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INDEPENDENT REGULATORY  
REVIEW COMMISSION

**FORMAL RESPONSE TO  
PUBLISHED DRAFT OF  
DOG LAW REGULATIONS**

**December 14, 2006**

**Presented By**

**DOG LAW ADVISORY BOARD**

**AD HOC COMMITTEE**

**March 16, 2007**

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On behalf of the following members of the Dog Law Advisory Board, Ad Hoc Committee, please accept these written comments for your serious consideration and review. Our intent is to eliminate the confusion and concerns expressed by various animal establishments while still addressing the need to bring a higher quality of life to dogs maintained in any long-term animal facility.

In addition to doubling the cage size and exercise, our Committee believes that the other most important and significant changes that should be made to the kennel regulations are:

- 1) Solid floor rather than wire caging.
- 2) Eliminate stacking or stack no more than 2 cages high.
- 3) No tethering, or follow the HSUS recommendations that tethering be 12 feet long, on a trolley and no choke collars be used.
- 4) The establishment of temperature guidelines generally consistent with New Jersey standards.

In addition to the above mentioned recommendations, we feel that the nature of the business conducted at an establishment must be considered in determining whether certain provisions of the kennel regulations should apply. Toward that end, this Ad Hoc Committee has considered both the functions of the various establishments and the length of time that a dog typically spends at a commercial breeding facility, a boarding kennel, a shelter, a rescue, or a humane society. Thus, we believe that it is appropriate to exempt various types of establishments from some of the more onerous changes in physical structure. We have also endeavored to delete any requirements that would not be rationally related to the welfare of the animals, i.e., the requirement of 6 inch drains, the sloping of the grade and the replacement of grass exercise yards with hard surfaces. We will provide further explanation or clarification on areas within this comment document as needed. Your contact on behalf of this Ad Hoc Committee is Marsha Perelman.

This Committee believes that it is absolutely necessary that dealers, brokers and retail establishments which sell dogs in the Commonwealth be responsible for identifying the establishment at which each dog was born. This information should be provided to consumers in advance of their purchase to help them make an informed purchase.

Thank you for your consideration of these comments. We are hopeful that the revised draft Regulations will achieve clarity, ease of application and benefit to the thousands of dogs housed within establishments across the Commonwealth of Pennsylvania.

Respectfully submitted,

Patti Bednarik  
Nancy Gardner  
Tom Hickey

Deborah Lefco  
Jen Muller  
Douglass Newbold

Marsha Perelman  
Mary Remer  
Sue West

## 1. §21.1. Definitions.

A definition of “Dealer” and/or “Broker” has been omitted and should be included within the Regulations.

A definition of “Puppies” as a special category of dog needs to be included. Define puppies as dogs 12 months and under.

A definition of “Veterinarian Medical Exam” should be included.

The definition of Establishment should be amended so that entities that will not be considered “establishments” are specifically delineated. Establishment shall not include entities where the dogs do not stay overnight; i.e., field trials and agility competitions; dog shows and parades; dog parks; and grooming, training, play and dog day care facilities are excluded from this definition. However, the facility would be an establishment if a cumulative of 26 dogs or more are kept overnight. The same dog is counted once, as one dog, even if it leaves and returns to the establishment several times throughout the year, unless the establishment is a boarding kennel. A private residence is not an establishment if the owners permit people to stay at their home with their dogs for free, or if the owners are caring for an offspring of their dogs for free or caring for their friend’s or family’s dogs without compensation. Dogs who do not stay overnight do not count toward the 26-dog threshold. Motels, hotels, campgrounds and other venues that permit dogs are not establishments under the Act. In these instances, the dog owner is the person in control of his or her dog and responsible for its care, not the owner or manager of the facility involved. Groomers are not required to have a kennel license unless they keep dogs overnight — they are then considered a boarding kennel.

Add a definition of “Bedding” which is to be supplied for outdoor dogs.

The existing definitions of “Establishment” and “Temporary Home” need to be incorporated into the Dog Law Statute via a legislative change.

Provide a specific definition for “Boarding Kennels.”

Define “Arctic dogs” and “Brachycephalic dogs.”

