



THE HUMANE SOCIETY
OF THE UNITED STATES

February 16, 2021

Re: [LR30.103](#)¹, Response to American Kennel Club (AKC) letter and AKC-proposed changes to language

Dear Chairman Lee, Rep. Jacobson, and Honorable Members of the Stamford Board of Representatives' Legislative & Rules Committee,

Re: The Humane Society of the United States discourages use of AKC-proposed language because it introduces more vagueness and thus less enforceability for law enforcement:

AKC proposed change	Problem
Section A, paragraph 1: removes definition of “adequate shelter” for dogs who are tethered	Creates vagueness and confusion; limits protections for dogs that are tethered
Section A, paragraph 2: removes definition of “adequate space” for dogs who are tethered	Creates vagueness and confusion; limits protections for dogs that are tethered
Section B (4) (f): added “keeper” to HSUS’s proposed addition	“Keeper” is vague, and typically refers to caretakers of community cat colonies, not dogs
Section B (4)—AKC added (g)	Not needed, already in state law (adds confusion)
Section B (8) – AKC added (8)	Creates vagueness, especially after weakening definitions in Section A pertaining to definition of adequate shelter and adequate space

The AKC has a long history of working to stop advancement of animal welfare bills (see Appendix A). The AKC has partnered with the Calvary Group and the American Dog Breeders Association, which has historical ties to dog fighters. A few years ago in Connecticut, the AKC was one of the major forces opposed to fighting puppy mill traffickers in our state. Indeed, the very language being proposed by Rep. Jacobson is from the statewide law that the Virginia state legislature saw fit to pass despite strong opposition from the AKC.

In the letter submitted to this legislative committee dated January 27, 2021, the AKC offers the faulty logic that some dogs are who are “escape artists” require tethering. If a dog is continuously trying to escape from a fenced yard, it might be because he is bored or anxious. Often dogs who

¹ <http://www.boardofreps.org/lr30103.aspx>

try to escape have been left alone for long periods, lack enrichment in their environment, and are not taken on walks or engaging with their owner regularly. Typically, escape issues can be addressed by expanding their dog's world: take him for more walks, bring him inside, teach him commands and tricks, and rotate his toys. Tethering an already bored or anxious dog would only enhance these behaviors.

Further, dogs who are tethered for long periods of time are more likely to develop aggressive behaviors than those who are not. Dogs feel naturally protective of their territory; when confronted with a perceived threat, they respond according to their fight-or-flight instinct. A tied dog, unable to take flight, resorts to fight, attacking any unfamiliar animal or person who unwittingly wanders into his or her territory. Tragically, the victims of such attacks are often children who approach the dog unaware of the risks. Furthermore, a tethered dog who finally does get loose from his chains may remain aggressive, likely to chase and attack unsuspecting passersby and pets because s/he has developed severe behavior problems from the long-term, intensive confinement.

We acknowledge that not all dog owners have the means to build a fence to allow their dog to roam freely. In these cases, dog owners should consider taking their dogs on frequent, regular walks, and keeping them inside with their family at other times. Additionally, local fence-building groups exist across the country and may be able to offer free or low-cost fences to low-income dog owners.

Chronic tethering is not humane confinement. Continuously tethered dogs commonly endure physical ailments as a result of being continuously tethered. Their necks can become raw and sore, and their collars can painfully grow into their skin. They are vulnerable to insect bites and parasites, and are at high risk of entanglement, strangulation, and harassment or attacks by other dogs or people. Tethered dogs may also suffer irregular feedings, overturned water bowls, inadequate veterinary care and exposure to extreme temperatures. During snow storms or extreme cold, these dogs often lack access to adequate protection from the precipitation and freezing winds. During periods of extreme heat, they may not receive adequate water or shelter from the sun. Law enforcement officers often report that owners who chronically chain their dogs are less likely to clean the area of confinement, causing the dogs to eat and sleep in an area contaminated with urine and feces. What's more, because their often neurotic behavior makes them difficult to approach, chained dogs are rarely given even minimal affection. Tethered dogs may become "part of the scenery," forgotten by their families.

In their letter, the AKC invites the comparison between a chihuahua and St. Bernhard to exploit the common misconception that dogs' fur enables them to withstand extreme cold. In fact, dogs of any breed who are exposed to extreme cold for long periods of time can and do suffer from hypothermia or death. Exposed skin like the nose, ears, and paw pads are highly susceptible to frostbite and can be permanently damaged, regardless of breed. The American Veterinary Medical Association (AVMA) recommends that dogs, even thick-coated arctic breeds, should not be left outside during below freezing weather, and especially not without shelter that allows the dog to maintain normal body temperature.

The language as it stands – without changes from the AKC -- creates clear, objective criteria that would serve both dog welfare, public safety, and enforcement of laws.

We agree with the AKC recommendation that a reference to CGS 22-350a, which provides exemptions for tethering (e.g., groomers), may be appropriate.² CGS 22-350a reads:

“The provisions of subdivisions (1) and (2) of this subsection shall not be construed to apply to: (A) Any veterinary practice licensed pursuant to section 20-197 that tethers a dog in the course of such veterinary practice, (B) any exhibition, show, contest or other temporary event in which the skill, breeding or stamina of such dog is judged or examined, (C) any exhibition, class, training session or other temporary event in which such dog is used in a lawful manner to hunt a species of wildlife during the hunting season for such species of wildlife or in which such dog receives training in a lawful manner to hunt such species of wildlife, (D) the temporary tethering of a dog at any camping or recreation area as expressly authorized by the Commissioner of Energy and Environmental Protection, or (E) the temporary tethering of a dog at a grooming facility in the course of grooming such dog.”

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Annie Hornish".

Annie Hornish

Connecticut State Director, The Humane Society of the United States

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² https://www.cga.ct.gov/current/pub/chap_435.htm#sec_22-350a