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March 14, 2007 2007 MAR 30 PM 3:05

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 irrational as it applies to foster homes that are utilized by all volunteer rescue organizations. Dogs that are placed in foster care are kept in a home environment just like owned dogs. Foster dogs are kept in a household until the animal finds its "forever" 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 is not 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.

If rescues were to close, that is thousands of animals that would be placed into the system for municipalities and shelters that are already filled to capacity. The cost to taxpayers would increase due to municipalities having to handle animals previously assisted by rescues. Shelters would be forced to kill the overflow of animals.

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.

Sincerely,

Tina Staff
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Camp Hill, PA
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