

Date: March 20, 2025

To: Senator Putnam and Members of the Agriculture, Veterans, Broadband and Rural Development Committee

From: Elaine Hanson, Legislative Liaison, Minnesota Pet Breeders Association

This letter highlights the most prominent reasons why SF1029 is unnecessary, inadvisable, and unreasonably intrusive into the private business details of licensed commercial dog and cat breeders.

No one who raises selectively chosen, health-tested purpose-bred dogs or cats is denigrating shelters that import thousands of unowned, unwanted dogs (and dozens of cats) of unknown backgrounds from random sources to be sold to Minnesota consumers without warranties. We do have concerns about the diseases and parasites they sometimes bring along to share with our home-grown dogs, but we are working with the Board of Animal Health to address that more effectively.

Questions have been raised as to why licensed breeders' addresses and other sensitive data were classified as private or nonpublic when this law was passed. Requiring owners of businesses involving pet animals to disclose their addresses and pet inventories to the public, rather than just to potential customers they have screened, makes breeders and their property vulnerable to damage, theft, breach of biosecurity measures, and physical attacks by intruders. Several of our members have woman-owned businesses, and it is common knowledge that women are perceived as easier targets for criminal behavior. Some statements are included with this letter.

Saying that public disclosure of breeders' records will level the playing field, since shelters' data are already public, is a false comparison ("kennels" as used in this statute refers to animal shelters). This provision is a problem looking for a solution. No one is clamoring to see shelter data; many shelters already publish much of it on their websites and annual reports. Requiring the Board of Animal Health to publish it will not enlighten the public about what nonprofit animal shelters do; that is already known for the most part, and what is not self-published is required by the IRS on their 990 reports.

By contrast there are several often-stated reasons why certain groups (generally not animal shelters) want to see breeders' data.

- *"The public has no way of knowing who the bad breeders are because we don't know what violations they have committed and whether they were resolved."* Please see attached summary data from the Board of Animal Health regarding breeders' violations of environmental and care standards. Many are not aware that the standards of care and environmental requirements are essentially the same for shelters and breeders – note that this is a Pass/Fail yardstick; there is no Good-Better- Best or other grading system. Either an inspected facility meets a standard or it doesn't, and if it doesn't, there will be a Notice of Violation and a Correction Order and reinspection to confirm it. If a breeder is not meeting standards, they will no longer be "in good standing" and not on the list published by the Board on its website.
- *"To tell the public who they should not buy puppies from."* The Board's summary data on violations by licensed breeders states that of 31 violations cited in a two-year period, ZERO were violations that jeopardized the health or welfare of animals.

- *“To help consumers who bought unhealthy puppies/kittens from breeders.”* See attached explanation of Minn Stat 325F.791, the “Puppy Lemon Law”. Consumers are protected by warranties that require replacement, reimbursement or refund in the event a pet is found to have been “unfit for sale” at the time of purchase due to undisclosed health issues or omission of other documentation. Nonprofit pet sellers are exempt from such obligations.
- *“To help with enforcement of cruelty laws and breeder regulations by telling law enforcement when a breeder has too many dogs and where to look for violations.”* There are several variations on this theme. The Board is responsible for making such determinations, and has been doing so successfully for ten years, up to and including revoking the licenses of the few breeders who persisted in noncompliance with licensing standards.

We are also opposed to the requirement to post a list of those whose licenses expired. This provision exposes the most basic of motives for this legislation: the opportunity to smear even formerly licensed breeders (who may still be breeding pets on a smaller scale) based on no adverse information whatsoever. The anti-breeding groups can freely peddle their imaginary reason as “breeder let license expire so they would not be monitored and required to care for animals properly.”

Finally, the claim that it would be necessary, and comparable to other businesses, for licensed breeders to disclose data such as street address, “product” inventory, and husbandry practices is not, in fact, a valid comparison. Other businesses, for example, are not typically:

- subject to campaigns of rumored misdeeds, harassment, theft, violence and other criminal behavior
- required to have regulators publicly display documentation that professional standards are met, or violations cited
- named on a public list as professionals who have retired, relocated or are banned from that business

Among professions proponents inappropriately compare commercial pet breeders to, many would not be seen as jeopardizing human health or quality of life if they failed to meet professional standards, and could, like licensed breeders, be faulted for technical violations that would not suggest they are “bad actors” in their profession.

Further, the Board of Animal Health, the administrative agency for licensing and monitoring animal enterprises, will provide summary data showing categories of failure to meet standards on request (note there were ZERO in the past two years that would affect the health and welfare of animals in their care). The Board also publishes, as required, a list of licensed breeders “in good standing”; those listed have been found to meet licensing standards.

For these reasons, the Minnesota Pet Breeders Association emphatically opposes SF1029, and requests that you vote No on the motion to approve it.