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2007 HAR -8 AM 9:08

NDEPENDENT REGULATORY REVIEW COMMISSION

March 8, 2007

Department of Agriculture Bureau of Dog Law Enforcement Attn: Mary Bender 2301 North Cameron Street Harrisburg, PA 17110-9408 Fax: 717-772-4352

PROPOSED RULEMAKING - DEPARTMENT OF AGRICULTURE Regarding [7 PA. CODE CHS. 21, 23, 25 AND 27] - Dog Jaw Enforcement

Dear Madam:

I am writing to support, the proposed changes to the regulations that affect dogs in puppy mills, which should include the following requirements:

» doubling the minimum cage size

» requiring daily exercise outside of the cage

» required heat when the temperature drops below 50 degrees

» required cooling (by fan or air conditioning) when the temperature rises above 85 degrees

» improving ventilation in kennel areas

» denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

» other provisions in the proposed kennel regulations.

There has been some concern that animal shelters and rescue groups may be affected by the kennel regulations due to the addition of a new definition of "temporary home." I share this concern and support the following:

» An exemption for shelters from the kennel expansion and exercise requirements » A note that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings

Sincerely,

Jonathan Schlegel

At Sh

33 Seltzer Avenue Womelsdorf, PA 19567

March 2, 2007

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

Mr. Arthur Coccodrilli, Chairman Independent Regulatory Review Commission 333 Market St., 14th Floor Harrisburg, PA 17101

Dear Ms. Bender and Chairman Coccodrilli:

I, along with many fellow citizens of the Commonwealth of Pennsylvania, am ashamed and saddened that Pennsylvania is known as the "puppy mill capital of the East." For years, Pennsylvania residents have called upon their legislators and regulators to clean up the cruel puppy mills that brutalize dogs and tarnish the state's image. Thanks in part to Governor Ed Rendell's commitment to help the tens of thousands of dogs affected by Pennsylvania's puppy mills, the issue has recently received increased attention, and, on December 16, 2006, changes to the outdated kennel regulations—currently used to inspect commercial breeding operations in Pennsylvania—were proposed.

I strongly support adopting the proposed changes to improve the living conditions of dogs currently in puppy mills, including:

- Doubling the minimum cage size.
- Requiring daily exercise outside of the cage.
- Requiring heat when the temperature drops below 50 degrees F.
- Requiring cooling (by fan or air conditioner) when the temperature rises above 85 degrees F.
- Improving ventilation in kennel areas
- > Denying kennel licenses to individuals convicted of animal cruelty within the past 10 years.

I also support the detailed comments on the proposed regulation changes submitted by the Humane Society of the United States. I also have concern that animal shelters and rescue groups (that are trying to improve the lives of these dogs) might be adversely affected by the kennel regulations due to the addition of a new definition of a "temporary home." I ask for an exemption for animal shelters from the kennel expansion and exercise requirements and that foster homes should be exempt from kennel housing requirements and instead have separate performance and care standards appropriate for home care settings.

Constant and State

Thank you for your attention to this issue.

Sincerely. Sandra Rapsa-Warner

a antique de la serie

Sandra Kapas-Warren 7900 Lindbergh Blvd, Apt #3100 Philadelphia, PA 19153

cc: Senator Arlen Specter Senator Bob Casey Representative Robert Brady

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2007 MAR -8 AM 9:23

INDEPENDENT REGULATORY REVIEW COMMISSION

2559

ALLEGHENY INTERNATIONAL

2559

DRU ANN DELGADO 220 Lea Street Munhall, PA 15120

8 March 207

Arthur Coccodrilli Chairman Independent Regulatory Review Commission VIA FAX: 717-783-2664

RE: PENNSYLVANIA PUPPY MILLS

Dear Mr. Coccodrilli:

I am contacting you concerning the upcoming legislation to improve the living conditions of dogs in "puppy mills" within Pennsylvania. Some of the issues which need to be addressed include:

Doubling the minimum cage size Requiring daily exercise outside of the cage Required heath when the temperature drops below 50 degrees Required cooling by fan or air conditioning when temperature rises above 85 degrees Improved ventilation in kennel areas

ESPECIALLY

Denying kennel licenses to individuals convicted of animal cruelty within the last 10 years

Also I ask for an exemption for shelters from the kennel expansion and exercise requirements and that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Your attention to these issues is appreciated.

