



MICHIGAN UNITED CONSERVATION CLUBS

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House Committee on Regulatory Reform

House Committee on Appropriations

Wednesday, October 21, 2015

Re: HB 4898 (H-2) and HB 4915

Dear Representatives,

Michigan United Conservation Clubs and our affiliate, the Michigan Hunting Dog Federation, have concerns with certain parts of HB 4898 (H-2) and HB 4915. If these issues could be addressed through amendments to the bill, we will be neutral on the bills.

HB 4898 (H-2)

HB 4898 (H-2) pertains to the issue of large scale dog breeding kennels, sometimes referred to as "puppy mills." Unfortunately, our responsible members who keep and may breed dogs for hunting purposes are often swept in with the more problematic puppy mills. We have been discussing possible amendments with the Michigan Humane Society.

In the definition of large scale dog breeding kennel, it says "FOR THE PRIMARY PURPOSE OF BREEDING." This is language that we requested and support. But the concern is that this is not defined anywhere and our dog owners are worried about regulators harassing them when the dog owner may have more dogs than the definition's threshold, but have no intent to breed that many females. For example (however unlikely, but to illustrate), a person has 10 intact female dogs (small scale) and now has 8 female puppies. This breeder decides to keep the puppies to train them and sell them as started dogs at 2 years-old, but never intends to breed them or 4 of the adult females ever again.

As an affirmative defense, we would like the addition of language to help define "for the primary purpose of breeding" in line with the following suggestion.

- Sec 9C (The records shall include all the following:),
"F. BREEDING RECORDS OF EACH FEMALE INTACT DOG THAT INCLUDES THE APPROXIMATE DATE(S) THE DOG WAS BRED AND THE BIRTH DATE(S) AND SIZES OF EACH LITTER, SINCE THE TIME THE DOG WAS AT EACH PHYSICAL LOCATION. INTACT BREEDING FEMALE DOGS HOUSED OR KEPT FOR THE PRIMARY PURPOSES OF BREEDING SHALL MEAN DOGS BRED WITHIN ONE OF THE LAST THREE YEARS AS DEMONSTRATED BY DOCUMENTATION FROM THE DOG OWNER OR BREEDER UNDER THIS PART"

This would allow small scale dog owners/breeders (who are not the intended subject of this law) to show MDARD records that they will need to consider when trying to regulate/bring enforcement action to the owner under this law.

In addition, there is a need for a clarifying addition on Page 8, Sec 6 (4)

- (4) THIS ACT IS NOT INTENDED TO APPLY TO A DOG OWNER OR BREEDER THAT HOUSES 15 OR FEWER INTACT FEMALE DOGS ***FOR THE PRIMARY PURPOSE OF BREEDING.***

With this change and the addition of the other language to help define the primary purpose of breeding, MUCC and the Michigan Hunting Dog Federation will be neutral on HB 4898.

HB 4915

The MI Hunting Dog Federation and MUCC have concerns with the minimum 4-day holding for dogs without traceable evidence of ownership and would like to see a 7-day minimum on all dogs. Commonly, hunters travel to different parts of the state to hunt with their dogs and if a dog does get away, it may be difficult to immediately know the correct local agency to inquire about a missing dog. MUCC and MHDF are also currently working with a Representative on drafting a bill making it illegal to remove a dog's tracking collar or identification. There have been many instances where people who dislike hunting with dogs remove the tracking collars, and/or break them making it difficult to find these dogs.

However, we would be willing to live with language that simply amends the definition of "holding period" to the following (and elsewhere in the bill as needed):

- Page 3, Line 18-19 and Lines 24-25; Page 4. Lines 4-5: to...The holding period begins ~~at the time~~ "THE NEXT BUSINESS DAY AFTER" the animal is admitted.