

Response to NYS Bill To Regulate Rabbit Breeders (2004)

In response to NYS bills A9988 & S6903 which would expand the Pet Dealer law to include rabbits as well as other animal breeders a survey was conducted. The purpose was to find out how many hobby show rabbit breeders would be affected by the new bills that require anyone breeding and selling more than 24 rabbits per year to be licensed as a pet dealer. A survey was posted to my website asking 18 questions. The survey was advertised on several rabbit breeder lists. The lists included the largest breeder list Showbunny on yahoo groups. Other lists included the Rabbit Education Society, NYS rabbit breeders, District 7 Rabbit breeders, and the Rabbit breeding group all on yahoo. In addition the survey was available at NYS rabbit shows.

There was a total of 169 responses from rabbit breeders. Sixty-eight (68) from NYS. Of the responses 62% were adults, 21% youth breeders¹, 9% indicated a family of both adult and youth breeders. Of the NYS breeders 61% were adults, 26% were youth, and 13% were mixed. 94% are a member of the American Rabbit Breeders Assoc (ARBA) or a breed specialty club, or a local or state all breed club. Thirty percent (30%) indicated they belong to 4-H while 9% added that they were once in it or were a leader or volunteer. The survey did not specifically ask if one had been involved in 4-H only if they were currently a 4-H member so there could be in actuality a much larger percentage of former 4-Hers or leaders and volunteers engaged currently in hobby breeding.

Question 13 on the survey asked "Do you think breeders selling over 25 rabbits or cavies per year should be required to be licensed?". A whopping 97% answered "NO". Four people didn't respond and only 1 person answered yes. It is clear that the breeding community does not think licensing hobby rabbit breeders is a good idea. I have believed since learning of A9988/S6903 that the threshold for pet dealer licensing is too low to accurately reflect rabbit breeding. The number was used when the NYS Pet Dealer law was first passed and only targeted dog and cat breeders and dealers. Rabbits are neither dogs or cats and they cannot be treated as exactly the same thing with the same standards and definitions.

In order to understand the flaws in A9988/S6903 one must understand the rabbit world. Rabbits are geared for reproduction as well as being a multi-purpose animal. Rabbits throughout history have been used as both food and pet. The American Rabbit Breeders Assoc motto is "Food, Fur, and Fancy". There also exists an organized system for judging and shows for those who wish to breed to a standard and compete with other breeders. The American Rabbit Breeders Assoc. 8 Westport Court, Bloomington, IL, 61704 www.arba.net is the organization responsible for overseeing a system for organized competition among rabbit show breeders. They also are the organization that administers the system by which breeders can register their rabbits and grand champion them. The ARBA is to the rabbit world what the AKC is to the dog world or the CFA is to the cat world. In order for a rabbit to be registered with the ARBA the animal must be brought in front of a licensed registrar and represent the breed standard and be free of any disqualifications, plus have a 3 generation pedigree. This system ensures only quality animals are registered.

Due to the unique reproductive capabilities of the rabbit, breeders face issues much different than dog or cat breeders. For example not keeping a rabbit doe in regular production often leads to her not being able to produce a live litter ever again. Most rabbit breeders breed a doe 2-3 times per year². Rabbits also have a shorter breeding life than other species. Rabbits are also induced ovulators which means there is no heat season and they can be bred year round. This is all due to nature and part of the challenges for rabbit breeders. Hobby rabbit breeders often raise more

¹ Youth defined as 19 years old and under

² Rabbit Education Society survey Jan 2000 Average number of times you breed a single doe in one year
Once 7%, Twice 33%, Three times 39%, Four times 10%, 5 or more times 11%

than one breed and have more animals and more litters per year than what many say is the average for dog breeders.

From the Rabbit Education Society Jan 2000 Breeder Survey:

4. How many different breeds do you raise? 1breed 38%, 2 breeds 24%, 3 breeds 15%, 4 breeds 8%, 5+ breeds 14%

5. Average herd size? I broke this down into averages based on the number of breeds

1 breed 27 rabbits
2 breeds 33 rabbits
3 breeds 49 rabbits
4 breeds 74 rabbits
5+ breeds 100 rabbits

6. Average number of litters produced per year

1 breed 14 litters
2 breeds 21 litters
3 breeds 25 litters
4 breeds 37 litters
5+ breeds 60 litters

The survey asked both how many breeds do you raise and the average total number of rabbits in your herd (keepers and juniors the breeder is watching not for sale animals). 45% of rabbit breeders responded that they raise 2-3 different breeds, 26% said they raise only one breed, 23% said they raise 4-5 different breeds, and 6% said they raise 5 or more different breeds. Regarding herd sizes 40% said they have 21-49 rabbits, 30% said 50-75. So 70% of rabbit breeders have average herd sizes at any given time of 21-75 animals. 15% said they have up to 20 rabbits, 8 % said 76-100, and 7% said they have over 100. Again because rabbits have a unique place as a multi-purpose animal many are used for food and this is why breeders tend to have much larger numbers in their rabbitries compared to dog or cat breeders.