Sincerely, Va han Migulo

2559

Independent Regulatory Review Commission Attn: Arthur Coccodrilli, Chairman 333 Market Street, 14th Floor Harrisburg, PA 17101

RECEIVED 2117 MAR -7 AM 10: 50 INDEPENDENT REGULATORY

ADEAWAYN WANAN

January 31, 2007

Dear Chairman Coccodrilli,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

The current proposed regulation changes have appeared to be burdensome and beyond rulemaking. The proposals add completely new categories and definition to the existing laws. These changes must be addressed through the legislative process.

The proposals referencing housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Furthermore, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

In addition, the proposed regulations call for the temperature of the kennel floor to be 50F° in the warm weather. Many kennels are air conditioned to a comfortable 70F°. A dog sleeping on a 50F° floor can develop hypothermia and become ill or die. For temperature, lighting, cleaning, exercise, housing, and veterinary care, the attending veterinarian should set forth and approve procedures specific for the kennel buildings and breeds of dogs.

The proposed changes above will require Pennsylvania's licensed and inspected kennels to be demolished and rebuilt. The average cost will be between \$30,000.00 and \$500,000.00 per kennel, if the proposed laws are adopted.

The current proposed appears to be over idealistic in term of improving the welfare of dogs. I urge that this proposal be rescinded and an approach similar to the USDA standards be developed.

Yours sincerely,

Simum

Zimmer's Pets 1065 E. Philadephia Ave Gilbertsville, PA 19525

2559

March 6, 2007

RECEIVED

2007 MAR 12 AM 9:23

INDEPENDENT REGULATORY REVIEW COMMISSION

Department of Agriculture Bureau of Dog Law Enforcement 2301 North Cameron Street Harrisburg, PA 17110-9408

Dear Mary Bender:

I am writing to ask for better treatment for the dogs in Pennsylvania's puppy mills. I support the proposed changes that would:

- Double the minimum cage size
- Require daily exercise outside of the cage
- Require heat when the temperature drops below 50 degrees
- Required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- Improve ventilation in kennel areas
- Deny kennel licenses to individuals convicted of animal cruelty within the past 10 years

I also want to ask for an exemption for shelters from the kennel expansion and exercise requirements and note that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Please help the tens of thousands of dogs who suffer in Pennsylvania's puppy mills. This is a disgrace to our state. Governor Ed Rendell is committed to helping these dogs.

Sincerely,

inar i

Julianne Swanson 2675 Kutztown Road Pennsburg, PA 18073-1915

cc: Arthur Coccodrilli, Chairman Independent Regulatory Review Commission 333 Market Street, 14th Floor Harrisburg, PA 17101

717-534-0811

MAR - 7 MM 19:

2559

408 Eim Avenue

Hershey, PA 17033

(717) 534-0811

March 6, 2007

Dog Law Bureau Director, Independent Regulatory Review Commission:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am <u>strongly</u> opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you.

Sincerely,

Karen S. Johnson

Karen S. Johnson

March 7. 2007

Arthur Coccodrilli, Chairman Independent Regulatory Review Commission 333 Market Street, 14th Floor Harrisburg, PA 17101

Dear Mr. Coccodrilli:

I am writing to support the proposed regulations that would improve the outdated kennel regulations used to inspect commercial breeding operations in Pennsylvania. Current regulations do not ensure humane treatment of dogs in puppy mills and this is a concern of mine.

Thank you.

