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

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Ms. Bender:

I submit the following comments on the Proposed Amendments to the Pennsylvania Dog Law Regulations at Title 7 of the Pennsylvania Code.

Section 21.14 Kennel Licensure Provisions

(a)(3)(ii) This section would group kennels, commercial breeders, rescue organizations, and foster homes together and subject them to the same requirements.

This provision is unreasonable as it applies to foster homes that are utilized by all volunteer rescue organizations. The Dog Law regulations as applied to kennels should exempt all non-profit 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.

Dogs that are placed in foster care are kept in a home environment just like owned dogs. The foster dogs are the "temporary" pets kept by a household until the animal finds its permanent home. These animals are not crated or kept in kennel-like conditions. Instead, the animals are kept inside, in a home environment. It is unreasonable to hold a home situation to the same standards as a commercial kennel or breeding facility. 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 would not be in the best interest of the animals to require the foster homes to place animals in a kennel environment instead allowing them to live inside a home.

The purpose of these revised regulations was supposed to be to better regulate living conditions for the animals raised in puppy mills and other breeding facilities. Extending the regulation 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 they would be unable to afford to meet, forcing them to close down, thereby jeopardizing the lives of the tens of thousands of animals assisted by rescues each year.

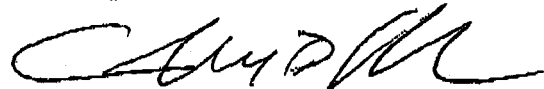
For example, assume there are 100 foster home-based rescues in Pennsylvania, each handling 1,000 animals per year. If rescues were to close, that is 100,000 animals that would be placed into the system for municipalities and shelters to handle in an already overburdened system. The cost to taxpayers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

Rescues serve an important function. They help animals with no cost to the taxpayers, and aid the state-wide economy by giving veterinarians tremendous business, and 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 state-wide economy. Thus, 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. The 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.

Moreover, representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Respectfully submitted,



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cc: Arthur Coccodrilli, Chairman
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