## 2. §21.4. Penalties

**Item (1) (iii), *Failure Of A Kennel To Comply With Licensure Provisions*, Page 5:** Add the word “purchases” to the sentence ... “Failure to obtain a kennel license prior to operating any establishment that keeps, harbors, boards, shelters, purchases, sells, gives away or in any way transfers a cumulative total of 26 or more dogs of an age in any one calendar year may result in any or all of the following actions by the Secretary:”

**Item (v) (A), *Seizure of Dogs*, Page 8:** It was suggested that the language be amended to provide that the Department may seize a dog if there are reasonable grounds to believe that the dog's mental or physical health, safety or welfare is endangered.

**Item (v) (B) bb, *Return of Seized Dog*, Page 9:** There should be some revision of the language providing for the owner of a seized dog to recover his dog upon payment of all costs, transportation and feeding, to include provisions for indigency.

**Section (2)(iv), *Attacks by a Dangerous Dog*, Page 13:** A statement is included within this text as follows, "or where the dog's owner provides a written admission of such conduct and specifically waives his due process rights, the dog's owner shall be guilty of a misdemeanor of the second degree ... " A dog owner providing written admission of such conduct does not make him guilty under law of a misdemeanor. This sentence should be amended.

**Item (iv), *Attacks by a Dangerous Dog*, Page 13:** A State dog warden or a police officer shall immediately seize and impound a dangerous dog upon the occurrence of any unprovoked attack as defined by the statutes [any violation of the provisions of section 505A(b) of the Act].

**Section (3)(v), *Torturing Certain Dogs*, Page 16:** Revise this heading to read "Torturing Dogs."

### 3. §21.14. Kennel Licensure Provisions

The General Provisions on dealing with unlicensed kennels should be broadened to include the purchase of dogs from unlicensed kennels.

**Item (a)(3) *Kennel License Required*, Page, 20:** A kennel license shall be required for any establishment in which a cumulative total of 26 or more dogs of any age in any one calendar year are kept, harbored, boarded, sheltered, purchased, sold, given away or in any way transferred.

**Item (a) (3) (iii), Page 21:** Add the word "purchases" as follows ... "A temporary home that keeps, harbors, boards, shelters, purchases, sells ... "

**Item (a) (3) (iv), Page 21:** Add the word "purchases" as follows ... "An establishment or temporary home that does not keep harbor, board, shelter, purchase, sell ... "

**Item (b), *Prohibitions On Dealing With Unlicensed Kennels*, Page 25:** The prohibitions on dealing with unlicensed kennels should be broadened to include the purchase of dogs from unlicensed kennels. It should also be broadened to include the acceptance, purchase, sale, trade or transfer of dogs obtained by a licensed kennel from any out-of -state kennel not licensed by the Bureau to do business in the Commonwealth of Pennsylvania.

It is unclear whether the draft is inclusive of such purchases. Additional wording to include transfer a dog "to or" from a kennel should be included. Amend the section to read ... "It shall be a violation of the Act and this Chapter for any kennel to keep, harbor, board, shelter, sell, give away or in any accept, purchase, deal or transfer any dog to or from a kennel or establishment operating without a license ... " Consideration of shelters or rescues receiving dogs from unlicensed kennels also should be reviewed and considered for exemption.

**Item (c), *Health Certificate Requirement*, Page 25:** The requirement of a "health certificate" for any dog entering the Commonwealth from another state or country should be amended to read a health certificate from a duly licensed veterinarian.

**Item (c) (i), Page 26:** In order that the Regulations are in compliance with the Animal Welfare Act, change this to read that the dog is at least eight [seven] weeks of age.

#### 4. §21.15. Exemptions

It is our understanding that the stated exemption for dog control facilities was meant to apply to all humane society shelters. However, not all humane society shelters are also duly acting as dog control facilities for the Bureau of Dog Law and eligible to receive grants.

Shelters play an important role for both the Bureau of Dog Law and other public agencies and local governments. In order to correct the statement and include nonprofit shelters as well as rescues in the exemption from cage size, quarantine and, more costly physical construction requirements, consider adding the following revision:

- A. "Dog control facilities authorized to receive grants under ... Section 1002 of the Dog Law as well as nonprofit establishments licensed by the Bureau of Dog Law which are not engaged in dog breeding practices shall be exempt from the following provisions of this Regulation: Cage size; quarantine provisions; type of materials utilized for floor; recordkeeping requirements other than those established under subsection 5 of §Section 21.14; exercise requirements within the first two months in which a dog arrives at an establishment, construction requirements as they pertain to floor surface during exercise; artificial ventilation requirements, as long as moisture and condensation are not prevalent and natural ventilation can be provided as needed; and new drain, gutter and pipe requirements unless there is evidence of current inadequacies exhibited by standing or accumulated water.