Question 12 asked "The primary reason you breed rabbits is for? (show, meat, sell as pets, fur, wool, research, other)". Most breeders selected multiple answers. Ninety percent (90%) of respondents wrote show. Pets came in second with 23%, Meat third with 19%, for fun 6%, fur or wool 3%, and "4-H" .7%.

Now that we have looked at what your average hobby rabbit breeder is let's explore how A9988/S6903 as written will affect breeders. The major flaw with this bill is that it picks an arbitrary number to define what a hobby breeder is vs a "pet dealer". On the Federal level the USDA recognizes the difference between hobby breeders and those breeding as a business. Under the Animal Welfare Act (AWA) commercial pet rabbit breeders are required to have a license and be inspected if they gross \$500 or more in sales not direct to the pet owner. This is commonly sales to pet stores. Hobby breeders selling directly to the pet owner do not require a license. Sales to auctions are also exempted as they are viewed as direct. Those who only use their rabbits for meat or fur/wool are exempt from licensing. However the USDA requires dog or cat breeders who own more than 3 breeding females to be licensed through them. The Federal government clearly sees a difference between rabbit breeders and cat and dog breeders.

On the 2004 rabbit breeder survey respondents were asked to list the total number of rabbits they sell or move out of the herd per year. One has to realize that when someone is breeding for show you have many more factors that are figured into who you breed, when, and which animals are retained, and for how long. Someone breeding for pets has a much easier time deciding who gets bred and who is for sale. A show breeder is breeding towards a standard which dictates what body type is desired, correct color, what are disqualifications for show, etc. The goal is always to move forward, to improve on what you have today with tomorrow's offspring. Therefore which rabbits are sold in any given year will include babies who do not meet our criteria for adding them to the breeding program, juniors who didn't turn out as well as we hoped, older animals no longer needed in the breeding program or who are being replaced with their offspring, as well as animals who for various reasons are not desired in the breeding plan.

The average number of rabbits sold per year by hobby rabbit breeders based on the survey responses is **68**. The average number sold per year for NYS hobby rabbit breeders is 67 based on the survey numbers. The responses listing number sold per year used to calculate these numbers were only hobbyists.

Respondents listing themselves as businesses rather than hobby breeders were calculated separately. The average number sold for those who responded they were a business was 3,387 per year while NYS respondents listed as a business was 382 sold per year. I have been unable to find any other data on the numbers sold on average by commercial pet rabbit breeders. From personal experience I did meet one such breeder based in NYS. He supplied 3-4 area pet stores and told me he sells them 1,000-1,500 rabbits per year for resale to pet owners. A pet store near me told me they sell 600 rabbits per year from two stores and are supplied by one breeder. Based on this and it's the best available at this time it appears that those breeding and selling rabbits for pets as a business are dealing in numbers in the high hundreds or more. Hobby show rabbit breeders are selling much fewer (average number sold per year is 68) however still much more than the limit of 24 A9988/S6903 sets for a licensing threshold.

As written A9988/S6903 requiring a license for breeders selling 25 or more rabbits would cause 81% of NYS hobby rabbit breeders to be licensed as "pet dealers". Based on the survey responses 77% of both NY and non-NYS rabbit breeders sell 25 or more rabbits per year. I also looked at NYS youth breeders to see how that group would be affected. The average number of rabbits sold by NYS youth hobby rabbit breeders is 40. Based on the survey responses 71% of youth hobbyists sell 25 or more rabbits per year thus they would be required to buy the \$100 license to be a "pet dealer".

The NYS Pet Dealer law currently sets \$100 per year as the licensing fee for breeders. The survey revealed 89% of hobby rabbit breeders do NOT make a profit. Seven percent (7%) said they did make a profit selling rabbits while 3% broke even and .7% said they "rarely profit". While most breeders did not state how much they lost per year those that did listed numbers between several hundred to over a thousand dollars per year in losses. It is unclear where these hobbyists are expected to come up with an additional \$100 per year to be able to continue to engage in breeding show rabbits when nearly 90% do not profit from this hobby.

One can also make a case for the inequity of the proposed expansion of the bill regarding the licensing fee. It is not known to the author how the \$100 per year fee was arrived at. However what is clear is that the price a dog or cat breeder sells their animals for is a great deal higher than what a rabbit breeder can sell theirs for. I checked classified ads for dogs and cats in the NY Post, NY Newsday, and the Albany Times Union. I found only 2 ads for cats with prices listed, one was for \$150 per cat the other was for \$800 per cat. I calculated the average price for the dogs advertised with price and it came to \$496 ea. I saw a few ads for dogs for \$1,000 to \$1,200 as highs.

