United States Department of Agriculture
Animal and Plant Health Inspection Service

Third-Party Inspection and Certification
Listening Session

Thursday, February 8, 2018
1:00 p.m. to 5:00 p.m.

USDA, APHIS
4700 River Road
Riverdale, MD 20737
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MR. MIKE TUCK: Good afternoon and welcome to the second Listening Session APHIS, Animal Care is holding to gather your comments to aid in the development of criteria for recognizing the use of Third-Party Inspection and Certification Programs as a positive factor when determining APHIS Inspection frequencies at facilities licensed or registered under the Animal Welfare Act.

My name is Mike Tuck, and I am from the APHIS Center for Animal Welfare and will be facilitating this session. In addition to this session, we have planned in-person sessions in Kansas City, Missouri on February 22nd and Tampa, Florida on March 8th. We also have a phone-in session scheduled for March 14th for those unable to attend in person. Additional details on these sessions can be found on the APHIS, Animal Care webpage. Written comments can also be sent to USDA, APHIS, Animal Care, 4700 River Road, Riverdale, Missouri 20737.
For this session, my role as facilitator is to make sure everyone has an opportunity to express their views. Therefore, it is vital that everyone remains quiet during the talks. This includes turning your cell phone off or putting it on mute. If you have to take a call, please do so out in the hall. Hopefully, everyone registered at the table outside and indicated whether you wish to speak. I will call you up to the podium, and you will have 5 minutes for your comments. I will stand to let you know you have 30 seconds to finalize your comments. In addition, your comments will be recorded, and a transcription placed on the Animal Care web page within a couple of weeks.

At this time, we are here to listen to your comments and will not be responding to any comments or questions.

MS. JANE BROENDEL: Good morning, I am Jane Broendel representing the ASPCA. “I am in favor of animal rights as well as human rights, THAT is the way of a WHOLE human being.” These
words are not my own. Rather, they belong to our much honored and respected 16th President, Abraham Lincoln.

Animals experience pain, anxiety, and suffering -- physically and psychologically -- when they are subjected to captivity, social isolation, physical restraint, or painful situations in which they cannot escape. But, they cannot voice neglect and/or abuse they are subjected to. Rather, it is up to us, the people, or in this case, the USDA, which is part of our government, the people's government, to ensure it meets its obligation to serve the public interest. What is that interest? To ensure animals used commercially are provided with humane care and treatment in order to ensure, if not a happy life, at least one as free of physical and emotional neglect and/or abuse as possible.

In order to ensure the Animal Welfare Act, which was meant to provide for the above, is enforced, the USDA must not abdicate its responsibilities. It must not recognize the so-
called certification/accreditation/inspection programs run by third-party, non-government organizations that have a vested interest in the continuation of traditional exploitative practices. Pardon the animal reference in this case, but this is like putting the fox in charge of the henhouse or, maybe better put, at least in this forum, Dracula in charge of the blood bank. It does not work. It won’t work. The Office of Inspector General has stated so in the past, and nothing has changed to convince me otherwise. Let’s not put hundreds of thousands of animals at further risk.

Anything short of a federal inspector being employed to enforce a federal law diminishes the effectiveness of that law. In fact, the USDA should perform more unannounced inspections, not less, and provide for transparency on its website so the public may be better informed of violations of the Animal Welfare Act. Relinquishing control to third parties who will perform few inspections and those inspections announced in ADVANCE will
not ensure animals are treated humanely. It is a 
slap in the face to the 55-year-old Animal Welfare 
Act.

Let’s remember Mahatma Gandhi’s words, 
“The greatness of a nation and its moral progress 
can be judged by the way its animals are treated.”

Let’s go forward, USDA, not backward.

MS. KATHLEEN CONLEE: I am Kathleen 
Conlee, Vice President for Animal Research Issues 
at The Humane Society of the United States. I am 
speaking on behalf of HSUS specifically in regard 
to the oversight of registered research 
facilities. I appreciate the opportunity to speak 
today.

I have the experience of working for 
several years at a primate breeding and research 
facility that was inspected at least annually by 
the USDA. Our facility was also accredited by the 
Association for the Assessment and Accreditation 
of Laboratory Animal Care International, known as 
AAALAC, which is a private nonprofit accrediting 
body.
With this personal experience in mind, I feel very strongly that it is imperative that inspections of research facilities be carried out by the USDA officials at least annually, as currently required by the Animal Welfare Act.

I will briefly share the reasons behind this, and more detailed information will be submitted in writing by our organization.

The fact that inspections were unannounced played a crucial role in the USDA seeing problems at the facility firsthand that couldn’t be covered up in anticipation of a visit. As someone at the facility who fought for better care for the animals, I was thankful when USDA violations compelled changes.

AAALAC site visits were planned well in advance and were only carried out every three years. This remains the same today.

AAALAC doesn’t use the Animal Welfare Act or corresponding standards when assessing facilities. The organization uses the Guide for the Care and Use of Laboratory Animals and two
other standards. They do, however, use USDA
inspection reports as part of their assessments.

AAALAC Council (those making decisions
about accreditation) are members of the research
community. Therefore, the community would be
policing itself. Self-policing is an utter
failure when it comes to protecting animals.

AAALAC keeps all of their findings
confidential. Therefore, there is no public
accountability.

AAALAC doesn’t have a mechanism for
formal enforcement such as penalties. The one
consequence is loss of accreditation, but it is
unclear how this determination is made.

The USDA’s Office of Inspector General,
on the other hand, places great emphasis on the
importance of monetary penalties to drive
compliance with the AWA. Increasing penalties is
one way that the USDA can address question #5 put
forth in regard to how APHIS can improve the
effectiveness of its AWA program.

As just one example, the HSUS carried out
an undercover investigation at Texas Biomedical Research Institute, which revealed serious welfare problems, and the facilities has been cited for numerous Animal Welfare Act violations by the USDA over the years. Despite this, the facility remains AAALAC-accredited.

Overall, it is clear that AAALAC accreditation or any other third-party mechanism cannot and should not be a substitute for thorough, annual USDA inspections at research facilities at least annually.

Finally, I want to stress that the HSUS every year leads efforts to increase budgetary support for Animal Care. In 2017, a bipartisan group of more than 220 US Senators and Representatives urged funding for enforcement, restoration of USDA records online for public accountability, and consequences for those who violate the Animal Welfare Act.

We will continue to do our part, and we urge you not to lessen yours.

MR. JOHN GOODWIN: Hello everyone. My
name is John Goodwin, and I’m the senior director of the Puppy Mills Campaign at the Humane Society of the United States.

About one year ago today, the USDA removed all of the animal welfare inspection reports from the website -- the APHIS website, and, while some of those were put back online, the vast majority available only in severely redacted form. For most commercial dog breeding operations, no one has any way of knowing who has direct violations, who has a perfect record, and who has minor violations. This assault on transparency has undermined eight state laws that were designed to prevent the worst kennels from selling to pet stores.

Apparently, that was the first part of a one-two punch against the integrity of the Animal Welfare Act. First, transparency was erased. Now, the agency is considering third-party inspections. Third-party inspections have been a total flop with the Horse Protection Act, and this situation can only be made worse now that
inspections are largely occurring in the dark, far from public view.

I’m not sure which entities support this proposal. I would say that there is some irony in the fact that these attacks on the integrity of the Animal Welfare Act, first through the purging of inspection records from your website and now this is that these actions frustrate state and local officials and move them toward action.

To date, over 250 municipalities have banned the sale of commercially raised puppies in pet stores, and the state of California enacted a similar bill in October of last year. This year, half a dozen other states are considering similar legislation from blue states like Oregon to red states like Nebraska. We’re in regular contact with legislators who are considering these sorts of proposals, and the subject of USDA licensed dog breeding facilities always comes up. Every move that undermines the Animal Welfare Act makes it easier for us to enact those sorts of laws that said I’d rather have a stronger Animal Welfare Act
than a strong talking point. This proposal is a lose-lose proposition for animal protection organizations that care about the well-being of animals. It’s a lose-lose proposition for people in various industries who frankly benefit from confidence in the Animal Welfare Act and Animal Welfare Act enforcement.

And, I want to make one more reminder to people who may be open to this idea. Administrations change. The sort of entities that could be given third-party inspection powers in this administration -- it may be different in another administration. That has the effect of politicizing this process. We already have too much politicization of law enforcement agencies in the United States today. We don’t need that to extend further with the USDA.

I would argue that this concept is fraught with problems, and I would urge the USDA to reject this idea.

MS. MARGARET KEATING: Hi, my name is Margaret Keating, and I’m just a little person. I
got the information to come here through PETA, but I’m just representing myself pretty much. And, I’m not going to talk long because I don’t have the experience of all these wonderful people who came before me, every point of which I agree with. The only thing I would say is when you go into the third-party people, who is to know who they represent. Do they represent the industry? More than likely, they would, I would assume. So, we’re not accomplishing anything. So, it seems to me all the questions in the front here that want information on these third-party people, let’s just get rid of them, and we don’t even have the questions. Let’s just go with more inspectors from USDA and more punch to the laws that are there and not try to eviscerate the laws that we have. Those laws were -- people worked very hard to get those protections for the animals, and it seems as if what we’re doing is going backwards. Thank you very much.

Merkley? Morgan Miller?

