



THE HUMANE SOCIETY OF THE UNITED STATES

Eric L. Bernthal, Esq.
Chair of the Board

Jason Weiss
Second Vice Chair

Kathleen M. Linehan, Esq.
Board Treasurer

Kitty Block
*Acting President and CEO and
Chief International Officer*

Michael Markarian
Chief Operating Officer

G. Thomas Waite III
*Treasurer and
Chief Financial Officer*

Katherine L. Karl
*General Counsel and
Chief Legal Officer*

Michaelen Barsness
*Controller and
Deputy Treasurer*

Amy C. Rodgers
Secretary

DIRECTORS

Jeffrey J. Arciniaco
Eric L. Bernthal, Esq.
Georgina Bloomberg
Jerry Cesak
Anita W. Coupe, Esq.
Neil B. Fang, Esq., CPA
Spencer B. Haber
Cathy Kangas
Paula A. Kislak, D.V.M.
Charles A. Laue
Kathleen M. Linehan, Esq.
John Mackey
Mary I. Max
C. Thomas McMillen
Judy Ney
Sharon Lee Patrick
Marsha R. Perelman
Marian G. Probst
Jonathan M. Ratner
Walter J. Stewart, Esq.
Jason Weiss
David O. Wiebers, M.D.

Sub House Bill 506 (Hill)
House Government Accountability and Oversight Committee
Corey Roscoe, Ohio state director, Humane Society of the US

March 5, 2018

Chairman Blessing, Vice Chairman Reineke, Ranking Member Clyde, and members of the House Government Accountability and Oversight Committee, my name is Corey Roscoe and I am the Ohio state director for the Humane Society of the United States (HSUS) the nation's largest and most effective animal protection organization. On behalf of the HSUS and our Ohio members and supporters, thank you for the opportunity to provide Interested Party written testimony on HB 506, to revise the law governing high volume dog breeders.

The HSUS appreciates efforts to address Ohio's serious puppy mill problem and offer breeding dogs the protections they desperately need. Unfortunately, we believe the standards of care and enforcement mechanisms set forth in HB 506 will not fully address this problem. For example:

- HB 506 sets forth a complicated threshold to trigger the ODA licensing requirement, which will be just as difficult to enforce as the current threshold for coverage. Should this bill become law, the estimated hundreds of high volume breeders that are currently avoiding oversight because it is difficult for ODA to prove they should be regulated will continue to do so. Only a simple, straightforward threshold based on number of breeding females would solve this problem.
- Another glaring downfall of HB 506 is the provision that bases cage size requirements on the weight of the dog, an illogical threshold that would require a scale to enforce, allow a tall but lanky dog to be kept in a small cage, and incentivize breeders to keep dogs thin so they could keep them in small enclosures. The USDA and the huge majority of states that regulate commercial breeders base cage size on the length and height of each dog—a far better threshold for ensuring dogs have adequate space.
- HB 506 also includes vague and nearly impossible to enforce requirements for exercise, socialization and temperature regulation. The bill's breeding restrictions are minimal and will do little to prevent the breeding of dogs with congenital defects or to prevent overbreeding.



THE HUMANE SOCIETY OF THE UNITED STATES

Eric L. Bernthal, Esq.
Chair of the Board

Jason Weiss
Second Vice Chair

Kathleen M. Linehan, Esq.
Board Treasurer

Kitty Block
*Acting President and CEO and
Chief International Officer*

Michael Markarian
Chief Operating Officer

G. Thomas Waite III
*Treasurer and
Chief Financial Officer*

Katherine L. Karl
*General Counsel and
Chief Legal Officer*

Michaelen Barsness
*Controller and
Deputy Treasurer*

Amy C. Rodgers
Secretary

DIRECTORS

Jeffrey J. Arciniaco
Eric L. Bernthal, Esq.
Georgina Bloomberg
Jerry Cesak
Anita W. Coupe, Esq.
Neil B. Fang, Esq., CPA
Spencer B. Haber
Cathy Kangas
Paula A. Kislak, D.V.M.
Charles A. Laue
Kathleen M. Linehan, Esq.
John Mackey
Mary I. Max
C. Thomas McMillen
Judy Ney
Sharon Lee Patrick
Marsha R. Perelman
Marian G. Probst
Jonathan M. Ratner
Walter J. Stewart, Esq.
Jason Weiss
David O. Wiebers, M.D.

- Another area of concern is the exemption under Sub HB 506. Currently under ORC 959.131 [Prohibitions Concerning Companion Animals](#), dogs used for “hunting or field trial purposes” are completely exempt from the state’s animal cruelty laws. Allowing this same category of dogs (hunting and field trial) to also be exempt from any commercial breeding regulations in sub HB 506 is equally inappropriate. There is no logical reason why breeding dogs who hunt should be treated differently under the law than those who do not. All dogs deserve humane treatment.

The HSUS has been engaged in public education on the inhumane treatment of dogs on puppy mills for years. Each year, we publish an annual report detailing the nation’s most problematic breeders called The Horrible Hundred. Ohio has the misfortune of appearing on that list several years in a row and is considered the second largest puppy mill state in the nation.

The HSUS will continue to educate the public on inherently cruel puppy mills while assisting local humane agents and rescues in uncovering these many abuses.

We thank Representative Hill for shining a light on the common abuses associated with commercial dog breeding. It’s an important acknowledgment.

Thank you for your consideration.

Best,
Corey Roscoe