



THE CAT FANCIERS' ASSOCIATION, INC.

World's Largest Registry of Pedigreed Cats

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Chairman Vincent C. Gray
Council of the District of Columbia
John A. Wilson Building
1350 Pennsylvania Avenue, NW
Washington, DC 20004

Attention: Dawn Slonneger, Chief of Staff

Re: B17-089; The Animal Protection Amendment Act of 2008 – OPPOSE certain sections

Dear Chairman Gray;

The Cat Fanciers' Association has only been made aware of the revised B17-089 a few days ago. We wrote a letter and provided testimony in June 2007. We realize this bill is now substantially modified, however; we still have concerns with several provisions that would negatively impact cats. We strongly request that these be removed.

CFA¹ was founded in 1906 and is the largest registry of pedigreed cats in the world, with member clubs throughout the United States, Canada, Japan, Europe, China and other areas. Our organization cares about animals killed in shelters and those abandoned or homeless in Washington DC. We are a founding member of the National Council on Pet Population Study and Policy, comprised of animal welfare organizations working to establish accurate national shelter data, originate studies to determine why once wanted animals are later relinquished to shelters, and to provide information for communities working to reduce the numbers of homeless animals.

We appreciate the provision in B17-089 that promotes “the utilization of trap, spay or neuter and return practices as a means of controlling the feral cat population”. This is the most humane and successful way to reduce the unchecked reproduction of freeroaming/unowned cats. We also fully support the requirement for scanning impounded animals for microchips. This will encourage pet owners to utilize microchip identification and will help increase reuniting of cats with their owners.

¹ *CFA's mission is to preserve and promote the pedigreed breeds of cats and to enhance the well-being of ALL cats. Our member clubs are a positive force in the Washington DC area. Cat fanciers raise fine examples of their chosen breed; help to educate the public about proper cat care, spay/neuter and responsible pet ownership. Many fanciers are involved with cat show production, cat breed rescue and trap/neuter/return programs for feral cats. CFA's Winn Feline Foundation is a major source of funding for cat health studies.*

As originally written B17-089 was highly punitive toward pet owners and those who breed pedigreed cats and purebred dogs. We are pleased that many objectionable provisions, including mandatory spay/neuter, have been removed in the Animal Protection Amendment Act of 2008. There are now several provisions that CFA believes would be detrimental to cats and breeders of pedigreed cats.

Cat licensing has been a dismal failure whenever attempted. Compliance is generally 6% and rarely more than 10% even with aggressive door to door canvassing. Cat owners consider a fee for owning a cat to be unjustified taxation. Responsible pet owners spay/neuter their cats – national studies show 87% to 94% now sterilize their pet cats. Good Samaritans take in homeless cats – 33% of cat owners obtain their cats as strays off the streets. These are actions that are discouraged by cat licensing/taxation. Some cats are cared for but “loosely-owned”. Cat licensing is a known deterrent to people taking the next step to fully own a cat, especially when there is a limit on the numbers allowed. It is imperative to put all efforts into helping those who will take in freeroaming/unowned cats because this leads to sterilization and ultimately fewer animals in the shelters.

The “Report on Animal Welfare in the District” (Cheh and Schaffner) states that “in 2004, cats represented approximately 70% of euthanized animals.” Cat licensing will only add to the numbers of cats unclaimed in shelters and euthanized. Progressive communities like San Francisco that have firmly rejected cat licensing have also dramatically reduced the shelter intake and euthanasia of cats.²

As to the thought that cat licensing brings in revenue – the San Francisco SPCA says it best:

“Cat licensing will cost local governments and taxpayers money, not raise it, resulting in a net loss to animal control and/or other vital government services. Indeed, we doubt whether revenues raised would even cover basic administrative expenses. For example, each license fee collected - and most proposals we've seen set the fee between \$5 and \$10 - will have to cover the costs of manufacturing, handling, storing and mailing the actual licenses (and/or implanting microchips), handling the checks and cash received, issuing receipts, recording and filing the necessary data on each cat and owner, updating the data as needed, responding to public questions and comments, mailing out renewal notices and reminders, preparing accounting statements and annual program reports, etc. This list doesn't include overhead or initial start- up expenses, like hiring and training staff to run the new program and developing new computer programs and databases.”³

