



**TESTIMONY OF PET INDUSTRY JOINT ADVISORY COUNCIL
BEFORE THE COMMITTEE ON ENVIRONMENT
SENATE BILL 856**

March 9, 2009

As the world's largest pet trade association, the Pet Industry Joint Advisory Council (PIJAC) appreciates the opportunity to offer our views on Senate Bill 856. We have had the privilege of testifying before this committee many times in the past, including on several bills of interest this session. PIJAC represents the interests of all segments of the pet industry throughout the United States, counting among its membership various associations, organizations, corporations and individuals involved in the commercial pet trade. More specifically, we represent pet breeders, pet product manufacturers, distributors and retailers throughout Connecticut who would be directly impacted by this legislation.

As this committee knows, PIJAC is very active in advancing the welfare of pet animals. We provide a highly respected animal care certification program because we wish to ensure that employees in the pet trade are well trained in the care of the animals they sell. But this program is widely utilized not only by persons in the commercial pet trade but also shelters and humane societies throughout the country, and has even been adopted as a statutory standard. PIJAC has worked closely with the USDA on effective implementation of the Animal Welfare Act for pets since its inception over three decades ago, and has joined hands with state and local agencies to ensure adoption and enforcement of appropriate regulatory standards. In addition to our support for appropriate governmental standards for the care of companion animals, PIJAC continually seeks to advance the voluntary implementation of superior standards in the care, handling and transport of companion animals in the pet trade.

PIJAC is also supportive of consumer protection, and believes that prospective pet buyers should be armed with appropriate information about the origin of puppies they are considering acquiring. All prospective pet owners have an interest in this information, irrespective of the source of the dogs.

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We would point out that Senate Bill 856 establishes its mandate relative to “retail establishments” in the state. In the interest of all consumers, PIJAC would suggest that if this measure is to advance that its scope should be broadened to include animals adopted out for a fee (which is, in effect, a retail sale) by private shelters and other nonprofit entities. Prospective pet owners should particularly be apprised of the origins of these animals when nonprofit entities import dogs from out-of-state for the purpose of selling them in Connecticut.

It is important to note that the requirement to post information about the origin of puppies for sale by pet stores is already mandated by regulation. The Department of Agriculture also relies on the information pet stores must maintain in order to track complaints about puppies that manifest illness or some other adverse condition. Thus, as to pet stores, SB 856 is superfluous.

That said, there are legitimate concerns about the manner in which this bill is currently crafted. The measure provides that dogs under a year of age must be accompanied by a “certificate of origin.” However, neither this bill nor established law defines what that certificate is. Who produces the certificate? Is it required to have certain dimensions or properties? What specific information must it contain? PIJAC respectfully suggests that the bill in its present posture is far too ambiguous to reasonably apprise regulated entities of how to comply.

Establishment of any requirement to post information on or near primary enclosures for puppies should be undertaken with prudence, because there are significant sanitation problems that can arise as a result. Additionally, there are severe space limitations involved.

PIJAC believes that existing regulatory requirements, vis-à-vis pet stores, are completely sufficient to fulfill the purposes of this legislation. If this committee determines there is a need to codify such requirements in statute, we would urge that you amend the bill to conform to the existing regulatory mandate, rather than adopt a new standard that would essentially require pet stores to post duplicative signage in an area for which very limited space is available.

Finally, we must question the appropriateness of a penalty that includes imprisonment for could easily constitute a minor error or oversight. Certificates could be ripped down by customers, or otherwise inadvertently displaced or destroyed in individual cases. To subject someone to possible imprisonment for such an eventuality seems punitive in the extreme.

While we commend the intent behind this bill, PIJAC believes that it is unnecessary in light of existing requirements, and that as now drafted suffers a host of problems. Accordingly, we urge the committee not to advance Senate Bill 856.

Thank you greatly for your consideration of our concerns!

Respectfully Submitted,

Pet Industry Joint Advisory Council
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