



October 30, 2025

Dr. Mary Jane Ireland, Chief Veterinary Officer for Canada
Mr. Paul MacKinnon, President
c/o Canadian Food Inspection Agency
1400 Merivale Road Tower 2
Ottawa, Ontario
K1A 0Y9

Via Email

Dear Dr. Ireland and Mr. MacKinnon:

Re: Request for update regarding CFIA commercial dog import ban

On behalf of leading animal protection and dog rescue groups operating in Canada and around the world, I am writing to request an update on Canada's progress to replace its "temporary" ban on dog imports from more than 100 countries, which came into force more than three years ago. This ban has effectively halted most imports of rescue dogs into Canada, denying countless dogs in need the opportunity to find loving homes here in Canada, and significantly impacting the operations and financial viability of rescue groups previously involved in rescuing dogs from lives on the streets abroad, war zones, and even the dog meat trade.

The "Temporary" 2022 Import Ban

As you know, on June 28, 2022, the Canadian Food Inspection Agency ("CFIA") posted a Notice to Industry announcing a new measure prohibiting the entry of "commercial dogs", into Canada from more than 100 countries that have been deemed "high risk for dog rabies"(the

Animal Justice Canada
5700-100 King Street West, Toronto, Ontario M5X 1C7
info@animaljustice.ca

“**Import Ban**”).¹ Pursuant to the Notice to Industry, commercial dogs include dogs rescued abroad and brought to Canada for adoption or fostering.²

On September 28, 2022, the Import Ban came into effect. There are currently no exceptions for dogs from prohibited countries. Notably, several war-torn countries, such as Ukraine and Afghanistan, and several countries where rescuers are saving animals from the meat trade, like the Philippines and China, were included in the CFIA’s list of the prohibited countries.³

To our knowledge, the CFIA did not notify or consult with any animal welfare or directly impacted dog rescue organizations during the development of the Import Ban. After learning of the Notice to Industry, several animal protection and rescue groups contacted the CFIA to express their concerns and urge the CFIA to consider other science-based measures to prevent the introduction of rabies into Canada. Animal Justice and Soi Dog Canada have appealed the Import Ban with the CFIA’s Complaints and Appeals Office and sought judicial review of the ban in Federal Court. Although the Court dismissed the application, Justice Zinn was clear that his role was not to assess whether other alternative measures could or should have been taken, and that his narrow focus was on the CFIA’s reasoning in light of the constraints set out in the statutory scheme.

Need to Replace the “Temporary” Ban

Though consistently described by the CFIA as a “temporary” measure to protect against dog rabies pending the development of permanent regulatory measures, the Import Ban has yet to be lifted or amended. A temporary measure should be targeted and time-limited, not lasting for years with no end in sight.

When the Import Ban was announced, the CFIA indicated that it was following the approach taken by the U.S which similarly announced a “temporary suspension” policy prohibiting dog importation from high-risk countries. However, the U.S. subsequently amended its policy, eliminating its temporary ban on dog imports from over 100 countries, and replacing it with a new policy based on science-based measures to prevent rabies while still allowing the international rescue of vulnerable dogs. The new U.S. policy on dog importation from high-risk countries is based on the World Organization for Animal Health (“**WOAH**”) guidelines, which

¹ See:

<https://inspection.canada.ca/en/animal-health/terrestrial-animals/diseases/reportable/rabies/notice-industry-2022-06-28>

² *Ibid*

³ Available online:

<https://inspection.canada.ca/animal-health/terrestrial-animals/diseases/reportable/rabies/countries-at-high-risk-for-dog-rabies/eng/1656375417730/1656375418777>

allows for foreign vaccinated dogs from “high-risk” countries to enter the U.S. provided they have an adequate antibody test along with a valid vaccination certificate (subject to the US Centre for Disease Control requirement that the rabies titer test be carried out at least 45 days prior to importation as opposed to 3 months).⁴

Likewise, all other Western countries, including all E.U. countries, allow dogs from higher risk countries to enter so long as stringent disease prevention requirements are met (including serology/titer/antibody testing).⁵ This approach is endorsed by the World Health Organization, the Food and Agriculture Division of the United Nations, and the World Trade Organization.

The CFIA’s Import Ban is overly broad and out of step with international best practices. Reasonable alternatives exist that would allow live saving adoptions to continue while preventing risks to public and animal health. In accordance with veterinary science and international best practices, we urge the CFIA to replace the Import Ban with permanent measures, including the following requirements:

- Blood drawn for titre a minimum of 30 days and no longer than 12 months after vaccination for rabies with an approved vaccine (SDF uses Bayovac LR)
- 60-90 day waiting period in the country of origin from the date the blood was drawn
- Rabies Titre Test Certificate from an Approved Independent Laboratory
- Rabies Vaccine Certificate
- ISO Microchip Certificate
- Dogs exported should be over 16 weeks of age at the time of vaccination to ensure a more robust antibody response
- Revaccination in Canada 10 days after arrival by a certified Canadian Veterinarian

Conclusions

Given the reasonable alternative options on the table, and the impact of the Import Ban on dog rescue organizations and the dogs they save, we respectfully request that you please advise as to when the “temporary” Import Ban will be replaced with permanent, science-based requirements as other countries have done. As always, we are pleased to assist in the development of those permanent regulations so rescue groups can resume their life-saving work while ensuring that public health is protected.