MS. SUE LEARY: Hi, my name is Sue Leary. I’m President of the American Anti-Vivisection Society and also President of Alternatives Research and Development Foundation, two other affiliations that are somewhat relevant for this discussion because they involve certification and accreditation programs. I’m also Chair of the Coalition for Consumer Information on Cosmetics, and also I’m on the Board of the Global Federation of Animal Sanctuaries and have been since 2008. So, I do have some experience with accreditation programs and certification programs. My experience, unfortunately, does not point to the advantages of using those programs as criteria, although I do know that some state laws use GFAS as criteria to establish whether or not a sanctuary is an appropriate place to have an animal go, and we appreciate that, and I’m not speaking on behalf of GFAS or CCIC. But, I’m just trying to draw on my personal experience. I don’t think there is any substitute for
the government. Law enforcement is law enforcement, and that’s what’s taken most seriously by any institution. The accreditation and certification programs are optional, and they’re not going to be viewed in the same way at all. I’m somewhat familiar with AAALAC accreditation because of my years of experience in this movement, and I would have to agree with the previous speakers. Katie’s experience certainly rings true with what we’ve seen. It’s -- AAALAC accreditation is not any reason to have criteria of a lower bar or some kind of accommodation for a research institution to have a pass or, you know, in any way change the priorities of the inspection.

I understand what you were saying earlier that perhaps it doesn’t mean there won’t be an inspection, but it does certainly imply that if you have this accreditation or certification, that the inspection would change, and I think, in fact, we need to strengthen the inspections and not weaken them in any way.
As Katie mentioned, the AAALAC inspection is one visit every three years. It’s a site visit, it’s not an inspection, and it’s announced. And, those are big differences and very significant differences.

The transparency issue is also something that is very important to us. I know that our experience with accreditation and certification programs is that the information that is provided is private, and we need to know more, as Mr. Goodwin said, not less about what’s going on with facilities that are using animals.

So, we’re in support of this proposal, and I can’t really say in terms of the fifth question -- I know you’re very interested in what’s the opportunity for APHIS to improve its program. I think that certainly some of the things that have come up in audits in recent years are worth revisiting, increasing penalties, and, of course, from the perspective of our Alternatives Foundation, the compliance with the alternative searches is something that needs to be
looked at and strengthened, and we’d be happy to
help with that. That’s all. Thank you.

MR. RYAN MERKLEY: Good afternoon, my
name is Ryan Merkley. I’m the Director of
Research Advocacy for the Physicians Committee for
Responsible Medicine, a national nonprofit with
12,000 doctor members and 175,000 members
nationwide. Because we advocate for the
replacement of animals in research testing and
training, I’m going to be talking today about this
plan as it would relate to the oversight of
registered research facilities.

I’m here simply and strongly to voice our
objection to this plan. We believe that this
would effectively put, or could assist in putting,
oversight of research facilities in the hands of
the very people who would be overseeing
themselves.

I’m going to say a couple of things about
AAALAC, and I won’t tell you the name of the
organization or spell it out because you’ve
already gone over that and how long it is. But,
the third party that most likely would oversee research facility inspection or assist USDA, as Bernadette said, would be AAALAC. So, it’s worth noting a couple things about AAALAC.

I would like to point out that the Council on Accreditation of AAALAC consists of 60 people at research facilities who are thus accredited by AAALAC, and of those 60 people, 27 US facilities are represented. So, I think it’s important to note that Emory University’s Chief Veterinarian is among those 27 facility representatives. So, let’s take a look at what’s happened at Emory over the last couple of years.

In January of 2015 at Emory, a macaque underwent a procedure to apply an identifying tattoo. The animal started moving abnormally and then developed signs of neurological problems and respiratory distress. The macaque was euthanized, and it was determined that the staff had failed to remove a rubber band applied during the tattooing procedure.

A few months later in December of 2015, a
separate macaque was euthanized after he became severely ill. The necropsy found a piece of sterile gauze had been left in his abdomen during a recent surgery, which caused adhesions and intestinal obstruction.

A year and a half after that in July of 2017, Emory proudly announced on its website that it had received full AAALAC accreditation and had said that AAALAC’s correspondence to them commended Emory for its high professionalism, demonstrable collegiality, and programs and infrastructure in support of research. That was in July of 2017.

The very next month at Emory in August, a non-human primate underwent a nephrectomy, and seven days later had to be referred for surgery again because a gauze sponge had been found inside the animal.

It’s hard to say that AAALAC accreditation leads to reduction in Animal Welfare Act violations. This is, as many people have said, the fox guarding the henhouse.
And, Emory is not an outlier. Habitual violators of the Animal Welfare Act are routinely awarded accreditation by AAALAC, which begs the question, if USDA hands over part of its authority to AAALAC, who is going to be looking after AAALAC?

AAALAC visits accredited facilities, as has been noted, once every three years. These are announced site visits, which are in drastic comparison to USDA’s current unannounced annual inspections. AAALAC openly prides itself in carrying out “confidential peer reviews,” which raises serious issues of accountability to the American taxpayers and also raises some questions about transparency. And, I’ll just ask too, will AAALAC site visit records be provided to USDA, and will site visit records be made available to the public through the USDA Animal Care public search tool?

Considering AAALAC’s priding of his confidentiality with accredited facilities, it’s hard to believe that they would want those records
made public and made public openly. Without such transparency, it’s indefensible that AAALAC would be given any authority at all akin to what USDA has.

We should also point out concerns with USDA’s own problems enforcing the Animal Welfare Act have been noted today and in recent years by the Office of the Inspector General. USDA is legally required to inspect every research facility at least once per year, and Bernadette, I’m going to cite something you said recently, which is seemingly at odds with what you mentioned this morning. At an ILAR Harvard Law Roundtable a few weeks ago, you said that USDA is considering having less thorough inspections and possibly announcing inspections in advance. That seems to be at odds with what we’re discussing here today and what was put forth, so I would like the USDA to, at some point, address what it is considering.

We understand that the Whit House and Congress has put before USDA a mandate to reduce “regulatory burden,” but we don’t believe that the
agency doing less and putting the lives of animals in labs in the hands of the very regulated community is the right way to proceed with addressing that. Thank you so much.

MR. DAVE LONDON: My name is Dave London. I’m a private citizen, and I’m very concerned about this matter. The inspections under the Animal Welfare Act should be done by the government with highly trained inspectors. It should be always unannounced with no minimums so facilities can’t say, oh, we’ve been inspected for this this year, now we’re good. But, it also should not be supplemented with private businesses and industries doing inspections because that’s going to muddy the waters, and it will muddy the waters intentionally.

A number of years ago, I was on a state commission, and we were investigating research on a certain matter, and we found that private industries would create their own pseudo-research, phony research, just so it would muddy the waters, and people would have to say, well, there’s two
sides to this, and that’s exactly what would happen here.

The inspections must be government only, and you know darn well that private businesses that are going to do these are industry created, and they’re going to have a conflict of interest, and you’re going to have a corrupt system. And, it’s going to just create a real disaster for you.

So, I want to emphasize that I agree with those people who spoke so far, and I don’t want to repeat what they said.

I think maybe it wasn’t brought up, so I want to just bring up one item about self-inspections. In the case of the Tennessee Walking Horses, we had industry-affiliated experts -- so-called experts -- doing the inspections, and they were not really interested in the animal’s welfare or reducing suffering, they were interested in just perpetuating their own barbaric practices of the soring. So, that’s a perfect example that places cannot self-regulate, and if they are going to be choosing private businesses -- and, I don’t
know if this is going to allow them to choose them themselves -- obviously, they’re going to choose the ones that are going to do what they want. You know, it would be like me saying, well, I’m not going to let a policeman tell me I can’t go through the red light, I’ll have my brother or sister do that. You know, it’s just ridiculous.

But, I guess the main point is, it would muddy the waters. It would just create excuses. While you’re saying we didn’t do this, well, this other business is saying we did, but that other business has conflict of interests. You’re going to create a mess. Thank you very much.

MS. MORGAN MILLER: Hi, my name is Morgan Miller. I’m here as a private citizen. I, like many other people, got a puppy from an unregulated breeder, and he got really sick and almost died.

So, that’s why I’m here today, because I’m now very interested in the regulation of commercial breeders.

I strongly oppose recognizing or the use of third-party programs to replace or supplement
USDA inspections, and here’s why. One disadvantage to using third-party inspections is the inconsistency of standards and regulations. The likelihood of finding an impartial, fully transparent third-party program to support the Animal Welfare Act is very low. As it stands, third-party programs that I’m aware of have done nothing substantial to earn the trust of the public and show little to no commitment to true animal welfare. If a third-party program were to be used, they should be required to (a) make their standards of inspection public, (b) make all their inspection reports public without redacted information at all, (c) have a clear and fair standard of penalties for noncompliance, and (d) all their veterinarians and inspectors vetted by the USDA.

Seeing as the USDA doesn’t even meet all these standards, I don’t see how the USDA should be able to use a third party that has subpar standards and practices that goes completely unchecked by the public. Without the ability for
the public to access information and little to no retribution for noncompliance, there is virtually no incentive for a facility owner to comply with the Animal Welfare Act.

In terms of encouraging compliance with the Animal Welfare Act, I think recognizing third-party inspections would be a huge step in the wrong direction. Instead, I would strongly suggest that the USDA return to full transparency in terms of their inspection reports. The redacted information doesn’t allow for someone like me to know if I am purchasing from a facility that has been compliant with the Animal Welfare Act.

Another suggestion would be to establish and then implement harsher punishments for noncompliance. I have seen inspection reports from the same establishment dating back over 10 years with multiple reports of noncompliance, citations, and warnings each year, yet they are still in business and have been for years.

There should at least be higher fees or
more license suspensions for noncompliance. I believe this would encourage compliance because it gives facility owners an incentive for complying. Plainly put, I don’t think the USDA is doing enough to protect the public from facilities with unsafe practices, and they are not doing enough to protect animals from unnecessary suffering.

