

What New Animal Welfare Enforcement Push Means For Cos.

By **Shennie Patel** (March 13, 2026, 4:49 PM EDT)

On Feb. 18, the Trump administration announced a coordinated, governmentwide push to strengthen enforcement of the Animal Welfare Act, or AWA, across the nation.

Attorney General Pam Bondi, Secretary of Agriculture Brooke Rollins, then-Secretary of Homeland Security Kristi Noem, and Secretary of Health and Human Services Robert F. Kennedy Jr. jointly declared their departments' commitment to holding animal welfare violators accountable and strengthening overall enforcement and oversight.

This article analyzes the implications of this sweeping, multiagency federal initiative to strengthen enforcement of the AWA and related laws. Key impacts potentially include broader and more frequent enforcement activities across industries, heightened scrutiny of compliance standards, and a need for businesses to adopt effective risk management practices.

The article also discusses the most noteworthy implications and concrete steps organizations can take to minimize exposure and disruption.

Scope of the Initiative

The breeding, import, sale and treatment of dogs is a key focus of this cross-agency initiative.

For example, Rollins announced that the U.S. Department of Agriculture, which houses the primary agency responsible for enforcement of the AWA, is taking "historic" actions to crack down on chronic violators and what she called the "worst offenders" of federal animal welfare laws involving dogs.

These include noncompliant dog breeders who sell dogs intended as pets or for medical research, as well as individuals who import dogs for sale without the required permits.[1] Rollins further announced a commitment to stronger interagency coordination with the U.S. Department of Justice in the prosecution of dog fighters.[2]

But this new animal welfare initiative is not limited to dog-related activities. Bondi emphasized the DOJ's commitment to stronger enforcement of a broader range of animal welfare violations.[3]

Bondi ordered the DOJ to prioritize its nationwide enforcement by coordinating consistent prosecution strategies between key agencies, including the DOJ's Environment and Natural Resources Division — which prosecutes civil and criminal animal welfare cases, as do the U.S. attorney's offices — the USDA,



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the Federal Bureau of Investigation, the U.S. Marshals Service, and U.S. Immigration and Customs Enforcement's Homeland Security Investigations branch, which, like the FBI and the Marshals Service, assists in AWA investigations.

Bondi detailed the five parts of what she called the DOJ's "historic plan to combat animal welfare crimes" in a memorandum to all DOJ employees:

- An animal welfare summit to train federal prosecutors and federal agents from around the country in prosecuting animal welfare crimes, which will cover prosecution strategies and procedures involving the Animal Fighting Venture Prohibition Act, the AWA, the Crush Video Statute and the Humane Slaughter Act;
- The establishment of a multiagency animal welfare executive strategic committee chaired by the Environment and Natural Resources Division's principal deputy assistant attorney general, Adam Gustafson, which will have regular meetings and issue an annual report of its accomplishments;
- The creation of a law enforcement "Tiger Team" — not restricted to actions involving tigers, despite its nomenclature — to assist with search warrants and seizures in AWA cases;
- Use of the asset forfeiture fund to offset the costs of the care of seized animals; and
- Grants to prevent animal cruelty.

In addition to this focus on animal welfare enforcement, there have been recent administrative and congressional moves addressing animal welfare and research testing. In April 2025, the U.S. Food and Drug Administration outlined its road map for reducing animal testing in preclinical safety studies, citing limitations and ethical concerns as a basis for implementing new approach methodologies.

Last fall, Kennedy stated an end to animal research as part of his Make America Healthy Again agenda, reportedly instructing the U.S. Centers for Disease Control and Prevention to end its in-house primate research, citing rising costs, practical and scientific concerns, and ethical considerations.

On Dec. 20, 2025, during a joint interview with Rollins and Bondi discussing their animal welfare enforcement initiative, Kennedy emphasized his intent to work to end animal testing, and the importation of animals for such testing. He also raised the option of retiring animals in labs — especially primates — to sanctuaries.

On Dec. 19, 2025, 10 Republicans and 10 Democrats in the U.S. House of Representatives issued a letter to the director of the National Institutes of Health, urging the NIH to demonstrate its intention to reduce reliance on animal testing, and progress toward "more humane, human-relevant scientific methods."

And in January, the U.S. Environmental Protection Agency announced its goal of phasing out animal testing, relying more on nonanimal methods.

What to Expect Next

New Animal Welfare-Related Enforcement Action Under Multiple Statutes

While a major part of this new animal welfare initiative involves dogs, it is important to keep in mind

that the AWA and other statutes listed in the DOJ's enforcement plan cover violations involving a much broader range of animals, including wild animals exhibited at zoos or smuggled across the country.

