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DOG LAW ENFORCEMENT

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1834 North Eden Rd.
Lancaster, PA 17601

Mary Bender
Pa Department of Agriculture
Bureau of Dog law Enforcement
2301 North Cameron Street Harrisburg, PA 1711-9408

Dear Mary Bender:

As a former member of the Dog Law Advisory Board (I resigned years before the Board was ended) I would like to submit comments concerning the new proposed dog law regulations. Even though I have not had any connection to dog kennels since 1999, I felt it was important to express my views concerning the proposed new dog law.

Many articles have been written and it is well known that it is beneficial to own a dog. Therefore, it is important to have dogs available for people who want them. The fact that Pennsylvania is a leading source for dogs should be thought of as a positive attribute for the state, not a negative one. This should be kept in mind as new kennel regulations are written. Regulations should protect the health and welfare of dogs, and kennels should be obligated to maintain relevant standards. However, they should not be so restrictive that it is almost impossible for a kennel to comply.

Annex "A"
7 Pennsylvania Code
Part II Dog Law Enforcement Bureau

Chapter 21

21.14 Kennel Licensure Provisions
(C) Health Certificate requirements
(5) Rabies vaccine

It says that all dogs received from another state, etc. must have a rabies certificate. However, dogs can be received starting at 7 weeks of age. According to veterinarians and vaccine manufacturers, dogs should start vaccinations for rabies at 3 months of age.

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INDEPENDENT REGULATION
RABIES COMMISSION

21.15 Exemptions

Language was added to assure that dog control facilities authorized to receive grants under section 1002 of the act (3 P. S. § 459-1002(a)) would be exempt from the new quarantine and space provisions of the regulations.

Do these exemptions mean that the health and welfare of dogs doesn't matter to the humane league? If dogs really must have to be quarantined for 14 days and, if dogs need twice as much space, they need it whether they are in a kennel or in the animal shelter. They either need it or they don't. It doesn't matter where they happen to be. If it isn't necessary for dogs to be quarantined for 14 days or if it isn't necessary for dogs to have twice as much space, then it should not be a requirement in the new regulations.

21.22 Housing

(d) ...quarantined for 14 days... whichever is Longer.

When a pet shop or kennel receives a dog, it should probably not be in contact with other dogs for a certain number of days. However, 14 days is probably longer than necessary. It means that the dog is 2 weeks older and therefore somewhat less desirable and somewhat less likely to sell. If one is concerned about the dogs being confined in the kennel, the sooner they can be put up for sale, the sooner they will get a new home and be out of the kennel. This also increases the expenses involved in caring for the dog each of the 14 days.

21.23 Space

(a) No part of the dog can touch any side of the enclosure.

This is asking a lot, especially since the dogs would probably prefer to cuddle up against the side of the kennel.

(b) Twice the minimum amount of floor space.

I believe most kennels will have to do an extensive and expensive remodel. If they don't build another building, they may only be able to keep about half as many dogs.

21.23

[(e)] The exclusions that applied to pet shops were deleted.

Since pet stores are in commercial buildings like shopping centers, there are very limited and expensive possibilities for reconstruction. In many cases there will only be room for half the number of dogs if the new law goes into effect.

21.23

New (e) 20 minute exercise.

It will be necessary to hire one full time employee plus a part time employee just to exercise all of the dogs 7 days a week. Because of the possibility that a dog could have an undetected illness or parasites, the dogs should not be allowed to play together. Therefore, each dog must be walked on a leash individually. If a kennel has 24 dogs it would take 8 hours every day including weekends to walk the dogs, plus the time to take the dog out of its kennel and put it back in and the time to write down all of the required records of exercise.

21.30 Condition of dog.

A State dog warden or employee of the Department may order a veterinary check on any dog that exhibits signs of ... parasites or the appearance of poor health. Since the dogs have probably been wormed there will be signs of parasites. An over zealous inspector could order a veterinary check even though the problem is being taken care of.

21.41 General Requirements

(e) Date, time and details of feedings, cleaning of kennel, and changing and refreshing water. If too much time is required for record keeping that has to include such things as a record of every time a dog's water is refreshed, there won't be enough time to do all the maintenance work that is required with the new law.

If you have any questions, please contact me by mail, phone or E-mail.
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