Impoundment of animals over a limit of 4 means a death sentence for pets. CFA is strongly opposed to arbitrary limits on the numbers of animals a person may own. We realize that D.C. Official Code section 8-1809 already imposes a limit of 4 with more pets allowed only if a person acquires an “animal hobby permit”. The new provision “The Mayor SHALL impound any dogs, cats, rabbits, or ferrets the combination of which exceeds 4 animals” adds an extremely punitive mandate that would be disastrous for the fifth pet or the stray cat who is ignored rather than helped. Most cat owning households in the US have multiple cats – 56% own 2; 44% own more than three⁴ and numerous cat owners also have one or two dogs. As more cats are kept indoors the trend for cat lovers is to enjoy multiple pets. This is not incompatible with the finest care for the animals. We cannot imagine the distress of a family facing forced impoundment of an elderly cat comfortable in her home being taken to a shelter where her chance of being killed is more than 70%.

The impoundment of animals over the limit of those authorized in an animal hobby permit would be difficult for those who foster homeless cats, individuals who provide breed rescue and those who take in

² San Francisco SPCA “Against Cat Licensing” - www.cfa.org/articles/sfspca.html

³ Ibid

⁴ APPMA National Pet Owners Survey 2007-2008 – www.appma.org

and place feral kittens or those who are small breeders of pedigreed cats. None of these households can predict the number of animals they will have in their home since this will fluctuate when cats come in or are placed. Breeders often have cats on lease, or for temporary showing who may be in residence but are not owned or co-owned. **CFA strongly urges deletion of this impoundment provision.**

Commercial Animal Breeder License. This provision is directed to “commercial” pet facilities. But the sale of 25 kitten/cats per year is NOT commercial. This would actually target the very best of the private non-commercial breeders of pedigreed cats. Home-based breeders provide the optimum in well socialized, healthy and genetically sound kittens. These enthusiasts are dedicated to preserving their breeds and unique characteristics. Raising and selling 25 kittens per year, not including rescue cats placed, represents a modest serious pedigreed cat breeding program. Breeders usually keep least 4 to 6 breeding females for genetic diversity. Cats of most breeds need to produce a litter more than once per year to maintain the health of the cat and prevent uterine infection. The threshold of 25 would mean approximately 6 litters per year – and only about 4 females. This is not a commercial “operation” and rules to establish standards for management of animals in a commercial facility will never be suitable for breeding cats who live as pets with breeders in their living rooms, kitchens and bedrooms.

Pedigreed animals have great value for those who want pets with predictable characteristics, good health and social personalities and have been raised with care in a home. We object to laws that would eventually end private home-based breeding. CFA has an excellent program for voluntary cattery inspections and mandatory cattery inspections for the few large catteries in the Country (approximately 50). There is no need for commercial cat breeder licensing.

We understand that D.C. already has a breeder permit requirement yet there are no permits issued and that there are only 25 “animal hobby permits” issued (to keep more than 4 pets). This is an indication of public rejection of governmental intrusion and annual inspections of citizens’ homes that is mirrored in most other places.

The pet population dynamics in D.C. described in the Report on Animal Welfare are similar to other areas in the country. We urge you to consider positive, non-punitive approaches to reducing the numbers of homeless animals that have worked. We ask that you strike these objectionable provisions in B17-089 regarding cat licensing, forced impoundment and commercial breeder licensing

Please feel free to contact me for further information.

Sincerely yours,



Joan Miller
CFA Legislative Coordinator

Cc: Councilmembers Jack Evans, Kwame Brown, Jim Graham, Muriel Bowser, Harry Thomas, Jr., Tommy Wells, Yvette Alexander, Marion Barry, Carol Schwartz, David Catania, Phil Mendelson, Mary Cheh

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