

## **Summary of HSUS and ASPCA Recommended Changes to USDA Dog Breeder Regulations**

A joint petition was submitted to the USDA and its Animal and Plant Health Inspection Service (APHIS) on behalf of the HSUS (Humane Society), the HSVMA (Humane Society Veterinary Medical Association) and the ASPCA requesting “necessary enhancement to existing regulatory restrictions on the inhumane treatment of dogs living in dealer housing facilities.” Ten deficiencies in current federal regulations are identified and proposed solutions are recommended.

The USDA has minimum standards of care and treatment for dogs bred for commercial sale. The standards are quite minimal. The humane groups are advocating for changes regarding 1) physical conditions at commercial breeding facilities, including the size, stacking, flooring of cages and temperatures inside the cages and 2) canine health and welfare in commercial breeding facilities, including access to exercise areas, socialization, breeding practices, preventive care, grooming, access to potable water and treatment of retired dogs.

The petition states that the changes are a result of discussions with pet industry representatives and pet stores coming to the table to negotiate with HSUS and ASPCA due to the “wave of ordinances at the local level banning or greatly restricting the retail sale of puppies.”

A summary of the current problems and proposed solutions are detailed below.

### **1. Flooring of cages**

**Problem:** Current commercial breeding facilities house dogs in primary enclosures with wire or gridded flooring causing severe emotional and physical distress for dogs who spend their entire day locked in cages.

**Solution:** Primary enclosures should have solid or slatted floors and only allow plastic-coated wire flooring if that type of flooring covers space that *exceeds* the minimum mandatory space allotment for each dog.

### **2. Size of enclosures**

**Problem:** Dogs can be kept in small cages for their entire lives or are packed in enclosures with other dogs. Scientific understanding of dogs’ needs has grown and now shows dogs need larger enclosures to stay healthy, mentally and physically.

**Solution:** Primary enclosures should be at least two times the currently mandated enclosure size.

### **3. Stacked primary enclosures**

**Problem:** Dealers stack their primary enclosures to maximize the number of breeding dogs they can contain in a facility. Stacking can prevent proper air flow, block light, make cages difficult to clean, hinder or eliminate access to exercise areas and limit the ability to monitor and access dogs. Stacking can promote the spread of diseases and allow feces and urine from higher cages to fall onto the dogs in the lower enclosures.

**Solution:** Prohibit stacking of primary enclosures.

#### 4. Exposed temperatures

Problem: Dogs kept inside or in sheltered facilities only need to be protected from extreme temperatures. Current regulations allow temperatures to fall below 45 degrees or rise over 85 degrees for up to four hours at a time.

Solution: Eliminate the four-hour rule and require dogs be kept in temperatures between 45 to 50 depending on the breed and 85 degrees.

#### 5. Inhumane breeding practices and unlicensed practice of veterinary medicine

Problem: Female dogs are bred as early and as often as possible to maximize their number of puppies and profits. Dogs are not screened for hereditary defects that can cause generations of dogs with unchecked hereditary defects causing painful lives and early death. Commercial breeding facilities often allow personnel without veterinary training to perform surgical births, despite existing prohibitions under some state laws. Such surgeries can lead to pain, infections and death.

Solution: Limit how often a female dog can be bred; set a minimum breeding age specific to the breed or size of the dog; create a reasonable screening program for known inheritable defects and a prohibition on breeding dogs with significant inheritable or other disabling health defects; establish a requirement that surgical births be performed by licensed veterinarians; and require female dogs be examined on a regular basis for conditions that could be exacerbated by breeding.

#### 6. Lack of preventive care

Problem: Dealers are not required to vaccinate against all recommended diseases or provide preventive veterinary health care.

Solution: Require an annual hands-on exam for each breeding dog and provide all breeding dogs with required recommended vaccinations and preventive medicine to treat heartworm, intestinal parasites and fleas and ticks.

#### 7. Lack of grooming

Problem: Dogs in high volume commercial facilities are rarely, if ever, bathed or groomed. Without proper grooming, certain breeds can face overheating and risks to the health of their skin, fur and feet. A lack of grooming can limit a dog's ability to see or move.

Solution: Dogs must receive grooming, including nail trimming and dental care, at least twice a year.

#### 8. Lack of exercise and socialization

Problem: Dogs in commercial breeding facilities are deprived of any time outside their enclosures to exercise, play or interact with humans or other compatible dogs, causing significant physical, emotional or behavioral problems.

Solution: Require dogs to have unfettered access to exercise areas and meaningful daily socialization with humans and compatible dogs, subject to limited exceptions.

## 9. Treatment of retired dogs

Problem: Breeders can inhumanely euthanize or abandon their dogs that are no longer able to reproduce, even though those dogs may not be close to the end of their natural lifespan. Breeders often do the same with puppies that are too old to sell or have disabilities.

Solution: Require the humane treatment of breeding dogs and unsold puppies through efforts to have dogs adopted or placed with rescue organizations.

## 10. Lack of continual access to potable water

Problem: Regulations do not require that dogs have constant access to water, and do not specify that water may not be frozen.

Solution: Dogs must be provided with continuous access to liquid, potable water.