June 16, 2020

Bryan P. Hurlburt, Commissioner
Connecticut Department of Agriculture
Suite 701 North
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Hartford, Connecticut 06103

(Tracking number PR2017-060).

Founded in 1884, the American Kennel Club (AKC) is America’s only not-for-profit all-breed dog registry devoted to the study, breeding, exhibiting, and advancement of purebred dogs. AKC demonstrates its commitment to responsible dog ownership and breeding through a variety of educational programs, humane programs, a multi-million-dollar commitment to canine health research through the AKC Canine Health Foundation, and by conducting thousands of kennel inspections each year. Our kennel inspections program, which includes a flexible, comprehensive, performance-based care and conditions policy for the welfare of all dogs, has conducted more than 70,000 inspections of people who have registered their dogs with AKC since 2000.

Breed rescue is a strong and longstanding part of the hobby breeder tradition. In fact, our breed rescue network is one of the largest in the United States. Hobby breeders’ particular expertise with a breed can make them exceptional foster homes for dogs in breed-specific rescue programs, which result in successful rehabilitation and life-long placements of dogs in permanent homes.

Multiple factors have contributed to an exponential increase in the number of dogs being imported for rehoming. Large-scale pet sterilization¹ and the associated decline in available puppies; social pressure to adopt a shelter pet rather than buy a puppy from a breeder; and defamation campaigns waged against breeders and pet stores have resulted in an increase in “puppy mill” and rescue dogs being imported both into the United States and between U.S. states to supply shelters and rescues. While the federal Animal Welfare Act currently regulates the breeding, care, conditions, and other standards of welfare for professionally bred pets, pets that are labelled as “shelter” or “rescue” pets have generally not been subject to the same requirements. The unregulated treatment of dogs in

¹ According to the American Pet Products Association, approximately 80% of American dogs have been spayed or neutered, including 75% of males and 85% of females. American Pet Products Association, APPA 2019-2020 National Pet Owners Survey (2019).
“rescue” animal mills has proven to present public health and animal safety concerns.\(^2\) We share these concerns regarding public health and safety as a result of unchecked transport and placement of dogs, some proven feral and semi-feral, in foster and permanent homes.

With those concerns at the forefront of today’s public policy considerations, it is imperative that laws and regulations better protect health and safety. To that end, a fair two-pronged public policy approach will ultimately demonstrate appreciation for the differences in sources of dogs by addressing specific supply chain problems; impose appropriate care, operations, and facility standards; and ensure proper and efficient enforcement of those standards. The first prong is ensuring that all dogs entering the United States are healthy, fully vaccinated, accompanied by a health certificate from an accredited veterinary authority in the country of origin, and are microchipped so individual health records can be verified upon arrival here. To achieve these goals, the American Kennel Club is advocating for the enactment of the recently-introduced *Healthy Dog Importation Act of 2020.*\(^3\)

The second prong is ensuring that reasonable and appropriate state care and facility standards for animal care facilities are adopted and implemented. The American Kennel Club appreciates the Connecticut Department of Agriculture’s effort in developing the proposed new standards and facility requirements for animal shelters and the amendments to the state’s rules applying to kennels, pet shops, grooming facilities, training facilities, and animal importers.

Thank you for the opportunity to comment on the Department’s long-anticipated proposed regulation of animal shelters and importers. **We have determined them to be fair and appropriate and we are pleased to express general support for the proposed care and facility standards, and to provide recommendations to further strengthen the proposal.**

To prevent harm, injury, and death to other animals or people, please consider the following:

1. The requirements for commercial kennels and pet shops include “isolation” for any dog or cat that has or is suspected of having a contagious disease, while for animal shelters only “physical separation” is required. We believe a uniform standard “quarantine” period of at least 48 hours should be adopted for animals imported into Connecticut animal shelters and foster homes, prior to permanent placement. To that end, we recommend adding the following definition to Sec. 22-344-22. **Definitions:**

   “Quarantine” means the confinement of an Animal, whether or not pursuant to an order of the Department to prohibit other animal contact by restricting the Animal to an Isolation Facility or Quarantine Room for the purposes of: (1) observing if the Animal displays signs of contagious or infectious illness, and (2) minimizing the risk of the Animal spreading such contagious or infectious illness to humans and/or other animals.

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II. To ensure the safety of consumers, we also believe it is important that those in the animal-care chain be required to report whether a dog has demonstrated overly-aggressive behavior.

Under Sec. 22-344-82. Animal Shelter Minimum Standards of Animal Care, we recommend adding a new subsection (d):

(d) Dogs or cats that are housed individually in a primary enclosure due to overly aggressive or vicious disposition must be specifically identified as such in the animals’ written health records and the information must be shared with any prospective foster home or new owner.

Under Sec. 22-344-75. Animal Importer Minimum Standards of Animal Care, we recommend adding a new subsection (d):

(d) Dogs or cats that are transported individually in a primary enclosure due to overly aggressive or vicious disposition under (c)(3) must be specifically identified as such in the animals’ written health records and the information must be made available upon an animal’s temporary or permanent placement.

The American Kennel Club is pleased to also express support for the updated care, health, facility, operational, and recordkeeping standards that apply to kennels, pet shops, grooming facilities, and training facilities.

The American Kennel Club thanks the Connecticut Department of Agriculture for its consideration of these comments and recommendations. We appreciate the Department’s recognition of the value of working with stakeholders to ensure that quality oversight for the purpose of ensuring the wellbeing of licensees’ animals and the people who make a home for them takes accurate data into account and reflects scientific principles and effective real-world experience in animal husbandry and care.

Questions may be addressed to:

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