



801 Old York Road, Suite 204  
Jenkintown, PA 19046-1611  
215-887-0816  
aavs@aavs.org  
[www.aavs.org](http://www.aavs.org)

May 10, 2017

Leroy A. Richardson  
Information Collection Review Office  
Centers for Disease Control and Prevention  
1600 Clifton Road NE.  
MS-D74  
Atlanta, Georgia 30329

RE: Docket No. CDC-2017-0021

Dear Mr. Richardson:

On behalf of the American Anti-Vivisection Society (AAVS) and its members, I submit the following comments in response to the notice regarding proposed data collection entitled, "Requirements for the Importation of Nonhuman Primates into the United States," issued by the Centers for Disease Control and Prevention (CDC) and U.S. Department of Health and Human Services (HHS).

AAVS supports the CDC's continued collection and monitoring of data regarding imports of nonhuman primates into the United States. CDC's monitoring is important for public health, animal welfare, and transparency to the public. Data collected can be useful in monitoring the health and well-being of the imported animals as well as the sources of animals and potential conservation concerns.

AAVS firmly believes that if importers/exporters are allowed to use automated collection for shipment-related data, there must be a way for CDC to monitor and verify that the correct species, quantity, health status, origin, etc, are entered.

Further, our experience has been that requesting such information through the Freedom of Information Act has been quite difficult. If information is automated or otherwise collected, efforts to categorize or digitize it should allow it to be easily collected and distributed. This would also reduce the work time burden for CDC staff members. For example the U.S. Fish and Wildlife Service (FWS) maintains the Law Enforcement Management and Information System (LEMIS), which includes data on import/export shipments of animals, including nonhuman primates. FWS is able to respond to FOIA requests regarding these data in a timely manner because they are easy to consolidate and share.

Thank you for your consideration of our comments.

Sincerely,

Crystal Miller-Spiegel  
Senior Policy Analyst