

The Rabbit Education Society is **opposed** to PAWS S1139/HB2669 for the following reasons:

-The PAWS amendment directly and negatively impacts hobby rabbit breeders by setting a USDA licensing threshold of \$500 gross sales of rabbits per year. If a rabbit breeder sells more than \$500 gross in sales of rabbits for pets or breeding stock they are required to be USDA licensed under PAWS. The average number of rabbits sold by hobby breeders is 68 per year (2004 rabbit breeder survey). The average sales price of a pet rabbit is \$19 (RES breeder survey). So the average hobby rabbit breeder would have gross sales of at least \$1,292 putting them well over the USDA licensing threshold PAWS would establish.

Currently a hobby rabbit breeder can gross under \$500 in sales to pet stores and be exempt from USDA licensing, or sell direct to owner and there is no sales volume limit. PAWS will negatively impact breeders who buy and sell breeding/show stock from other breeders due to the unrealistic licensing threshold. PAWS will also negatively impact youth breeders and 4-H who will likely have to be licensed and will likely have problems even finding breeding stock. The ability of show breeders to buy and sell quality show stock is crucial to maintaining quality bloodlines. PAWS will negatively impact the quality of rabbits and the ability of breeders to improve their herds.

-PAWS treats rabbit breeders unfairly. PAWS sets a licensing threshold that is extremely low in comparison to the exemption given to hobby dog breeders. According to the AKC website in their FAQ section on PAWS a hobby dog breeder can whelp 6 litters and sell 40 dogs and still be exempt from USDA licensing. The average price of a dog based on classified newspaper ads in 2004 was \$500. So the dog breeder from the AKC example could gross \$20,000 in sales of dogs and be exempt from USDA regulation while a hobby rabbit breeder could only gross \$500 to be exempt.

Rabbits and their reproductive issues are very different from dogs therefore rabbit breeders have more rabbits and breed more frequently. However PAWS treats rabbit breeders as if it's the reverse by allowing a hobby dog breeder to gross so much more in sales and be exempt than rabbits. Pet rabbits are not in demand like pet dogs. Industry estimates for current pet populations are 5.3 million rabbits and 74 million dogs and 90 million Cats.

-PAWS also redefines the scope of the Animal Welfare Act (AWA) which is not desirable. In 2002 the Doris Day Animal League sued the USDA over how they defined a retail pet store. The intention was to force the USDA to regulate all hobby breeders who sell direct to pet owners. The lawsuit lost on appeal because it was determined that there was no legislative intent to regulate breeders selling direct to pet owners. PAWS shows clear legislative intent to regulate breeders selling at retail aka direct to pet owners. The current scope of the AWA to regulate breeders who sell at wholesale and exempt those who sell at retail should remain unchanged.

The Rabbit Education Society believes that the current regulation level of rabbit breeding-exemption for food/fiber, all sales direct to owner, and sales of less than \$500 to pet stores (wholesale) is sufficient and we oppose any further attempts to regulate hobby rabbit breeders.

The Rabbit Education Society

<http://www.rabbited.0catch.com> Our list is at <http://group.yahoo.com/groups/rabbit-ed-society>