Sincerely,

Cathlen

Cathleen Pryor 1B Richland Lane Apt. T6 Camp Hill, Pa. 17011

Cc: Mary Bender

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ERICA COHEN

108 Crofton Drive Pittsburgh, PA 15238 EricaCoh@yahoo.com

March 7, 2007

Arthur Coccodrilli, Chairman Independent Regulatory Review Commission 333 Market Street, 14th Floor Harrisburg, PA 17101

Dear Mr. Coccodrilli,

mm 12 M

My name is Erica Cohen and I am writing this letter in hopes of verbalizing my interests and support of the current Pennsylvania legislature regarding Puppy Mills. I believe this is a very important topic, for the inhumane condition and cruelty these animals endure is unacceptable. When looking at websites such as <u>www.stoppuppymills.org</u> and <u>www.prisonersofgreed.org</u>, I am deeply saddened by the stories and photographs I see. It is very widely publicized that Pennsylvania has a large number of puppy mills; there are hundreds of kennels with thousands of dogs that are currently suffering and some even freezing to death in below zero temperatures of winter. Pennsylvania has even been nicknamed the "puppy mill capital of the East." These animals understand what is happening to them and can feel the pain and torture they endure. As humans and Pennsylvania citizens, I know it is up to us to stop and prevent this cruelty toward animals. I really hope you are willing to address this issue. I greatly appreciate your time.

Sincerely,

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Erica Cohen

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

January 30, 2007

Dear Ms. Bender,

I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

The proposed changes require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, and the feeding and watering dates and times, etc. All these burdensome and excessive requirements will require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,

Wint & synak

Stonewall Farm Kennel 166 Sickler Pond Rd Jermyn, PA 18433

Independent Regulatory Review Commission Attn: Arthur Coccodrilli, Chairman 333 Market Street, 14th Floor Harrisburg, PA 17101 **2559**

KECEI

2007 MAR 14 MM 9: 12

INDEPENDENT REPORT ATOMY

January 19, 2007

Dear Chairman Coccodrilli,

I am writing in response to the Dog Law Act 225 that was issued on December 16, 2006, of which I have several disagreements. The regulatory proposals in general are very difficult and costly to enforce, extremely onerous, and not feasible when put in to practice.

The new proposal only permits a licensed kennel to buy from another licensed kennel. This is fraud for the following reasons:

1. Unless the kennel has purchased, sold, or transferred more than 26 dogs in a calendar year to the individual, it is impossible for the kennel to know if the individual is required to have a Pennsylvania kennel license.

2. It is unlawful for the department to regulate and inspect kennels outside of Pennsylvania.

3. The Pennsylvania Department of Agriculture Dog Law Enforcement Bureau already requires the name, address, acquisition date, disposition date, type of sale, breed, sex, color, whelping date, and identification number be recorded for each and every dog sold, transferred, adopted, or given away. If the Department wishes to enforce the law, they already have all information needed.

The proposals referencing to housing and social interaction of dogs of different sizes are contrary to good husbandry, socializing and training practices. Moreover, there is no scientific or accepted husbandry basis for the amended space and exercise requirements.

The current proposal claims to be a general list of ideas to improve the breeding environment for dogs, which are neither substantiated by science nor attributed as accepted canine husbandry practices. A better idea would be for Pennsylvania to adopt USDA type standards.

I sincerely request that this proposal be withdrawn.

Yours Sincerely, Warlene Fair

Darlene Fair 40 Summer Mountain Road Bernville, PA 19506

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2007 MAR 13 PM 3:22

INDEPENDENT REGULATORY REVIEW COMMISSION

March 13, 2007

2559

As a resident of Pennsylvania, I am writing a letter in support of the proposed changes to the regulations that affect dogs in puppy mills in Pennsylvania as follow:

- Doubling the minimum cage size
- Requiring daily exercise outside of the cage
- Requiring heat when the temperature drops below 50 degrees
- Requiring cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- Improving ventilation in kennel areas
- Denying kennel licenses to individuals convicted of animal cruelty within the past 10 years

Also please exempt shelters and rescue groups from the kennel expansion and exercise requirements.

Foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Thank you,

Debbie Smith 1315 Lonely Cottage Road Upper Black Eddy, PA 18972

SONITROL

2559 2559

JOHN G. STEELE 1257 DIVOT DRIVE WESCOSVILLE, PA 18106 610-398-2755

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2007 MAR 14 M 7:28

March 12, 2007

INDEPENDENT REGULATORY **REVEN** COMMISSION

Mr. Arthur Concodrilli Chairman Independent Regulatory Review Commission 333 Market Street, 14th Floor Harrisburg, PA 17101

I want to express my support for the following proposed changes to the Pennsylvania Dog Kennel Regulations:

- The minimum cage size for dogs should be doubled.
- Daily exercise for all dogs should be required outside of their cages.
- Proper heat should be required, when the temperature drops below 60 degrees.
- Fan cr air conditioning cooling should be required, when the temperature rises above 85 degrees.
- Improved ventilation should be required in all Kennel areas.
- No ir dividual who has been convicted of animal cruelty within the last 10 years should be able to obtain a Kennel License.

In my opinion, the following exemptions should also be approved:

- An exemption for legitimate shelters from the Kennel expansion and exercise requirements.
- An examption for legitimate foster homes from Kennel housing requirements. Instead, separate performance standards should be set that are appropriate for home care settings.

The people who try to defend (or make excuses for) the Puppy Mill industry rationalize that, in a market economy, they must be selling healthy puppies in order to stay in business. There is very substantial evidence to the contrary, i.e. that many Puppy Mill puppies (often purchased by unsuspecting pupple at pet stores) actually have real physical and/or mental problems.

However, even if all of their puppies were healthy, the "Puppy Mills" themselves would be abominable, <u>be cause of the virtual torture that is experienced on a daily basis by the mothers and</u> fathers of the puppies. They are kept in tiny wire cages, forced to walk on the cage wires, every day of their sad lives – usually with little or no exercise. Often these cages are stacked on one another, so that the dogs in the lower cages are continually living in urine and feces.

Most kennel fabilities are woefully inadequate – unheated in the freezing winter months, no protection from sweltering heat in the summer. The horror stories go on and on – dogs with missing feet being forced to walk on the cage wires (because they can still breed), litters of puppies born in the heat of summer and being literally fried to death (because nobody was there to care for then), the parent dogs being electrocuted, shot, or drowned when their breeding value has ended, as well as many, many more atrocities.

JOHN G. STEELE

Mr. Arthur Concodrilli Independent Regulatory Review Commission March 12, 200' Page 2

These parent dogs receive non-existent dental care, so many of their teeth are missing or painfully rotten. Dogs that have a lot of fur usually have a lot of matted fur, sometimes so much so that they can't even stand or walk. Real vet care is non-existent, so routine problems are allowed to turn into horrible pain issues for these dogs. Females often experience excruciating pregnancy and/or childbirth pain from being bred while much too young, and also because their internal organs have been damaged by too many caesarian sections.

The heartless prople who create and profit from this hideous treatment of defenseless dogs should not only be put out of business, but also prosecuted to the fullest extent of existing cruelty to animals laws. Gov. Edward Rendell has admirably started the process of breaking the cycle of abuse that exists in so many of the Puppy Mills by championing new regulations for kennel operators. The adoption of these new Kennel regulations will be a positive step in providing some protection for the poor, helpless dogs who are lifetime prisoners of these vile Puppy Mills.

Sincerely,

IJA A Stale . John G. Steele 2559

Karen Brand 1806 Raptor Dr. Audubon, PA 19403

3/9/07 galaxy

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2007 MAR 14 MM 9: 12

INDEPENDENT REGULATORY REVIEW COMMISSION

Dear Mr. Coccodrilli,

I am outraged by the Puppy Mills located in Pa. The conditions in these mills are too horrible to mention. These mills brutalize dogs and tarnish the state's image. I believe these should be under strict regulation of the state—and include better protection from the elements, more cages and general concern for the welfare of these animals.

I cannot believe that such conditions are allowed to take place in the state where I pay taxes and have chosen to raise my children.

I appreciate your consideration of my comments and am confident that you will support any humane legislation. Thank you.

