These increasingly stringent breeder requirements are already causing bad breeders to either go out of business entirely, or continue to breed animals without a USDA license. Anecdotal evidence points to many "rescue" animals coming from these unlicensed sources, which in some cases even get paid for these animals to feed the rescue demand. Incidentally, last year in CT, registered non-profit rescue groups sold or adopted more than double the number of imported dogs sold by pet shops, while municipal shelters adopted/ sold dogs outnumbering dogs sold by pet shops too. Where do all those dogs come from? Out of state breeders, shelters and more. CT does such a great job that we have to import dogs to feed consumer demand for shelter dogs and rescues.

Assuming we all truly care about animals and their sourcing, let's all agree to support the Department of Agriculture's initiative to mandate that all dogs being imported into the state be micro-chipped. That way we can monitor not only the source of the animal, but track her age, and see if she spends her life in her forever home or elsewhere.

With the states of origin for pet shop dogs being much more regulated by those states of origin, along with stricter USDA enforcement, much of the problem of CT pet shop dogs coming from inhumane sources is diminished.

Despite information that supports that pet shops are well regulated and supplying healthy animals to consumers.... there is still something we all CAN do here in the spirit of working together and compromise. We all love animals and we all want to see the bad breeders put out of business! Using the public USDA inspection reports, let'sdentify the bad breeders and black list those that have Direct Violations (USDA violations that have a high potential to adversely affect the health and well-being of the animal), and forbid CT pet shops to buy from them, until such a time as they have an inspection without any direct violations.

Laura "Peach" Reid Fish Mart Inc. 28 Richards Street West Haven, CT 06516

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# USDA Animal Care Provides Its Inspectors With New Guidance for Conducting Inspections

USDA Animal and Plant Health Inspection Service sent this bulletin at 12/02/2013 02:42 PM EST



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At USDA Animal Care, we are continually looking to improve the way we administer the Animal Welfare Act and help ensure that all of our methods and processes uphold the intent of the federal regulations. The information that follows is intended to inform you of some changes we are making that will affect certain inspections and our publically-available inspection reports.

We have provided our inspectors updated procedural guidance on the following topics: documenting attempted inspections; taking photographs during pre-license inspections; conducting inspections inside a residence; and documenting citations on inspection reports. More specific information can be found in the updated Inspection Guide, posted on our website:

http://www.aphis.usda.gov/animal\_welfare/downloads/Inspection%20Guide%20-%20November% 202013.pdf.

### Documenting Attempted Inspections

Our inspections of regulated facilities under the Animal Welfare Act are unannounced. This, of course, provides us with the most genuine picture of how a particular facility is caring for its animals. An *attempted* 

*inspection* occurs when an authorized person is not available to accompany our inspector into a facility; thus, **no** inspection is conducted. To reduce the number of attempted inspections that occur each year, our inspectors will ask facility operators to identify a range of optimal inspection times for when authorized individuals will be available. If we attempt to inspect a facility during those optimal times and an authorized individual is not available, our inspector will cite this on the inspection report as a noncompliant item.

### Taking Photographs During Pre-license Inspections

Our inspectors will no longer take photographs of non-compliant items found during *pre-license* inspections. Reason being, during routine inspections of already-licensed facilities, those licensees are already expected to understand and abide by the standards and regulations, so we take photographs as a visual way to document their non-compliant items. *Pre-license* inspections, in contrast, are intended to provide an educational opportunity for applicants to learn about the standards they must meet in order to obtain a license.

#### Conducting Inspections Inside a Residence

We anticipate an increased number of licensees that breed and raise dogs and cats inside their residence. Although the minimum standards of housing and humane care apply to all types of facilities, we recognize that inspecting dogs and/or cats that are being kept and/or bred inside the home of a licensee or applicant can be different. So, we have provided new guidance to our inspectors regarding how to apply the standards to residential breeding operations. Guidance topics include: restricting photographs to only those areas that house animals; wearing clean boots or shoe covers; and being careful not to intrude in areas unrelated to the licensed activity. Inspectors have been advised to call their supervisors if they have any questions.

## Documenting Inspections on Inspection Reports

Previously, our inspectors were instructed to include the entire section of the Animal Welfare Act regulations when citing particular non-compliant items on inspection reports. However, this could be misleading in instances when the section in question contains multiple types of possible non-compliant items. Under our revised guidance, our inspection report narratives will be more specific. Inspection reports will now include the following information: 1) the citation for the most pertinent subsection of the regulations (as opposed to the full section); 2) a clear, detailed description of the non-compliant item; 3) an explanation of why the item is being cited as non-compliant and/or the impact the item is having on the animal(s); and 4) a deadline for when the non-compliant item needs to be corrected along with a general description of how the licensee/registrant can correct the item.

At USDA Animal Care, ensuring the welfare of the animals we regulate is at the heart of everything we do.



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