Now let's compare that with rabbit prices. Most pet stores will only pay between \$5 and \$15 per rabbit. According to the 1999 Rabbit Education Society breeder survey 53% of rabbit breeders don't even sell to pet stores. For those that do on average they sell 18 per year to the pet store. The average price for a pet rabbit sold directly to a pet owner is \$13-\$19 while the price for a show quality rabbit to another breeder was \$31-\$61. To put it graphically:

Species	Average Price for a pet	NYS Pet Dealer licensing fee per year
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Cat	\$475	\$100
Dog	\$496	\$100
Rabbit	\$ 19	\$100 (proposed under A9988/S6903)

Survey Responses from Businesses:

Examining the survey responses for those listing themselves as a business yields some interesting results. First none of those breeders responding that they were a business listed pets as the primary reason they breed (question #12). Of those who say they are a business 75% listed meat in response to question #12, 56% show, 38% pets, 13% wool or fur, and 6% research. Only 65% of total business respondents said they make a profit, the number was 20% for NYS. A couple of the respondents specified that they ran a farm although I did not ask people who selected "business" to specify if they were a farm or not. It appears that most of these rabbit businesses are primarily meat breeders who also sell some rabbits as something other than a meal. As written A9988/S6903 will require all these breeders to be licensed as "pet dealers", insane when their business is mainly providing food.

More Popular Solutions?

The survey also asked respondents what they thought would be better criteria for licensing pet dealers and what would be a better number to pick for licensing threshold. When asked what would be a better criteria to use to determine who needs a pet dealer license 44% said if they claimed their breeding business on taxes, 29% said if a breeder files a Doing Business As (DBA), 11% said intent to profit, 6% said if supply to pet stores and 6 % said if they make a profit. Finally 4% said USDA definition should be used.

Question 14 asked what would be a better number to choose for licensing instead of the 25 or more. 35% said 100, 32% picked a number between 100-500, 24% picked a number over 500, and 7% picked a number less than 100.

Conclusion

In conclusion the bills proposed to expand the NYS pet dealer law would adversely affect the majority of NYS hobby rabbit breeders. First the vast majority of hobby breeders would be required to be licensed because the licensing threshold is too low to exempt hobby rabbit breeders. Secondly the vast majority of hobby rabbit breeders lose money at the level of hundreds to thousands of dollars per year. They will be unable to afford the \$100 per year license fee. Rabbit breeders despite the average selling price of a rabbit being grossly less than that of dogs or cats are expected to pay an identical licensing fee.

The majority of our youth rabbit breeders will also be adversely affected by the expansion of the pet dealer law. Youth activities involving rabbits teach responsibility as well as keeping them out of trouble. You don't have time to experiment with drugs, violence, or sex when you have to clean cages, attend shows, and socialize baby bunnies. The cost is incalculable regarding the loss of our youth breeders. The author got her start in breeding rabbits through 4-H and feels the experiences helped enormously throughout college and life. I would not have been able to do it if I had to pay \$100 per year just for a license, heck I can't afford that now!

And of course the rabbit breeding community feels we're being given a raw deal with A9988/S6903 because we are being denied an exemption for hobby breeding currently enjoyed by dog and cat breeders. Why the discrimination? The survey results prove that hobby rabbit breeders sell more than 24 rabbits per year, we should be provided with an exemption the same as dog and cat breeders enjoy based on accurate numbers for our species. Commercial breeding

is already regulated on the federal level, the state should exempt hobby breeders and hopefully that avenue will be explored.

Following a summary of the survey results this report contains responses from respondents regarding how A9988/S6903 will affect them. It should be noted that many breeders are saying they will either leave the hobby or will have to alter what they do to reach the 24 or less exemption level. There will be serious repercussions for these actions. To start the state economy could be negatively affected. The reason is simple, fewer people breeding for show and fewer shows, clubs, and national shows held in NY. In the 80's NYS was the host for the annual ARBA convention, an event that spans 5-7 days and attracts breeders nationwide. It is also an event that generates income for hotels, restaurants, attractions, airports, vendors, and a whole list of incidentals. NY breeders are hoping to host another convention soon. In Nov 2004 the ARBA convention will be held in Providence RI.

In addition to the ARBA convention national specialty clubs host national shows, usually lasting a few days. In 2003, Syracuse NY, the NY Netherland Dwarf Rabbit Club hosted the American Netherland Dwarf Rabbit Club national show. Syracuse is also home to the annual "Grand Finals" rabbit show which lasts 2 days and hosts 4 shows. Breeders travel from all over NY as well as out of state. Again this event brings in revenue and helps our economy. Throughout the year NYS is home to many shows and breeders from neighboring states often attend them. The ARBA yearbook lists NYS as having 19 local all breed clubs and 13 regional specialty clubs. The 20th annual Mohawk Valley RCBA catalog lists the United English Spot rabbit club show, the Eastern Mini Lop Club show, the NYS Mini Rex Club show, and the Northeast Polish RC show to be held in conjunction in Frankfort NY June 2004. There have been many other national breed shows also held in NYS. But passing a law that would require 81% of NY rabbit breeders to be licensed as a business will surely result in many fewer of these events held in NY and adversely affect the fragile NYS economy.