⁴ See <https://www.cdc.gov/importation/dogs/foreign-vaccinated-high-risk-countries.html>

⁵ See the World Organization for Animal Health Requirements, set out in Article 8.14.6 of the Terrestrial Animal Health Code: https://www.woah.org/fileadmin/Home/eng/Health_standards/tahc/2018/en_chapitre_rabies.htm

Should the CFIA wish to discuss the above-noted recommendations or the Import Ban further, please do not hesitate to contact Kaitlyn Mitchell, director of legal advocacy with Animal Justice, at kmitchell@animaljustice.ca.

Yours truly,



Kaitlyn Mitchell
Director of Legal Advocacy, Animal Justice

On behalf of:

Sondra Sieminski	Vice-President	Soi Dog Canada
Ewa Demianowicz	Program Director, Companion Animals	Humane World for Animals Canada
Barbara Harrison	Director	Paws Across the Water
Viive Tamm	Co-Chair	Golden Rescue
Christine Ayushi	Founder/Director	Snookie's Society
Donia Heider	Founder	Don't Furry, Be Happy Animal Rescue
Marlene Collins	Director	Backstreet Paws Rescue
Terri Schipper	Director	Hopeful Tails
Lindy Lystar	Founder	Baladi Dog Rescue of Ontario
Morgan Sinclair	Founder/Director	Fetch + Release Rescue
Helen Antoniou	Director	Cause 4 Paws Rescue
Lisa Cundal	Founder/Director	Pawsitive Steps Dog Rescue
Cynthia Ashkar	Founder	Rescue Dogs Lebanon-CANADA

Animal Justice Canada
5700-100 King Street West, Toronto, Ontario M5X 1C7
info@animaljustice.ca

Brenda Marchant	Founder	Carters Forever Rescue & Sanctuary
Kelly Blais	Founding Member	International Rescue Coalition of Canada
Dominique Rousselle	Co-founder	Dogs Without Collars Rescue
Belinda Morrison	Founder	CB Rescue Foundation
Marie Charlebois	Co-Founder	Paws for Cause Animal Rescue
Christine Reio	Director	DIBS Rescue
Doris Wohl	Independent Rescuer	
Kelsey Goodwin	Medical Director	Pawsitive Match Calgary
Sandra Kyrzakos	Co-Founder	Alice's ONEderland Rescue
Anna Sankar	Founder	Anna's Rescue Sanctuary
Jenna Bye	Executive Director	Save Our Scruff
Lorraine Houston	Founder	Speaking of Dogs Rescue
Jody Daloise	President	BARCS Rescue
Brenda Marchant	Director	Carters Forever Rescue & Sanctuary
Jocelyn Dollack	President	Jack Russell Terrier Rescue Ontario Inc
Lynda Jeacock	Founder/President	Dogs Unlimited Rescue

International Organizations:

Sally Yassin	Founder	Unleashed Rescue for Stray Dogs, Egypt
Mona Khalil	Founder	Egyptian Society for Mercy to Animals (ESMA)

Animal Justice Canada
5700-100 King Street West, Toronto, Ontario M5X 1C7
info@animaljustice.ca

Bilkes Ibrahim	Founder	Habiba & Friends Animal Shelter, Egypt
Hanan Deebes	Founder	Animal Protection Foundation, Egypt
Ahmed Al Shurbaji	Founder	HOPE Egyptian Baladi REscue & Rehabilitation
Engy Tarek	Executive Manager	Cairo Animal Rescue Team (CART)
Nihal Selim	Independent Rescuer	Friends of Zamalek Stray Animals
Laila Fayek	Independent Rescuer (Egypt)	
Dadeg Kamel	Independent Rescuer (Egypt)	
Ahmet Cullu	Director	Gokturk Hayvan Sevenler Dernegi, Turkey
Perla Nassif	Independent Rescuer (Lebanon)	
Cindy Ashkar	Rescuer	Rescue Dogs of Lebanon
Naja Halaoui	Rescuer	GAEA Animal Welfare Lebanon
Lisanne Hillen	Independent Rescuer (Turkey)	
Mandy Abadani	Independent Rescuer (Greece)	
Nilufer Atalay	Founding Member	HAYTAP, Turkey
Ozlem Ibdan	Shelter Operator	Ozlemin Sevgi Yolu, Turkey
Yanela Hoyo Gramatges	Founder	Collares Rojos, Dominican Republic
Patricia Blanco	Founder	Patricia Blanco Animal Foundation
Meral Imal	Director	Mor Pati Dernegi, Turkey
John Dalley MBE	President/Co-Founder	Soi Dog Foundation International
Ashraf Hussien	Founder	Pet Lovers, Egypt
Sara Mattar	Independent Rescuer (Egypt)	
Hafiza Mohsen	Founder	Hafiza Rescue Shelter, Egypt

Animal Justice Canada
5700-100 King Street West, Toronto, Ontario M5X 1C7
info@animaljustice.ca

May Ali Baligh	Owner	Petsville, Egypt
Amal Mohamed Fouad	Independent Rescuer (Egypt)	
Ha Garamoun	Founder	Ha Rescue, Egypt
Rofia Touhami	Co-Founder	Chance Rescue, Egypt
Hanan Zaki	Founder	Forever Foster Shelter, Egypt
Noha Mohamed	President	Tayla Rescue Shelter
Kirsten Dale	Director	Dogs and Cats of the Dominican Republic
Volkan Zafer Güngören	Director	Patigiller Hayvanları Koruma Derneği (Turkey)

CC: Honourable Marjorie Michel, Minister of Health
MP Gord Johns, NDP Health Critic
MP Dan Mazier, Conservative Health Critic
MP Luc Thériault, Bloc Québécois Health Critic

Animal Justice Canada
5700-100 King Street West, Toronto, Ontario M5X 1C7
info@animaljustice.ca