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PA Department of Agriculture  
Bureau of Dog Law Enforcement  
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INDEPENDENT REGULATORY  
REVIEW COMMISSION

As residents of Lancaster County we have first hand knowledge and observation of the puppy mill practices being conducted by dog breeders in the area. Because of this, we strongly support the amended Dog Law Regulations as posted on the Pennsylvania Bulletin.

These laws should be a viable and enforceable means to eliminate the cruel, inhumane treatment of dogs, some of which are not healthy, or able to produce healthy puppies. Responsible dog breeders are already providing a good environment for their healthy dogs, and should not object to these laws, recognizing their importance to good breeding practices. The high prices charged for these puppies warrant that they be conceived and live in comfortable, sanitary conditions with proper care, food and water. Dogs used for breeding should also be healthy and properly cared for. Anyone unwilling to implement standards as mandated by the amended Dog Law Regulations, or who has been convicted of animal cruelty, should not be issued kennel licenses.

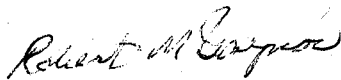
Remarks by Nina Schaefer, President of the PA Federation of Dog Clubs, in the Lancaster Sunday News (1/28/07) unfortunately put into question her credibility as someone who is familiar with dogs. Cages do need to be large enough for dogs to "stretch out" as this is how they love to sleep. Doubling the current cage requirements is not unreasonable. Being familiar with how a business tends to grow, it is also reasonable to require breeding establishments to have a facility large enough to handle the number of dogs allowed by the class of license issued. If the facility is only large enough to handle 6 dogs, then that is what their license should be for. It is not uncommon for puppy mill breeders to add dogs to the operation, without expanding their kennel size. Why should a "Class I" license be given to someone with a 6 dog kennel?

Exercise yards and outdoor runs should be available for dogs, maintained grass and/or layered stone. Dogs should be exercised daily, half an hour is not unreasonable, when boarding our dog, we paid for that option, knowing how critical it is. Likewise, being in a climate controlled environment is mandatory – temperatures, no less than 55 degrees and no warmer than 85 degrees. Dogs, especially those confined, are affected by the temperature, and can be cold & shivering, or stressed from heat. Kennels should be well lit during the day, and ventilated. Dogs should also be placed in other kennels, or exercised while their kennels are being cleaned, which should be done according to set requirements. While being tethered can be a temporary option, dogs should never be permanently tethered.

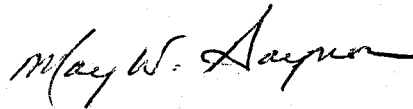
As in many situations, these proposed amended Dog Law Regulations are a result of irresponsible or bad behavior. When individuals or groups do not practice minimal standards or regulate themselves, it is necessary to enact standards in the form of laws and regulations. For years, puppy mills have been a matter of great concern. There was opportunity during this time for changes to be made by breeders and dog organizations. What did individuals like Nina Schaefer, Nathan Myer and Ken Brandt do to educate breeders and ensure that the puppies being sold were healthy, well bred, and cared for? If their efforts were non-existent or minimal, then their remarks about the proposed regulations should carry that same weight. Their concern and knowledge about "animal husbandry" seems short sighted. The best practices result in the best profits.

Since self-monitoring did not occur in this "industry" it is time for stronger, enforceable laws and regulations. Rather than putting breeders out of business, it will ultimately help them provide puppies that they can be proud of and sell in good faith. These laws will help eliminate the perception that all puppies from PA come from business that exploit the dogs, and exploit the people who buy them. While referring to puppies as "products" is unpleasant, that is what they are. And in this case, it is a product that we are ashamed of, and if dog breeders, dog clubs, and others in the dog world are not ashamed of this way of doing business...and the dogs that are produced, then we are ashamed of them as well.

We appreciate the efforts of Governor Rendell, the PA Department of Agriculture, dog law enforcement officials and the Governor's Dog Law Advisory Board. We rely upon you to forward the adoption of the amended Dog Law Regulations in behalf of the citizens of Pennsylvania who want to do the Right and Responsible thing!



Robert M. Gaynor



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