In conclusion, I strongly opposed the use of recognizing third-party programs, and I strongly suggest the USDA to spend time evaluating their own practices. Thank you.

MR. MIKE TUCK: Okay, can I have Cristina Miranda, Gina Moraz, Kerry Mullen, Heidi Osterman, Renee Payne, Connie Porter, Leon Seidman, John Seyjagat, and Chris Shaughness.

MS. HEIDI OSTERMAN: Good afternoon, my name is Heidi Osterman, and I’m here as a private citizen. Basically, I grew up in a small farming town with the horse industry and mostly cattle farming, so I’m just kind of a private citizen. I’ve read the questions, and these are kind of my
thoughts reflecting on the questions.

So, good afternoon, and thank you, again.

In responding to the questions regarding the use of third-party programs when determining the inspection frequencies, I do not believe that a reduction in the inspections would be an incentive for facilities to use third-party programs, nor do I believe that these programs would be an effective method to support compliance. The third-party programs will be businesses, even if they’re made accountable to the USDA, and there are very critical differences between a government agency and a business. A government agency is more likely to be transparent and work outside of the industry it is governing. A business is usually run for profit -- at least some profit -- and it needs to be part of the industry to succeed. As businesses, the third-party programs will need to hire people in the industry who have ties to the industry, because they understand the industry, so that’s a big conflict of interest. And, really, they won’t have any incentive or
reason for transparency as a business unless, you know, the USDA holds them to some sort of transparency.

Some third-party programs, again, because there is money involved, they may need to charge dues to keep up with their expenses, and this could impose a hardship upon the different facilities and create club kind of atmosphere where the membership needs to pay to sustain the third party instead of an independent body of professionals. And, even though it would be voluntary, the facilities may feel like they have to join these third-party programs because it’s kind of a club-type thing, you know? So, that could be a problem. They could feel pressured to join.

Another crucial difference, which I find extremely concerning, between a government agency and private business is that businesses can and do influence laws. Many business organizations have political action committees with lobbyists who influence their legislators and bills. If a
third-party program can influence laws, then it can never be an independent organization, and I don’t see how they can do any type of inspections or regulation if they’re going to be, you know, have a political action committee.

Finally, I would like to use the example from the past to illustrate difficulties that third-party programs have faced in the past. Again, someone mentioned this about the Tennessee Walking Horse Shows. The inspectors were part of the industry, again, because that’s where you’re going to get the people -- from the industry. So that, again, makes for a conflict of interest.

Then, to make matters worse, in 2015, the Fifth Circuit Court of Appeals determined that the USDA could not require private inspection programs to impose minimum penalties under the Horse Protection Act. So, therefore, the third-party programs were rendered powerless to affect any kind of meaningful change if they found a violation at a show. There was nothing they could do -- no reason for the people to pay attention to
them.

So, it seems to me it’s impossible to uphold the Animal Welfare Act standards when your organization has no authority to do so.

In thinking about other options, the only option I can see would be to train independent inspectors with no ties to the industry, and then that’s going to be an expense for the USDA. So, I’m not sure how you get around that conflict of interest except to use a government agency to do, you know, what Congress has determined through the Animal Welfare Act. To me, only the USDA can do the job that Congress instructed it to do. I don’t see how you can get away from the conflict of interest. Thank you so much for your time, Mr. Tuck. I really appreciate it.

MS. GINA MORAZ: Good afternoon, my name is Gina Moraz, and I’m the Senior Manager of the ASPCA’s Puppy Mills Campaign. I’m here today on behalf of the ASPCA and our 6.5 million members. Thank you for the opportunity to comment on potential revisions to the USDA’s inspection
The ASPCA opposes APHIS’ dangerous suggestion that third-party inspections could substitute for government inspections in any form, even just for determining the frequency of inspections under the Animal Welfare Act. Animal Welfare Act oversight is a function of the federal government and should not be outsourced to private entities tied to the industry being regulated. Doing so would not only endanger the lives of countless animals but also undermine the efficacy of the Animal Welfare Act and further erode the public’s trust in the USDA.

The USDA should abandon this ill-conceived idea: first, because we know self-policing has failed in the past; second, because of the widespread conflicts of interest; third, because this policy could result in low-quality and low-frequency inspections; and fourth, because this policy compromises the transparency that the American public deserves.

First, self-policing has failed in the
past in APHIS’ own Animal Care Division. As made clear by the third parties used in horse-soring inspections, self-policing is ineffective, as violations are overlooked, and animals are endangered. Now, in spite of a wealth of evidence demonstrating its inadequacy, the department is inexplicably looking to possibly extend this policy to all areas of the Animal Welfare Act.

Second, conflicts of interests exist in other industries. The breeders, laboratories, and zoos regulated by the Animal Welfare Act could be inspected by organizations that seek to serve industry interests. Of these organizations, the ASPCA isn’t aware of any robust, uniform, or transparent inspection programs or any that have real enforcement mechanisms for poor treatment of animals. For example, the American Kennel Club, possibly the most widely known purebred dog registration in the US, claimed to have some type of regular program to visit dog breeders, but there is little public information beyond that. Nothing providing information on how the breeders
are assessed, who is making these visits, or if there are any animal care standards. We do know that the AKC has visited breeders in the past who have kept dog in filthy, deplorable conditions, but yet maintained their AKC registration. The AKC’s revenue is dependent on the registration of puppies from these breeders -- a clear conflict of interest, and exactly why inspections should not be left to private groups closely tied to the very industries they’re inspecting.

The third reason APHIS should abandon this idea is that the USDA should not base its frequency of oversight on the judgement of organizations that may conduct low-quality inspections. Inspections could be infrequent, superficial, and announced, giving facilities the ability to appear as if they are in compliance. This would create a positive feedback loop, in which passing inspection at the third-party level results in fewer inspections from the USDA. Animals in desperate need of help would slip through the cracks.
Finally, we must consider the effect this policy will have on transparency. Transparency will be lost, as third-party accrediting organizations likely will not publish their standards, their inspection procedures, or inspection records. If these documents are not available through FOIA, third-party inspectors will be serving a government function, while circumventing accountability to the public. The disruption of public trust that the USDA data blackout caused should make clear to the USDA that any further infringement on the transparency of the inspection process will be met with loud public resistance.

On its face, this policy is a shameless abdication of USDA’s duty under the Animal Welfare Act. On closer inspection, it’s a threat to the safety and welfare of the millions of regulated animals, it’s a treat to the right of the American public to transparency and open government, and it’s an attack on the Animal Welfare Act, which for over 50 years has provided at least a minimum
level of protection for animals throughout the
country.

The ASPCA urges the USDA to abandon this
idea and instead work to strengthen and improve
existing enforcement processes, and I think that’s
your answer to number 5. I think a way to
actually encourage compliance is to strengthen
enforcement. I think one way to do it is through
actual deterrence through issuing fines in a
timely manner, and I think also stopping the auto
relicensing of licensees that have violations on
their record would help. Thank you.

MR. JOHN SEYJAGAT: I am John Seyjagat, the Executive Director of the Zoological
Association of America. We are the second largest
trade association in North American with over 65
accredited facilities and 455 professional
members. We are strong supporters of the USDA-
APHIS program and stakeholders in this program.
We believe that we would work with the USDA in
finding the greatest opportunity with APHIS to
improve the consistency and effectiveness of its
inspections; however, we are concerned with the notion of a third-party inspection. Presently, the ZAA offers an assessment and auditing program through accreditation for its members. This is a stringent program that requires two to three inspectors that go over an institution for up to two days inspecting everything from animal welfare and animal and human safety.

We are concerned with this because in question 3 of the USDA, it says, is there a potential for well function and market for third-party programs to develop. We don’t know what this entails. We don’t know what the intent is and what this is going to turn out to be. ZAA inspects its facilities once every five years, and that, in itself, is a very stringent exercise, and it’s a burden on the institution. Part of our accreditation program requires the last three years of inspections from the USDA, and if there is any reduction in USDA inspections, this will drastically affect our accreditation and our auditing program.
Right now, we are in a listening phase. We would like to get more information. We would like to see how this develops. We will submit our comments to the USDA soon, but at present, we would really like to hear more about this third party, how it’s going to develop, who is going to be the third party, because if we have -- if we are considering as a third party, that would incur expenses on our members, because they pay for their inspection for inspectors to come out to do these inspections. And, having inspections more than one year by our association is going to be burdensome on our members.

We believe in the USDA inspection. We believe they are doing a good job. We would like to see more consistency. We would like to work with them for more consistency. But, turning this over to a third party -- we have concerns over that. Thank you.

MS. CHRISTINE SHAUGHNESS: Good afternoon, my name is Chris Shaughness, and I’m the Executive Director of an animal welfare
organization in Montgomery County, and I’m also a volunteer for several animal organizations. But, I’m here today to speak to you from my personal experience as a dog trainer and a behaviorist and from my experience in working with puppy mills. I’m the author of a book called Puppy Mill Dogs Speak, and the co-producer of a documentary called Uncaged: Second Chances for Puppy Mill Breeder Dogs. 

