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INDEPENDENT REGULATORY  
REVIEW COMMISSION

8 March 2007

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

Dear Ms. Bender:

I am writing regarding the proposed changes to the Dog Law regulations. Although I would like to commend the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs bred in puppy mills in Pennsylvania, a region with one of the highest concentrations of puppy mills in the country, I would like to suggest several modifications and improvements to the Act. Significant steps must be taken to improve conditions for dogs in commercial breeding facilities in Pennsylvania.

Doubling the required cage size is, in my opinion, the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities. This section of the Act 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 the dogs by doubling in size when two dogs are present, tripling when three are present, and so on. I also urge you to prohibit the stacking of cages, which creates an unnatural and unsanitary environment for the animals in which urine and feces can be spread from one cage to the next. Since wire is uncomfortable and unnatural for the dog, all animals must be given resting boards that allow them to lie comfortably on a smooth surface.

Furthermore, I hope that hobby breeders who breed 25 or fewer dogs per year will also be brought under the Act. Small breeders were not bound by these regulations in the past, but should be now.

Finally, 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.

Thank you very much for your time and attention. I appreciate your efforts to improve living conditions for dogs raised in puppy mills and other commercial breeding operations in Pennsylvania.

Sincerely,

*Elizabeth J. Gabor*

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