

ILLINOIS FEDERATION OF DOG CLUBS AND OWNERS, INC



P.O. Box 13043
Springfield, IL 62791-3043

July 12, 2012

Animal Welfare; Retail Pet Stores and Licensing
APHIS-2011-0003
RIN: 0579-AD57

Dear Secretary Vilsack:

The Illinois Federation of Dog Clubs and Owners, Inc works to defend and protect responsible dog ownership in Illinois by monitoring dog legislation in our state and also enhancing education among owners, breeders, clubs, and legislators in order to protect dogs and their owners, as well as the public. Illinois has 184 AKC dog clubs, and the American Kennel Club indicates that 646 licensed and sanctioned dog events were held in the state of Illinois in 2011, in which more than 119,500 dogs participated. According to the AKC estimates as of 2011, over \$36.7 million is generated annually within the Illinois economy from spending on purebred dogs in the state. This includes spending on events, dog clubs, show exhibitors, breeding and basic dog care, just to name a few. As dog shows are a family sport, the spectator gates generate additional revenue for cities and towns statewide in the form of hotel stays, support of local restaurants and other businesses. After considerable review, the Illinois Federation of Dog Clubs and Owners, Inc. opposes the proposed APHIS changes in their entirety because we do not believe they are in the best interest of the health and safety of dogs, dog breeders, the pet buying public, or the Illinois economy.

There has been insufficient evidence from APHIS to support the notion that the sales of dogs over the Internet require further regulation to protect their health. Long before the Internet was conceived, the pet buying public chose to either visit a breeder to purchase a dog or have a dog shipped or sent by other means after both parties mutually agreed on the terms and the dog. We believe that any restriction that unnecessarily interferes with the pet buying public's choice of the source and means of acquisition of a healthy dog is not in the best interest of a buyer or any dog. Current federal, state, and local ordinances provide multiple layers of protection for the health of dogs that are sold--especially those sold sight unseen and shipped by airlines or other means of public transport. We believe State and Local Inspections by properly licensed and trained inspectors in addition to the more than 5,000 annual inspections by AKC provide a far more consistent level of protection than reliance on the local pet buying public that is least likely versed in AWA or animal care and husbandry. All dog transactions must currently be accompanied by a signed certificate of health by a state licensed veterinarian in the state of origin at the time of a sale. Buyers are further protected when they bring a new dog to their local veterinarian for a

wellness check. All dog owners are required to complete any puppy vaccination protocol as well as rabies vaccine at appropriate ages as defined in the Animal Welfare Act. We believe that this multiple layer of oversight is satisfactory and allows for the identification and intervention of substandard facilities without further expansion.

IFDCO believes that the pet buying public has the right to make informed choices on the purchase of their pets. After considerable research, if a prospective buyer in Hawaii determines that the best quality dog for him is from a breeder in Illinois, he should be able to make arrangements to get the dog without penalty to the buyer or seller of the dog purely because the buyer does not fly from Hawaii to pick up the dog. IFDCO respects the fact that not all breeds of dogs are raised in every state or within driving distance for every buyer. We further respect that some dogs are purpose bred and come from breeding stock that may be more desirable than others from the perspective of a buyer who has researched a breed. We believe that an educated buyer should continue to be allowed to make the choice of a pet without undue restriction or restraint from government on the breeder.

Because the small hobby breeder or fancier does not operate with a goal for profit as is the case with large scale commercial breeders who often house more than 90 dogs, the two groups do not and should not be expected to operate under the same model of regulatory care. The small hobby breeder is concerned with maintaining and protecting breed type as well as health, engages in early socialization and virtually never breeds each female at every heat cycle during her adult life. We believe this small home approach provides an ideal environment for preparing puppies to enjoy a healthy and happy life as a family pet. The provisions for standards of care and USDA licensing, for example, of anyone who ships one dog if they own 5 females has no logical correlation whatsoever other than over zealous demands placed on the small breeder which will interfere with the pet buying public's decisions on the best dog to meet their needs and will place an unnecessary financial burden if their choice is from a breeder several states away.

The licensing requirements based on number of females, number of sight unseen sales, as well as the cost prohibitive requirements for compliance with building permits and construction will cause for more harm to dogs and the dog buying public than the status quo and will be the death knell for virtually all small scale breeders of healthy quality dogs from their private residences. As a result, the loss of state revenue from dog events, as well as the income for veterinarians, and losses by businesses that sell dog supplies and dog food sold in our state will further cripple the Illinois economy. Illinois cannot afford the potential loss of more than \$36 million dollars to our state economy based on a proposal that does nothing to improve protection for dogs or buyers.

For these reasons, we oppose the proposed changes in total. If these changes are implemented, our pet buying public will lose, our quality breeders will lose, our state veterinary community will lose, and our state economy will lose.

Patricia McCann,
Corresponding Secretary, IFDCO, Inc.

