being bred overseas and imported into the United States in order to bypass the welfare regulations and standards required of U.S. breeders. In many cases, irresponsibly bred and undocumented foreign puppies end up at shelters, rescues, or other informal or unregulated retail venues. The influx of such animals undermines responsible breeders who comply with U.S. regulations and best practices of animal husbandry and creates unnecessary burdens on responsible breed rescue groups. Moreover, diseases borne by such animals create public health dangers for both animal and human populations.

The AKC believes the proposed rule provides a reasonable interpretation of the law and appropriate enforcement guidelines to "prohibit the importation of dogs from any part of the world into the continental United States or Hawaii for purposes of resale, research, or veterinary treatment, *unless the dogs are in good health, have received all necessary vaccinations, and are at least 6 months of age*". (64 Fed. Reg. 54392 (Sept. 1, 2011) (emphasis added).

The AKC appreciates the efforts of those who have worked to establish guidelines to implement enforcement of this important statute. We stand ready to continue to work with APHIS to ensure that any proposed regulation that focuses on dogs ensures the health and safety of American dogs and the wellbeing of the dog-owning public.