

#### CFIA BAN ON IMPORT OF COMMERCIAL DOGS INTO CANADA

### **Position:**

The Humane Society of Kitchener Waterloo & Stratford Perth supports the animal welfare industry's role in increasing the life-saving capacity of animals through humane animal transport.

We oppose the blanket ban imposed by the CFIA on the importation of commercial dogs from countries considered high-risk for rabies. We believe that a blanket ban is not the answer, and instead call for the development of a review and exemption process for dogs. This process should be supported by valid, screened and reputable animal welfare agencies and rescue, and is similar to other humane and reputable processes worldwide, including those approved by the Centre for Disease Control in the United States.

### Rationale:

# 1. Animals will suffer with the prolonged implementation of this ban

- Hundreds of millions of animals suffer and are abused daily across the world. In the US alone, over 100 million animals suffer due to testing and inhumane treatment<sup>1</sup>. These statistics can be exponentially higher with countries that do not track statistics of animal abuse.
- By taking away access to humane transportation and importation options, these animals will remain in situations with no other options available
- Dogs in countries that are in humanitarian crisis may no longer be rescued and therefore continue to suffer
- With fewer animals available to adopt this will exacerbate the puppy mill industry. If Canadians can't rescue dogs from abroad, domestic puppy mills will step in to profit, resulting in cruelty to dogs both here and overseas.<sup>2</sup>

# 2. The decision was made without full scope and background information

- Reputable rescue and animal welfare organizations were not asked to provide input or involved in the consultation process
- Vaccination records were not properly vetted prior to the ban. Enhancing importation processes is the solution, including blood tests and quarantine procedures, not an outright ban of all animals
  - By example, additional safeguards to assess risk by examination and/or quarantine of imported dogs for disease control by a licensed Canadian veterinarian upon arrival in Canada. This would assist in determining health.

<sup>1 &</sup>quot;Animals Used for Experimentation", https://www.peta.org/issues/animals-used-for-experimentation/

<sup>&</sup>lt;sup>2</sup> Puppy Mill industry <a href="https://animaljustice.ca/blog/canada-dog-import-ban">https://animaljustice.ca/blog/canada-dog-import-ban</a>

status and risk and address concerns over the validity of country of origin certificates of health <sup>3</sup>

# 3. Dogs and cats are not the issue for rabies in Canada

- Only 4% of all rabies in Canada are found in pets (cats and dogs).
- 93% of rabies cases in Canada are found in terrestrial wildlife (raccoons, skunks, fox)
  (65%) and bats (28%)<sup>4</sup>

# 4. The CFIA sited human health risk as their main reason for the ban, however rabies from dogs are not the source of the risk

 All exposure within the last 20 years has been from bats or exposure outside of Canada, not dogs<sup>5</sup>

# 5. Import processes are working in other countries

 The Centre for Disease Control currently has a systematic process for allowing dogs that have valid vaccinations and follow a strict quarantine process

### 6. An import exemption framework already exists in Canada

- Although CFIA has banned the entry of commercial dogs, personally owned pets can still be screened and imported
- The same screening process could be applied to dogs falling under an reputable animal welfare organization or rescue organization

# **Recommendation:**

For the CFIA to work with veterinarians and reputable animal welfare agencies to develop screening processes and procedures to import commercial dogs into Canada and eliminate the blanket ban on all commercial dogs.

# **Overall Resources:**

As an industry, we continue to use the sources cited to make quality, educated, evidence-based decisions in all things related to animal welfare.

- Animal Justice <a href="https://animaljustice.ca/">https://animaljustice.ca/</a>
- Humane Canada https://humanecanada.ca/
- Humane International <a href="https://www.hsi.org/">https://www.hsi.org/</a>
- Canadian Veterinary Medical Association www.canadianveterinarians.net
- PAWS (Puppy Mill Awareness Working Solutions) <a href="https://pawshumane.org/">https://pawshumane.org/</a>

<sup>&</sup>lt;sup>3</sup> "Canadian Veterinary Medical Association, Position Statement - Importation of Dogs into Canada, October 21, 2022, www.canadianveterinarians.net

<sup>&</sup>lt;sup>4</sup> "Surveillance of Rabies", Government of Canada, Health and Diseases, 2014-2016, https://www.canada.ca/en/public-health/services/diseases/rabies/surveillance.html

<sup>&</sup>lt;sup>5</sup> Surveillance of Rabies", Government of Canada, Health and Diseases, <a href="https://www.canada.ca/en/public-health/services/diseases/rabies/surveillance.html">https://www.canada.ca/en/public-health/services/diseases/rabies/surveillance.html</a>