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March 12, 2007

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

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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Topic: Proposed Dog Law Regulations Comments

Dear Ms. Bender and Mr. Coccodrilli:

We wish to submit the following comments to the Commonwealth of Pennsylvania regarding the proposed changes to the Dog Laws in Pennsylvania.

In our opinion, clear and well-understood regulations are an important and necessary component for improving how dogs are raised and treated in the commercial breeding operations prevalent in Pennsylvania. They provide the specific guidelines by which the breeders and those involved in the approval and enforcement processes can successfully and fairly carry out their responsibilities.

Based on our experience as volunteers with rescue groups in the Commonwealth and reading websites that highlight the animal abuse (see attached representative list of websites - Attachment B), the changes proposed in the regulations and the enforcement process are sorely needed to increase the likelihood that the dogs used in the breeding operations are treated humanely.

We believe that dogs are not treated humanely, but are instead treated only as a necessary ingredient for production of the end product - saleable puppies.

Humane

- o Marked by compassion, sympathy, or consideration for humans or animals (www.m-w.com)
- o Marked or motivated by concern with the alleviation of suffering (www.wordreference.com)
- o Characterized by kindness, mercy, or compassion (www.thefreedictionary.com)

The ASPCA has done an excellent job in reviewing the proposed regulations and in suggesting changes (see their letter - Attachment B). We recommend you strongly consider incorporating their changes into the current proposed regulations.

In the hearings held on March 6th, one of the strong messages of the testimony was that education can be used as an enforcement tool. Educating breeders on how to integrate the regulations into their commercial operations can only help make enforcement easier.

Also mentioned in the hearings were recommendations on how to document information on each dog. We feel that having a medical chart that documents vaccinations, surgeries (i.e. spaying, neutering, c-sections, dental work, "debarking" procedures, etc.), grooming records, (i.e. nail clipping; taking care of matting, etc.), date of birth of the puppies, age of the mother and number of times bred, as well as information on the stud would be helpful to the end consumer. The consumer often does not meet with the breeder operator or his/her staff.

We believe education and awareness is also important to the members of the House subcommittee who are reviewing the proposed regulations.

To aid in their education, we strongly suggest the committee randomly select 10 - 15 commercial breeding operation from the registered list of commercial breeders in Pennsylvania, and make unannounced site visits to their facilities. Understanding how the operations are currently run will allow the committee to make more informed change recommendations. We believe these visits will underscore the need for the regulations to be clear and concise, and that the enforcement process needs to be strengthened to protect the welfare of the dogs.

Thank you for considering our comments, and we hope our suggestion for site visits is carried through.

Sincerely,



Stephen Neff
Dena Neff

cc: American Society for the Prevention of Cruelty to Animals
Pennsylvania State Senator: Andrew Dinniman
Pennsylvania House Representative: Duane Milne
United States Senate: Robert P. Casey, Jr.
United States Senate: Arlen Specter
U.S. House of Representatives: Jim Gerlach
Michael K. Hanna, Chairman
Gary Haluska, Vice Chairman
Art Hershey, Chairman