Another adverse effect would be for those who will be forced to sell many fewer rabbits per year to stay below the licensing threshold. Again a hobby breeder supplies more than just the pet market. Rabbits are being sold for food (which A9988/S6903 would include to count towards the 24 per year limit), as breeding and show stock to 4-Hers and other youth breeders as well as adult breeders, and finally some portion are sold as pets. If the hobby breeders are forced to just butcher and eat the rabbits we don't need in our breeding program it will hurt those trying to start out with good stock. In addition the hobby rabbit breeder is the best source for pets, it would be wrong to eliminate or cut down that source for consumers. The pet dealer law actually encourages "bunny mills" as they will be the only ones who can afford the high licensing fee and regulation. Plus when hobby show breeders drastically reduce the number of rabbits available for pet owners the commercial breeders will happily take their place.

Since hobby show breeders are not breeding to create pets to sell we are much more picky as to who we breed and how much breeding we do. We breed towards a standard which means more of our animals actually look like they are suppose to and we work to eliminate genetic problems and strive for optimal health. It's not to say commercial pet breeders produce inferior animals but let's face it all the criteria they need is something that's healthy and looks cute to go to the store for the pet owner to buy. The hobbyist spends considerable time educating pet owners and even the stores (even if we don't sell to them). Many hobby breeders add to the expense of running their rabbitry by giving pet stores and pet owners pamphlets and advice about proper rabbit care for free. They spend hours on the phone and on the computer educating people, only for love of the breed. A breeder licensing program will only add to the expense and will probably force many to cut out these "freebies". A9988/S6903 will actually hurt the choices consumers have now as to where to buy a pet rabbit.

Summary of Rabbit Breeder Survey:

All respondents: 62% adult	21% youth	9% both (family)
NYS only	61%	26% 13%
94% respondents a member of ARBA or breed club		
30% are 4-H members		
97% do not believe breeders selling over 25 rabbits per year should be licensed		
89% of hobby breeders do not profit from breeding rabbits		
7% make a profit		
3% break even		
81% of NYS breeders sell 25 or more rabbits per year		
71% of youth sell 25 or more rabbits per year		
68 is the average number of rabbits sold by hobby breeders		
67 is the average number of rabbits sold by NY hobby breeders		
3,387 is the average number for businesses		
382 is the average number for NYS businesses		

Question #18 "How will A9988/S6903 affect you if it is passed as written?"

-I may have to lower my number of rabbits, etc, which will make me less competitive at shows, will also defeat purpose of raising for meat as well if I have to lower my number of rabbits

-Put me out of rabbits probably

-It will be more difficult to buy rabbits from NY breeders and there will be less breeders in the NY area for shows to compete with/against

-QUIT or do business to deduct from income tax really depends

-No, I do not believe in regulations that are intended to charge a licensing fee to pursue a hobby and give an animal rights organization such as the ASPCA, who is opposed to breeding of animals, the authority to regulate breeders.

I don't believe in the establishment of a pet dealer license. It penalizes law abiding citizens and the lawbreakers get away scot free. Laws already exist to deal with the problems but are not enforced. This proposed bill is not intended to make anything any better but is intended to increase the difficulty in breeding any animal species in NYS and to give the ASPCA increased power over all animal activities in NYS. I do not see how an organization that is dead against animal breeding can be placed in charge of regulating and inspecting breeders when the training of such personnel is done by anti-breeder organizations?

Since rabbits are multi-use animals, I have no idea how one would come up with a rational system. Meat breeders might set up a DBA to sell their animals to a processor. Other businesses are set up to provide pathogen free lab animals. But most people who breed and show rabbits don't establish a DBA because of the amount of paperwork involved and the fact that they lose money year after year (defeating the criteria for a business on income tax filing...).

1. It will take away a constitutional right to the pursuit of happiness, right to privacy and freedom. It will turn animal breeders into criminals the day it is passed if they breed and sell animals beyond the number specified. One single commercial New Zealand White rabbit in production can easily exceed or come very close to, the "magic number of " 25 in one year.

2. It will put a known anti-breeder organization (ASPCA) in charge of regulating breeders. The only possible impact it can possibly have it to stop the breeding of all animals and eventually, the use of all animals. The bill also requires such regulatory personnel to have training in the species they are inspecting or investigating. It does not state WHERE this

training takes place or who provides it but without a doubt, it is not going to come from any animal breeding organizations but will be coming from animal rights organizations. In the case of rabbits, the ASPCA utilizes the House Rabbit Society for "expert" advice on rabbits, an organization, like the ASPCA, that is a staunch opponent to breeders and ANY methods used by breeders to house and care for rabbits. The American Rabbit Breeders Association will not be used as an expert in the field of raising and caring for rabbits, with a membership of about 30,000 Nationwide and an organization that provides research grants to find cures for various rabbit ailments and conditions.

3. It will place undue hardship on people whose only intent is to pursue a hobby that makes absolutely no money for them, and, in fact, they lose money year after year pursuing. There is no profit in raising or showing rabbits, never has been. Profit as I know it is the money left over and in your pocket after a sale when the expenses of producing a product are deducted. Profit is not the \$5.00 I got for the rabbit without any consideration for what it cost me to produce it.

