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Bureau of Dog Law Enforcement
Attn. Mrs. Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17710-9408

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Dear Mrs. Bender,

I am compelled to correspond with you to express my dissatisfaction with December 16, 2006 proposed amendments to the Pennsylvania dog law regulations. As a dog show hobbyist with an interest in many breeds, I own only two (2) English Cocker Spaniels at the present time.

I am in agreement that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the regulatory changes are needed, or would necessarily have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, unenforceable and will not improve the quality of life for the dogs in these kennels.

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.

There is no scientific or accepted husbandry basis for the amended space and exercise requirements.

These regulations will require complete renovations and rebuilding for kennels already built in compliance with current federal and state standards. Again, there is no scientific foundation for the arbitrary, rigid engineering standards specified.

Those of us who are smaller breeders and dog owners who maintain their dogs in our own residential premises but are covered by the PA dog law, and 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.

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 extreme situations. These extreme situations already violate the existing regulations.

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The above is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the 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 of accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely,

Ronald B. Britton