For instance, the infamous "Tiger King"-related civil and criminal investigations and prosecutions around the country prosecuted AWA violations covering dogs, tigers, cheetahs and lemurs, among other species.[4] Further, many AWA prosecutions include violations of other keystone environmental statutes.

U.S. v. Envigo RMS LLC and Envigo Global Services Inc., a 2024 criminal case brought against a dog breeding facility in Cumberland, Virginia, resulted in a \$35 million fine for violations involving the AWA, plus Clean Water Act penalties for the facility's unlawful discharges of untreated wastewater.

Among other payments, the facility also paid \$3.5 million to restore the environment and ecosystems in the area.[5]

Attempts to Impose Substantial Penalties

This new multiagency initiative focuses primarily on midlevel civil penalties pursuant to an AWA-based investigation.

But in practice, such investigations could expand to cover other related statutes resulting in multimillion-dollar penalties and restitution for environmental harm.

Increased Scrutiny of Animal Testing

In their joint interview last December, Bondi, Rollins and Kennedy emphasized coordinating actions across their agencies to target not only dog fighting and puppy mills, but also animal testing.

Indeed, while Kennedy appears to be most focused on reducing animal testing in research, as demonstrated by his recent comments, it is unclear if the coordinated effort to enforce the AWA will also include increased enforcement regarding the treatment of medical research animals.

Increased Civil AWA Prosecutions

There are indications that the federal government is amping up its civil AWA enforcement actions. For example, on Febr. 24, the government filed U.S. v. K&M Pets LLC, a civil complaint in the U.S. District Court for the Eastern District of Michigan,

The complaint asserted that K&M, a licensed animal dealer in Saginaw, Michigan, was responsible for repeated AWA violations. K&M's facility houses rabbits, hyenas and sloths, among other animals.

The government's claims primarily arise from denial of access to required inspections by the USDA as part of its licensing regime, as well as fraudulent recordkeeping. The claims also cite a failure to address serious health and safety violations affecting both animals and the public, such as inadequate enclosures and lack of veterinary care.

The DOJ sought an injunction requiring K&M Pets to allow inspections and halt regulated activity until compliance is achieved, underscoring the role of regulatory oversight in federal animal welfare actions and initiatives.

On Feb. 27, the court issued a temporary restraining order against the company, effectively prohibiting K&M Pets from engaging in any activity regulated by the AWA. The order also required the business to allow inspectors immediate access to the facility to conduct unannounced inspections in order to assess the well-being of all the animals in the facility.

Businesses Affected

The administration's directive to prioritize animal welfare does not create new legal obligations. However, it can potentially alter the enforcement environment, regulatory focus and compliance expectations across organizations involving research animals, agriculture, food production, wildlife exhibition and trade, transportation, imports, and exports.

All of these activities require USDA licenses that allow for animal welfare inspections, including unannounced inspections. These reviews — led by teams of USDA inspectors and animal care specialists — include not only interviews and physical examination of areas where animals are housed or treated, but also reviews of records related to animal procurement, disposition, veterinary care, handling and medical research protocols, and other compliance-related documents.

Although inspecting medical research facility, or an industrial agricultural facility such as a concentrated animal feeding operation, is time-intensive, it is arguably faster and more efficient at uncovering AWA violations than investigating an illegal dog-fighting operation.

We would thus not be surprised to see agencies shift focus and increase facility inspections at a wider range of animal-related operations based on this newly announced multiagency energy to enforce the AWA. If that happens, the USDA would have more facility inspection and compliance reports to post online, providing more information available to the public regarding a facility's AWA compliance — or noncompliance.

Risk Mitigation Steps

Potentially affected entities should continue operating their USDA-licensed businesses in full compliance with the AWA and its regulations. However, to err on the side of caution and best practice, businesses should also consider the following additional steps that cover areas the DOJ tends to focus on in AWA investigations.

Schedule proactive compliance audits.

Conduct unannounced internal welfare reviews aligned with likely inspection focus areas, including outside or foreign upstream suppliers.

Implement staff training on inspection protocols.

Conduct training of frontline employees on communication and cooperation techniques that can significantly reduce the potential for costly missteps or misunderstandings during agency inspections. Prepare for unannounced inspections before they happen.

Maintain organized, transparent documentation.

Ensure accurate paper trails, especially involving the chain of custody of animals, veterinary oversight, training records, incident reporting, quarantine protocols, customs permitting, acquisition and disposition of animals, transportation, seller and broker licensing compliance, etc.