Animal Breeders are not against animal welfare, they are against animal rights. RESPONSIBLE Animal breeders would be have to be crazy to not properly care for animals they are raising and/or showing since it has a direct impact upon the quality and health of the animals. Unfortunately, animal RIGHTS organization have found a very useful tool in the fight to eliminate all animal breeding and use, and that is, to infiltrate a previously respected WELFARE organization, the ASPCA, and turn it into a very profitable animal rights organization that is given dominion over animal control and enforcement by our NYS government without a single law regulating THEM!!!!!! They are non-profit organization that have substantial sums of money in the bank, are given contracts by THOUSANDS of city, town, village and state governments to "enforce" animal laws in the state and do not have to answer to anyone as to who they employ, the methods they use and are even given status as policemen and women with guns and the right to arrest. Who is regulating them? Who is weeding out the vegan zealots who are trying to do nothing else but take away the animals owned by people doing nothing wrong?

Our governments in NYS are strapped for cash so this is a win-win situation for them and the ASPCA. Pass a law that collects money from law abiding citizens you have now made into criminals overnight and place someone else in charge of enforcing the law who has their own personal agenda and absolutely NO regulations placed upon THEM and PAY them to do it as well!!!

Today I have the right to raise rabbits. The day you pass this bill, you turn me into a criminal if I don't apply for a license. You take away my right to privacy by eliminating my legal right to require a search warrant and proof of suspicion of a crime before you storm my house and property, and you place the enforcement of this law into the hands of an organization that is radically opposed to what I am doing.

Some people claim that is I have nothing to hide, then why should I be opposed to licensing and unannounced inspection without the need for a search warrant? Don't I have a constitutional right to privacy given to me by the US Constitution, that cannot be taken away by the state? Just because a person refuses to allow someone on their property doesn't make them a person with something to hide. It makes them nothing more than a person exercising their right to privacy afforded them by the US Constitution. Why should I cooperate with an organization (ASPCA as enforcer) whose sole purpose for their existence is to stop me from breeding animals? Letting them onto my property to collect evidence based upon their own "criteria of abuse or neglect" is, as far as I am concerned, unlawful. I have seen so many cases of suspected "abuse" or "neglect" by our local ASPCA, televised on the local television networks. Ever wonder how the TV stations just happen to be there during the "raid?" The ASPCA wants donations and publicity so they call them and give them the time the raid is going to take place. They spoon feed the media the information behind the raid, even though anyone with half a mind can see from the broadcast, that the animals being confiscated are in good condition and not neglected. They confiscated the animals, in one case locally, because the owner did not provide "human affection" to the animals. And the ASPCA considers anyone with a lot of animals, a "horder". This places all breeders in that category. There is no definition as to how many animals is too much. Another case with a local ASPCA that decided to enforce the "shelter during cold weather" requirements by taking all dogs away from a breeder who had them housed outdoors in well insulated dog houses. These were hunting dogs, traditionally raised outdoors.

The ASPCA use to be a welfare organization. Unfortunately, it isn't anymore and most politicians are completely unaware of this fact. It is now an animal rights organization, with a lobbyist in place in NYS who is in charge of writing the new bills and laws. These bills place the ASPCA in charge of enforcing the laws they have a hand in writing as well as providing funding through fees and contracts. They write these law exempting themselves from the very laws they write! And the ASPCA has no governmental agency in charge of checking on them, regulating them or requiring them to provide reports of any kind regarding their internal activities. So who is representing the animal owners and breeders in NYS? Nobody it seems.

-will not effect me directly as I am in NJ. But, could if other states follow suit. Also could effect the number of entries at shows if hobby breeders drop out.

-Might be a bad influence on my legislators.

-put me out of my hobby

-not me yet....but the trend might spread to my state

-will not unless other state use as template

-As a hobby breeder, I would be discouraged from breeding due to the fee. My animals are sold mostly as 4H animals - I am helping the future of society! Someone has to raise the food we eat, and teach our children responsibility, good sportsmanship and responsible decision making.

-I'll lose most of my NY friends at the shows, as I know \$100 is out of the question on top of our losses. I was also looking to move to NY - if that happens, no way!

-I will have to sell my rabbits because I cannot justify "\$1 a rabbit" just to have it on my land. I live in an agricultural zone!

-probably won't breed many

-no longer be able to keep my pets/hobby

-I don't live in NY so probably not a lot but have stopped raising guinea pigs because of the bill in Maine

-Possibly give ammunition for a similar bill in CA

-impair new york hobby breeders

-QUIT or do Business to put losses on incomes taxes

-It won't affect me directly, but it may give PA some ideas

-find something else---hang out

-I'll quit and quit 4H

-quit

-It may, many good stock out of NY herds hard to obtain or may cause good breeders to sell out, I buy quite a bit out of NY state

-quit

-I would have to cut down on breeding which would make my entire program slow down and not produce quality stock as fast as I do now

-I do not live in NY so maybe not directly-but I have rabbit friends who live there, and it is not right to put these limitations on responsible breeders

-It will, again, open the door in other states for the animal rights agenda, which seeks to end all animal ownership and use, be it companion, service, food, pet, or industrial.

