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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

**RE: Regulation ID # 2-152 (#2559) Dog Law Regulations**

Dear Ms. Bender:

I thought the purpose of the revised dog law regulations was to regulate living conditions for dogs raised in puppy mills and other commercial breeding facilities. The regulations need to put a clear limit on the number of puppies that can be produced each year by the commercial breeders, and strict fines imposed if they do not comply. This is the only way that Pennsylvania will no longer be referred to as "Puppy Mill Capital of the US", which is a disgrace to Pennsylvania!

I have the following comments on the Proposed Amendments to the Pennsylvania Dog Law Regulations, specifically, Section 21.14 Kennel Licensure Provisions (a)(3)(ii). This section groups kennels, commercial breeders, rescue organizations, and foster homes together and subjects them to the same requirements, which doesn't alleviate the puppy mill problems.

The provisions of this section are not fair since foster homes are utilized by many volunteer rescue organizations. Dogs that are placed in foster care are kept in a home environment like family owned dogs. Foster dogs are the "temporary" pets kept by a household until the animal finds its permanent home. These animals should not be crated or kept in kennel-like conditions because foster dogs will become someone's family member. Instead, the animals are kept in a home environment. Foster homes utilized by rescues provide more humane living conditions for the animals cared for by rescues, because the animals are indoors, socialized, and become housebroken. It is not in the best interest of these animals to require foster homes to place animals in a kennel environment rather than allowing them to live inside a home.

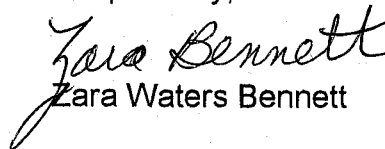
Extending the regulations to include all volunteer non-kennel based rescues and foster homes does nothing to regulate the puppy millers. Instead, the proposed regulations impose standards upon private, all volunteer rescues that would be unable to afford to meet, forcing rescues to close down, and jeopardize the lives of thousands of animals assisted by rescues annually.

Assuming there are 100 foster home-based rescues in Pennsylvania, each handling 1,000 animals per year and the rescues had to close, that is 100,000 animals that have to be placed into an already overburdened system for municipalities and shelters to handle. The cost to taxpayers would increase due to municipalities having to handle animals previously assisted by rescues. Shelters would be more overburdened than they already are, forcing them to kill the overflow of animals—animals whose lives would have been spared in the current rescue system.

Rescues are an important function, helping animals with no cost to the taxpayers, and aid the statewide economy by giving veterinarians tremendous business, as well as the pet stores for food and supplies. Thus, putting the rescues out of business—as the regulations would do—would have a far reaching impact on taxpayers and the statewide economy. Therefore, foster based rescues should be exempt from the provisions of these proposed regulations, and there should be an explicit provision stating that in the proposed regulations.

In addition to the exemption for rescues, the proposed regulations should put a clear limit on the number of puppies that can be produced each year by the commercial breeders, and strict fines imposed if they do not comply. These proposed regulations do nothing to stop the endless production of animals by the commercial breeders. Allowing this production to continue will sanction the killing of animals by shelters all across the Commonwealth.

Respectfully,

  
Zara Waters Bennett

/z

cc: Honorable Edward G. Rendell, Governor

~~L~~ Arthur Coccodrilli, Chairman, IRCC