



New York State Conservation Council Inc.
8 East Main Street, Ilion, New York 13357-1899

MEMORANDUM IN OPPOSITION

Providing for the registration and regulation of dog breeders and setting standards for the care and breeding of dogs and puppies.

The NYSCC is concerned that the proposals put forward attempt to impose a one-size-fits-all regulatory structure to a field that is comprised of practitioners with significantly different objectives, standards and operating practices.

The law of unintended consequences comes into play. While the sponsors may have a clear idea of the problem they are attempting to address, the ramifications for other entities that are, at best, barely related to their intended target are arbitrary and serve no purpose.

The stated targets of this legislation are "puppy mills" whose principal objective is to produce large volumes of puppies as cheaply as possible. The sponsors' chosen method is to establish a regulatory structure designed to micro manage the industry into compliance with detailed statutory standards. Such an approach is nonsensical when applied to sporting dog breeders whose objective is the whelping of a limited number of sound, healthy animals.

The rigid requirements specified in these proposals are often in conflict with the established best practices in the breeding and training of sporting dogs. These include flexible feeding schedules and exercise routines. Sporting dog breeder practices are tailored to the requirements and capabilities of each dog, not an arbitrary schedule.

Any additions or changes to existing law must reflect these night and day differences. Regulation is best left in the hands of local authorities who are cognizant of the activities which they are overseeing and fully capable of providing adequate oversight.

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