-if passed in SD I could not afford my hobby

-I WILL HAVE TO CUT DOWN ON MY BREEDING

-Ruin a harmless hobby.

-I will sell out and then move

-Will be forced out!! / Forced to be an outlaw!

-It won't unless it comes to my state but I know a few NY breeders it would adversely affect.

-This would make the raising of MOST animals impossible, including large livestock

-may not keep rabbits

-Stop selling rabbits and any extra will go for meat (personal consumption), until I can move out of New York State.

-I would have to give up the hobby

-I would probably have to cut back to only 24 rabbits a year sold, and I would raise mostly my rabbits to feed my family. I would rather sell a few less, and keep my privacy than deal with laws that are getting into places they do not belong. Back yard breeders, and hobbyist are no different than ordinary pet owners, except we have more rabbits. It's not the fee that gets to me it's the privacy invasion... I thought we lived in the US of A.

-will kill my hobby- then it will kill all ny fairs- which in turn will kill the money coming from them and then will have ripple effect on all connected to fairs and job losses which in turn will vote the incumbent out of office after their names are published against ny fairs. I would not want that coming at me - angry voters if I was up for re-election.

-My fear for A99988/S6903 is that passing this law in one state will make it easier to pass in all states, eventually affecting the entire rabbit fancy.

-It will negatively effect other rabbit breeders in NY, and that effect could spread to the rest of the US. This bill is WRONG and trying to punish/control those who do not need to be controlled.

-I wouldn't be able to raise my rabbits, which are private property, the way that I choose. Other people shouldn't care about me or my hobby as long I I do not abuse my animals. Butt out!!!

-I don't know...and it worries me.

-It will hurt my hobby ,i have no profits from my hobby other than the joy of my bunnies and improvement of my breed and line

-I'm not sure what would be better, but limiting the number of animals or charging a licensing fee isn't fair to the responsible breeders that are out there.
I am a youth breeder, and it is hard enough to make ends meet without adding my rabbit and cavy projects. If this law is passed, I will have to either give up my hobby, or reduce my herd, almost down to nothing. That would end all of the shows, and the conventions, and the 4-H, and all of the things that have greatly impacted my life. Passing this law is unfair, and it will affect alot of people, including the lives of many youth breeders in this country. If more teens were involved in animal based hobbies, I truly believe that this world would be a much happier, safer, and more productive place.

-HUGE INVASION OF PRIVACY!

-will have to get out of rabbits

-I think negatively. We are on the border of if we'd sell enough to make a difference but in the long run, it would be negative.... more restrictions are always bad....

-put me out of showing and breeding rabbits

-I don't plan to have alot of show bunnies, not sure

-I will quit. Will not have inspections on my land

-I would stop raising rabbits as would my children, we would no longer be able to do something they and myself truly enjoy.

-It will cause me to lose my hobby and sit and twiddle my thumbs

-Set a bad precedent for other states

-I would fit into that over 25 group and the more money that has to be paid out the lower my profit.

-I wont be able to raise my rabbits and show them. I sell very few "pet" rabbits each year most of mine are breeding and show quality animals. pure bred and have pedigrees.

-it's more expense and alot of headache and invasion of my privacy. If the bill gets passed. Ill sell 24 rabbits a year and butcher the rest.

-I would have to give away all my rabbits so I would not be a criminal and lose a lot of money. I would not be able to continue showing my rabbits. I would also not be able to breed for a better quality rabbit. I would lose the only hobby in the world that I love so dearly.

-for one thing, we are in town and would be closed down I am sure - we are not hurting anything, our rabbits are healthy and happy, my kids are learning valuable life lessons and responsibility raising rabbits and this will be taken away from us as I know our hobby would not be approved at our present location.

-PA will be targeted next - we are the highest taxed state in the US.

-I do not live in NY, but it will affect me indirectly by limiting the number of rabbits and rabbit breeders in NY, meaning less stock nationwide for me to choose from for new bloodlines, plus less nationwide compeition at shows.

-It could lead to my state instituting a similar requirement, we are already under USDA jurisdiction, so see no need for the state to also be involved

-It will ruin it for anyone in or around NY - we buy and sell to people there

-If no what number do you think is a better choice to denote someone who is a pet dealer in NYS? The number of rabbits and cavies bred by an individual for the purpose of sale should not be the issue here but the intent of the breeding for

selling which should be the issue. First off the US Department of Agriculture and the Food and Drug Administration did not recognize rabbits and covies as pets until 1990 but as Agricultural Commodities and were not subject to regulation under pet laws. To regulate Rabbits and Covies in the manner of this proposed legislation would disrupt and further damage the already fragile meat, Fiber, and Medical Research Industries. If there is to be any regulation concerning the sales of rabbits and covies as pets it should be written for those companies which already participate in the mass sale of animals as pets for profit. Such as the ASPCA and the Humane Societies. They are the only organization which clearly make a profit. Pet stores do not make a profit from selling the animals, except maybe from exotic wild life, but from the feed and equipment needed to house the animals.

