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Washington, DC 20037
202-452-1100
humaneworld.org

Formerly called the Humane
Society of the United States and
Humane Society International

Milwaukee Common Council
200 E. Wells St, Room 205
Milwaukee, WI 53202

December 15, 2025

Via Email

Dear Honorable Members of the Milwaukee Common Council,

Humane World for Animals (formerly The Humane Society of the United States) appreciates this opportunity to comment on ordinance proposal 250028, related to the ethical treatment and ownership of animals.

We recognize the immense challenges faced by shelters during the ongoing shelter crisis¹, however, the draft ordinance would impact almost all pet owners in the city without increasing the availability of pet care resources such as spay/neuter surgeries or microchipping and may create serious unintended consequences for pet owners, particularly those who cannot access wellness and veterinary services for their pets. Disparities in access to services and resources are often a result of larger systemic issues including affordable and attainable veterinary care and availability of stable housing that welcomes pets. These complex issues are interconnected and punitive measures, even when intended to be educational in nature, can further harm and destabilize already vulnerable communities.

Our comments reflect our concerns with the following:

- The inclusion of cats in the ordinance
- The penalties that an owner would face if their pet had an accidental litter
- The requirement that all cats and dogs be microchipped
- The lack of data collection included in the ordinance to objectively review outcomes
- Lack of codifying education as the first approach
- The impact of punitive measures on historically marginalized communities

Cats: As written, the ordinance would apply to all dogs and cats including community cats. This would likely have significant impacts on those who provide care to colonies of cats. Effective policy for the management of community cats should focus on encouraging participation in trap-neuter-return programs, not create barriers to achieving a high sterilization rate for these cats. The microchipping mandate would require that previously trapped cats be re-trapped and microchipped, an unnecessary and unintended consequence of the ordinance. The penalties for accidental litters may also extend to community cats and deter efforts for trap-neuter-return over

¹ Shelter Animals Count 2025 Mid-year report: <https://www.shelteranimalscount.org/explore-the-data/2025-mid-year-report>



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concerns with punitive measures. We strongly recommend that cats be removed from the ordinance and that efforts be made to increase funding for trap-neuter-return and other community cat sterilization efforts.

Mandatory spay/neuter: It can seem beneficial to set legal requirements for owners to ensure their dogs and cats are spayed or neutered in order to elevate animal health and welfare but approaching this complex issue via an unfunded legal mandate, rather than through the expansion of fully accessible spay and neuter and wellness programs, does not increase spay/neuter rates and can have unintended consequences. Across the United States, we have partnered with cities and counties grappling with the multifaceted challenges posed by an excess of companion animals and a shortage of veterinary professionals and resources. We have not seen data to support that mandating spay/neuter improves sterilization rates and instead can separate pet owners from the very resources they need. A more equitable approach is to improve access to spay/neuter by funding programs that provide low and no cost services and assist with other barriers such as transportation. Of the hundreds of thousands of pets our Pets for Life program has met in underserved areas around the country, 85% were unaltered when met. Yet over 70% of those were subsequently altered through the program. Highlighting that punitive measures are not necessary, the vast majority of people want their pets to be altered when the service is made accessible. When municipalities take a broad stroke and punitive approach to manage all dogs and cats without distinction, rifts between animal service providers and pet owners with limited resources can form which is counterproductive to increasing sterilization rates.

Mandatory microchipping: One in three pets will go missing in their lifetime and while the vast majority are reunited with their owners without the assistance of animal services, lost pets traditionally represent the largest percentage of pets in local shelters. We support efforts to increase reunification rates and applaud the city's recommendation that stray reclaim amounts be decreased to \$25. However, access to microchipping is not equally available to everyone. A microchip must be implanted by a veterinarian, under the direct supervision of a veterinarian or through an animal shelter/animal services. Accessing a veterinarian can be a significant barrier for pet owners living in a community without affordable care and local shelters/animal services having the capacity to meet the demand of tens of thousands of pets is unrealistic. Lost pet research is clear² – the best way to get lost pets home without increasing intake at a local shelter is to provide free collars and tags³ and to assist owners with challenges that may be causing their pet to become loose such as fence repairs and behavior consultations.

While Humane World does not support mandatory microchipping, if a city were to pass a requirement, we strongly recommend that it be made available for free for all residents. San Antonio, Texas passed such an ordinance but also provides free microchip appointments through Animal Services and hosts regular "Check Your Chip" events to

² Weiss, Slater, Lord, "Frequency of Lost Dogs and Cats in the United States and the Methods Used to Locate Them", Weiss, Animals, 2012, <https://pmc.ncbi.nlm.nih.gov/articles/PMC4494319/>

³ Weiss, Slater, Lord, "Retention of provided identification for dogs and cats seen in veterinary clinics and adopted from shelters in Oklahoma City, OK, USA", Science Direct, September 2011, <https://www.sciencedirect.com/science/article/abs/pii/S0167587711001565>



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ensure owner information is up to date. An unfunded city mandate will simply push the costs of microchipping to individual pet owners and criminalize people who do not have access.