From my work, I have witnessed firsthand what happens in puppy mills -- both the regulated and the unlicensed. I have witnessed how breeders work together to circumvent the rules. It’s very common knowledge that they hide dogs in other locations, often in relative’s properties. I have seen how they have found ways to avoid following the regulations. I stood vigil for 80 dogs who were shot and killed by their owner because he did not want to pay the money to bring his dogs to veterinary standards according to the regulations. I’ve also seen what happens when some breeders convince their veterinarians to look the other way
when the animals are clearly not being cared for. I’ve even known of inspectors getting paid off to pass inspections for facilities that clearly should be shut down. It is an insidious business. The introduction of third parties into the mix gives me great concern. I believe that those inspections will give operations less oversight and more opportunities to circumvent the regulations more than they already are. Who will qualify these third parties, and what will the qualifications be? Who will be watching them? Will APHIS be overseeing them, and, if so, that could add more administrative overhead to their already packed scheduled. What would be the incentive for the facilities to hire third-party inspectors? I have a lot of unanswered questions here.

As other people have mentioned today, history has shown that third-party inspection programs do not serve the animals’ best interest. The USDA has its own past experience to learn from in delegating animal welfare monitoring to private
third-party inspectors. Under the Horse Protection Act, inspections at Tennessee Walking Horse Shows are conducted by private inspectors, who are industry employees and exhibitors. These inspectors are supposed to help eliminate the cruel practice of soring horses, but instead have served mostly to help cover up its continued use.

I am strongly encouraging you to reconsider the use of third-party programs, which would add more layers of complication to an already weak process. Instead, please focus on improving and streamlining the process and adding more unannounced visits. The effectiveness of the Animal Welfare Act and the animals depend upon it.

Thank you very much.

MR. MIKE TUCK: Okay. If I could have Emily Spivak, Anita Summers, Maryam Tabrizi, and Monica Tierney.

MS. EMILY SPIVAK: Hi, my name is Emily Spivak. I’m here as a private citizen and Maryland constituent, and I’m also here on behalf of my father, who is a disabled Marine Corp.
veteran in Pittsburgh, Pennsylvania.

I am here to express my strong opposition to a USDA proposal that would dramatically diminish oversight of facilities such as zoos, research facilities, and commercial dog breeders regulated under the Animal Welfare Act. This proposal would be equal, as other folks have said, to the wolf guarding the henhouse -- an industry self-policing system. Allowing the industry to monitor itself would be extremely detrimental to the well-being of the animals kept in these facilities.

According to the USDA’s website, “Highly trained USDA inspectors located throughout the United States conduct routine, unannounced inspections of all facilities licensed or registered under the AWA to assess these facilities’ compliance with the AWA.” The USDA should maintain all of these absolutely vital compliance and enforcement responsibilities in house and not outsource any of them to private third-party inspectors.
We trust our government to ensure the welfare of our nation’s animals, and we cannot expect the same level of standards to be enforced by third-party auditors, and they should not be considered a qualified replacement or addition to federal inspections.

Also, reading in the questions, the term “qualified” that they state is also very general. There is no substitute, in my opinion and my dad’s opinion, for trained federal employees.

The Animal Welfare Act is the only federal law that regulates the treatment of animals concerning the transportation, sale, and handling. It is incumbent upon the USDA to continue to ensure proper enforcement of the AWA.

One of the major public concerns is that a third-party accrediting organization who may be given the vital responsibility of monitoring the welfare of our nation’s captive wildlife has an innate conflict of interest, as others have stated. These organizations collect dues from their accredited members and have incentive not to
take disciplinary actions against those who violate the AWA if doing so could contribute to fines, enforcement actions, or possible USDA license revocation.

Transparency with the American people is of the utmost importance. This proposal would further dampen the current state of transparency. The USDA has currently a very insufficient listing of inspection FOIA record reports available to the public right now, which is an issue. And, these records allow the public to identify, for example, which zoos have violations of the AWA. Passing this proposal to outsource any of the USDA’s responsibilities to third-party entities would exacerbate the issue, making it even more difficult for the public to obtain this information from the private third parties.

Through the Animal Welfare Act, the American public has entrusted the USDA to protect our nation’s animals. These animals will absolutely negatively be affected by the privatization and outsourcing of federal welfare
inspectors’ expertise.

Please maintain this vital responsibility on behalf our nation’s animals and for the public. It’s a consumer protection issue as well. I, and my father, strongly urge the USDA to please perform more unannounced inspections by USDA inspectors only, and please don’t supplement these by third-party entities. We ask that you please maintain the vital responsibility on behalf of the public and our nation’s animals. I just want to thank you so much for considering all of us today.

Thank you.

MS. ANITA SUMMERS: Hi, my name is Anita Summers. I’m here as a private citizen. The USDA is the agency responsible for ensuring that operations such as puppy mills, roadside zoos, and research facilities are complying with the standards of animal care established by the Animal Welfare Act.

My first thought when I heard about the proposal to possibly reduce or supplement USDA inspections of these facilities and allow third-
party inspections was, oh boy, here we go again.
Did we learn nothing from delegating animal
welfare monitoring to private third-party
inspectors under the Federal Horse Protection Act?
It’s been an unmitigated failure and is evidence
of the conflict of interest that can be created by
third-party inspections.

I do not believe that reducing or
supplementing the USDA’s Animal and Plant Health
Inspection Service -- APHIS inspections -- will be
an incentive for regulated facilities to use
third-party programs to support compliance under
the Animal Welfare Act.

As a taxpayer, I would wonder if the USDA
is getting complete and unbiased reports from
these third parties, and if violations of the law
are being overlooked or compliance is not being
enforced. And, who is going to pay for these
third-party inspections? If it’s the industry
being regulated that pays, I would be concerned
that the industry would want to exhibit some
influence over the inspections and the reports.
And, if it’s the taxpayer, then I would recommend that this program not be instituted and the money be reinvested in improving the current inspection and reporting process.

The biggest and most important risk associated with this proposed program is how it affects the welfare of the animals that the USDA is charged with protecting. For over 50 years, this nation has valued the independence of this federal agency to ensure that certain humane standards are being met. The USDA needs to remain the objective party in these inspections and not outsource oversight and enforcement to industry.

In my view, the only way for the USDA to achieve and sustain compliance with the Animal Welfare Act is for the USDA to retain its responsibility for inspections and to increase the frequency of inspections including unannounced inspections of facilities, to increase penalties for violations, and to make enforcement data transparent and easily available to the public.

Thank you.
MS. MARYAM TABRIZI: Hi, my name is Maryam Tabrizi, and I’m here as a concerned citizen. The United States taxpayers and citizens rely upon the USDA for its role in the protection of public health and oversight of animal welfare as an objective and independent watchdog. As a concerned citizen and a public health professional, I strongly object to the USDA outsourcing or supplementing its compliance and enforcement responsibilities at USDA-regulated facilities such as the thousands of research laboratories, puppy mills, and wildlife exhibitions or zoos to private third-party inspectors because these oversight programs have the potential to fail to ensure the basic animal welfare standards as met by the Animal Welfare Act.

It is important to note that the welfare of animals in these facilities also helps to ensure the public’s health through the conduct of valid, scientific research of benefit to human health, the safety of employees and visitors to
wildlife exhibitions, and the adoption of healthy companion animals. I will further outline my concerns with the use of private third-party inspectors as follows.

First, as others have stated, use of third-party inspectors creates potential problems with conflicts of interest. Once the USDA hands off the power to third-party inspectors, these types of programs create an environment for the potential of self-policing, which can be devastating to the welfare of animals kept in these facilities where the enforcement of the Animal Welfare Act is already very challenging. Private-industry inspectors have contributed to the persistence of cruel practice of horse-soring, which previous speakers have said, as found in the USDA’s own Inspector General report in a 2010 audit of the agency’s enforcement of the Horse Protection Act.

And, as others have stated, the American Kennel Club and accrediting body that is funded by fees paid by breeders who pay to register the
puppies, on several occasions have also accredited
dog breeders that have failed USDA inspections.

Second, the use of third-party inspectors
does not necessarily reduce the USDA’s workload.
It will be challenging for the USDA to ensure that
these third-party inspectors are objective at
conducting duties to ensure the animal welfare
standards. There still exists the additional
oversight and extra burden on the USDA to audit
these third-party inspectors to ensure proper
enforcement of the law in an environment were
again, enforcement of the animal welfare standards
is already a difficult task under experienced and
trained staff at the USDA.

Third, use of third-party inspectors
creates problems with transparency, as others have
stated. There is a concern with the release of
information and transparency regarding the results
of third-party investigations and adherence to the
animal welfare standards. Private third-party
inspectors may be less likely to want to release
information on inspections due to privacy
concerns, and the public therefore might have no way of knowing if a puppy mill or other operation passed its third-party inspection. As it now stands, the public does not have sufficient and easy access to enforcement records, which may be able to help identify zoos or breeders that have failed or have a chronic violation of the Animal Welfare Act. It is already difficult, if not impossible, to obtain animal welfare information from the USDA.

To summarize, the outsourcing and privatization of inspectors has the potential to detrimentally impact tens of thousands of animals, shortchange taxpayers, and adversely affect public health. I ask that the USDA please continue to maintain the integrity of this very important oversight responsibility. There is no substitute for the thorough, unannounced inspections by trained and experienced inspectors at the USDA for the robust enforcement of the Animal Welfare Act.

MS. MONICA TIERNEY: Hello, my name is Monica Tierney, and I’m the Program Manager at
Children’s International School. I’m here today not only behalf of the animals but also for our children. Our Pre-K children are very, very active social activists, and recently, this past fall, they wrote a letter to USDA expressing their concern about certain issues, and they included drawings in their quotes. They received a response back, and they were very, very excited. So, I’m here on their behalf as well.

Like many others today, I do not support the USDA’s proposal to recognize third-party inspection and certification programs as a factor in determining inspections of licensed and registered facilities under the Animal Welfare Act. Based on past experience, there are no advantages of using third-party programs to support compliance under the Animal Welfare Act. If anything, they would create more problems, setbacks, and inefficiency like we’ve heard today from other people.