-Where rabbits and covies are concerned Section 2 lines 4 - 10 are very ambiguous. I have been following the regulations as they are written USDA Article 8 Section 7 to run my Rabbitry for the past six years. I am a farmer as well as a rabbit breeder. My rabbits are not only for show but I raise meat rabbits and Angoras for the Wool Industry. I sell an average of 1500 rabbits per year. a very small number compared to the demand for rabbits in New York State. What is wrong with the Federal laws as they are written? Why must New York change things?

No breeder of rabbits or covies whether for pet or agriculture, especially myself, makes a profit breeding rabbits and covies. Except for the very few who are considered by ARBA as the best in the country, Betty Chu of California, Bill Guardsmere of Ontario Canada, Manuel Hildalgo of California etc...or some of the few farmers who breed and market 2000 to 10,000 rabbits a month. Based upon the number of rabbits sold in this part of New York I would say that in New York City alone the average number of rabbits consumed as food per week is at least 4000 to 10,000 rabbits. The consumption of rabbit as a meat is recommended by the American heart Association and the American Cancer Society because of its low fat and cholesterol content. What will you tell people with heart disease or Cancer that they can no longer obtain rabbit meat for their diet.

Next you have to look at the Wool Industry. I personally produced only a small amount of wool from my Angora rabbits. The largest Angora farm I know of is in Tennessee. The owners work with around 2000 Angora rabbits. They produce large quantities of wool for NASA. This wool goes into insulating the astronauts space suits. The wool is also used in the underwear of the Antarctica scientific explorers. As the cost of man made fibers rise many people are turning to more natural fibers for the clothing industry. This is becoming apparent with the rise in home spinning and weaving. There has been an increase in the number of Natural Fiber Shows, Fiber Spinning and Weaving Guilds as well as Natural Fiber Businesses within the United States and Canada. Just in Monroe County there are 22 new members of the Genesee Spinners Guild this past year. This new law and its counterparts will damage a very old as well as newly discovered agricultural industry.

This law needs to further define "public" and "consumer." Would this definition include the selling of rabbits and covies to other breeders, 4H children, FFA students, Medical Laboratories, Schools, farmers, and butchers as well as the pet dealers? On line 6 the definition begins "shall include breeders who sell animals; provided that a breeder who sells directly to the consumer fewer than twenty-five animals per year that are born and raised on the (breeders)BREEDER'S residential premises shall not be considered a pet dealer as a result of the sale of such animals. It sounds like the farmers, including Amish, Mennonites, American Indians, and other ethnical groups who make a living breeding rabbits will have to be included? Who ever wrote this law clearly didn't study the subject matter of breeding rabbits before writing it.

I thought New York wanted to support domestic agriculture and reduce the dependence on foreign imports especially where food is concerned. If a breeder must show a profit in order to be classified as a dealer but is unable to show a profit why are these laws being written? As I read it I can't tell if the law is written as a consumer law because it contains regulations which should be written for the New York division of the USDA.the law is written for the for the Dept of Commerce and not the NY division of the USDA?

As I see it the persons who wrote this law and its counterparts need to stop what they are doing and do their homework where rabbits and covies are concerned.

-If this were to come to Nebraska, it would devastate our whole livestock industry -- it's written in such a way that even a farmer couldn't do "business as usual".

Allowing Animal Rights groups to be involved with animal legislation is totally irresponsible on the part of legislators -- it's like asking the fox to guard the henhouse. Can't you folks understand that these Animal Rights groups want to end ALL uses of animals -- they want to take away YOUR pets, they want to take away YOUR right to eat meat, they want to take away MY right to raise MY OWN meat and milk MY OWN cow.

We as a country have a heck of a nerve going into other countries and going to WAR so that those people can be FREE -- while our own government officials are allowing AMERICANS to have their FREEDOM taken away!

-I thought the US was a democracy were majority rules -- why is it that all of a sudden minorities and "special interests" have more rights than the majority?

The majority of the citizens of this country do NOT want laws like this -- it's only those vocal few who think that they have a right to be able to tell the MAJORITY what to do.

-I believe that it will be a very negative precedent, which other states (including my own) may follow. The arbitrary basis of the licensing requirements could result in the loss of purebred animals of many species. Any species which produces young in litters can easily produce well over 25 offspring per year, per pair. Thus the limit of 25 animals will result in inadequate gene pools within a "herd" "flock" or other breeding pool to maintain healthy animals.

-No, I think this is an outrage!!! You sell to try and recoup some money, to put back into your bunnies. I know what few we sell, goes right back into our bunnies. Why be punished for making a wee bit of money to put back into your hobby.