Sincerely, Koven Grand

Karen Brand Cc: Mary Bender, Dept. of Agriculture



requirement

HELP PENNSYLVANIA POOCHES

Pennsylvania-nicknamed the "puppy mill capital of the East" because so many puppy mills call the state home-may soon become a more humane place for pooches. Thanks to Governor Ed Rendell's commitment to help the tens of thousands of dogs affected by Pennsylvania puppy mills, the issue has been getting a lot of attention and, on Dec. 16, changes to the outdated kennel regulationscurrently used to inspect commercial breeding operations in Pennsylvania-were proposed.

The proposed changes could improve the living conditions of dogs who currently suffer in puppy mills. If you are a Pennsylvania resident, you can help by submitting a letter supporting the new, more humane regulations. Please don't miss this chance to help puppy mill dogs in your state!

With your support, changes to the regulations that affect dogs in puppy mills could include the following requirements:

- » doubling the minimum cage size
- » requiring daily exercise outside of the cage
- » required heat when the temperature drops below 50 degrees » required cooling (by fan or air conditioning) when the temperature rises above 85 degrees

» improving ventilation in kennel areas » denving kennel licenses to individuals convicted of animal crueity within the past 10 vears

Writing Your Letter of Support

You can submit a short statement of support or a more detailed letter. Letters do not need to be overly formal or lengthy and can be as detailed or as broad as you like. You might want to note support for:

- » the provisions listed above
- » other provisions in the proposed kennel regulations that you feel are important,
- » the detailed comments submitted by The



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To stay informed about all HSUS programs. subscribe to our newsletters. Sign Up Here



TO: 17177832664

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2007 MAR 14 PM 2:43

RAVEN COMMISSION

Betsy's Cocker Place, InchinePendent Regulatory

24 East Avenue New Canaan, CT 06840 203-972-3000 www.betsyscockerplace.com info@betsyscockerplace.com

March 14, 2007

To: Dog Law Bureau Director, Independent Regulatory Review Commission:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and airconditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you.

Sincerely,

BETSY'S COCKER PLACE, INC

Varie Durch

By: Jane Dweck



Mr. Kenneth A. Scott P.O. Box 476 Pocono Lake, PA 18347

February 19, 2007

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

Dear Ms. Bender:

I am writing this letter to inform you that I am against the new dog law proposal. I do believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or that if adopted, these changes would necessarily have a beneficial outcome.

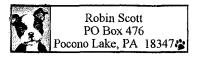
Camp KCS is one of the finest kennels around. If the new laws are adopted, it will put a <u>HUGE</u> burden on not only the owners of the kennel but also on the customers who board their dogs at the kennel.

I ask that you oppose this law. If the proposed law does go into effect, the owners will have to increase their charges for boarding. Many customers will not be able to afford the increases, and many kennels, such as Camp KCS, may be forced to go out of business.

I am in full support of the changes to the new dog law proposal that have been suggested by the owners of Camp KCS. Thank you for your attention to this matter.

Sincerely,

Kenneth Scott



February 19, 2007

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

Dear Ms. Bender:

I am writing this letter to inform you that I am against the new dog law proposal. I do believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or that if adopted, these changes would necessarily have a beneficial outcome.

Camp KCS is one of the finest kennels around. If the new laws are adopted, it will put a <u>HUGE</u> burden on not only the owners of the kennel but also on the customers who board their dogs at the kennel.

I ask that you oppose this law. If the proposed law does go into effect, the owners will have to increase their charges for boarding. Many customers will not be able to afford the increases, and many kennels, such as Camp KCS, may be forced to go out of business.

I am in full support of the changes to the new dog law proposal that have been suggested by the owners of Camp KCS. Thank you for your attention to this matter.

Sincerely,

olan - catt

Robin Scott

HOWARD

2559

Barbara W. Howard 998 Broad Run Road West Chester, PA 19380-1532

March 14, 2007

Mr. Arthur Coccondrilli Chairman of the Independent Regulatory Review Committee 333 Market Street, 14th Flr. Harrisburg, PA 17101

VIA FAX 717-783-2664

RE: Pending Puppy Mill control legislation

Dear Mr Coccodrilli,

As a citizen of Pennsylvania, and a dog owner, I wish to express my gratitude concerning the pending legislation to improve and regulate conditions at kennels in Pennsylvania, especially at the "puppy mills" that are numerous in the State.

