

Chairman Baker, Chairman Farnese, and members of the Judiciary Committee:

Thank you for this opportunity to comment today. My name is Jonathan Stanley. I am a Pennsylvania business owner, the Vice President of an AKC All Breed Club, and a PA licensed kennel operator breeding quality Labrador Retrievers for nearly three decades. My wife is an AKC Breeder of Merit and she is pursuing her judging license. We have been show/breeder/enthusiasts for our life time and it has been a professional pursuit for decades now. My core value: What we do with Dog Legislation must be *for the benefit and health of the dog within the bounds of our PA and US Constitutions*.

I am presenting my comments in four major areas:

1. Things to beware of on Senate Bill #44
2. Current PA Dog Laws and Law Enforcement
3. The underground movement of dogs into and around our country, specifically those into Pennsylvania and
4. Consumer Protection Law proposals

1. On Senate Bill #44.

- Please do not vote for Senate Bill #44. This bill unnecessarily scapegoats pet shops while inventing a new brand of “Pet Shop Kennel” for further regulation. This is my opinion and that of the Pennsylvania Federation of Dog Clubs (PFDC). The American Kennel Club (AKC) emphatically supports the freedom of choice in selecting a pet. AKC actively promotes efforts to ensure that people are educated, understand the demands of responsible ownership and have access to a pet that is right for them. The AKC strongly opposes any measure that restricts choice by compelling people and/or retailers to obtain pets solely from shelter or rescue distributors.
- American Pet Products Association (APPA) industry statistics state that pet shops amount for only 4% of the dogs acquired. To say they all come from “Puppy mills” is to use an undefined and pejorative term in a sweeping statement. According to our PA Dog Law Act 119, we regulated puppy mills out of existence in PA in 2008. I agree with the Pennsylvania Veterinary Medical Association (PVMA) that we should pursue illegal kennels and those operating in the shadows.
- In this bill, there are new undefined terms and terminology used that could turn a breeder into a “Pet Shop Kennel” if they co-own dogs, have a web presence at all and talk to their buyers face to face. Next, “Pet Shop Kennels” will be on the “To Be Banned” list.
- The bill preambles by citing unsubstantiated and socio-emotionally driven concepts that are consistent with the message of animal rights organizations, i.e. *“there is an overabundance of pets and puppies”*. **This is incorrect** . APPA statistics show in 2018 that 85% of the dogs in the US are spay/neutered. Legally operating breeders are being regulated and “shamed” out of existence. There are not enough dogs to supply the need of the public, especially with pure bred dogs.
- Further supporting the fact that there actually are NOT enough dogs, Rescues are in print, talking about having litters with their rescued dogs. (Will they do health clearances like I do? Do they know the generations like I do?) *Does producing puppies even sound like the mission statement of a rescue/shelter?*
- People should be able to obtain a purebred dog, bred with the characteristics that distinguish the breed. Sometimes, pet shops can help the consumer find that. Getting rid of pet shops has

nothing to do with puppy mills or the false narrative of an overabundance of pets. Have you tried to acquire a dog during pandemic? There aren't enough.

- The bill does not make clear if Rescues would place dogs in small shops. It only bans the pet shop from selling anything but a rescue. Nothing is said about compensation. There is no promise in the bill that Rescues will even supply the dog to small shops.
- ***According to the very definition of a "Broker" and "Pet Shop Kennel", according to this proposed Law, every rescue and shelter should be designated as a broker and pet shop kennel.***
- Any law scapegoating pet shops while rescues are competing for dogs at national (USDA) dog auctions (read the articles) is hard for me to take seriously.
- I believe that the Bureau of Dog Law Enforcement should be fully funded. All (breeders, shelters and rescues) who deal in the trade should report the movement and transport of all dogs in the trade because that protects the dog.

2. The Laws we have and the Laws we need:

- As to current proposed laws or the need of such laws, I support, along with the PFDC, **SB# 1267** establishing a Commission to evaluate existing law, proposed law and Consumer protections. The caveat to our support is that we need amendments that provide more seats. That commission needs to have more people who represent proponents of breeders and those in animal enterprise. What merit does a commission have to craft law without the input of obvious stakeholders?
- As the PFDC said in it's Op-Ed supporting **SB663**: "*What the Auditor General left out is, in 2009, the Legislature and the Rendell Administration balanced the budget by taking money from special accounts outside the General Fund. This included over \$3 Million from the Dog Law Restricted Account.*" The Bureau of Dog Law Enforcement was never fully funded. It is my understanding that these funds from the Restricted account are used for the state courts. Every year, **SB #663** funding Dog Law is introduced but dies a political death. Why are we talking about new legislation when we haven't funded the one we passed 12 years ago?
- I stand with the Pennsylvania Federation of Dog Clubs (PFDC) in supporting the **SB #663** bill even though they disagree with reducing the age for a license to 8 weeks.
- My experience with one size fits all dog law is that it is not always good for the health of the dog. For example; since my kennel cannot go below 50 degrees inside, I must heat it at an appropriate level so as not to dip below the regulated temp. My male stud dogs go out and sleep on the freezing pavement because it's too hot inside. I've had three incidents of frost bite on the testes of international champions in the last two years. I can't use my play yards anymore, and my dogs smell like kennel dogs. A Breeder knows his breed and knows what is good for his dogs. As a private breeder I could always put my dogs concerns first. As a commercial kennel licensee, I must please the ***continuously developing interpretation of the law*** by the bureau of Dog Law enforcement. This comes at the cost of the dog and what might be best for the dog. More latitude should be given breeders for the environmental health of the dog. Pharaoh Hounds and Sled Dogs cannot abide the same temperatures. Pointing to the one size mentality in Libre's Law, it is now illegal to have an individually licensed dog like a Labrador Retriever or a St Bernard outside in less than 32 degrees if you put it on a leash while you load

