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NPPMWATCH

North Penn Puppy Mill Watch

Give Hope To The Mill Dogs - BOYCOTT Stores That Sell Puppies

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INDEPENDENT REGULATORY
REVIEW COMMISSION

March 15, 2007

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

RE: PROPOSED DOG LAW REGULATIONS COMMENTS

Dear Ms. Bender:

As an advocacy group that focuses primarily on educating the public about the intricate pet shop/puppy mill connection and its ultimate ramifications, North Penn Puppy Mill Watch is thrilled with the Bureau's decision to address the many abuses and overall neglect faced by dogs trapped within the commercial canine breeding kennels in Pennsylvania.

That said, it's only fair to acknowledge that our expertise lies not within the specific and detailed guidelines designed to improve the day-to-day living conditions within the kennels. Without a doubt NPPMWatch endorses the specific regulations that provide for and outline: larger cage sizes, adequate veterinary care, regular exercise, clean food and water, no tethering, proper lighting, adequate temperature control and more detailed documentation to prevent over and in-breeding problems. Individually, and collectively, these regulations are all necessary and appropriate improvements.

It would have been very easy to provide the Bureau with a copy of one of the more detailed form letters authored by the larger animal advocacy groups such as HSUS, ASPCA and UAPM. These agencies did, individually, review the aforementioned items in detail, however, and while NPPMWatch readily agrees with and endorses those points of view, there is one issue that has not been sufficiently addressed: how will the many rescues and shelters – those that are largely run by volunteers and privately funded – operate under the newly proposed Dog Law Regulations?

In some instances, many of the health and welfare issues regularly occurring at the large

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commercial canine breeding kennels, along with their respective remedies, would seemingly be applicable to any situation where dogs are housed on a long or short term basis. Unfortunately, and for a variety of reasons, it's impossible to compare a breeding kennel to the many privately funded rescue, shelter and foster situations.

It would absolutely behoove Pennsylvania's canine population, and the Bureau, to create a section within the Regulations that addresses those bona fide groups that function independently from State and locally funded shelters yet work tirelessly to alleviate overpopulation and a reduced rate of euthanasia in the State.

In that same vein, it would be most helpful if the proposed Regulations included detailed descriptions of the following terms:

1. shelter
2. rescue
3. foster home

along with a more detailed description of the term 'temporary housing.'

In light of the fact that the primary venue most frequently utilized by private rescues and foster agencies is that of private homes, there is a need to modify the proposed Regulations to accommodate, versus exempt, by way of specific designation, those rescues and foster home agencies that would NOT be required to implement the more costly and rigorous improvements and record keeping prescribed by the proposed Regulations.

NPPMWatch could not endorse a situation whereby any or all private rescues, shelters or foster homes are totally exempted from regulatory oversight. There absolutely is a need to provide these groups with regulations that will serve to (a) protect dogs and (b) insure that the care, nutrition, exercise and housing provided is consistent with and meets or exceeds those guidelines that specifically outline the prescribed standard of care.

While the creation of a designation and applicable verbiage used to describe this scenario would indeed present a challenge to the Board, the benefits would far outweigh any decision to provide a blanket exemption or simply not address the issue at all.

Potentially a 'designation' would offer MORE control versus an 'exemption' if structured with specific test criteria.

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Some of the problems that currently exist with the private rescue and foster situations include:

1. no regulatory monitoring of the primary agencies arranging the transport and housing;
2. the transporting of out of state unlicensed dogs into Pennsylvania without:
 - a. veterinary certification; and
 - b. pre-determined housing destinations;
3. guidelines that would insure automatic spay/neuter prior to or immediately upon arrival;
4. guidelines that would dictate the number of foster dogs permitted in any private venue based upon the actual square footage of the physical property.

To expect the Bureau of Dog Law to police the many private homes used to foster rescued dogs, as it currently does the licensed K1 through K5 kennels and not-for-profit shelters, is an unrealistic expectation. Instead, those private rescues and shelters who aid in excess of 26 dogs on a cumulative basis annually would have to apply for a license and then be largely responsible for:

1. applying any specific test criteria to their foster network;
2. inspecting the homes used for fostering on at least a bi-annual basis;
3. provide standard of care guidelines to the individual(s) who offer fostering; and
4. maintain detailed records that are available for State audit at any given time.

Individual foster homes falling under the umbrella of any specific rescue group or agency licensed through the State would:

1. be registered with the State under the name of the primary rescue/foster agency;
2. be required to follow the same standards of care stipulated for their primary rescue group or agency;
3. agree to allow State inspection of their property at any given time.

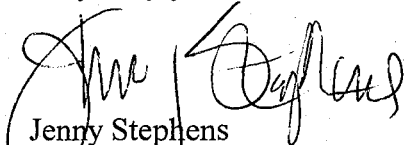
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In addition to providing standards that would insure the care of foster and rescue dogs, these guidelines would also serve to (a) separate the bona fide private shelters and rescues from those with ulterior motives and (b) help to prevent hoarding – an ever growing problem within the private shelter, rescue and foster community.

Finally, by adding a new section for private shelters, rescues and fosters to the proposed Regulations, thereby accommodating this large group of animal advocates, the ultimate goal of the Dog Law Advisory Board – to improve conditions for all dogs in Pennsylvania – would more easily be met. Currently, without such provisions, the Regulations have become embroiled in a bitter controversy that serves only to divide the very community the State relies upon to help the many homeless and unwanted dogs.

Thank you very much for the opportunity to comment on the newly proposed Dog Law Regulations. NPPMWatch is hopeful and looks forward to the day when thousands of Pennsylvania's dogs no longer suffer at the hands of those who utilize and exploit these marvelous creatures for the purpose of reaping a 'cash crop.'

Very truly yours,



Jenny Stephens
NORTH PENN PUPPY MILL WATCH

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www.nppmwatch.com