

Dear Commissioners,

My name is Bob Baker, I have been involved in the research and investigation of commercial dog breeding industry since 1980 having visited over 1,000 such facilities throughout the Midwest including Minnesota. I am currently the executive director of the Missouri Alliance for Animal Legislation and reside in Missouri.

I wish to emphasize that local government cannot rely on the U. S. Department of Agriculture for adequate enforcement of animal welfare laws and regulations to ensure humane conditions at commercial dog breeding facilities.

USDA's lax enforcement efforts have been documented over the years by damning reports by the USDA's Office of Inspector General and by Congressional Oversight.

The most recent example of USDA's malfeasance was the adoption of rules intended to cover up violations of the federal Animal Welfare Act, namely the "teachable moments" rule and the "self-reporting" rule. Since the adoption of these rules, welfare citations dropped by 60 % and enforcement actions brought by the USDA fell by 90 %.

These rules were adopted illegally as USDA ignored the federal rulemaking process. USDA further violated federal law by instructing its inspectors to falsify federal inspection reports and to certify that no non-compliance items were discovered during the inspections, a violation of federal law.

I understand the board is discussing this issue further — including the role of the USDA. Again, based on my assessment, the USDA has proven to be ineffective in the care of animals. I do not recommend deferring animal welfare to this agency.

As there is considerable documentation about the USDA and its conduct over decades, I would be happy to participate in any future work sessions about this issue.

Thank you.