Such establishments shall adhere to all temperature regulations except that, for non-Arctic and non-brachycephalic dogs, artificial cooling or fans may be used when temperatures exceed 85 degrees.

Dogs held within these establishments for 2 months or longer must adhere to the stated Exercise Requirements Dogs held for legal cases should also have exercise; however, this becomes difficult due to legal ramifications. Typically there is no bond posted to pay for these dogs while held in a boarding facility or shelter. Consider giving shelters and rescues the right to apply for an exemption from exercise requirements in instances where there are legal considerations, and allow such exemptions to be at the discretion of the Secretary of Agriculture.

An exemption to Section 21.14, Kennel Licensing Provisions, will apply when licensing requirements are triggered by the receipt of dogs surrendered from unlicensed kennels.

The proposed Draft should take into account the varied nature of operations being regulated. There has been evidence of extreme concern from hobby breeders who typically raise dogs in a home environment. The following exemption has been included to address those legitimate concerns:

B. Any Establishment breeding 2 or fewer litters annually in a primary residence and temporary establishments will be exempt from regulation requirements as follows: caging and cage size; quarantine provisions; type of materials utilized for floor; exercise requirements and surfaces; recordkeeping requirements other than those established under subsection 5 of §Section 21.14; new drain, gutter and pipe requirements unless there is evidence of current inadequacies exhibited by standing or accumulated water. Artificial ventilation requirements are not required as long as moisture and condensation are not prevalent and natural ventilation can be provided as needed.

C. Boarding Kennels which are not engaged in dog breeding practices shall be exempt from the following provisions of this regulation: Cage size; quarantine provisions; type of materials utilized for floor; recordkeeping requirements other than those established under Subsection 5 of §Section 21.14; exercise requirements; construction requirements as they pertain to floor surface during exercise; and new drain, gutter and pipe requirements unless there is evidence of current inadequacies exhibited by standing or accumulated water. Artificial ventilation is not required as long as moisture and condensation are not prevalent and natural ventilation can be provided as needed. Dogs held within these establishments for 2 months or longer must adhere to the stated Exercise Requirements and be housed using the cage size requirements as outlined in §Section 21.23 of the Regulations.

Note: The rationale for eliminating the requirements set forth for boarding kennels is the following: unlike commercial breeders, dogs who stay at boarding facilities usually stay short term, i.e., for vacations and business trips. The owners of these dogs are aware of the cage size and the treatment that the dog will receive at the boarding kennel. Most kennels charge an additional fee for the animals to be walked and exercised, and that should be the choice of the consumer. Most boarding kennels permit the owners to inspect the premises prior to deciding whether to board their animal at that facility. Therefore, the concerns which may apply to commercial breeders who keep dogs for longer periods of time are not present.

All licensed establishments meeting the rules of Exemptions A, B or C will be subject to the same requirements as stated within these Regulations regarding inspection, providing licensed tags for each dog housed therein and maintaining records which meet the criteria established in subsection 5 of §Section 21.14.

D. If a boarding kennel or trainer has a dog with re-occurring overnight stays, the dog will only be counted one time within the 26 Dog Rule.

## 5. §21.23. Space

**Cage Size:** The Ad Hoc Committee strongly supports the measures currently identified in the draft regulations requiring double the minimum cage requirements. The committee agreed that for each additional dog in a cage, the cage size should be increased an additional size, i.e., 2 dogs would require doubling the cage; 3 dogs would require tripling the cage, etc.

**Cage Stacking:** The Ad Hoc Committee is strongly recommending that stacking be eliminated as a method of housing dogs in kennels. It is difficult to visually observe dogs when stacked resulting in unattended illness or distress by a dog. Our second choice is to limit stacking and the height of the stacked cages in order to minimize the dogs' stress and to ensure that kennel employees and dog wardens walking through the kennels can visually inspect the dogs without resort to any ladders, scaffolds. We felt a reasonable limitation on height would be ensuring the bottom of the highest cage is no higher than five feet from the floor, and cages may be stacked to a maximum of two cages high (only one cage above the cage closest to the floor).