Basically, in the past, USDA inspectors often found problems at facilities that proclaim
compliance with a third-party program. Social media has played an increasingly invaluable role in educating the public and uncovering cases of animal cruelty in facilities that are currently licensed. People are watching. People do care.

Based on a recent survey, one-third of Americans want animals to have the same rights of people. Very few Americans, only 3 percent, believe animals require little protection from harm and exploitation. There is a huge animal rights movement gaining momentum daily, especially among the younger generation, and they want accountability.

Everyone is looking at the USDA, whose responsibility is to ensure the well-being of animals, not third parties, to hold violators accountable. I believe that this is a turning point and one that can be viewed as an opportunity versus a challenge. The way to move forward is for the USDA to work from a proactive versus reactive paradigm. Those facilities that do not comply with the minimum requirements of the law
should have their licenses immediately revoked. This would encourage other facilities to achieve and sustain compliance with the Animal Welfare Act. I see this as the greatest opportunity to improve the effectiveness of the program.

There is no replacement of thorough unannounced government inspections. This applies for all types of industries, not just animal welfare. Would we want our childcare, health, or food to be regulated by nontransparent entities? Animal abuse is a very serious issue that concerns all of us. Please do not involve third-party programs and instead create a more effective and transparent system of government oversight. Thank you.

MS. KATHLEEN SUMMERS: Hi, my name is Kathleen Summers. I’m the Director of Outreach and Research for the Puppy Mills Campaign at the Humane Society of the United States. Before I start my prepared remarks, I wanted to answer Ms. Juarez’s question regarding number 5. I feel that the USDA should work with
State Departments of Agriculture and Humane Law Enforcement Agencies and specifically ask them to alert the USDA of any significantly problematic operations. My understanding is that this is not currently being encouraged, and it should be. And, I’m wondering why USDA would be considering third-party inspections from potential industry groups when they’re not working with Humane Law Enforcement Agencies or State Departments of Agriculture that are already experienced in impartial inspections.

I’ve studied problematic dog breeders as my full-time job at HSUS for 12 years, and we’ve seen that none of the current approval systems run by pet industry groups or breeder collectives can be called impartial, nor have they been successful in controlling bad breeders.

Case in point, the current president of the Missouri Pet Breeders Association, according to the USDA’s own records, has been warned repeatedly for violating the Animal Welfare Act regulations. In February of 2016, the USDA gave
him an official warning and complaint for failing to open his kennel to USDA inspectors on four different occasions, and even after the USDA filed that official complaint, he continued to fail to allow federal inspectors into his kennel on at least three more occasions, for a total of seven failed inspection attempts. This is egregious waste of taxpayer dollars and agency resources. And, when USDA inspectors did finally access his kennel in May of 2016, they found two emaciated Boxers with their ribs visible as well as a Bulldog with a mass near its eye and a Lhasa Apso who was weak and lethargic. This is the leader of the most visible pet breeder association in Missouri, one that has hundreds of members. Several other members of this pet breeders' association and others like it have been repeatedly cited by the USDA or state inspectors for having sick, underweight, and injured animals. In fact, it seems like some of the worst breeders use their positions in professional pet associations to cover up for an otherwise subpar
record. These associations then play a part in lobbying against stronger laws or enforcement of its existing ones.

Then, there’s the American Kennel Club, an organization that used to be associated with quality dog breeding. In recent years, the AKC has become an organization that routinely opposes any and all regulation of dog breeders. Our study of AKC lobbying activities in 2015 found the AKC has opposed more than 150 different state bills designed to regulate dog breeders or require even the most basic humane conditions for dogs. The AKC even opposed a Tennessee bill that would have prevented dogs from being left in hot cars, a Pennsylvania bill that would have banned the sale of dog and cat meat for human consumption, even some recent bills that would have banned the sexual abuse of animals, and the AKC even opposed a North Carolina bill that was modeled after the AKC’s very own Care and Conditional Policy for Dog Breeders.

The AKC’s knee-jerk opposition to almost
all canine welfare laws makes it clear that they are not capable of having a place in any program that would help objectively enforce these laws.

While the AKC opposes virtually all government of dog breeders, it does claim to have its own inspections program. We have found again and again that the AKC’s program is toothless. For example, in 2014, two Mississippi dog breeders, one of whom had been listed as an AKC breeder of merit, pleaded guilty to animal cruelty after more than 70 dogs, including a former AKC Best in Show dog named Wild Bill, were found living in utter filth, literally standing in their own waste. According to news reports, some of these dogs were in such poor condition, that they could barely walk out of that building. Yet, this operation had recently passed its inspection with the AKC.

There have been many similar cases where individuals who had recently been inspected by the AKC were not just accused but convicted of animal cruelty. When AKC inspected Malamute breeder,
Mike Chilinski, who had bred numerous show dogs, was visited by Montana Law Enforcement in 2011, authorities found adult Malamutes who should have weighed at least 70 pounds weighing only 35 pounds. Court records later showed that of the 139 dogs examined, 35 were extremely underweight, and many more were malnourished. At trial, Chilinski said that he didn’t think there was anything wrong with the conditions of his kennel because he had passed an AKC inspection.

These cases demonstrate that being a member of a self-described professional dog breeders group or a national dog club does not make a breeder any more likely to follow even the most basic common-sense laws and regulations. Too often, the camaraderie enjoyed by these like-minded groups results in a failure to report or even address the bad apples among them. Thank you.

MR. MIKE TUCK: Okay, could I have Donna Zeigfinger, Julianne Zimmer, Bethany Duzalt [phonetic], Charles Frohman [phonetic], Francesca
Dijulio [phonetic]. You can come on up.

MS. BETHANY DUZALT: Hello everyone, my name is Bethany Duzalt, and I’m in intern at the ASPCA right now, but I am speaking as a private citizen and also for my grandmother, who is an animal rehabilitator and could not be here.

As a young adult looking forward to what the future lies ahead, it saddens me to see the current administration trying to turn back time on the Animal Welfare Act. We are already only allowed limited access to the USDA’s investigations on puppy mills, zoos, and animal testing laboratories, and now there may be a chance that the USDA itself will not know what is going on in these facilities. As an American with a love for animals and their well-being, I have the right to know the conclusions about the inspections. By outsourcing part of the USDA’s work to companies that have conflicted interests, it portrays another maneuver to decrease the Animal Welfare Act’s potential to ensure that our future pets will not be neglected or mistreated.
before they become members of our families. As other people have said, we have seen this in the past when the USDA allowed a qualified third-party, industry-run enforcement system under the Federal Horse Protection Act to administer the majority of the inspections at the Walking Horse Shows. The USDA Inspector General noticed that these private inspectors were employees of horse show organizations and had prior affiliation with the Tennessee Walking Horses. Thus, the USDA should resume full authority of the inspections of the industry. So, why try to bring back something that does not work?

On behalf of all the animals that are currently suffering and my own generation, I strongly oppose the use of third-party investigators. Thank you very much for the opportunity for me to speak to you.

MS. JULIANNE ZIMMER: I’m Julianne Zimmer and the President of an organization called We Love Animals. I oppose this suggestion to utilize third-party inspection oversight. Federal
inspections must be used. We must -- we demand a
nonbiased interest checking on the welfare of
those with no voice. My organization has found
that many breeders that sell their puppies in the
pet stores in Maryland are not in compliance with
the Animal Welfare Act, so we rely on accurate
reports to ensure proper sourcing of these pets
that are sold. We have a lot of information on
lawsuits, heartbreak, and things that can’t be
measured, and these things are all due to some of
the lack of legislation that we already have
currently. We have worked really hard on
legislation that utilizes these inspection reports
so that consumers can be informed so that they can
avoid the heartbreak, avoid the litigation. I
can’t tell you how many times I’ve spoken with
families that have purchased puppies from pet
stores that were sourced from breeders that either
were improperly inspected or somehow got through
and are selling these puppies to the public.

Third-party investigations or inspections
opens up the door for corruption in regard to
greed and bias off the blood of the very animals we aim to protect. As mentioned previously, APHIS reports were removed last year that we counted on for legislation that was passed in the state of Maryland. We worked hard for that legislation. We utilized those reports so that people with smartphones could look up the puppies that they were about to purchase to avoid heartache.

Whittling away at transparency is not what we need to maintain the substance of the laws we count on to protect us and our animals. I hope that you’ll think about everything that we’ve all said today as private citizens, as leaders of organizations. This matters to us. Many of us spend a lot of our time helping to inform the public, and reports and investigations are a huge factor in that. We need to know that these are done by people that are not being led by greed, led by other agendas, but by people like yourself that protect us, the citizens. Please consider that in what you’re thinking about possibly doing and continue the reports and the inspections that
you have, provide more inspections that are not announced, and help us tighten the reins on this. This is not something that’s needed, you know. We need to -- we need to dial in on this, not dial out. Thank you for your time today and giving us the chance to speak.

MS. DONNA ZEIGFINGER: My name is Donna Zigfinger, and I’m a private citizen, and I’m representing myself, my dog, who came from a puppy mill, and from a support group that is, at any given time, over 200 people that have adopted puppy mill dogs or have purchased dogs from pet stores. I don’t want to go over everything that I agree with with Humane Society, whether it’s the ASPCA or HSUS. We are just in support of what they are saying, and I would like to have my club closed down and have all dogs protected. So, please, please keep that in mind when you make this decision.

