



AMERICAN
KENNEL CLUB®

May 8, 2018

The Honorable Ken Moore
Members of the Franklin Board of Mayor and Aldermen
109 3rd Avenue South
Franklin, TN 37064

RE: AKC Supports Consumer Choice, Urges Caution in Promoting Unregulated Sources of Pets

Dear Mayor Moore and Members of the Board of Mayor and Alderman,

On behalf of responsible dog owners and future dog owners in Franklin, the American Kennel Club (AKC) wishes to share our grave concerns regarding a proposed ordinance that seeks to ban the retail sale of pets obtained from regulated breeders and promote only the sale of pets sourced from shelter and rescue distributors and importers.

The AKC shares your concerns about the wellbeing of all pets. As a not-for profit organization dedicated to the health and wellbeing of all dogs, our clubs operate the largest purebred rescue network in the nation. We advocate for responsible dog ownership and support strong enforcement of the Federal Animal Welfare Act, including the updated 2014 retail pet store rule that requires breeders who sell pets sight unseen or to pet stores to be inspected and meet federal animal welfare requirements.

We are concerned that legislation proposed in Franklin ignores these recent advances and seeks to ban the retail sale of pets obtained from licensed, inspected, and regulated breeders. We are concerned about legislation that would remove from the local markets the most regulated sources of pets, while promoting pets obtained from sources that frequently lack animal welfare oversight.

Likewise, we are concerned that numerous animal shelters, rescue groups, and humane societies are engaged in transporting "rescue" pets to and through Tennessee without obtaining required U.S. Department of Agriculture licensure and/or registration and complying with the regulations thereto. Banning properly-regulated sources of pets in favor of pets from sources that may operate without state or federal oversight is not in the best interest of either the animals or the community.

Further, we are concerned about a growing practice among certain rescue groups to purchase dogs from the same commercial sources they decry, and then transport and resell those pets without required oversight.

Of additional concern, as reported in a 2016 study which surveyed 193 individuals associated with animal shelter and rescue organizations in the U.S., "Only 19% of participants mentioned requiring health certificates, even though most state laws require them for dogs entering their state. As most of the dogs were transported by car, it is important to note that pre-transfer medical requirements, or lack thereof, have the potential to impact not only the destination organizations and their communities, but also the states and regions through which the dogs travel."

We ask you to observe that nothing in this ordinance would limit or prohibit “animal care facilities” and “animal rescue organizations” from purchasing, importing, transporting, and otherwise acquiring dogs for purposes of resale under the guise of “rescue”.

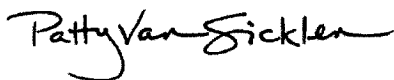
The AKC emphatically supports freedom of choice in selecting a pet. We actively promote efforts to ensure that people understand the demands of responsible ownership and have access to a pet that is right for them. An important part of ensuring the success of a pet with a new owner is to ensure that the animal selected is an appropriate fit with the owner’s lifestyle. Treasured pets may be obtained from a variety of sources, including breeders, pet stores, rescues, and local shelters. However, when consumer choice is limited and a prospective pet owner cannot acquire a pet that is an appropriate fit for their lifestyle, that animal is more likely to be returned to the shelter system.

If Franklin wishes to enact a policy that protects consumers, we encourage you to pursue a policy similar to the one adopted by the State of Connecticut. Their law prohibits retail pet stores or dealers from purchasing animals from any breeder that has been found to have committed a direct violation of USDA animal welfare regulations or three or more indirect violations of USDA regulations related to the health or welfare of an animal in the last two years. These legislative safeguards not only protect animal welfare but also preserve consumer choice and the legal operation of businesses in your community.

In the interests of our shared commitment to the wellbeing of all dogs, the American Kennel Club urges you to oppose any proposed restrictions on the retail sale of pets obtained from regulated sources, especially when such proposal concurrently promotes the acquisition and resale of pets from unregulated and foreign sources.

We would welcome the opportunity to work with you or other stakeholders to develop alternative and more effective solutions to reduce shelter intakes, expand responsible dog ownership and promote responsible pet choice in Franklin. Please do not hesitate to contact me or another member of the AKC Government Relations team at 919-816-3720 or doglaw@akc.org if you have questions or we may be of assistance.

Sincerely,



Patty Van Sicklen
Regional Manager, AKC Government Relations

Founded in 1884, the American Kennel Club (AKC) is a non-partisan, not-for-profit purebred dog registry dedicated to promoting responsible dog ownership, advocating for dogs as family companions, advancing canine health and well-being, and working to protect the rights of all responsible dog owners. The AKC represents more than 5,000 dog clubs nationally, including 92 clubs in Tennessee. In 2017, the AKC licensed and sanctioned 328 events in Tennessee in which more than 49,000 dogs participated.