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Ms. Mary Bender
Department of Agriculture
Bureau of Dog Law Enforcement
2301 North Cameron Street
Harrisburg, PA 17110-9408
February 4, 2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

Martha Conway
120 Sweetbriar Lane
Kirkwood, MO 63122

RE: ID #2-152 (#2559)

Dear Ms. Bender,

I am writing to record my objections to the above-referenced proposed regulation of dog breeders. Even the most modern kennel will be unable to satisfy the proposed regulations, and the paperwork requirements will be onerous. Breeders would spend their time completing mounds of paperwork rather than time better spent with the dogs and puppies in their care. The intention to rid the state of "puppy mills" is well-meant, but there will be unintended consequences if the proposed regulations are adopted. . . your finest breeding facilities will be forced to close. I suggest state money would be better spent educating the public on the dangers of purchasing from puppy mills and let the educated consumer drive the puppy mills out of business without harming your honorable breeders.

To be more specific, I find the following proposals objectionable:

- dogs must be walked on a leash 20 minutes a day. If a breeder with just one litter of 8 puppies were required to walk each pup 20 minutes a day (nearly 3 hours), there would be little time left for the more important feeding, cleaning, socializing, and training. In addition, dogs gain more from running free and socializing in open paddocks than from a 20 minute walk on leash. Your better breeders provide the open fenced-in acreage.
- dogs must be segregated by size and gender. Are puppies to be removed from their mothers? Are male puppies to be removed from their female littermates?
- daily recordkeeping. Six separate forms would have to be completed cataloguing each day's exercise, feeding, watering, and sanitation for each dog in the kennel. The amount of paperwork would be overwhelming. Who will review this mountain of paperwork? Is the state committing the funds needed to hire the staff who will enforce the proposed regulations? It is poor public policy to enact regulations that are unenforceable. The puppy mill breeders will continue to thumb their noses at the regulations, and the good breeders will try to comply but will be driven out of business for trying.

- interstate sales. No dog could be sold out-of-state without a rabies certificate. Puppies are not vaccinated against rabies until they are 4 months old. That is difficult on both the out-of-state buyers and the breeders.

I could detail more specific objections, but my point is made. This attempt to curtail puppy mills has unintended consequences that will force your reputable kennels out of business when a consumer education program would be more effective and less costly.

I live in Missouri and recently drove to Pennsylvania to purchase a puppy from one of your state's finest breeders. This breeder will not survive if the proposed regulation is adopted. Missouri had a bad reputation for its puppy mill industry, but improvements have been made by our Department of Agriculture by increasing the number of inspectors and the frequency of their inspections. The Missouri Humane Society is also very proactive in reporting kennel violations to the State. I would suggest your staff contact your counterparts in Missouri for further information on how improvements have been made here.

I also urge you to offer an extended public comment period so you can better understand the repercussions of the proposed regulations.

Very sincerely,

Martha Conway

Martha Conway

cc: IRRC, Arthur Coccodrilli, Chairman
Governor Edward G. Rendell