Monitor regulations and agencies.

Track agency enforcement updates as well as guidance materials and rulemaking activities covering the USDA's Animal and Plant Health Inspection Service and closely related enforcement agencies, such as the U.S. Fish and Wildlife Service, the EPA and state enforcement agencies.

Prepare for crises.

Develop response protocols for inspection citations, notices of violations, animal seizures, public complaints and major worker-safety incidents. Prepare for media attention. Review your legal strategy.

Conclusion

The Trump administration is channeling its full federal enforcement energy into areas with strong public appeal — preventing animal abuse or mistreatment. Top federal agencies have mobilized an unprecedented, boots-on-the-ground enforcement initiative to aggressively target animal welfare violations.

USDA-regulated entities operating in targeted or related industries involving other types of animals may face a materially heightened risk of federal scrutiny either as a direct or secondary focus of this animal welfare enforcement push.

Entities regulated under the AWA should expect increased inspections, stricter compliance reviews and enhanced interagency enforcement, potentially affecting any operations involving AWA-protected animals.

However, there are questions about how the government will implement the required level of increased enforcement, given the recent departure of thousands of experienced attorneys and investigators from the DOJ, the USDA's Animal and Plant Health Inspection Service and the USDA's Office of Inspector General.

To mitigate risk, businesses importing or using animals for research, testing or other lawful purposes should proactively audit their compliance, maintain thorough documentation, and monitor ongoing regulatory developments and enforcement trends across all affected industries.

Licensed entities should keep in mind that public-facing AWA compliance data is likely to increase due to more frequent and transparent inspections, potentially amplifying reputational risks for all USDA-regulated facilities.

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[1] U.S. Dep't of Agriculture, "USDA, DOJ, DHS, and HHS Launch Coordinated Effort to Crackdown on Chronic Dog Welfare Violators," Feb. 18, 2026. <https://www.usda.gov/about-usda/news/press-releases/2026/02/18/usda-doj-dhs-and-hhs-launch-coordinated-effort-crackdown-chronic-dog-welfare-violators>.

[2] On Feb. 17, in advance of the multiagency announcement, the USDA's Animal and Plant Health Inspection Service released proposed regulations to improve welfare standards for dogs handled by dealers, research facilities, exhibitors and other regulated entities. See 91 FR 7162, "Standards for the Care of Breeding Female Dogs and Exercise and Socialization of Dogs," Feb. 17, 2026. <https://www.federalregister.gov/documents/2026/02/17/2026-03077/standards-for-the-care-of-breeding-female-dogs-and-exercise-and-socialization-of-dogs>.

[3] U.S. Dep't of Justice, "Attorney General Bondi Announces Department of Justice Prioritization of Animal Welfare Enforcement," Feb. 18, 2026. <https://www.justice.gov/opa/pr/attorney-general-bondi-announces-department-justice-prioritization-animal-welfare-0>.

[4] See, e.g., DOJ press releases: (1) Civil complaint against Jeff Lowe and Tiger King LLC at <https://www.justice.gov/archives/opa/pr/justice-department-files-complaint-against-jeffrey-lowe-and-tiger-king-llc-violations>; (2) Criminal wildlife charges against "Joe Exotic" at <https://www.justice.gov/usao-wdok/pr/grand-jury-adds-wildlife-charges-murder-hire-allegations-against-joe-exotic>; and (3) Doc Antle's criminal plea to wildlife trafficking and smuggling charges at <https://www.justice.gov/archives/opa/pr/doc-antle-owner-myrtle-beach-safari-pleads-guilty-federal-wildlife-trafficking-and-money>.

[5] See U.S. v. Envigo RMS LLC and Envigo Global Services Inc., No. 6:24-cr-00016 (W.D.Va.), information filed June 4, 2024. See also the DOJ sentencing press release: <https://www.justice.gov/usao-wdva/pr/animal-breeder-sentenced-animal-welfare-and-water-pollution-crimes-will-pay-more-35m>. The DOJ also filed a civil complaint for declaratory and injunctive relief on May 19, 2022. See U.S. v. Envigo RMS LLC, No. 6:22-cv-00028 (W.D.Va.). The civil complaint resulted in the surrender of approximately 4,000 beagles intended for medical research from the company. See DOJ press release announcing the surrender of the dogs and background on the case at <https://www.justice.gov/archives/opa/pr/justice-department-secures-surrender-over-4000-beagles-virginia-breeder-dogs-research>.