

OPPOSITION TO SECTION 111-12, BREEDERS PERMIT AS PROPOSED IN AMENDMENT TO  
CHAPTER 111, PUBLIC SAFETY AND ANIMAL WELFARE ORDINANCES

January 19, 2016

The CT Federation of Dog Clubs and Responsible Dog Owners, Inc. ("CFD"), is a non-profit organization comprised of all breed and specific breed kennel clubs, performance related dog clubs and individual dog owners. CFD and its members are also a part of the American Kennel Club (the "AKC").

CFD respectfully requests that Section 111-12 of the proposed amendment to Chapter 111 of the ordinance of Public Safety and Animal Welfare creating breeding permits for Stamford residents be deleted.

CFD believes that responsible dog owners and breeders in the City of Stamford know, understand and obey laws that apply to them. CFD agrees with AKC's opposition to breeding permits and breeding bans in general. CFD supports reasonable and enforceable laws that protect the welfare and health of dogs. Imposition of new permits and fees only serve to burden responsible breeders and owners who are already in compliance with the City's laws and ordinances and will not likely incentivize irresponsible casual breeders in complying with these new laws.

Responsible breeders are engaged in selective breeding of purebred dogs as opposed to those individuals who participate in unintended or callously disregarded reproduction. Although the proposed language in Section 111-12(A)(7) states that "Breeders who have a kennel license from the Stamford Town and City Clerk do not need a breeding permit" it is not clear from this subsection the requirements to attain a kennel license, nor is it clear what City ordinance regulates the kennel license issuance. We respectfully request that the Committee clarify the current kennel license regulations so that the residents of the City of Stamford may better analyze the effect of Section 111-12 to the current kennel license regulations and to responsible breeders.

In addition to the issue regarding the kennel license as described above, certain requirements and restrictions as set forth in Section 111-12(B) are extremely broad and difficult to impose compliance. Section 111-12(B)(2) states "No breeding shall be granted to a person unless: The applicant has adequate indoor and outdoor space in which to care for the dogs and their offspring." This provision does not specifically define nor specify who makes the final determination of what is an "adequate indoor and outdoor space." The same argument applies to Section 111-12(B)(3), who will determine what defines safe, sanitary, humane and appropriate for a specific breed or species.

We respectfully request that the Committee take these concerns into consideration before moving forward with this amendment. CFD is available and willing to assist the Committee to ensure that the needs and rights of all responsible dog breeders and owners are protected. Thank you.

Respectfully submitted,

Laurie Maulucci, President

Mabel M. Diamond, Legislative Liaison

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