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INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Ms. Bender:

I am writing to you in opposition of the proposed amendments to the Pennsylvania dog law regulations. I do not believe in inhumane kennel conditions but I do not agree that most of the proposed changes would have a beneficial outcome if adopted.

As Legislative Liaison for the Weimaraner Club of America, I feel that this bill would discriminate against many of our members who live in Pennsylvania and are small hobby breeders and dog fanciers. These proposals would be burdensome and impractical for quality home-based kennels, breeders and our rescue groups, where these changes are not needed. This would also limit the availability of healthy, well-socialized dogs.

I am also a member of the dog fancy who regularly attends dog events in Pennsylvania such as conformation, agility and obedience shows. If severe restrictions are placed on Pennsylvania breeders this may lead to the end of dog events in your state. I would not spend money on events, hotels and restaurants in a state that puts such severe restrictions on responsible breeders. I would also recommend that the Weimaraner Club of America not hold anymore national events in your state. The WCA held its National Specialty show in Gettysburg in 2005 and is planning on holding the 2007 National Specialty in Cranberry, PA.

Examples of problems with the proposal are the following:

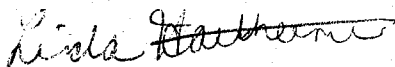
- The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.

- Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.
- The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.
- The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

The Bureau has tacitly conceded that its current regulations have not been adequately enforced. The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has no connection to specific instances in which the welfare of dogs could not be secured and no basis in science or accepted canine husbandry practices.

I strongly urge that this proposal be withdrawn.

Sincerely,



Linda Hartheimer
Legislative Liaison
Weimaraner Club of America