

Progress Report: Position Statement 03-ID-13: Developing Importation and Exportation Restrictions on Exotic and Native Wildlife with Potential Adverse Impact on Public Health

This position statement was developed and endorsed by the Council of State and Territorial Epidemiologists (CSTE) and the National Association of Public Health Veterinarians (NASPHV) in June 2003 during the peak of the monkeypox outbreak. The outbreak resulted in federal agencies including the Centers for Disease Control and Prevention (CDC), the Food and Drug Administration (FDA), and the United States Fish and Wildlife Service (USFWS) being called to testify in various Senate and Congressional committees. While monkeypox was the hotplate issue for legislators, the position statement recognized that the exotic pet trade poses a risk of introducing and disseminating even more serious pathogens if left unchecked. It requested a comprehensive assessment of the current jurisdictional status and issues, outlined some objectives and requested that a working group of federal agency representatives along with CSTE and NASPHV be formed to examine them.

Letters of response to the position statement from FDA, CDC and USFWS were received by CSTE between July 23 and August 12, 2003. The USDA did not respond. Summarizing the responses: the FDA advocates the promotion of educational initiatives to the public and the pet trade; FWS sent their Senate testimony which reiterates that "live wildlife presents the highest risk for introduction of diseases that may be transmitted to humans from animals", and acknowledges that the importation of exotic wildlife parts including meat also poses a risk of disease introduction; and CDC supported the statement and mentioned that CDC's Office of General Counsel, FDA, FWS, USDA, Department of Transportation, and Bureau of Customs and Border Protections were collaborating to define responsibilities and identify gaps in the lines of authority with regard to the translocation of animals.

Although there reportedly were several federal interagency meetings about exotic animal issues in the months after the position statement was written, CSTE and NASPHV were not involved. It is not known whether an ongoing working group is in place, whether any of the position statements objectives were met, or if recommendations were developed.

Aggressive and rapid control measures were taken by federal and state public health agencies after monkeypox was recognized in the United States. The federal agencies codified the embargo order prohibiting the importation of certain African rodents in November, 2003 and as of February 27, 2004, the FDA has not relinquished control over the barter, sale, release, trade, and movement of native prairie dogs. During December 2003 and January 2004, the Health and Human Services announced emergency orders in response to SARS and avian influenza prohibiting the importation of civet cats, and birds. While these rapid actions may prevent some disease introductions, they fail to address the need for a comprehensive approach to reducing the ongoing risk of zoonotic disease introductions.

At this point, the important lessons of the monkeypox outbreak risk being abandoned until the next zoonotic disease catastrophe is recognized. To mitigate this, CSTE and NASPHV request again that a working group of the representatives from the federal and state agencies and organizations outlined in the position statement is convened to review the findings and recommendations from the various 2003 interagency meetings and to proceed with the goals outlined in the position statement.