



USDA's proposal to schedule appointments in order to inspect dog breeders is part of the Agency's continuing effort to increase the dog breeders' compliance rate with the Animal Welfare Act (AWA). This is an attempt to heighten the reputation of the commercial dog breeding industry. In this endeavor, USDA has implemented the "teachable moment" policy and self-reporting policy. USDA has even proposed that third parties such as the AKC and other industry groups perform inspections of dog breeders for USDA. Since that proposal was met with such an outcry from the public, USDA is now considering **announced** inspections to help the breeders increase their compliance rate.

It is USDA's desire to help the industry fight back against state and municipal laws prohibiting pet stores from buying dogs from breeders with numerous or serious violations. It is also intended to provide ammunition for the industry in their efforts to fight laws banning pet store sales of puppy mill dogs. Maryland has now joined California by enacting a state-wide ban on the sale of dogs in pet stores in addition to over 250 localities nationwide that have banned the sale of puppies. In response, USDA wants to be able to assert that over 90% of breeders are PERFECT (no non-compliant items on inspection reports) and therefore no need for further restrictions on pet stores selling puppy mill puppies. There is certainly no better way to increase compliance rates than by scheduling inspections in advance thereby providing breeders an opportunity to clean-up the facility and improve living conditions and to conceal sick and injured animals.

USDA is deeply committed to obstructing all local laws that might halt the sale of dogs that originate from cruel puppy mills. **USDA has repeatedly affirmed that "We need to enable breeders to sell their dogs to pet stores and violations are an impediment to such sales."**

Secretary Perdue needs to recognize that it is not USDA's mission to help substandard dog breeders oppose state and municipal laws, and in many instances, to circumvent existing laws. **Ironically, the only reason local government has become involved with puppy mills is because of USDA's failure to effectively enforce the Animal Welfare Act.**

If USDA truly wants to increase the compliance rate of dog breeders, the agency should **vigorously and effectively enforce the Act** thereby giving breeders an incentive to comply with the law and its regulations. Hiding inspection reports from the public and calling violations "teachable moments" and allowing self-reporting sends the message that non-compliance is acceptable and only incentivizes non-compliance. Giving advance notice of inspections would eliminate almost all incentive to provide adequate care year-round. **Unfortunately, USDA is more concerned about public relations and appearances than they are about the welfare of the animals that they are charged with protecting.**