



# NATIONAL ANIMAL INTEREST ALLIANCE

*Supporting the people who care for America's animals*

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June 24, 2010

The Honorable Paul Luebke  
Senior Chairman, House Finance Committee  
Sent Via Email: Paul.Luebke@ncleg.net

Letter in opposition to SB 460 as currently drafted

Dear Chairman Luebke and Committee Members:

I am writing on behalf of the North Carolina members of the National Animal Interest Alliance (NAIA) in opposition to SB 460, a seriously flawed bill that will come before your House Finance Committee in the near future.

NAIA is a national educational organization, whose role is to provide a moderate, balanced, fact-based perspective within the animal welfare debate. We are proud to represent a variety of animal interests including organized dog and cat enthusiasts, agriculture, medical research, veterinary medicine, wildlife management and pet owners in North Carolina and across America.

While our members support the basic goals of SB 460, they oppose the bill as it is currently written because its definition of a commercial breeder is overly broad and imprecise. As currently drafted many purebred dog enthusiasts who hunt, train or participate in other canine sports would be inappropriately classified and regulated under that category.

Many kennels that are maintained for hunting dogs and other canine sports breed dogs primarily to maintain bloodlines that are valued for their working ability, their good health and dependable temperaments. These breeders have an enthusiast's orientation rather than a commercial one. Their primary interest is to preserve and improve their breeds and to test their ability in shows and trials.

Many of the medium and large sized breeds, including many used for hunting have litters of 10 or more puppies. Under your current definition such hobbyists would be branded as commercial if they bred only three litters a year to preserve their bloodlines and traditional sports and maintained large kennels.

Regulating such breeders as commercial is in conflict with the bill's stated goals and legislative findings and would have unintended fiscal consequences that far outweigh the bill's goals.

Here's why. Although these enthusiasts are not commercial themselves and often lose money pursuing their goals, the result of their labors brings 10's of millions to North Carolina in the form of fees and tourism dollars each year, not to mention their enormous impact on the hunting and pet industries in the state. No amount of fees collected could replace the lost revenue caused by inappropriate application of commercial regulations to these non commercial parties.

Please think carefully before applying regulations to anyone based on their *potential to engage in a particular activity* rather than *their actual, known participation in that activity*. SB 460 assumes that the ownership of 15 intact females coupled with 30 puppies indicates commercial breeding activity, but neither the presence of 30 puppies or 15 or more intact females demonstrates commerciality. Many breed enthusiasts and hunting dog kennels keep their dogs intact whether or not they plan to breed them. They keep them intact while they are growing them out and assessing their potential and they typically retain their hunting and show dogs long after their dog's retirement from the ring or field. Many that are kept intact are never bred. While neutering dogs is a widespread practice in the US, it's still an owner's personal choice. Some dog owners with the time and facilities necessary to prevent unwanted litters view neutering as unnecessary and too invasive to have done routinely, a view widely held in Europe.

NAIA urges a no vote on SB 460 as it is currently drafted. As currently written it will do more harm than good.

Sincerely,

Patti Strand, National Director