MR. CHARLES FROHMAN: Hello, my name is Charles Frohman [phonetic], and I’m speaking as a private citizen. Like those who came before me, I
oppose this policy. Why is this even under
consideration when the USDA is well aware of its
dangers? The Office of the Inspector General has
uncovered systemic abuse of the third-party
inspection system in Tennessee Walking Horse
competitions and has reported on the ineffective
enforcement process for problematic animal
breeders and sellers and puppy mills. Adopting
this policy would be a conscious choice on the
USDA’s part to allow further abuse to go
unchecked. Thank you.

MR. MIKE TUCK: Okay. Could I have Jeff
Horsefield, Jacqueline West, Kathryn Kopanke,
Katie Kraska.

MR. JEFF HORSEFIELD: Good afternoon, my
name is Jeff Horsefield [phonetic]. I’m here as a
private citizen. I was motivated to come and
speak out because I formerly worked at a big cat
rescue and sanctuary located in North Carolina
that was both inspected by the USDA and regularly
assisted the USDA on a number of rescues to shut
down roadside zoos or other facilities that needed
to be closed down.

I wanted to speak up because the use of third-party inspectors or anything that could possibly delay or hide information from the USDA or delay necessary and required inspections from the USDA could lead to a lot of harm in this area. I specifically am thinking of a roadside zoo in Mississippi where we assisted Mississippi law enforcement and the USDA in shutting this organization down, but they had a number of violations for the Animal Welfare Act. The use of third-party inspectors in this area -- the organizations that I can think of -- some of them allow you to choose your own inspectors. Some of them allow for very infrequent inspections, and -- to sort of supplement what others have been saying -- the inspection criteria is often also unclear and can lead to a lot of conflicts of interest. These organizations are interested in supplementing their own membership fees and supplementing their own membership numbers, and their interest is not in the best interest of the
animals.

This Mississippi organization that we rescued animals from had a number of animals that required emergency surgeries and operations at the time of the rescue, again, just thinking that any chance at delaying their rescue would have been very harmful and dangerous for the animals that were seized from this organization.

So, I just wanted to speak out and voice my opinion against any shift away from USDA inspections. Rather, I would sort of copy some of the previous recommendations and recommend that the USDA continue to inspect more frequently, continue the number of announced inspections, and continue to publish information as transparently as possible. Thank you.

MS. JACQUELINE WEST: My name is Jacqueline West, and I am an employee of the ASPCA, but I’m here today as a private citizen. Probably all of the points that I would have raised have already been addressed by people much more eloquent than I.
But, I did want to mention that in the first question that was on your list, it sort of brought me up short when it says, “Would a potential reduction in the frequency of APHIS inspections be a sufficient incentive for regulated facilities to use third-party programs?” I figure that yes, indeed, it certainly would, but for all the wrong reasons.

As a private citizen and as a taxpayer, I am relying on APHIS inspectors who have a mandate and the authority to go into facilities to be my eyes and ears. You can go where I can’t. I feel very strongly that that is a sacred trust that I would not want to see you advocate to a third-party inspector.

Also, just in terms of practicality, for an agency that we know is understaffed and underfunded, I fail to see how adding yet another layer of bureaucracy would be a fiscal good idea, because I’m assuming that someone at APHIS would have to oversee the overseers. That, to me, would take resources and personnel away from their
initial responsibilities. If, in fact, the agency needs more funding, I think it is incumbent upon Secretary Purdue to go to Congress and fight for you. I'm all in favor of having more inspectors and certainly more inspections.

In closing, I would just like to say in question 5, you say, "What are other methods APHIS could use to encourage facilities to achieve and sustain compliance with the AWA?" To me, it's obvious. More inspectors, more unannounced inspections, and also more stringent penalties. To do anything otherwise to me would be a breach of the public trust and a terrible betrayal of the millions of animals who are counting on you to put their welfare about any other consideration.

Thank you.

MS. KATHRYN KOPANKE: Hi, thank you for having me here today. My name is Kathryn Kopanke, and I’m here as a private citizen. For three years, I worked for a medical school as first a researcher and next a veterinarian technician and coordinator in the Veterinary Resources
Department. Though a lot of my work was closely tied to experiment protocol, oversight, procurement, and routine veterinary care, I took most seriously my responsibility to the research animals and their welfare. Even with dedicated personnel working day and night to uphold the minimal provisions for research animals set in the Animal Welfare Act, I quickly learned that research institution site visits conducted by APHIS are too few and incomplete to properly assess and improve the conditions for research animals. The current state of inspection is already too lax, even with an on-site office of animal welfare assurance. And, I can say from example that the planned AAALAC visits were rather disheartening as I watched all personnel scramble to make things look wonderful upon the arrival of the AAALAC visit, and then slowly over the next few weeks slowly decrease in standards.

Rather than supplementing to third parties, who most certainly will adopt even more regular inspection policies, the USDA should
establish more consistent and frequent inspection procedures. The medical professional conducting the research and the individual lives used in research cannot afford less inspections and more inconsistency with additional agencies. This would put both the welfare of the animals and the quality of data at risk. I strongly oppose this policy and suggest the USDA reevaluate their current inspection practice. I also ask that APHIS consider scheduling more unannounced inspections.

MS. KATIE KRASKA: Hi, everyone, my name is Katie Kraska, and I’m here as a private citizen, but I also work for the ASPCA. This issue is near and dear to me because I am from Kentucky, Lexington originally -- anybody else from Kentucky? I didn’t think so. I have been involved in the horse industry my entire life, and I know a lot of people who were involved in the Tennessee Walking industry. I know personally probably hundreds if not thousands of horses who would have been helped if the 1970 law would have
been actually enacted, the Horse Protection Act. Instead, the regulations were rolled back to third-party inspectors, and that was clearly not sufficient to change behavior in the industry.

Just to hammer home some of the points that everyone else has so eloquently made, handing inspection responsibilities off to third parties is just not acceptable. The USDA is already doing too little to endorse the Animal Welfare Act, and this policy would clearly be a step backward. This policy would also result in fewer and lower-quality inspections when the opposite is needed. As made clear by the third parties used in horse-soring inspections, self-policing is ineffective. Countless animals would be endangered by the change in policy.

The USDA has an obligation to serve the public interest -- our interest. Transparency and accountability is essentially to maintaining public trust and representing the interest of the American people. Relinquishing control of inspections to third-party groups is an abdication
of duty on the USDA’s part. The USDA has overseen the enforcement of Animal Welfare Act for over 50 years. Giving up a large part of this responsibility now reveals blatant disregard for the purpose of this law and the animals that it protects.

Just to speak directly to question 5, I believe, I think everyone has implicitly remarked that the majority of the regulators if this were rolled back to third party, would be part of the industry, and I think that that is by necessity because there is no market for this kind of thing outside of the organizations that would be involved in the industry. Thank you so much for this opportunity.

MR. MIKE TUCK: Okay. Jimmy Metcalf. Is there anybody I have missed or who signed in late that would like to speak? Please come up now. You can sit up here.

MR. JIMMY METCALF: Good afternoon, my name is Jimmy Metcalf. I work in Federal Affairs for the Humane Society Legislative Fund. Today,
I’m speaking on behalf not only of HSLF, but of Nicole Paquette. Nicole is Vice President of our Wildlife Campaign at the Humane Society of the US. So, first, thank you for the opportunity to speak on this issue. As part of our campaign to protect captive wildlife, we have extensively reviewed standards and implementation of zoo and sanctuary-accrediting programs. There is a growing list of these programs, and they vary drastically in terms of quality and professionalism. But, none of them should be considered a replacement for or supplement to inspections conducted by federal animal care inspectors and veterinary medical officers who are trained in interpreting the Animal Welfare Act.

Accreditation should compliment USDA enforcement, not replace or supplement it. Accrediting organizations naturally have a built-in industry bias. While some are more successful than others at mitigating that bias, none are as impartial as inspectors from federal agency. Under the proposal, bias would be amplified since
an accreditation inspection would take on new meaning. Not only determining whether a facility gains accreditation, but the possibility of impacting whether a facility should retain USDA licensing or face other enforcement actions.

Accreditation Committee members would be less likely to take punitive actions against a colleague if doing so could contribute to federal fines or warnings. Some accrediting organizations have opposed proposals for stronger Animal Welfare Act standards that were later adopted such as those relating to the public handling of tiger cubs. The USDA has determined that licensees who do not house neonatal wild cats in a controlled sanitary temperature-controlled environment and who expose them to public contact are considered noncompliant with the veterinary care and handling requirements of the Animal Welfare Act regulations.

That raises the question of whether accrediting organization that previously objected to these stronger standards concerning public
contact can realistically be expected to
adequately monitor such interactions and
requirements.

There are other problems with third-party
programs. Accrediting organizations may use the
allure of less federal oversight as a marketing
tool to generate greater membership. And to
appeal to a wider audience, accrediting
organizations may be tempted to lower their
standards so that more facilities can become
accredited. We’ve already seen accrediting
organizations delay implementation of stronger
standards to accommodate facilities that refuse or
fail to comply. In some cases, rather than
representing best practices, standards may reflect
the weakest accredited facility with unsafe and
outdated practices.

Accreditation inspections are conducted
on scheduled dates after a facility has had months
to prepare versus USDA inspections that are
unannounced and capture a more realistic picture
of day-to-day operations.
Accreditation inspections are also based on the individual accrediting organization standards rather than Animal Welfare Act standards. Further, there may be a three- to five-year gap between accrediting inspections, which is insufficient to determine a facility’s ongoing Animal Welfare Act compliance.

So, there are countless examples also of accredited facilities having troubling records of dangerous incidents, poor animal care, abusive handling, and Animal Welfare Act violations. Third-party inspections will lead to a lack of accountability, reduce transparency, and ultimately failure to ensure adherence to the Animal Welfare Act.