your vehicle for longer than 30 minutes. Labs were bred for cold weather and icy water. When you are getting cold, they are getting happy.

- We need a “Working Animal Bill” in this agricultural state of Pennsylvania that protects animal enterprise as well as farmers and those who have working dogs in all forms of service.

3. Interstate transport and health issues.

- As a CK-5 Kennel operator, having more than 60 transfers a year, I have to keep careful records of every dog I receive from out of state. If my stud dog goes 15 miles away across the state line to be bred and returns in a few days, I need to get an inter-state transfer certificate from a vet which costs about 50.00. While I think this is wise public policy, it has delivered an unnecessarily burdensome regulation on my business. It is amazing how often one dog is coming back from a show out of state, or a dog comes back from a few days where his semen are stored, or maybe a new puppy is coming here, or someone brings a dog here for some purpose related to dog showing or training. But the fact is, nearly half the dog trade and nearly all trafficking in our country is conducted by unregulated rescues and you will never get an interstate vet transfer from them. That’s because;
- The Big News is that according to those same 2018 APPA statistics, 44% of people indicated they got their dog at a rescue.
- 44% of the dog trade is transacted by unregulated rescues. The elephant in the room, and the huge gaping hole in Dog Law is unregulated rescues becoming nearly half of the dog trade in the last 12 years. Without reporting one transfer or interstate vet certificate to Dog Law or being inspected for any conditions, they have mushroomed to be the single largest source of Dogs, all without any inspection/reporting or record keeping. Imagine the special conditions that a rescue would need if it was *really a rescue*. A horse stall is not necessarily a good rescue ward, but no one is even looking! 44% of the dog trade is on the honor system and I as a lover of my breed am regulated to “the most demanding and difficult standards in the US”. For the sake of dogs everywhere, Rescues and Shelters must come off the honor system. It has clearly become a huge business as well with an additional profit center of tax free monetization by fund raising.
- It is important to state some realities about what the Dog Law changed in 2008. Gone are one half to three quarters of commercial kennels. There used to be 200+ brokers listed on the PA list, but now they are all gone and are replaced by rescues. We have turned a blind eye to this entire market. We really don’t know anything about where these rescue pets are shipped from. How is it that so often they are puppies? Is it really rescue if you go buy the whole litter twice a year from the same breeding farm in another state? How do we really know about this supply of dogs? We will not, because rescues exempted themselves from the law and lawmakers didn’t realize they had handed over legislative capture of the industry to the Animal Rights movement. Why do we need trucks of dogs from National Mill in Colorado, or plane loads of diseased dogs from Puerto Rico or Africa landing in New York City to potentially spread all these pathogens when we supposedly have an overabundance of too many dogs? Now, you can take a rabid dog from Africa, turn it into a media prop and fundraising machine, take donations, request free vet care and then sell the dog, all free of “government interference” without reporting a thing about its whereabouts or health. We should really stop and think again. This cannot be good for the benefit and health of the dog.