I would like to ask that allowance for flexibility be included in the legislation for nonprofit rescue groups, particularly those that are not kennel based. These organizations do a great deal of good and offer a service that, if not available, would overwhelm the SPCA and other organizations, and result in needless death for many animals.

Also, in order to support and help, rather than hinder, these rescue groups, it would be helpful to have a representative of these rescue groups on the Dog Law Advisory Board.

Thank you for considering my input.

Sincerely,

Barbara W Howard

Barbara W. Howard

2007 MAR 14 PM 2:43

INDEPENDENT REGULATORY REVIEW COMMISSION

REU

Chairman of the Independent Regulatory Review Committee (IRRC): Arthur Coccodrilli, 333 Market Street, 14th Floor Harrisburg, PA 17101

Dear Mr. Coccodrilli:

The Dog Law regulations as applied to kennels should <u>exempt all non-profit animal welfare and rescue organizations</u>, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.

2. Representatives from non-profit <u>animal welfare and rescue groups</u> should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Thank you for your consideration:

Judy Berey

Judy Beery / 10315 Wanneta Rd. Albion PA 16401

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724-283-4447

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March 13, 2007

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2007 MAR 14 PM 2: 43

Chairman of the Independent Regulatory Review Committee (IRRC) Arthur Coccodrilli 333 Market Street, 14th Floor Harrisburg, PA 17101 Main Telephone: (717) 783-5417

Dear Chairman Coccodrilli,

I am writing to ask two things related to the changes Governor Rendell has proposed to the dog law regulations.

Non-profit animal welfare groups are <u>not</u> in the same category as the people doing the kinds of things which these legislative changes are meant to address – they are the organizations which struggle to deal with the "animal fallout" created by such people. As such, their employees and board members have a clearer picture than most of many of the things involved in the issues relevant to these regulations.

Please make sure that:

1. The Dog Law regulations as applied to kennels should <u>exempt all non-profit</u> animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.

2. Representatives from non-profit <u>animal welfare and rescue groups should be</u> included on the Dog Law Advisory Board to better represent the interests of <u>animals in forming these regulations.</u>

Sincere thanks to Governor Rendell for his commitment to change the situation for puppy mill animals in Pennsylvania.

Sincerely,

Lesley Bachman

INDEPENDENT REGULATORY REVEW COLMISSION

To: Honorable Mike Carroll To: Bureau Of Dog Law Enforcement, Pa Dept Of Agriculture, Attn: Ms Mary Bender.

I am writing to voice my personal objections to the recent proposals to the Dog Law Act 225. I am a voting resident of the commonwealth.

I use Trifecta Kennels, located in Gilbert, Pa, and have been very happy with their facility, and with the care they provide my beloved pets. I have been a customer of this facility for 10 - 4200

Now, I hear, that the kennel may close if these proposals become law. Or if they stay open, the boarding fees will be prohibitive.

The kennel as it is now, is spacious. I'm satisfied with its size. My dogs are excited/happy to arrive at the kennel, and they are clean, and in good shape when I pick them up. I like the personal care I get at this kennel. They know me and they know my dogs. I fear the loss of this individual attention if the proposals are accepted. Perhaps, the staff will be busy with the required time consuming record keeping. Perhaps, the kennel will hire more employees, who do not know my dogs, or me, but they can keep the required records. I know with certainty that I trust the staff at Trifecta. We are on a first name basis, and I like it that way.

broken? Their kennel sizes have been fine for as long as I've used them. Now, it seems there is an urgency to remodel the kennels, and give the dogs more room. Who decided they needed more room? On what criteria was it decided that existing, and licensed boarding facilities needed to update?

I know that the decision to revamp the dog law was motivated by a desire to seek better care for our animals in our commonwealth. That kind of goal is an admirable one. But the result of such efforts should not be to place a difficult burden on licensed facilities already in existence in the commonwealth, especially facilities that have a history of yearly passed inspections by the department of agriculture.

