

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions.

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300.
 2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations.
 3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that
 4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of the dogs.
 5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations:
 1. State laws relating to dog licensing, control and owner responsibilities;
 2. State and federal laws relating to animal care, cruelty and neglect;
 3. State laws relating to dangerous dogs;
 4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
 5. State and federal laws relating to pounds and shelters;
 6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
 7. Report-writing and record-keeping;
 8. Overview of the legal system, court structure and terminology;
 9. Basics of interpreting animal behavior;
 10. Identification of injury, disease, abuse and neglect in dogs;
 11. Animal hoarders; and
 12. Civil liability issues.
 6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is important that
 7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the regulations.
 8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs difficult.
 9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be used.
 10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the regulations are based on scientific research.
- Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed at kennels.

Sincerely,

Yoko Furumoto
YOKO FURUMOTO