So, for these reasons among others, we oppose the use of these programs as a positive factor when determining the frequency of federal inspections. Thank you.

MS. HEATHER NARVER: Now, for something a little different. I’m Heather Narver, and I’m a Clinical Veterinarian. I currently work for a
federal research institution, but I’ve been a Laboratory Animal Veterinarian for about 15 years, and included in my work experience are non-federal institutions. I care a great deal about the research animals that I take care of on a daily basis as well as the important science that I support. I’ve had substantial experience with both USDA inspections and third-party regulators with animal research.

Today, I’m representing the American College of Laboratory Animal Medicine. ACLAM is comprised of approximately 1,000 veterinarians with specialty training and certification in laboratory animal medicine and welfare.

We welcome the opportunity to provide feedback on the subject, and we believe, in contrast to every other speaker so far, that the USDA would make better use of its limited resources by considering qualified third-party review in its risk-based approach to animal research oversight.

Analysis of APHIS inspection reports
reveals that regulatory compliance by research
facilities has improved dramatically in the last
decade. Research facility-specific issues
identified by APHIS have declined 87% since 2006,
and most citations today are related to
administration and not to animal care.

In 2016, 1.5 percent of registered
facilities accounted for more than 30 percent of
noncompliance, indicating that while most
institutions are doing a great job, a small number
present more risk and need more frequent and
focused attention from APHIS.

I read my APHIS Policy Manual before
coming here today, and discovered that in 1998,
APHIS implemented a risk-based inspection system,
and under that system, several objective criteria,
including but not limited to past compliance
history, are used to determine the minimum APHIS
inspection frequency. Facilities meeting the
criteria for low-frequency intervals are subject
to inspections once every year or every two to
three years, or, in some cases, only when
complaints are received, while facilities
determined to require high-frequency inspections
are subject to inspections as often as every three
months.

Decreasing regulatory burden is a timely
initiative in science and is mandated by recent
legislation including the 21st Century Cures Act.
Recognizing third-party review is one step that
the USDA could take to decrease regulatory burden
on beleaguered scientists as well as on
administrative and animal care staff while
continuing to ensure Animal Welfare Act compliance
in animal care.

Third-party regulators of animal
research, most notably AAALAC, are widely utilized
by the animal research community and whatever you
might think about AAALAC, as we’ve already heard,
the AAALAC site visits are -- many of them are
actively involved in animal research -- not at the
institutions that they are visiting, but at other
institutions -- and as such, they provide a unique
perspective and expertise, and they bring that to
their site visits, and it’s actually complementary
of APHIS’ efforts.

The program description, which is
required by AAALAC in advance of each tri-annual
site visit, is a lengthy document describing every
aspect of the animal research program. This can
be hundreds of pages in length and requires months
to put together, requiring concerted effort by the
animal care and administrative staff as well as
the Animal Care and Use Committee.

The concept of using third-party review
to complement Animal Welfare Act-mandated review
of animal research programs already has some
precedent in that APHIS currently allows an AAALAC
site visit to substitute for the required semi-
annual facility inspection and program review when
the site visits falls within a specific time
period before or after the scheduled date of the
semi-annual visit.

ACLAM believes that the use of third-
party inspections to support Animal Welfare Act
compliance would be most effective if there is
harmonization of third-party and USDA regulations, inspection standards, and reporting mechanisms.

In summary, ACLAM applauds the USDA’s efforts to further improve the efficiency of the APHIS inspection process. While we recognize the value of APHIS and that there is no substitute for unannounced inspections by experienced APHIS personnel, we think that allowing third-party review by qualified, time-tested, and well-respected programs such as AAALAC to be considered as part of the compliance history of regulated institutions conducting animal research is an important refinement to APHIS’ risk-based inspection process. Thanks for your time.

MS. ELIZABETH OKUTUGA: Good afternoon, my name is Elizabeth Okutuga. I work for American National Standards Institute; however, I’m speaking today as a private citizen. I was compelled to speak based off all the feedback about third-party accreditation and certification, and I just wanted to clarify a lot of the points that were made today.
As a program coordinator for American National Standards Institute, we use international standards. The specific standard that I use is ISO 17065. One of the things about international standards is that we have a lot of risk-based impartiality and other mechanisms to ensure that the requirements that are being followed are actually being followed, and we check that regularly. For example, a lot of you are familiar with the FCC and EPA. Those are other government regulatory programs that often require third-party accreditation. The electronics that you use in your homes, 90 percent of them are, you know -- via third-party accreditation. You have to be -- the certification body has to receive accreditation in order to sell those products. So, electronics, the things in your house that your children, your family, and all these things that are being used are being used because of our -- are verified through third-party accreditation. So, I don’t want us to dismiss third-party accreditation because it offers the way for
verification because often times our government does not have the resources to do all these unannounced inspections. They can’t, you know -- a lot of people are calling for increased unannounced inspections, increase, increase. But, that’s increasing our taxpayers dollars as well. So, we can’t just make these demands. We can’t just make these, you know, without having all of the information behind it.

So, to say that third-party -- to some aspect, I’m sure that third-party accreditation or certification can be improved such as the government ensuring that those who do third party have to go through an approved body such as, you know, approved organization before those organizations can then go and do those certifications. So, those are -- there are ways to improve the third-party process, but to say to eliminate it, I think would require additional research before we do that. Thank you.

MS. CATHY LISS: Hi. Cathy Liss with Animal Welfare Institute. Thanks for your
patience. I know it’s a long afternoon. Animal Welfare Institute strongly objects to USDA’s proposal to recognize third-party inspection and certification programs as a factor in determining inspections of licensed and registered facilities under the Animal Welfare Act. It’s a bad idea, been working on issues for more than 30 years, and it’s an idea that was considered quite a number of years ago. It had no merit then, and it has no merit now. The USDA should not offer this prospect of fewer inspections or any other incentives for participation in third-party programs.

These programs are not focused solely on insuring compliance with the Animal Welfare Act. They are created, as you know, by industry entities that have a strong vested interest in protecting their dues-paying member businesses. Their site visits, not inspections, are conducted by one another’s peers, colleagues, and buddies. USDA inspectors often find problems at facilities that proudly proclaim compliance with one third-
party program or another.

One commercial licensed operation
licensed as a breeder and registered as a research
facility that had primates had stipulated
penalties from USDA in 2006, 2008, 2009, became
accredited in 2015, and in 2016 was cited for
having monkeys that were dying from internal
bleeding when they had been improperly trained by
unqualified personnel and had conducted
ultrasound-guided liver biopsies on the monkeys.

In addition, USDA has filed yet another complaint
against the facility in September of 2016 for
dozens of willful violations over the course of
five years, including actions that led to the
death of 38 non-human primates.

A whistleblower suit involving another
research lab where the attending vet, who was an
AAALAC trustee, explained that accreditation would
be revoked only if a lab gave AAALAC “the finger.”
Otherwise, AAALAC will work with them for years.

At another prominent AAALAC-accredited
facility, they were cited by USDA for shortcomings
in crucial areas like veterinary care and environmental enrichment for primates. Yet, another was cited repeatedly for a long list of animal welfare problems that resulted in suffering and death for monkeys, rabbits, and other animals. We have a long list that will include in our written testimony of the facilities that are accredited and yet have been cited by the USDA inspectors.

There is an AZA-accredited exhibitor who was written up for various infractions including housing incompatible animals and failure to provide proper veterinary care. Yet another accredited zoo actually admitted to 51 violations of the Animal Welfare Act spanning more than five years, and they paid a $45,000 fine.

As you’ve heard, USDA’s experience with the DQP under the Horse Protection Act has allowed inspectors at shows exposed the various risks and weaknesses associated with relying on third-party programs.

Reports, if there are any, from site
visits -- again, not inspections -- that are conducted by third parties are not available to the public, unlike USDA reports, or at least some of them.

Indeed, AAALAC emphasizes that its process is confidential, and site visit results are known only by the lab and AAALAC, even if deficiencies are found. This thwarts transparency and accountability. The USDA should set as its goal a minimum of annual inspections for all licensees and registrants, not just research facilities, and beyond that, the inspection schedule for any given facility licensed or registered under the Animal Welfare Act should be based solely on that facility’s history of compliance of lack thereof.

If the USDA strengthened its enforcement of the law and responded to violations on a more timely fashion, this would send a message to facilities that they better meet the minimum requirements under the law. Facilities that cannot comply should have their licenses
permanently revoked. The USDA need not waste time year after year after year with dealers and exhibitors who can’t care for the animals properly and can’t or won’t comply with the law.

Bottom line -- enforcement, enforcement, enforcement, and transparency. Having those records available to the public to put pressure on entities that can’t comply. Thank you.

MS. MARISA SCHATZ: Hi there, my name is Marisa Schatz. I’m a lifelong Maryland resident and animal welfare advocate. For the past 50 years, the USDA has been responsible for inspecting zoos, animal breeders, petting farms, wildlife parks, and other animal exhibitors to ensure that they are meeting the animal care standards set forth by the Animal Welfare Act. Although the USDA has been criticized by some for being too lax in their enforcement, I value the independence of these government inspections. If the USDA shares any responsibility with the very industries that are regulated by this act, the power of the Animal Welfare Act would be
completely undermined and would jeopardize billions of animals who need protection.

Judging from the countless problems found with the care of animals at various accreditations such as ASA, ZAA, AZA, and AKC, it’s clear that an accreditation is not a stamp of sufficient animal welfare and does provide the confidence that the animals are being cared for in a satisfactory way. Giving any power to decide which facilities warrant USDA oversight to those same industries that are being regulated would completely undermine the objectivity of the process.

