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Bureau of Dog Law Enforcement
Attn: Ms. Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110-9408

Rhoda J. Springer
362 Mattson Rd
Glen Mills, PA 19342

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2007 JAN -6 AM 10: 23

INDEPENDENT REGULATORY
REVIEW COMMISSION

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DOG LAW ENFORCEMENT

JAN 3 2007



Dear Ms. Bender:

I am, what is called in the parlance of current legislation, a hobby breeder. I have been very active in the dog community for over 13 years, actively showing, training, and breeding; and hold myself to the highest standards of animal care. My dogs are pets first and live at my home on almost 2 acres where they get the high quality food, sleep in soft beds inside my house, and exercise on fenced property.

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels.

Examples of problems with the proposal are the following:

- * The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate. I do not breed for an income. Every one of my litters has lost money. I do it to further the development of the breed. My dogs receive health test that no commercial breeder – who will have no problem complying with these regulations – ever does. Would you force me to build another building on my property like a commercial breeder for my beloved dogs to live in instead of my home? Also, would you force the informed public to buy poor quality animals from Missouri who live in wretched conditions just so that you can stop me? That is seriously flawed logic!

- * The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.

- * There is no scientific or accepted husbandry basis for the amended space and exercise requirements. Dogs of the same weight are not necessarily the same size. In addition, what is the issue with exercising dogs of different breeds together? There is no basis for this regulation and would force animals in the same household to be turned out separately which does not make good sense. Dogs are exercised best when exercised together.

- * Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards. I am not a commercial kennel – I am better than they are! These laws though would make it easier for them to succeed further degrading the conditions are dogs live in.

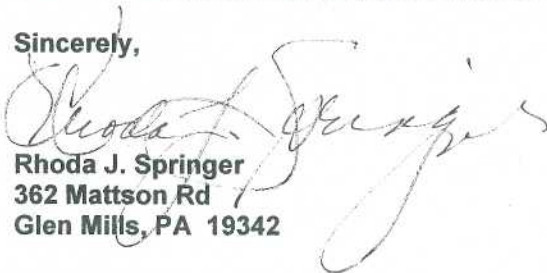
- * The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious

circumstances already violate existing regulations.

The above is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

The Bureau has tacitly conceded that its current regulations have not been adequately enforced. If, after implementing its recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, it should cite these specific deficiencies and propose changes based on them. The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has no connection to specific instances in which the welfare of dogs could not be secured and no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rhoda J. Springer", is written over the typed name and address.

Rhoda J. Springer
362 Mattson Rd
Glen Mills, PA 19342