

Ms. Sharon Scrafano
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Bureau of Dog Law Enforcement
Attn: Ms. Mary Bender
Pennsylvania Dept. of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110-9408

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Dear Ms. Bender:

I would like to offer some comments on the issue the Dept of Dog Laws is currently considering. That is regarding the passing of the many changes to the existing kennel regulations. From what I've read, these changes will affect the operations of ALL kennels in PA.

But there are many different kinds of kennels in our state.....

* There are the unlicensed back-yard breeders who breed anything as long as one is a male and one is a female and then they advertise "home raised puppies" to the unsuspecting buyers.

* There are the large commercial puppy breeders in the farm land rural areas of PA who might have a couple dozen to a couple hundred dogs and those puppies are sold as being "raised by loving Amish families."

* Another one is the licensed retail market, which because they fall under the category of a PET STORE (although they are NOT a pet store) they don't have to follow the same rules as the good breeders?? (and why not, I'd like to know?) They buy from brokers, carry anywhere from a few to a dozen or more breeds and tell people their puppies come from "good home breeders"...HA.

In our area that would be Jacks' Dog Farm, Almost Heaven and Hackett's, to name a few. They often sell poorly bred and sickly dogs for top dollar. If a buyer complains that they have a sick dog the reply is often "bring it back and we'll give you your money back and put the dog to sleep!" Since the family now loves the puppy, have named the puppy, the kids want the puppy - they refuse - and so end of guarantee.

Then there is the small hobby breeder who raises a few litters of quality puppies a year IN THEIR HOME. They screen their buyer, sell with spay/neuter contracts, have their breeding stock tested and screened for health problems, and will take back any puppy they sell at any time - no animal shelters for these dogs.

*Then you move on to boarding kennels. There are many small, responsible boarding kennels like the one I use. They have large clean and bright indoor and outdoor runs and a caring staff, very small and personal.

*There are also other boarding kennels that keep their client's dogs in small cages with little outdoor time and minimal attention.

*Plus you have dogs being boarded at veterinarians; again mostly in small cages and these are not dogs being there for treatment, but only for a boarding service to their clients. (but they get to also be exempt, again why?)

*Next are the many young puppies in small cages for weeks and sometimes months at a time in pet stores (and that too is exempt from most of the proposed changes?) Something is not right here. You can't look for a set of rules that can apply to all of these categories the same. That is ridiculous.

So, if you're Dep. is set on proposing new rules, make this time and effort really count for something. Do it right this time. Do it slowly. Ask for comments from a few responsible kennel clubs, like Harrisburg K.C. right in your back yard – ask the AKC – ask a few very reputable breeders, NOT lawyers for God's sake!

Don't just work with words –think what the effects of those words will have on the various CATAGORIES of breeders and kennels and DOGS AND puppy buyers. You do realize without puppy buyers – there would not be this problem in the first place. THAT'S THE MARKET that is generating whatever problems you feel exist!

Therefore, I agree with many others when I respectfully ask that you reconsider these proposals until it can be done right. Perhaps the comment I am hearing a lot of “enforce the existing rules and we would not need new rules” is beginning to make more sense. Before re-writing everything why not try that?

Respectfully,

