May 10, 2021

The Ornithological Council

PROVIDING SCIENTIFIC INFORMATION ABOUT BIRDS

Association of Field Ornithologists

Birds Caribbean

CIPAMEX (Sociedad para el Estudio y Conservación de las Aves en México)

North American Crane Working Group

Neotropical Ornithological Society

Pacific Seabird Group

Raptor Research Foundation

Society of Canadian Ornithologists/ Société de Ornithologistes du Canada

The Waterbird Society

Wilson Ornithological Society

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Samuel Edwin, PhD
Director, Division of Select Agents and Toxins
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Centers for Disease Control and Prevention
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Dear Dr. Edwin,

The Ornithological Council is a consortium of scientific societies that works on behalf of scientists who study birds. Although some study captive-bred birds, the vast majority study wild birds, sometimes in captivity but much more commonly in the wild. Consequently, many of these scientists import avian materials (blood, feathers, tissue, extracted DNA, plasma, study skins, whole carcasses, or body parts) into the U.S. for scientific research. Sometimes these materials are field-collected shortly prior to import, meaning that they were taken from living birds during the previous several days to several weeks. Some of the imported materials have been preserved in museum collections for months to decades, and often over 100 years.

The Ornithological Council has previously requested that the CDC start a formal process to re-examine the requirements for the importation of non-living animal matter, which would allow the CDC to focus their policy on true threats using a risk analysis. We reiterate that request here. The current policy requires that all imports of animal products are accompanied by documentation confirming that the animal or animal product is not known to contain (or suspected of containing) an infectious biological agent or has been rendered noninfectious, but this general policy is confusing. As a result, compliance is difficult and denial of entry of material is often left to the discretion of inspection agents at ports of entry, which can lead to unnecessary denial and the loss of valuable research material. Without further guidance as to which infectious agents are of concern or which treatment methods are appropriate, the documentation required by the CDC is very difficult for importers to produce.

<u>Treatment</u>

It is fairly easy to certify that the animal or animal product has been rendered noninfectious IF the importer knows what methods are considered by the CDC to be effective. The importer should not have to guess at the methods the CDC (or agents at U.S. ports of entry) will accept, only to arrive at the port and determine that they have guessed incorrectly. Conversely, the Animal and Plant Health Inspection Service's Animal Products Import Export (APHIS APIE) office has a published list of methods that it will accept. Thus, in lieu of

developing specific CDC requirements, it would be very helpful if the CDC were to state affirmatively that the APHIS methods are acceptable for the CDC as well, along with any other methods that the CDC deems effective.

Certification

It is very difficult for an importer to certify that an untreated import does not contain an infectious biological agent. To make such certification, the importer would have to know all the pathogens that occur in that particular country or region – including those commensal with the animal, such as normal gut bacteria – and somehow test for every one of those pathogens, including potential pathogens that have not yet been identified. Further, the importer would then have to then isolate each potential pathogen and somehow determine if it is, in fact, capable of causing human infection. A microbiologist would be needed to assess each sample at great cost and significant delay – and potentially destroy the sample in the process. If the concern is the safe handling of the import once in the U.S., then Biosafety in Microbiological and Biomedical Laboratories (BMBL) compliance can be achieved either by university/institution review, which can be provided to the CDC, or USDA certification.

Live Imports

Our member scientists rarely import live animals, but when they do, it is unclear how a live animal can be rendered noninfectious. Thus, every organism on or in an animal would have to be identified, tested for human pathogencity, and if found to be capable of causing disease in humans, eliminated, potentially harming the animal, possibly rendering it unfit for research.

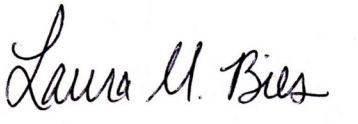
Conclusion

We look forward to having more definitive guidance from the CDC as to the specific pathogens of concern, the acceptable methods for inactivating said pathogens, and the methods the CDC considers acceptable for determining the presence or absence of infectious pathogens in animal products. We also reiterate our request for a scientific review of the agency's risk determinations.

Our members want to comply fully with the CDC requirements but it is very difficult to do so without more specific information. The Ornithological Council has had a very successful, multi-year dialogue with APHIS APIE regarding that agency's regulation of animal products (pertaining to HPAI and END) and I am confident that if you consult with them, they will agree that it has led to a very high level of compliance.

We realize that there is an immediate, ongoing public health crisis that is no doubt consuming considerable time, energy, and expertise at the CDC but hope that your office will soon have a chance to consider our request.

Sincerely,



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