



AMERICAN  
KENNEL CLUB®

January 18, 2023

**RE: AKC Requests Clarification to House Bill 1984**

Dear Agriculture Subcommittee Chair Webert and Subcommittee Members:

On behalf of our over 100 affiliated clubs in Virginia, and the thousands of dog owners in the Commonwealth, the American Kennel Club (AKC) writes to voice our concerns and ask for clarification on **House Bill 1984** which seeks to amend the definition of "adequate water" as it relates to the care of companion animals to align with the federal Animal Welfare Act.

As the recognized experts in canine breeding, health, and care, the AKC promotes responsible dog ownership, which includes proper care necessary to keep dogs healthy and safe. To that end, our affiliate, The AKC Canine Health Foundation, is currently providing over \$440,000 in grants in Virginia to fund research to improve the health and lives of dogs.

**AKC agrees that all dogs should have access to clean water at appropriate intervals and amounts, as is required in current Virginia Code, and that it should be provided in a *sanitized* receptacle.** However, the phrasing in this legislation that adds "... adequate water means water that is continuously available, unless restricted by a veterinarian, in a receptacle that is cleaned and sanitized before being used to provide water to a different dog or a different social grouping of dogs." is very confusing. It is unclear how "continuous access" to water would be defined and enforced.

House Bill 1984 seeks to apply federal Animal Welfare Act regulations *applicable to breeders who have four or more breeding females and sell pets sight unseen*, to all owners of companion animals. In short, it appears as if this legislation attempts to take *a federal standard specifically designed for certain dogs* and kennels and *attempts to apply it to all dogs* and all situations. As currently written, it is unknown how this legislation would apply to activities such as walks, participation in events, or grooming, to name a few.

Again, AKC fully agrees with the intent of the sponsor. However, AKC is asking for clarification as to whether "*continuous access*" would apply to all dog owners in all situations, or for specific situations like breeding operations, research facilities or rescues and shelters. If it is the former, we would request an amendment that exempts activities such as walks, participation in events, or grooming, etc. If it is the latter, AKC fully supports the bill but would recommend language be included to clarify so.

Thank you for considering our concerns with this legislation. Please do not hesitate to contact me at (919) 816-3971 or [charles.hall@akc.org](mailto:charles.hall@akc.org) if you have any question or if I can be of further assistance on this or any dog related issue or question.

Sincerely,

Charley Hall  
Legislative Analyst/Community Outreach Coordinator