I truly trust this kennel with the care of my dog. I inspect it each and every time I use it. Who knows what's best for my dogs, the state or me?

To sun up: I vigorously object to the proposed dog law act 225, which was issued on Dec 16 2006.

Very Truly Yours:

Davon Rarrick

To: Honorable Mike Carroll To: Bureau Of Dog Law Enforcement, Pa Dept Of Agriculture, Attn: Ms Mary Bender.

I am writing to voice my personal objections to the recent proposals to the Dog Law Act 225. I am a voting resident of the commonwealth.

I use Trifecta Kennels, located in Gilbert, Pa, and have been very happy with their facility, and with the care they provide my beloved pets. I have been a customer of this facility for <u>10 years</u>.

Now, I hear, that the kennel may close if these proposals become law. Or if they stay open, the boarding fees will be prohibitive.

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I know that the decision to revamp the dog law was motivated by a desire to seek better care for our animals in our commonwealth. That kind of goal is an admirable one. But the result of such efforts should not be to place a difficult burden on licensed facilities already in existence in the commonwealth, especially facilities that have a history of yearly passed inspections by the department of agriculture.

I truly trust this kennel with the care of my dog. I inspect it each and every time I use it. Who knows what's best for my dogs, the state or me?

To sumup: I vigorously object to the proposed dog law act 225, which was issued on Dec 16 2006. Very Truly Yours:

2- Santh G. Thy

Dr Sarrantha G. Thompson Veternarian 07-13-2007

To: Honorable Mike Carroll

To: Bureau Of Dog Law Enforcement, Pa Dept Of Agriculture, Attn: Ms Mary Bender.

I am writing to voice my personal objections to the recent proposals to the Dog Law Act 225. I am a voting resident of the commonwealth.

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Arleen S. Martin 528 Lindbergh Ave. Strouckburg, PA 18360

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NAME Jennifer Hoke Derrich Hoke ADDRESS 30 SASSMERAS ROAD Albrightsville, PA 18710 To: Honorable Mike Carroll

To: Bureau Of Dog Law Enforcement, Pa Dept Of Agriculture, Attn: Ms Mary Bender.

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Mamis Ilya M. Picca Joseph Picca

ADDRESS 2037 Treable DR Effort PA 18330

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As for the renovations necessary to make Trifecta be in compliance with the proposed changes I have to ask: Why are the owners being forced to fix something that is not broken? Their kennel sizes have been fine for as long as I've used them. Now, it seems there is an urgency to remodel the kennels, and give the dogs more room. Who decided they needed more room? On what criteria was it decided that existing, and licensed boarding facilities needed to update?

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Very Truly Yours:

Bonnie R. Hackett P. O. Box 329 Kresgeville, Ja 18333

February 7, 2007

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

Dear Ms. Bender:

I am writing to you in reference to the new legislation being proposed by lawmakers in PA in an effort to improve the living conditions of animals that live in commercial breeding facilities. I would like to applaud your efforts and thank you for your work on behalf of those who have no voice.

I am writing to enthusiastically support this legislation. It is my hope that legislators will not bend to the special interests of groups who are allowing their collective financial self-interest to supercede the overall welfare of the dogs that live in these commercial breeding facilities. As you are well aware, many of these dogs spend *years* living in cramped cages with little or no medical care, no good nutrition, no socialization and no opportunity for regular exercise. It is unfortunate indeed that some turn a blind eye to the suffering of these helpless animals. I fully realize that these are the facilities that this legislation is intended to regulate more effectively.

Once again, I applaud your efforts on behalf of the helpless animals that are suffering in the state of PA at this very moment due to the greed of certain individuals. I hope that you will work tirelessly to see to it that this legislation can be passed and become law. It is my hope that the final legislation will not interfere with the work of shelters and rescues who are already working tirelessly on behalf of animals. That being said, I would like to once again express my support of this legislation.

