



AMERICAN KENNEL CLUB®

December 3, 2013

Dear Task Force Members:

On behalf of our 59 dog clubs and thousands responsible dog owners and breeders in Connecticut, the American Kennel Club (AKC) wishes to express our concerns about the vague, proposed topic for your December 4 hearing.

As the world's largest purebred dog registry, the nation's largest purebred rescue network, and the only not-for-profit purebred dog registry that for 129 years has been devoted to the health and wellbeing of dogs, the American Kennel Club actively advocates for humane treatment of *all* dogs.

The AKC believes the best way for a person to obtain a new pet is through personal interaction with the pet's breeder. These types of relationships often lead to lifelong friendships as well as a source of assistance or mentoring for ensuring the best care for a pet. The AKC also recognizes that consumers should have the option to choose a pet that is the best fit for their particular lifestyle. Treasured pets may be obtained from a variety of sources, including breeders, rescue, shelters or pet stores. For this reason, the AKC has strong concerns about the question "Should humane sourcing of dogs and cats be a requirement for pet shops?" This question appears to use vague, undefined language to limit the legitimate options of consumers and businesses in Connecticut.

As you consider this a complex topic, we ask you to consider the following:

- **What specific issue/problem in Connecticut is the task force seeking to address? How will the intended proposal address achieve the desired outcome in a fair and enforceable manner?**

Is the intent to curtail animal cruelty and neglect? AKC applauds efforts to curtail negligence or cruelty. However, Connecticut already has laws penalizing animal cruelty. In addition, Connecticut also has regulations regarding dogs being imported into the state. This includes requiring that every dog or cat imported into the state be accompanied by a certificate of health from a licensed veterinarian issued no more than 30 days prior to the date of importation. Statutes also require pet shop licensees to include a certificate of origin with every dog offered for sale. If the intent is to curtail animal cruelty and neglect, improved enforcement of existing laws is likely to be a more effective solution than potentially restricting sources of healthy animals.

Is the intent is to regulate pet sellers or breeders? The federal Animal Welfare Act (AWA) already requires licensing and inspections of breeders and dealers who sell animals to pet stores. A new revision to the federal AWA made effective on November 18, 2013, further subjects anyone who maintains more than four breeding females and sells even *one pet* sight unseen to USDA licensing, inspection, and care standards.

- **How is the term "pet shop" defined, and what impact will this have on local breeders and small businesses?** Connecticut's statutory definition of "pet shop", as seen in Sec. 22-327, reads, "Pet shop means any place at which animals not born and raised on the premises are kept for the purposes of sale to the public." This could reasonably be expansively read to include a multitude of operations, including rescues and shelters. Furthermore, a variety of definitions exist throughout the country: in some jurisdictions, a pet store may be a small hobby breeder who breeds an occasional litter. In others, it is a public shelter, a large box store, or even a website. It is imperative that an easily understood definition be the basis of public discussion.
- **How is "humane sourcing" defined?** Prior to addressing any concerns, we believe it is also critically

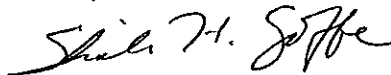
important to agree on what this term means and how "sourcing" regulations will be enforced. We believe humane sourcing should refer to animals that are bred and raised in a safe and healthy environment. Responsible, humane sources should be identified based on the care and conditions provided the animals, not on the business model or number of animals maintained. Humane sources may also include, but should not be limited to, animals from rescues or local shelters. Existing laws regarding cruelty, neglect, and the importation of dogs and cats provide significant oversight for the care of these animals.

- **Is it the job of the state to make sourcing decisions regarding the property of private individuals or businesses?** The AKC strongly believes that all dogs should be bred, raised and maintained in healthy, safe environments where basic needs such as food, water, shelter, and veterinary care are met, regardless of their source. This is why AKC supports current state laws regarding cruelty, neglect, and the importation of dogs and cats. We caution the task force to carefully avoid establishing regulations that limit the choice of individuals to obtain an appropriate pet by limiting the sourcing options of private individuals and businesses that already comply with state laws. When consumers cannot obtain a pet that is an appropriate fit for their lifestyle, that animal is more likely to end up back in the shelter system. A better solution is to ensure that consumers are educated and that they have access to a variety of pets so that they can obtain a pet that is an appropriate fit with their lifestyle.
- **Would the proposal interfere with interstate commerce?** If "humane sourcing" is determined to mean only the sourcing of animals from unknown sources or out-of-state shelters, do these limits infringe on interstate commerce or the ability of an individual to obtain the pet desired? Connecticut currently regulates the general importation of dogs and cats into the state for transfer. Further regulation of a subclass of this group may put the state in the position of limiting commerce or attempting to enforce their standards and laws on other states or areas outside their jurisdiction.

The American Kennel Club welcomes the opportunity to work with the State of Connecticut to develop public education and other effective solutions to ensure that dogs in Connecticut continue to be raised in safe, healthy environments, that those who mistreat animals are held accountable, and that responsible dog ownership and freedom of choice are promoted in the state.

Thank you for your consideration.

Sincerely,



Sheila Goffe
Director, Government Relations

Founded in 1884, the AKC is the world's largest purebred dog registry and the only not-for-profit purebred dog registry devoted to the health and wellbeing of all dogs. The AKC advocates for the purebred dog as a family companion, works to protect the rights of dog owners, and promotes the ideals of responsible dog ownership. In 2012, the AKC sanctioned and licensed more than 200 events in Connecticut, in which more than 24,300 dogs and their owners participated.