Data collection: We strongly recommend the ordinance include specific data requirements so that impacts of the ordinance, if passed, would be objectively measured over time including:

- Quantity of cats and dogs and their owners impacted by the ordinance
- Origin of the intervention (animal services, Dept. of Neighborhood Services, member of the public)
- Location of the intervention (street and zip code)
- Intervention outcome (resources, education, fines, pet confiscated)
- Specific resources provided to residents including spay/neuter appointments, microchipping assistance, and lost pet reunification efforts.
- Shelter intake data for any shelter in the Milwaukee jurisdiction (types of intake by species and age)

Currently, the ordinance applies to all pets in Milwaukee. Based on our analysis⁴, 80,321 cats and dogs in Milwaukee are currently unaltered *and* living with families that bring in \$25,000 or less in income each year. In order for families to meet the spay/neuter and microchipping requirements, there is a large need for affordable and accessible veterinary services in the city. Milwaukee is not alone in facing the ongoing veterinary shortage and Humane World has provided maps (attached) to help illustrate the gap between the ordinance's requirements and the availability of services. While the existing spay and neuter organizations are working tirelessly to provide services, they cannot be expected to take on this volume of need or to fully and adequately address the other common barriers owners face in accessing services. Availability of surgical appointments is often one factor, but the scope of the ordinance also requires affordability of services, appointments for annual examinations, transportation assistance for citizens with mobility issues and without a vehicle, and language services for individuals for whom English is not their first language.

Education: In many cities, animal services strives to work with community members to elevate animal health and welfare. We recommend codifying that education is a consistent first step. Example language:

A first violation of this section in any twelve-month period shall be subject to education that will be provided by MADACC or the Department of Neighborhood Services to ensure:

- *The owner or keeper of an unaltered animal is aware of free or low-cost spay neuter services in their area and the benefits of spay/neuter,*

⁴ We use U.S. Census data, AVMA estimates and Humane World's Pets for Life data to determine 1) the number of households at or below \$25,000 in annual income, percentage of households with pets, estimated number of pets per household and estimated unaltered pets in areas that have access to veterinary care barriers. In Pets for Life markets where there are significant barriers to veterinary care, 85% of pets were unaltered prior to the availability of no cost spay and neuter and other wellness services, bilingual support, trust building with the community, and transportation services.



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- *The owner or keeper of a pet that is not microchipped is aware of low-cost or free microchip services in their area,*
- *The owner is supported in complying with the requirements of the ordinance, including, but not limited to, providing information on government and non-profit resources that can assist with transportation, housing, finances, and animal care. If government and non-profit resources are not available, owners will be contacted when they become available and no further violations shall occur until resources are made available.*

Impacts on historically marginalized communities:

Over policing in communities of color is well documented. New data shows this also applies to enforcement of companion animal welfare ordinances and laws. Research conducted by the Institute for Human-Animal Connection, at the University of Denver's Graduate School of Social Work on a nationally representative data set of over 1 million companion animal control cases, identified that not only are communities of color experiencing higher rates of animal control enforcement, the outcomes are more punitive in nature. Of the four Social Vulnerability Index (SVI) domains (1 - socioeconomic status, 2 -household characteristics and disability, 3 – race and ethnicity and 4 - housing and transportation) race/ethnicity and socioeconomic status domains are the primary drivers of punitive outcomes in enforcement of companion animal ordinances and laws.

Citation for the manuscript: Moss, L. R., O'Reilly, K.M., Hansen, M., Arrington, A., & Morris, K. N. (2025). Demographic Disparities in Animal Law Enforcement: Rates and Outcomes. [Manuscript submitted for publication].

We know that addressing the root causes of the abundance of pets can be a painfully slow process but instead of punishment, we ask the council to consider instead, investing in programs and services that remove barriers to services for all Milwaukee pet owners.

Thank you for your time and consideration,

A handwritten signature in cursive script that reads "Amanda Arrington".

Amanda Arrington
Vice President, Access to Care
Humane World for Animals
aarrington@humaneworld.org

A handwritten signature in cursive script that reads "Lindsay Hamrick".

Lindsay Hamrick
Director of Shelter Outreach & Engagement
Humane World for Animals
lhamrick@humaneworld.org