



**TESTIMONY OF PET INDUSTRY JOINT ADVISORY COUNCIL  
BEFORE THE COMMITTEE ON ENVIRONMENT  
SENATE BILL 397**

**March 12, 2010**

The Pet Industry Joint Advisory Council (PIJAC) appreciates the opportunity to offer this esteemed committee our views on SB 397. As the world's largest pet trade association, with a very active membership in the state of Connecticut, we have had the privilege of testifying before this committee on many occasions relative to legislation impacting the pet industry. As this committee is aware, PIJAC represents the interests of all segments of the pet trade, including associations, organizations, and businesses both large and small involved in the commercial pet trade. Our membership encompasses thousands of pet breeders, pet product manufacturers, distributors and retailers supporting a responsible pet industry.

In our decades of representing the pet trade, both here in Connecticut and across the many states, PIJAC has actively sought to advance both the welfare of pet animals and the protection of the pet owning public; we have consistently supported statutory, regulatory and voluntary standards to further these interests. Indeed PIJAC has, for many years, provided a highly respected animal care certification program intended to ensure that employees are well trained in the care of the animals they sell; a program that is widely utilized not only by persons in the commercial pet trade but also shelters and humane societies throughout the country, and one that has even been adopted as a statutory standard. PIJAC has worked closely with the USDA on effective implementation of the federal Animal Welfare Act for pets since its inception over three decades ago, has worked with the federal Centers for Disease Control to prevent and resolve health concerns involving animals, and has joined hands with state and local agencies to ensure adoption and enforcement of appropriate regulatory standards.

Our association has long been recognized as the voice for a responsible pet trade, and routinely advocates for new statutory standards that are in the best interests of companion animals and the pet-owing public. We also continually seek to advance the voluntary implementation of superior standards in the care, handling and transport of companion animals. PIJAC strongly believes that concerns about companion animal health should not be restricted to a limited segment of the pet trade, but should encompass all sources of pets.

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Accordingly, our initial observation concerning this bill is that it places an inordinate emphasis on pet stores, to the exclusion of other sources of pet puppies. The fact is that, while pet stores supply only about 7% of all the puppies in the state of Connecticut, they are by far the most heavily regulated. Pet stores are required to be licensed, subject to strict standards in the care and sale of their dogs, and are subject to a statutory warranty (the liability under which we increased for pet stores only last year). While we recognize that puppies sometimes get ill (as do all living creatures), pet stores go to great lengths to minimize the incidence of disease in the puppies they sell. Indeed, the preeminent study on this question, conducted at Cornell University Veterinary School, found that no source provides healthier puppies on average than do pet stores.<sup>1</sup> This is because most such puppies come from breeders licensed by the federal government under the Animal Welfare Act, and these puppies enjoy a greater number of veterinary health examinations than do puppies from most other sources.

In contrast, puppies that are imported by shelters or rescue groups escape essentially any regulation at all. This is by far the greater source of disease in puppies in Connecticut and should enjoy the greater focus of any legislation in this area. PIJAC has met with legislators in the recent past to discuss ways in which such puppy imports might be better regulated. We were interested to note the surprise amongst some members that organizations import puppies from outside the state for purposes of adoption. The reality is that puppies are imported for adoption not just from outside Connecticut but from outside the United States. Federal law prohibits importing puppies into the United States for resale; but that law does not cover puppies imported for adoption (even adoptions for fees).

Thus, the focus on certificates of origin referenced in this bill is misplaced and we respectfully suggest that Senate Bill 397 be amended to specifically address imports by these unregulated sources.

A further concern about this bill, however, is its use of ambiguous, and even meaningless, language. Directives in the bill for the Commissioner of Agriculture to conduct assessments of dogs from "puppy mills" have essentially no constructive value. "Puppy mill" is a pejorative term that has no meaning in law. If the intent of the bill is to identify dogs that were bred or raised in substandard conditions, then the mandate to the Department would be infinitely better articulated by stating as much. More to the point, whether such substandard facilities are large or small, commercial or otherwise, we would hope that this committee would seek to fashion legislation that would capture sick puppies from all such substandard conditions.

As we have in the past, PIJAC reiterates its support for legislation that establishes reasonable standards to ensure puppies coming into the state are healthy. Such standards are already in place for puppies coming to pet stores. We would urge this committee to take this opportunity to extend such safeguards to all puppies being imported into Connecticut.

Thank you for your due consideration of our concerns!

Respectfully Submitted,

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Vice President of Governmental Affairs and General Counsel  
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<sup>1</sup> "Source of Acquisition as a risk factor for disease and death in pups," *Journal of American Veterinary Medicine*, vol 204, No. 12, June 15, 1994.