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INDEPENDENT REGULATORY REVIEW COMMISSION

Ms. Mary Bender
Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
2301 No. Cameron St.
Harrisburg, PA 17110-9408

Mr. Arthur Coccodrilli 333 Market St., 14th Fl. Harrisburg, PA 17101

Greetings:

I submit the following comments regarding the proposed new regulations to Pennsylvania's Dog Law. The new regulations mark an important step forward in recognizing that Pennsylvania's puppy mills are places of horror and unnecessary cruelty for thousands of dogs each year. Additionally, puppy mills cost pet owners hundreds of thousands of dollars each year since the current lack of adequate regulations allow puppy mills to mass produce defective dogs for consumption by unsuspecting consumers.

Although the proposed regulations contain important safeguards against the cruel operation of puppy mills, they are not perfect. Two salient deficiencies are described below.

- 1. 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. Most of these groups are staffed largely by volunteers and all of them are not for profit. Since the intent of the regulations is to shut down profiteering by unscrupulous and cruel breeders, the non-profit rescues should be specifically exempted.
- 2. 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. Currently, the regulations lack an adequate "voice" for these important groups and they clearly deserve a place at the table where they can contribute meaningfully in the formation of a humane dog policy.

Thank you for your attention to this important matter.

Sincerely,

Neme Marin
Verne R. Smith

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Facsimile Transmittal

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Date:	3/14/07		
Re:	PUPPY MILL REGS COMMENT		
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Comments: