



AMERICAN
KENNEL CLUB®

February 16, 2012

Re: AKC Opposes Senate Study Bill 3159 – Commercial Breeder Regulations

Dear Chairman McCoy and Members of the Senate Commerce Committee:

The American Kennel Club (AKC) writes on behalf of our 63 dog clubs and the thousands of responsible dog owners, breeders and sportsmen in Iowa to respectfully ask you to oppose Senate Study Bill 3159 and not allow it to advance.

Our mission includes working to protect the rights of all dog owners, promoting responsible dog ownership and supporting the humane treatment of dogs. Responsible dog owners and breeders have a significant impact on the Iowa economy. In 2011 alone, over 250 AKC dog events took place in the state, in which over 37,300 dogs participated from across the United States. Our research has also shown that an estimated \$15.6 million is generated annually within the Iowa economy from spending on purebred dogs, including dog shows, breeding, and basic dog needs such as grooming and veterinary care.

Responsible breeders are models for their communities. They raise healthy dogs and work to ensure that puppies are placed with responsible owners. These breeders are in a unique position to support new pet owners and teach them to be responsible dog owners. Continuing to pass restrictive legislation will send the very clear message that responsible dog owners and breeders are not welcome in Iowa and could result in the loss of the ability to continue to obtain a quality purebred dog from a responsible Iowa breeder. It could also lead to a significant loss of revenue for Iowa communities.

We strongly believe that all dogs deserve to live in safe, healthy environments and should not be kept in conditions where their basic needs are not met. As currently written, however, SSB 3159 would be detrimental to responsible Iowa dog owners and breeders and make it virtually impossible for many people to continue to own dogs and occasionally breed a litter in their home. We have numerous concerns with this bill, including, but not limited to the following:

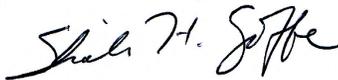
- **Surety Bond or Letter of Credit Requirement** - Current law defines a commercial breeder as someone who owns more than three “breeding” dogs or cats and receives any kind of consideration. This definition includes hobbyists and dog exhibitors who may occasionally breed a litter in their home, or even offer a stud dog for a responsible breeding. SSB 3159 (§162.8A) would require these responsible dog owners to obtain a surety bond or an irrevocable letter of credit from a financial institution that will be used if an animal is placed with a custodian as a result of a violation of the state’s animal cruelty or neglect laws. This is an unreasonable requirement for someone who simply keeps a few dogs in their home and is not a true commercial establishment and makes the unfair and offensive assumption that the license holder will prove to be irresponsible or cruel to their animals.

- **Ability to Deny License Without Hearing** – This bill removes the ability in §162.12 for a person seeking a license to have a public hearing if their application for commercial breeder authorization is denied. As a result, the department may simply determine that someone is not in compliance with the laws and regulations regarding care and conditions for animals, and there is no ability for the applicant to appeal. The denial may force them to give up dogs in order to ensure they do not fall under the low threshold in the definition of commercial breeder. This means that dogs may be taken out of loving homes and placed in shelters where they are cared for and/or euthanized at the taxpayers' expense.

Senate Study Bill 3159 violates the rights of responsible dog owners and breeders in Iowa and does nothing to further protect the health and welfare of dogs. We respectfully ask that you oppose this proposal and not allow it to advance. The American Kennel Club welcomes the opportunity to work with you to develop legislation that would address your concerns without harming responsible dog owners. Please contact us at (919) 816-3720 or doglaw@akc.org if we can be of assistance.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Sheila H. Goffe". The signature is written in a cursive style with a large, stylized 'S' and 'G'.

Sheila Goffe
Government Relations Director