

RECEIVED

Bureau of Dog Law Enforcement
Pennsylvania Dept. of Agriculture
Attn: Ms. Mary Bender
2301 North Cameron St.
Harrisburg, Pa. 17110-9408

2007 FEB -5 PM 1:29

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender;

I would like to comment on the proposed changes to Dog Law Regulations. As a member of the Dog Law Advisory Board and as president of a private, non-profit animal shelter I fully support changes to the regulations which will bring about better conditions for dogs in large commercial breeding facilities.

In order for the proposed changes to be supported, however, modifications need to be made to allow shelters and rescues exemption from certain of the rules.

For example, the proposed exercise requirement cannot be adhered to in a shelter facility. Stray dogs entering the shelter must be housed in the isolation area until it is determined that they are disease-free. Exercising them would require that they use areas which other dogs would also use, putting our shelter population at risk for diseases such as parvo, which remains on grass and other surfaces for as long as 6 months.

Our shelter recently took in 63 dogs as part of a cruelty investigation. Fortunately, the owners voluntarily signed the dogs over to us and we were able to send some to breed rescues and spay/neuter/medicate the others to prepare them for adoption.

Had the owners refused to sign the dogs over, we would have been required to hold all 63 until the trial was completed—most likely for months. At present, the provision for an owner making payment for the costs the shelter would incur are not adequate. Language needs to be added so that payments would be made at the very least bi-weekly, or the dogs would be considered “abandoned” and available for adoption or transfer to breed rescues. Otherwise, the shelter would incur costs of many thousands of dollars, and the likelihood of the owners ever paying the shelter would be very slight.

no addresses
(Rec'd 1/30/07)

We understand that shelters will be exempt from the cage size requirement (although all of our dogs have kennels large enough to meet your specifications) but other building regulations will be impossible for us to meet.

Typically, non-profit shelters run at a deficit (ours is over \$100,000 annually) and we cannot afford new construction to comply.

We support the stricter regulations for commercial breeding kennels, where breeder dogs spend their entire lives in a cage. Our dogs, it is hoped, spend a short time in a kennel awaiting adoption.

It seems evident, then, that the new regulations will have to be split out so that shelters and rescues may continue their important work of sheltering, protecting, and adopting dogs.

Commercial kennels should, on the other hand, be required to make whatever changes are necessary to comply with the new laws. In any business, it is necessary to invest part of the profits from time to time to bring buildings up to code. This is no different. Objections from those who imply that enforcement is impossible are not valid. Enforcement of speed limits on out-of-the-way country roads may be difficult, but that does not mean we remove the legal limits and allow everyone to choose his own speed.

I look forward to working with the advisory board to make the new regulations effective. Speaking for my own shelter, I can assure you that we are willing to make whatever changes we must make in order to improve the lives of the thousands of dogs in high volume breeding kennels.

Sincerely,

Nancy E. Gardner