- I have further concern with the free movement of 44% of the dog trade because we have seen Pathogens in animals crossing borders. The following is a list of pathogens brought into the US as documented by the National Animal Interest Alliance (the NAIA), of which I am a member: Rabies, Canine Influenza, Screwworm, Leptospirosis, Canine Onchocerciasis (River Blindness), Distemper (new strain) and Canine Brucellosis. Brucellosis is of grave worry, and is often found in dogs coming out of Mexico and Korea and the Philippines.
- A Question: Is it finally obvious now, that Zoonotic diseases are a real threat to our population and that other invasive and infectious diseases are importing a generation of suffering for animals and potentially humans alike?
- The CDC's estimates for 2018 were that at least 1.065 million dogs were imported into the USA. Two thirds of those came by air from countries all over the globe. In all, only 780 dogs were even turned back. Not one dog being driven into our country from Canada was turned away in that period. That isn't a border, that is a bridge for illicit dog trafficking.
- To quote the National Animal Interest Alliance:
"To fill the void, rescues began moving dogs from areas of high supply to areas where shortages exist. But as the US supply of dogs declined, rescues expanded their networks to foreign countries, a phenomenon that has blossomed into a full-blown supply chain. Today, an ever-increasing number of unhealthy and ill-tempered rescue dogs from both national and international rescues pour into our communities, arriving with temperament problems and illnesses that threaten U.S. dogs, livestock and the American public. Imported dogs are reintroducing diseases and parasites that were previously eliminated in the U.S.³ Dogs imported from South Korea introduced canine flu in 2015, which required the development of a new vaccine⁴ and more recently a new strain of the distemper virus arrived. Making matters worse, our animal populations have no immunity to many strains of these imported diseases, so disease progression can be fast-moving. In addition to new and lethal strains of distemper and canine influenza, multiple rescue dogs have been imported carrying canine brucellosis⁵ and countless vector-borne diseases like ehrlichiosis, babesiosis, and leishmaniasis. These diseases and parasites are becoming common in the destination sites for international rescue dogs. For example, prior to rescue relocation programs, there were no native cases of heartworm in the Pacific Northwest. Now, due to interstate transport programs dog owners in and throughout the region must treat their dogs monthly to prevent heartworm infections.⁶ Dr. Edward Dubovi, a professor at the Animal Health Diagnostic Center at Cornell University, estimated that the cost of the 2015 influenza outbreak to dog owners in the Chicago area was between \$25 and \$75 million.⁷" Patti Strand, NAIA President
"It's now or Never, Help Stop Dog Trafficking Now". Footnotes provided by request.

4. Consumer Protection Law issues:

- When we sell a puppy or dog, we include the puppy lemon law right in the bill of sale. The law should cover the unknown for both parties, but responsibility has to shift back to the center on this law so that equal weight for care is placed on seller and buyer. The laws are written as if it's the breeders' fault if anything goes wrong. New Puppy owners can cause things to go wrong soon after the sale.
- Current consumer protection law needs to be re-written. A dog can become clinically ill at the hands of it's new owners in less than 10 days, and a lot can happen in the life of a puppy in 30 days. New proposed consumer protections would extend this time even further out to 45 days

in some places, putting the breeder on the hook for the potentially misguided or inadequate care provided by the new owner. A puppy needs to be cared for like a baby coming home from the neonatal ward, not like its the homecoming queen as is often the case. We provide new owners nearly 50 pages of guidance and instruction because we know that many times, the problem originated with inadequate or untimely care by the new owner which then exacerbates quickly into “the breeders fault”. A change of water, a change of food and too much excitement without rest will run down a puppy immune system and create a clinically ill puppy in 3 days. We have documented three occurrences where new puppy owners sought to defraud us by lying to their vet and the vet defended them.

- There have been consumer protection bills proposed that strengthen the bond of the buyer and seller and spread responsibility fairly. I recommend the [Dog Purchaser Protection Model law](#) legislation from the NAIA.
- I believe consumer protections should be tightened so that rescued and shelter dogs are fostered and rigorously evaluated for months before being offered to the public. People who adopt a rescue should have the same protections as those who purchase a puppy from a breeder or other source. Rescues have no history on their dogs, and many have been abused or neglected. To put these dogs into homes without an established consumer protection law is legislative malpractice. People are further put at risk because those rescues will shame the adopter into keeping and caring for a dog carrying issues that were not disclosed in the adoption. This dog then stands a very high chance of being dumped into the system again, hopefully without passing disease or dog bites/attacks to the poor host family. Take note that a rescue/shelter or otherwise exempt party (44% of the trade) has no such consumer protection responsibility to the buyer, and keep in mind that when someone decides to go to a rescue, they first decided they wanted a pet. Public pressure causes them to go to a rescue, so rescues should know, most people are looking for a pet not a project, and they deserve protections and transparency concerning this potentially troubled dog they bring home.
- We are now “importing meat dogs” from southeast Asia. These dogs have been bred for generations for a trade that is culturally intolerable for us so there is a lot of mis-placed emotion on this newer development. These creatures are raised as livestock (note that they all look similar to each other) and without socialization. What are we thinking by bringing these dogs into our countries as hero’s and distributing them into homes where they may carry disease or violent behaviors? I deeply worry about the blind eye being cast in this direction. Rescues should be held liable for importing diseased or dangerous dogs.

Thank you for the opportunity to share my experiences from what is going on at “see-level” in the industry. I will continue to avail myself as a resource on these issues, specifically to those who want the whole story, beyond chain-link and the accompanying sad song. In the end, any law, regulation, or rule we make should always be with the best interest of all dogs in mind. They should be focused on what is best for the dog first, while we must also be mindful to not overburden the responsible owner, breeder, rescue, shelter, or pet store. If we overburden those that are responsible, we really aren’t looking out for the best interest of the dog after all.

Thank you for reviewing my testimony.

Jonathan Stanley

607-426-9744(cell)

jstanley521@gmail.com (email)