The AKC has often fought against state and federal laws designed to improve standards of care for dogs and have upheld the membership of breeders who have routinely failed USDA inspections, not to mention they are funded by the membership fees of breeders. If these inspections are conducted by the very organizations whose existence relies on the membership of those they are charged with inspecting, where is the objectivity? These inspections would become a
free-for-all amongst those who profit from the sale and exhibition of animals without maintaining proper standards of care.

Third-party oversight or assistance of the Animal Welfare Act would inevitably invite conflicts of interest that could incentivize accreditation committee members to ignore conditions which might constitute violations of the Animal Welfare Act.

It is my belief that using third-party inspectors in any capacity to uphold the Animal Welfare Act would jeopardize the integrity of the entire act.

Those who advocate for animal welfare, in my experience, have long felt that the USDA should be strengthening their standards and processes for protecting animals, and it has become clear that legislators agree. In 2017, over 220 US Senators and Representatives sent letters to Appropriation Committee members urging vigorous funding for more stringent enforcement. They also asked for restoration of the inspection documents that were
purged from the USDA website and a crackdown on rampant abuses by violators of the Animal Welfare Act. We need more transparency, tougher enforcement of existing regulations, and stronger regulations to improve living conditions for animals.

This proposal to conduct inspections with third parties is moving in the opposite direction and would make a bad situation so much worse. It is my belief that if the USDA doesn’t retain sole responsibility of its inspections of Animal Welfare Act-regulated facilities, the entire Animal Welfare Act will be jeopardized, and it will change the animal welfare industry for the worse, resulting in decreased transparency to the public, a lack of accountability, greater risk for injury to the visitors of the facilities, and even more animals suffering.

I also wanted to address number 5 in your questions, “What methods could be used to achieve and sustain AWA compliance?” It reminded me of a couple of months ago. I have a cousin in New York
who called me. She had been chaperoning one of her son’s field trips to a petting zoo in Melville, New York, and they left crying because the animals were in such bad shape. She said all of the parents were horrified, the kids were horrified, and they were never going back. They walked right out. So, I did a quick google search of this place, and some of the comments that I found -- and, this is a USDA-licensed petting zoo -- some of the comments said there was no water for them to drink, the animal pens and enclosures were dirty, the animals looked like they were seriously suffering, they look like they’re in pain, two dead baby rabbits were in the pen with a bunch of other rabbits. “I was deeply disturbed by what I saw as soon as I walked in. A baby giraffe was locked in a tiny wooden house and apparently, according to the sign, is only allowed out on the weekends. He was so afraid and said, it made me cry.” “This was an extremely depressing experience. I went on a hot day and saw too many animals crowded into too small a space baking in
the sun without shade. I can’t support a farm that treats animals like this in good conscience.” “The zebras barely had any room to move freely.” (These are all different comments.) “The camels looked so stressed, they were losing patches of hair.” “We found it hard to enjoy ourselves when all you could see is how stressed, desperate, and exhausted these animals were.”

And, it’s just my feeling that, you know, when you talk about wanting to increase compliance with the Animal Welfare Act, it seems pretty simple. Just pay attention to complaints like this. Conduct unannounced inspections. Severely fine or penalize places like this. If a facility has numerous USDA violations that haven’t improved, they shouldn’t be allowed to operate. I appreciate your time. Thank you for listening.

MS. ALLYSON COLEMAN: Hello, my name is Allyson Coleman. I’m here from the Leesburg Animal Park. I am speaking on behalf of Shirley Johnson, the Director, and myself as the Curator. Now, I do have some questions. I’m
concerned about the objectivity of a third-party inspector. How would they be trained? How would they be certified? Would the inspection differ based on state? Does USDA still oversee inspection criteria, and, if so, why use a third party at all?

We’ve seen in recent years that the delegation of authority by federal agencies to third-party, non-governmental entities has raised concerns in Congress and in the public about the lack of accountability in these kinds of arrangements. Indeed, in such circumstances, these third parties could conceivably be outside Congress’ spending and oversight authority. Here, it seems that these organizations would be one step removed from direct accountability to the Executive Branch, too. If such delegation occurs, I believe that the community of zoos across the country may have no direct recourse to the decisions made by the outside organizations, and recourse is especially important within the context of enforcing our
nation's laws. Our many Constitutional protections, such as due process, for example, only apply when the government is the actor.

To address question 1, I do not think a reduction in inspections would be beneficial. I rely on feedback from the USDA, and I think more inspections are welcome as well. With this in mind, I am opposed to this proposed regulation, and I encourage others to oppose it too. Thank you.

MS. PHYLLIS BRYANT: Hi, my name is Phyllis Bryant. I don’t have anything prepared. I wanted to come here and voice my opinion because I love all kinds of animals. I own three little Poodles, you know, and I mean they are my heart. I think that I agree there shouldn’t be a third-party affiliation. It should stay with the USDA. The animals do not have a voice. We are their voices, and, you know, I get all upset when I see that commercial. I can’t even look at it that comes on TV. I turn it away because it’s so, you know, it’s so dear to my heart. It really hurts
my heart. I think that we do need to have more inspections and look out for these little animals that have no voice for themselves. We just have to do the best job that we can do, and if we need to have more inspections from USDA, I think that should be something that should be well looked upon. We pay taxes -- we use our tax money for everything else -- this is something that is very dear to my heart, and I think if that’s the case, then they need to allow more of our taxpayer money to go toward helping out these animals. That’s the way I feel. My vote goes toward keeping it with the USDA Department. Thank you for your time.

DR. ALKA CHANDA: Good afternoon, my name is Dr. Alka Chanda. I’m here on behalf of PETA, People for the Ethical Treatment of Animals. We thank APHIS for hosting this stakeholder listening session as the agency considers third-party inspection and certification programs to determine inspection frequency and other inspection parameters such as thoroughness of inspections,
the number of inspectors dispatched to the facility, and whether the inspection will be preannounced.

According to APHIS, this effort is motivated by the desire to use a risk-based inspection system to better use the agency’s inspection resources. And, the ultimate aim is to support compliance under the Animal Welfare Act.

At the earlier listening session, APHIS clarified that AAALAC -- which has already been spelled out, so I won’t do that again -- is one of the third-party certification programs being considered by APHIS. As my colleague, Dr. Ingrid Taylor, discussed at that session, animal laboratories maintain AAALAC accreditation through the payment of an annual fee and a prearranged and preannounced site visit, not inspection, once every three years. A peer-reviewed 2015 study revealed that laboratories accredited by AAALAC were cited for violations of AWA regulations in USDA inspection reports more frequently than unaccredited facilities. There were more
violations, and more violations specifically related to improper veterinary care, personnel qualifications, and animal husbandry.

As the purpose of reliance of third-party certification programs, is to support AWA compliance, APHIS must not confer preferential status to AAALAC-accredited facilities.

Moreover, as others have stated, AAALAC is an industry-friendly organization. Its Board on Accreditation consists of representatives from universities with massive animal experimentation programs, contract testing laboratories with thousands of animals, multinational pharmaceutical companies, and other entities immersed in the use of animals in experimentation. Thus, using an institutions AAALAC accreditation status as a basis for possibly decreasing the frequency of USDA inspections or somehow reducing the degree of oversight of the facility introduces considerable conflict of interest into the inspection process.

On its website, AAALAC describes its origin as being rooted in “a need for assuring the
general public that laboratory animal research is conducted on a professional level.” The sentiment was echoed in a 2015 essay written by the organizations Executive Director, in which he trumpeted AAALAC’s success in, again, “allaying some of the public concern surrounding the use of animals.”

Indeed, this is PETA’s experience with AAALAC. When a post-doctoral veterinary fellow from Columbia University came to PETA to tell us, among other things, that baboons were not receiving adequate anesthesia or postoperative analgesia after their left eyes were cut out and a clamp was inserted into the empty eye socket to clamp shut blood vessels going to the brain, inducing a stroke, and puppies were killed by painful cardiac injections, PETA shared its concerns with the USDA, which thankfully opened an investigation, went in, and cited and fined Columbia University.

Meanwhile, Columbia issued a brief letter to concerned individuals, the thrust of the
message being that the university of AAALAC accredited. So, nothing to see here, everything’s fine, go on ahead.

Similarly, PETA’s eyewitness investigations at Covance, Primate Products, Incorporated, University of Utah, ONPRC -- the list goes on and on and on of accredited facilities documented obscene treatment of animals. For each of these facilities, the USDA opened investigations, for which we are immensely grateful, and cited and took some type of action against the facilities for egregious violation of the Animal Welfare Act. And, the facilities used the window dressing of their AAALAC accreditation to assure the public that all was well. To our knowledge, none of the institutions mentioned were placed on probation, and none of them lost their accreditation.

You see, AAALAC accreditation isn’t so much about higher animal welfare standards, and it isn’t about ensuring compliance with minimal animal welfare standards codified in regulations
and guidelines put in place at the will of the American public. It’s simply about assuring the public that all is well. If the purpose of reliance on third-party certification programs is indeed about supporting compliance under the AWA, AAALAC accreditation means nothing and should not be used as a factor in determining the frequency or other parameters associated with USDA inspections. Thanks very much.

MR. MIKE TUCK: Okay. Is there anybody else who would like to speak that we’ve either missed or came late? If not, I would like you, if you have a copy of your presentation, to leave it up here at the front desk. I appreciate you coming to listen to everybody’s opinions and views. Have a nice day and drive safely. Thank you.

(Listening session concluded -- off the record.)
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