



AMERICAN  
KENNEL CLUB<sup>SM</sup>

**Sheila Goffe**  
Vice President  
Government Relations

April 10, 2023

Docket No. APHIS-2022-0022  
Regulatory Analysis and Development  
PPD, APHIS, Station 3A-03.10  
4700 River Road, Unit 118  
Riverdale, Maryland 20737-1238

**RE: American Kennel Club Supports Environmental Enrichment ANPR**

The American Kennel Club (AKC) supports the United States Department of Agriculture's Animal and Plant Health Inspection Service's (USDA APHIS) consideration of future performance standards-based environmental enrichment requirements for Animal Welfare Act (AWA) licensees. We believe environmental enrichment increases normal, desirable behaviors in dogs and helps reduce undesirable behaviors that may result from boredom and frustration. Moreover, we believe the consideration of how to implement future performance-based environmental enrichment standards should provide licensees the flexibility to determine and implement enrichment practices that take into account breed(s) maintained, facility size, purpose, and other factors that impact best outcomes.

Founded in 1884, the American Kennel Club is America's only not-for-profit all-breed dog registry devoted to the study, breeding, exhibiting, and advancement of purebred dogs. AKC is a private, not-for-profit organization that demonstrates its commitment to responsible dog ownership and breeding through a variety of educational programs, humane programs, and a multi-million-dollar commitment to canine health research through the AKC Canine Health Foundation.

AKC is also the only national all-breed dog registry with a kennel inspections program. We are proud to have conducted more than 70,000 inspections since 2000 of people who register their dogs with us. One way AKC demonstrates its belief that animal welfare practices extend beyond what is needed to ensure mere biological health is through the implementation and enforcement of our *Care and Conditions of Dogs Policy*, which, in part, guides evaluations of breeders we inspect.<sup>1</sup> The performance standards-based policy requires, at minimum, daily play and exercise opportunities in an area appropriate to the needs of the dogs housed. It also requires that dogs be provided with daily positive human contact and socialization.

AKC's policy reflects what many hobby and professional dog breeders have long recognized: Incorporating environmental enrichment practices helps ensure that the dogs they house and produce are both physically and mentally sound and able to perform the functions for which they were bred. By offering a variety of enrichment activities, environments, and opportunities to play, they contribute to dogs' cognitive development, meet their needs to interact socially, and contribute to their quality of life. Moreover, they know that in the case of puppies, more social contacts and a variety of experiences leads to a decrease in the development of fearful or aggressive behavior.<sup>2</sup>

Environmental enrichments have been found to increase behavioral diversity and the range of regular behavior patterns, the positive utilization of the environment, and the ability of animals to cope with challenges, while reducing the frequency of abnormal behaviors.<sup>3</sup> Because different forms of enrichment work both separately and together to add complexity to dogs' environments, AKC believes that a performance-based environmental enrichment requirement that allows utmost flexibility would be most beneficial to regulated dog breeders. Such requirements should be added to 9 CFR §2.40(b), *Attending veterinarian and adequate veterinary care (dealers and exhibitors)*, and would allow a facility's attending veterinarian to help develop, review, and approve enrichment plans with licensees. It is important to note that requirements in 9 CFR §3.8, *Exercise for dogs*, likely already meet social and physical aspects of environmental enrichment.

Because most licensees already provide enrichments, direct costs to be incurred would depend upon the type of additional enrichments that would be incorporated into facility operations. Direct costs should also reflect ongoing changes made to enrichment activities. On a per dog basis, annual expenses are difficult to project, and may range from a few dollars to significantly more.

Again, AKC appreciates this this opportunity to comment and is pleased to offer our support for further consideration of performance-based environmental enrichment standards as part of AWA regulations. Please feel free to contact me directly at 919-816-3721 or shg@akc.org if I may be of further assistance.

Sincerely,



Sheila Goffe  
Vice President, Government Relations  
American Kennel Club

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<sup>1</sup> AKC's Care and Conditions of Dogs Policy.

[http://images.akc.org/pdf/governmentrelations/documents/Care\\_Conditions\\_Policy.pdf](http://images.akc.org/pdf/governmentrelations/documents/Care_Conditions_Policy.pdf) (accessed March 6, 2023).

<sup>2</sup> American Veterinary Medical Association. Literature Review on the Welfare Implications of Socialization of Puppies and Kitten, June 9, 2014. <https://www.avma.org/resources-tools/literature-reviews/welfare-implications-socialization-puppies-and-kittens> (accessed March 6, 2023).

<sup>3</sup> Garvey, Morgan; Stella, Judith; and Croney, Candace. Center for Animal Welfare Science, Implementing Environmental Enrichment for Dogs. <https://extension.purdue.edu/county/lagrange/docs/Implementing-Environmental-Enrichment-for-Dogs-1.pdf> (accessed February 28, 2023).