



THE CAT FANCIERS' ASSOCIATION, INC.

World's Largest Registry of Pedigreed Cats

Legislation – What's Hot

By Joan Miller, CFA Legislative Information Liaison

USDA/APHIS proposal UPDATE – Comment Period extended to August 15th!

The United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) announced a comment extension on Friday July 13. On Monday morning the [Federal Register publication](#) officially extended the comment period to August 15, 2012. There was no indication of any other change to the rule language. With this extension we now have more time to submit comments, elicit support from Congressional representatives and to mobilize the pet loving public. It is critical to take action. The cat fancy and all pedigreed breeds are in serious jeopardy unless the USDA/APHIS withdraws Docket No. APHIS-2011-0003 !

Go to the [CFA Legislative Alert](#) page to read the official APHIS Docket, Regulatory Impact Analysis and other APHIS materials. There are articles covering the background and outlining the adverse consequences of this proposed rule. CFA has complete guidance on how to comment.

What you can do NOW:

- **Make sure your club sends a letter on letterhead NOW. Submit your individual comments.** You can use the Government e-portal and also mail. The [CFA Comment Guide](#) includes the Federal eRulemaking Portal address, the snail mail address, instructions for commenting and plenty of points to make. If you have already submitted your comment send another, or several. Keep checking the CFA Alert page for up to date information between now and August 15th in case there are any changes. To view comments already submitted, [click here](#)

The strategy of having clubs and fanciers hold off until the last days to comment was thwarted by the extension announced on Friday. With just three days left the CFA letter was already mailed just prior to the announcement. The CFA Comment letter is on the CFA Alert page.

- **After submitting your club letter and your individual comments - contact Congressional Representatives and Senators.** They need to know about the detrimental consequences of this proposed APHIS rulemaking. Ask your Representative and Senators to urge the USDA/APHIS to withdraw Docket No.

APHIS-2011-0003. Contact by email or have several club members meet with a key local office staff person.

To find your House Representative -
<http://www.house.gov/representatives/find>
Enter your zip code. On the Representative's website you will see contact information, the email procedure and an appointment scheduler's email address and/or phone number.

To find your two Senators – <http://www.senate.gov>
Enter your State; then on each Senator's website find the email procedure and locate the local office nearest you for scheduling a meeting.

You can also drop in to the district office and talk with staff members. Take a copy of the CFA Comment Letter. This can be attached to a letter from your club. Staff members have a big influence on Representatives and Senators. This is a good opportunity for cat fanciers and clubs to initiate contact and educate them.

- **A CFA flyer designed for the pet loving public** is on the CFA Alert page. Print copies for cat shows. Send flyers to friends, family, pet buyers, veterinarians, co-workers and cat rescuers.
- **Write to the Secretary of Agriculture.** Urge him to have the USDA withdraw the proposed Rule – Docket APHIS-2011-0003:

Tom Vilsack, Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

APHIS again revised the [FACTSHEET](#). It is now back to the original written in May. The July 2012 FAQs most likely represent a response to the numerous legitimate concerns expressed by breeders and rescuers. There were several blatantly deceptive statements in that document. However, it did indicate that confusion and reality is starting to penetrate the agency.

The agency in the July Factsheet said "Pet animal retailers who sellin face-to-face transactions at a location other than their own premises are subject to some degree of public oversight and **therefore are not the focus** of this proposed rule". .

CFA fanciers and others were not misled. There is nothing in the proposal that gives any latitude regarding buyers having to come inside the seller's residence. There is no mention of "face-to-face" sales in Docket APHIS-2011-0003. The rule language has not changed.

APHIS proposes to change the "retail pet store" definition to "**a place of business or residence that each buyer physically enters in order to personally observe the animals available for sale prior to purchase and/or to take custody of the animals after purchase.**"

Those who own more than 4 “breeding females” must be licensed if only ONE kitten/cat is sold without the buyer coming inside your home.

In the July APHIS FACTSHEET it also stated that rescue groups who engage in “face-to-face” transactions off their premises “are not the focus of this proposed rule and would not need a license”. This language is also NOT in the proposed rule.

This rulemaking process may take more new turns. There could be yet another FACTSHEET. Stay tuned.

The USDA has asked for input. It is important for the Comments from cat clubs and individuals to mount in numbers. Commenting online is easy. Ask them to withdraw Docket #APHIS-2011-0003. Contact the CFA Legislative Group at legislation@cfa.org