- I think this is an outrage, to anyone who wants to have, a safe educational hobby. I started out 6 years ago, searching for something for my children to do. We joined 4H and wow!!! what an enriching experience it was. My kids have learned so very much from this. They no longer are apart of it, due to a lack of leaders. I feel if this becomes a law, there will be no rabbits for kids to purchase, because no one will have the money or enthusiasm to continue. Our rabbits are loved and well cared for. We loose money every year, from keeping these wonderful critters. Are we complaining, NO. Our children have learned so very, much from us having about 50 rabbits, that includes 3 different enriching breeds. Each breed brings it's own learning experience. My kids have learned how to groom, feed and care for all rabbits, in our rabbitry. You would be amazed how much science is involved in this hobby. A hands on experience, why would you want to punish us by imposing such a ridiculous law. This would mean that no other family would be able to experience, what we have. How many kids can you ask, what do you do in your spare time??? My kids rake, scrub cages and care for all their bunnies willingly!!! They know all the body parts of a rabbit. Also, all the diseases and cures for bunny. They enjoy and are proud of all the bunnies in our Rabbitry. If this becomes a law, we will have to close our rabbitry. With loosing about 900.00 or more a year, we could not afford another \$100.00 on top of what we are already loosing. Then to top it off having the SPCA come trumping on your property, telling you how to care for your bunnies. No this is not fare in one bit. Did they get any training in this? I think not!!! So why should they come in and judge, what we do as a hobby!!!! not for profit, but for the joy of doing it. If you want a ridiculous law, then prove to me that it's warranted. You will put out many rabbit breeders, with this bill. No one will want to raise bunnies. Most people get started for the joy and wonder of it. Don't take that away from us, most of all our children. It will mean 4H will probably go out, most rabbit groups would be non-existent. Everyone will suffer!!! IT will be a spiral effect. I pray this will not pass, my children will loose something they really enjoy doing. It's like your trying to punish people for having a hobby. No this shouldn't be!!!

-well I for one am a disabled person who started out with rabbits because some were given to me for butchering purposes. They were for the purpose of feeding my family healthy wholesome home raised meat with no additives, and controlled quality that you cannot get from a store. we decided to breed a doe up and get more meat for the house, and it went from there. i discovered the joy of raising pure of breed rabbits. If this bill passes then I will have to kill all my stock and put them all into the freezer. I do not make any profit from my rabbits. The few sales I do each year helps pay for food and supplies and meds housing ect ect. I pay out of pocket expenses each and every month, and have never came out ahead of the game at all. BUT it is something I enjoy very much, but with the laws that are proposed, it will wipe me out completely. What ever happened to privacy?

- Well, it would certainly affect my being a 4-H leader and my SPECIAL NEEDS child being a 4-H Youth. Plus, I wouldn't be able to improve my breeds quality. After all, 4-H and ARBA/ACBA believes in quality breeding. Improve, improve, improve.

-I raise rabbits because I like them and to show.
License should not be req. if you don't make a profit and it truly IS a hobby operation.
Req. a license if someone BUYS, to RE-SELL and make a profit from them.

- It will set a horrible and very easily abused precedent for other states and regions in which animal ownership is already endangered, as well as reflecting extremely negatively upon NY and its legislators. Many will label supporters of this bill as rabid animal rights activists, or legislators intent on governing every single facet of citizens' lives--and they would be correct.

- I would imagine we'd have to drop the hobby altogether because I have six children and the stress of having to keep up a license will take away from the joy of just enjoying our hobby. I don't have time or opportunity to keep up with legislation regarding this. This is supposed to be our only fun family hobby. We can't afford going to amusement parks or fancy vacations with all of our kids. This is much more affordable when you figure the cost for showing at our last show was about \$30 for my three oldest kids and food at the show was another \$30 including myself.

-More rabbits will be eaten then will be sold. As I breed the SMALL breeds, this will be a great waste as Hollands, Dwarfs, Lionheads all are just so small.

-I will have to stop having rabbits

- The youth of America will be impacted the most - so many that find their self esteem and direction thru 4H - fair shows and ARBA are helped and supported by Breeders. You and I. Many of our Judges are embedded within the school system - and several I know work with our VERY troubled young men and women. Our Future Breeders. I am not a PET DEALER. yes I may have lesser quality animals - that become pets. BUT !! I do not breed for the pet market.

Or do you think some other criteria is better to use i.e. intent to run a business, filing of a D/B/A, claiming the rabbits on income tax etc, list what you prefer: if you file for a business tax ID # . . . and identify yourself as a PET TRADES BREEDER - you are the one who should have to meet the regulations of the new proposed A9988. the number of animals becomes a moot point because the PET DEALER is NOT a BREEDER!! I have been contacted by these people wanting to buy 10 to 20 a month. They are not Breeding what they are supplying to the Pet shops.

Organizations that Represent Rabbit Breeders:

American Rabbit Breeders Assoc www.arba.net

New York State Rabbit & Cavy Breeders Assoc. <http://www.nyrcba.com/>

Rabbit Education Society e-mail ranger18@fairpoint.net <http://www.rabbited.0catch.com>