**Item (iii), Dogs put in an exercise area shall be segregated in the following manner, Page 32:** Replace items (A), (B), (C) and (D) with the following: Small dogs under 25 pounds will be exercised separately from large dogs due to safety issues. Tethering may not be used in conjunction with exercise.

**Item (e) (C), page 32:** Protection from the Weather – Delete this section.

**Item (e) (E), page 32:** Sanitation and Maintenance – Remove.

**Item (iii) (F), Page 33:** Replace this wording as follows: Females in heat shall be exercised separately from male dogs except for the female's own puppies.

**Item (iii) (G), Page 33:** Replace the word "may" with Shall.

**Item (v) (B), Page 33:** This Committee has developed two monthly certifications in lieu of the cumbersome record keeping requirements set forth in the proposed regulations. The rationale is to require the owners of the establishments to provide accountability to the Department without the time commitment required by the proposed regulations. These certifications are to be kept at the establishment, with copies sent to the Bureau. Both would require that the owner verify the information pursuant to the law regulating false swearing. The first certification, which would be completed and signed weekly, and provided to the Bureau on a monthly basis, is attached hereto as Exhibit A. The second certification, which would include a signature for each day of the month, would be signed daily and sent to the Bureau at the end of each month, and would verify that each day kennels were cleaned and sanitized, and dogs received food, water, and exercise all in accordance with these regulations (not included).

## 6. §21.24. Shelters, Housing Facilities and Primary Enclosures

**Item (b) Outdoor Housing Facilities, Page 34:** All references to “acclimation” shall be removed as too vague to be enforceable. This item shall be amended to state, “Unless an Arctic breed, dogs will be taken indoors when the outside temperature falls below 55 degrees and kept indoors until such time as the temperature is consistently above 55 degrees. Arctic breeds will be brought indoors at 45 degrees . Alternatively, “Arctic breeds” can be replaced by a listing of those breeds which are naturally acclimated to cold temperatures.

**Item (b.7.) Page 36:** Revise this item to read: “Building surfaces in contact with dogs in outdoor housing facilities, including [indoor or] primary enclosure floor areas, outdoor floor areas when the floor area is not exposed to the direct sun, or are made of a hard material such as [wire] wood, [metal] or concrete and all walls, floors, boxes, houses, dens and other surfaces in contact with the dog shall be impervious to moisture and easily sanitized.”

Note: References to wire and metal were removed in anticipation of requiring a solid floor surface.

**Item 4, Page 36:** If the regulations incorporate the New Jersey Standards for temperature, amend this sentence as follows ... Contain clean and dry bedding material at all times [and additional clean and dry bedding shall be required when the temperature is 35 degrees F or lower].

**Item (b.8.), Page 37:** We believe that, in general, specific engineering standards should be replaced by performance standards throughout these regulations.

Outdoor runs and exercise areas may be constructed of concrete, gravel or stone but may not be a surface material which would cause harm to the dog if easily ingested or which would cause respiratory problems. Remove the following ... [The first layer shall be of a thickness adequate to provide proper drainage (approximately 4-5 inches) and the top layer shall be of a thickness adequate to assure none of the bottom layer stones are protruding (approximately 2-5 inches).] The surfaces shall be kept in good repair at all times with proper drainage resulting in no standing or accumulated water. [Cracks or chips in concrete shall be repaired as soon as weather permits. Repairs to stone or gravel surfaces shall be done as necessary to prevent protrusion of the course first layer and to repair any holes or depressions caused by compaction of the materials or digging by the dogs.]

**Item (b.11), Page 38:** Outdoor facilities, including runs and exercise areas shall be maintained in good condition with grass and weeds cut down to within a height of 8 inches. [kept free of grass and weeds. Grass and weeds shall be cut back from the sides of runs and exercise areas to a distance of 5 feet to help prevent tick, flea and other parasite infestation.]

**Item (c), Page 38:** Remove this item and prohibit tethering. If the Bureau decides to permit tethering, then we request that the Bureau adopt the standards set forth in the HSUS comments.



