



To: Task Force Concerning the Sale of Cats and Dogs at CT Pet Shops from Inhumane Origins
From: Amy Harrell, President, CT Votes for Animals
Re: Final recommendations
1/23/2014

The evidence collected by this Task Force on the commercial breeding industry and CT pet shops has led me to several conclusions:

1. **The federal Animal Welfare Act allows for federally-sanctioned cruelty in commercial breeding facilities.**
A permanent living space consisting of a cage with wire flooring, 6 inches of headroom, and no insulating bedding when the temperature is 51 degrees is unacceptable to anyone who cares for dogs.
2. **USDA enforcement of the AWA is currently inadequate, and cannot be relied upon to identify and penalize breeders in violation.**
PIJAC stated in a 9/24/13 press release that they have “worked with the United States Department of Agriculture (USDA) over the past 40 years to enhance effective enforcement of the Animal Welfare Act (AWA)” and cites amendments passed in the 1970s. Yet in a 2010 audit, the US Office of Inspector General concluded the USDA’s enforcement process was altogether insufficient, and “Ineffective against problematic dealers.” [<http://www.usda.gov/oig/webdocs/33002-4-SF.pdf>] Despite their claims, PIJAC has not been successful in enhancing either the AWA regulations themselves, or the enforcement of them. This track record gives me no hope of strengthening federal oversight of commercial breeders in the near future, and points to the need for state level legislation to stem the sale of puppy mill dogs in CT’s pet shops.
3. **Breeder violations of even these egregiously low standards are commonplace.**
An examination of the data in Karen Rasmussen’s testimony reveals that 70% of the USDA-licensed breeders used by CT’s pet shops had violations within the past 3 years.
4. **CT pet shops have not implemented sufficient measures to ensure they are not sourcing puppies from puppy mills.**
Pet shop owners commonly testified they had not personally visited a breeder in several years. Ms. Rasmussen’s report identified widespread practices of sourcing puppies from breeders with multiple USDA violations and horrific breeding practices, as evidenced by inspection photos. Her report also showed that most pet shops sourced a significant percentage of their puppies from unlicensed out-of-state breeders. Such purchasing records by pet shops demonstrate a disturbing apathy and carelessness.

5. **The animal rescue community, and local reputable breeders, stand willing to provide CT families with puppies.**

Lorin Liesenfelt from Dog Days Adoption events, testified that she could easily obtain an abundance of puppies to CT adopters. Puppies who need homes sit in shelters both inside CT, and just over our borders.

6. **CT Pet shops are already heavily regulated.**

Task force member Ray Connors has cautioned us against piling on additional pet shop regulations, since his State Animal Control Division is already stretched to its limits in enforcing current state pet shop laws.

7. **Pet retail businesses do not have to sell commercially-bred puppies in order to thrive.**

Pet stores such as H3 Pet Supply in Stratford have built successful businesses on the popular public concepts of adoption and rescue, as well as selling food, supplies, and training. The vast majority of pet stores in CT have similar business models. At no point during the testimony did I hear an explicit explanation of why our current puppy-selling pet shops cannot move to this model as well.

Recommendations for improving CT laws

On behalf of CT Votes for Animals, I remain convinced that the only way to guarantee that pet shops source animals from humane origins is to prohibit the sale of commercially-bred dogs and cats. In this scenario, pet shops may choose to humanely source puppies and kittens from rescue groups and municipal shelters.

However, if the CT General Assembly is compelled to favor legislation that would allow current pet shop owners to maintain status quo, a second option would be to apply the above humane sourcing requirements to new pet shop licensees only. Thus, current pet shop licensees may continue their businesses selling commercially-bred dogs and cats, but would not be able to transfer their license, nor relocate, unless they upgrade their business model to humane sourcing as described above.

Importantly, none of these options place additional burdens on the state budget, or the staff of the CT Dept. of Agriculture. They also represent meaningful gains toward the goal of ensuring that dogs from puppy mills are not sold in CT's pet shops.