

## WASHINGTON DC PERSPECTIVE

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### **TOP 10 REASONS WHY ALL RESPONSIBLE BREEDERS SHOULD “CONDEMN SUBSTANDARD KENNELS:”**

**10. It’s the TRUTH!!!** And it’s true because responsible breeders care about their animals’ health and welfare, and are appalled when they read or hear about deplorable conditions in an isolated, substandard kennel that is used to discredit the other 99.9% of the truly responsible breeders.

**9.** Responsible breeders need to “Tell Their Story,” instead of letting the malicious lies and half-truths go unanswered. **And by condemning “substandard kennels,” responsible breeders will enhance their credibility when they “Tell Their Story.”**

**8.** “Silence,” as reflected by the absence of a growing chorus of “condemnations,” **allows those who spin the “half-truths” and lies to get away with what they are saying,** which has created the perception in the minds of the Public and Elected Officials that any responsible breeder who sells his or her puppies through pet stores or over the internet is a “PM.”

**7.** Most Elected Officials at the Federal and State level have bought into the idea that breeders are “PMs” because **they hear the half-truths over and over again, which is “quietly” reinforced by assertions that “if they really cared about their animals, they would condemn bad breeders, and since they don’t make such a condemnation, they obviously are all bad.”** That is but one example of the misrepresentations being made by the “DISTORTION MILLS!”

**6.** Public condemnations of substandard kennels by responsible breeders DO NOT, I REPEAT, DO NOT HURT THEM AND SUCH CONDEMNATIONS IMPROVE THE CREDIBILITY OF RESPONSIBLE BREEDERS! For example, three years ago, Senator Santorum was the “champion” of the HSUS, and had repeatedly sponsored Bills that would have crippled the breeder industry. He had introduced the PAWS Bill (which came before the PUPS Bill), and he was considering the request of the HSUS to add a breeding limitation to the PAWS Bill. However, when he learned of the MPBA condemnation of substandard kennels, he did the following three things:

- He issued a Press Release in which he acknowledged that the vast majority of breeders were responsible breeders who truly cared about the health and welfare of their dogs.
- He stopped using the “PM” phrase, and never again used it.
- He resisted HSUS pressure to add the breeding limitation, and then he stopped pushing the PAWS Bill and allowed it to “die.”

**That was the POWERFUL RESULT OF A SINGLE CONDEMNATION, AND THAT REPRESENTS THE POWER OF CREDIBILITY.** Just think of how powerful the credibility of responsible breeders could become if the chorus of public condemnations was significantly increased!!!!

5. Responsible breeders need to reinforce their credibility, as never before, and they may do so by publicly condemning substandard kennels and putting HSUS on the defensive - - **YES, PUT HSUS ON THE DEFENSIVE!** For example, multiple condemnations could result in Elected Officials asking HSUS and other animal protection and rights groups: *“Since responsible breeders have condemned substandard kennels, why do we need to make the changes in laws that you are urging?????”*

4. **Public condemnations will slow down the full court press of HSUS**, which is bragging about how it has successfully orchestrated 225 new laws at the State Level, and has enlisted the support of the Georgetown Law School to help it in its crusade to put all responsible breeders out of business.

3. **If HSUS and other animal protection and animal rights groups are not confronted with the need to “Tell the Whole Truth, and Nothing But the Truth,” their influence with Elected Officials will continue to grow, and the credibility and influence of responsible breeders will continue to diminish.** Multiple condemnations would become a major part of the **“WHOLE TRUTH!”**

2. If the echoing chorus of public condemnations by responsible breeders grows louder, **it will allow responsible breeders to put HSUS on the defensive by asking over and over again:** *“Since responsible breeders are uniformly condemning substandard kennels, why has the HSUS never publicly condemned those who violate the “Animal Enterprise Terrorism Act?” Does its “silence” and lack of condemnation of acts of terrorism that are prohibited under this Act mean that they support such acts of terrorism?????”*

**1. IF RESPONSIBLE BREEDERS DO NOT UNIFORMLY JOIN IN THE CHORUS TO PUBLICLY CONDEMN SUBSTANDARD KENNELS, THE PROBABILITY OF RESPONSIBLE BREEDERS BEING DRIVEN OUT OF BUSINESS AS A RESULT OF INCREASINGLY UNREALISTIC, OVERLY RESTRICTIVE AND PUNITIVE BREEDING LAWS WILL DRAMATICALLY INCREASE.**

A public condemnation of a substandard kennel can be less than 50 words, but those few words will have the power to “move mountains” and slow down the growing momentum of HSUS. The following language is what I recommend to be used in any public condemnation:

*“The (Name of Breeder Group) condemns all substandard kennels which reflect poorly on the vast majority of responsible breeders who have demonstrated by their actions that they are in compliance with existing animal welfare laws and regulations, and that they truly care about the health and welfare of their animals.”*

**HSUS’ 100 POINT CHANGE AGENDA FOR ANIMALS:** To date, this is the most ambitious, aggressive and **invasive** agenda that HSUS has ever undertaken. It is focused not just on the Department of Agriculture, but on just about every other Department in the Federal Government. Specific Offices that are “targeted” by HSUS include **The White House; the Departments of Justice, State, Defense, Transportation, Commerce, Education, Treasury, Interior, Housing and Urban Development, Health and Human Services, the Environmental Protection Agency, the Consumer and Product Safety Commission, the Federal Trade Commission, and even the U.S. Postal Services!** How far reaching are these 100 initiatives? They range from establishing an **“Animal Protection Liaison in the**

White House” to prohibiting the U.S. Navy from conducting training exercises that are essential for protecting the “national security” of the U.S. And according to the HSUS 100 Point Agenda, the new version of a “PUPS” Bill will include an explicit limitation on how often a dam may be bred. Yet another reason for a public condemnation in order to increase resistance to the “steamroller” efforts to put responsible breeders out of business in 2009!

**APHIS’ PROPOSED REGULATION THAT WOULD REQUIRE BREEDER CONTINGENCY PLANS FOR NATURAL DISASTERS MAY GO BACK TO THE “DRAWING BOARD!!!!”:** As

a result of a series of communications that I had with representatives from the Small Business Administration (SBA), the SBA Office of Advocacy sent a letter to the APHIS Administrator which highlighted flaws that SBA strongly recommended be considered. The contents of the letter can not be ignored by APHIS, which means APHIS must address at least nine shortcomings in its proposed regulation. The following extracts from the SBA letter highlight the most significant shortcomings that simply cannot be ignored:

- **“APHIS is not in compliance with . . . , and (APHIS) does not have a factual basis for assuming the costs would be minimal for the affected entities (breeders).”**
- **“APHIS could have done a better job of gathering data . . . .”**
- **“APHIS fails to address and analyze any costs associated with evacuation of animals, backup sources of water and power, etc. Additionally, the rule fails to analyze what types of equipment or supplies might have to be purchased immediately in order for affected small entity facilities to be equipped to handle an emergency evacuation should the occasion arise.”**
- **“(APHIS) is required to publish a compliance guide pursuant to Section 212 of the Small Business Regulatory Enforcement Fairness Act.”**

In light of these comments, I anticipate that APHIS will either withdraw the Proposed Regulation, or publish an amended Proposed Regulation, which will require a new public comment period and greater scrutiny from the Office of Information and Regulatory Affairs (OIRA). Significantly, OIRA has the authority to stop the publication of any regulatory regulation!