Most sincerely,

Denise B. Moll 248 Highland Avenue Kutztown, PA 19530 February 5, 2007

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

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Most sincerely,

Megan Coursey 18720 Shremor Drive Derwood, MD 20855

February 5, 2007

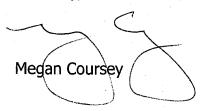
Ms. Mary Bender Department of Agriculture Bureau of Dog Law Enforcement 2301 North Cameron Street Harrisburg, PA 17110-9408

Dear Ms. Bender:

I am writing you in reference to the new legislation being proposed by lawmakers in Pennsylvania in an attempt to improve the living conditions of animals that live in commercial breeding facilities. As a family member of several Pennsylvania residents that have adopted dogs that were rescued from these "puppy mills", I applaud your efforts and thank you for your work on behalf of the animals.

I am writing to express my strong support of this legislation. It is my hope that legislators will not bend to the special interests of groups who are allowing their financial self-interest to supercede the welfare of the dogs that live in these commercial breeding facilities. I understand that many of these dogs spend **years** living in cramped cages with little or no medical care, poor nutrition, no socialization and no opportunity for regular exercise. It is my understanding that these are the facilities that this legislation is intended to regulate more effectively.

Once again, I applaud your efforts on behalf of the animals that are suffering in Pennsylvania due to the greed and heartlessness of certain individuals. I hope that you will work diligently to ensure that this legislation be passed into law. It is my hope that the final legislation will not interfere with the work of shelters and rescues who are already working tirelessly on behalf of animals. That being said, I would like to once again express my support of this legislation.



February 6, 2007

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

Dear Ms. Bender:

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February 5, 2007 34 Main Street Keyport, N.J. 07735

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Most sincerely,

plea Cerane

Carole A. Cerase

30 Newberry Lane Levittown, PA 19054 February 9, 2007

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

Dear Ms. Bender:

As a dog lover and an animal advocate, I applaud the steps recently taken by the Dog Law Advisory Board to update the antiquated regulations that have left thousands of PA dogs suffering on a daily basis.

The newly drafted proposed regulations, introduced on December 16, 2006, are practical, enforceable, and will greatly improve the quality of life for the dogs living in the commercial breeding kennels. Moreover, those breeders opposing the regulations, based upon the costs they will incur to implement the necessary changes, do not have the dogs' best interest at heart. Clearly, these are the breeders who should be out of the business should they choose not to support or comply with the new regulations; the issue is the health of the dogs - not the money in the breeder's - or dog registry's - pocket.

It is absolutely documented by canine authorities that daily exercise, grooming, proper veterinary care and quality housing all serve to promote canine health and mental stability..

The Bureau has my whole-hearted support to implement the newly drafted proposed regulations and to continue policing and shutting down the substandard kennels that have littered our state to such a degree that we're known as the 'Puppy Mill Capital' of the east.

Sincerely,

Joan Miller

Joan Miller 30 Newberry Lane Levittown, PA 1919054

1103 Lincoln Avenue Phoenixville, PA 19460 February 9, 2007

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Robert W. Lusch 1103 Lincoln Avenue Phoenixville, PA 19460

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

February 19, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 per day of violation.

2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.

3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc. CLIPCTEA 1 2007 1000 1000 (2010)

4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition

of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

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1. State laws relating to dog licensing, control and owner responsibilities;

- 2. State and federal laws relating to animal care, cruelty and neglect;
- 3. State laws relating to dangerous dogs;
- 4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
- 5. State and federal laws relating to pounds and shelters;
- 6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
- 7. Report-writing and record-keeping;
- 8. Overview of the legal system, court structure and terminology;
- 9. Basics of interpreting animal behavior;
- 10. Identification of injury, disease, abuse and neglect in dogs;
- 11. Animal hoarders; and
- 12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs

more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

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10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Monica W. Enbark

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 per day of violation.

2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.

3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

- 1. State laws relating to dog licensing, control and owner responsibilities;
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- 3. State laws relating to dangerous dogs;
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- 7. Report-writing and record-keeping;
- 8. Overview of the legal system, court structure and terminology;
- 9. Basics of interpreting animal behavior;
- 10. Identification of injury, disease, abuse and neglect in dogs;
- 11. Animal hoarders; and
- 12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

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Bureau of Dog Law Enforcement

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