**Item (d), Page 39:** We strongly request the prohibition of wiring flooring. Remove items (1) (2) (3) (4) (5). We recommend solid flooring that can be easily sanitized. Medically, it will eliminate many foot problems experienced by the dogs, e.g., improper growth of nails. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down and forcing a dog to lie over an exposed area can contribute to anxiety. Given the value and income generated per square foot of cage space, we feel it is legitimate to suggest a phase in period of no more than one year. All new cages, or replacement cages, during the one year phase-in shall be constructed with solid floors.

**Item (1.), Page 40:** Add ... rabbit hutches as items not allowed as a primary enclosure.

**Item (7), Page 40:** Remove dead animals from this sentence and address it separately.

Add new item: Multiple, routine walk-through observations through the kennel will be done by the kennel owner or authorized agents on a daily basis to visibly look at each dog and ensure there are no obvious signs of illness or difficulties/distress. Dead animals will be removed immediately upon discovery and documented within the required recordkeeping

**Item (8), Page 41:** Recordkeeping – In lieu of such cumbersome recordkeeping, establish a certification form that breeders will use to certify daily that required cleaning, sanitizing, exercising, feeding and watering took place as required by the Regulations. Each such form would contain daily certifications for one month. A separate certification, signed weekly, would certify information concerning birth, deaths, euthanizations, injuries, and veterinary procedures. (See Exhibit A.) Copies of both types of certifications would be kept at the establishment and sent to the Bureau. If found to be falsifying this information, penalties for falsification to authorities would apply.

**Item (i), Page 42:** Replace the sentence [Such kennels shall have adequate holding facilities to allow a dog to .... of the primary enclosure] with Dogs may not be inside the primary enclosure while the enclosure is being cleaned. Enclosure must be dried prior to returning the dog to its primary enclosure.

**Item (11), (ii – vii), Pages 42 and 43: Pipe Sizes / Gutters / Drainage:** The size of the pipes, gutters, and specifics regarding drainage and slope are not as important as their functionality. This section is excessively detailed and burdensome, and does not correctly address improvements needed in the current regulations. We feel more emphasis should be placed on performance standards. Consider replacing with a statement indicating that Outdoor runs shall have clean, dry and sanitized housing which will ensure the animal stays dry. Outdoor runs shall be constructed such that within them there is no standing or accumulated water.

## 7. §21.25 Temperature Control

The Committee strongly recommends the adoption of standards currently in use in New Jersey. Remove all reference to slab and slab temperature. Facilities shall adhere to the requirement that non-Arctic dogs must be brought indoors when the ambient temperature falls below 55 degrees. Arctic dogs must be brought indoors at 45 degrees. The ambient indoor temperature shall not exceed 85 degrees F. Appropriate air circulation and ventilation must be provided and maintained. Arctic and brachycephalic dogs must be provided artificial cooling when temperatures exceed 75 degrees

We understand that breeders of working dogs that live and hunt in a pack have standards for their working dogs which contain a lower threshold temperature than our recommendations. This was discussed and we understand that working dogs are quite different than those who live as pet quality dogs. However, our decision has been to adhere to the above stated recommendation per the ASPCA's recommendation that all dogs should come inside at 45 degrees.

**Item (c), Page 45:** Auxiliary temperature control and air movement from fans, blowers or air conditioners shall be provided when the ambient temperature is 85 degrees F (29.5 C) or higher. In establishments where brachycephalic and/or Arctic dogs are housed, cooling shall be provided when the ambient temperature reaches 75 degrees.

**Item (d), Page 45:** Delete sentence and insert ... Indoor kennels shall have a heating source sufficient to assure ambient heat of no less than 55 degrees.

**Item (e)(1), Page 46:** Delete and insert ... The ambient temperature in the facility shall not fall below 55 degrees.

**Item (e)(2), Page 46:** Insert ... In establishments where brachycephalic dogs and/or Arctic dogs are housed, cooling shall be provided when the ambient temperature reaches 75 degrees.

## 8. §21.26. Ventilation in Housing Facilities

We do not believe that humidity control is as relevant as temperature control. If you are appropriately cooling the facility, you will also have a reduction in humidity. Therefore we recommend removing references to humidity controls from the regulations.

**Item (b), Page 47:** Delete as this is not defined [in accordance with generally accepted husbandry practices.]

## 9. §21.27. Lighting and Electrical Systems

We are concerned about the enforceability of these standards. If such standards are not enforceable, consider the following language: "Artificial lighting shall be diurnal and bright enough to provide easy observation of the physical condition of the dogs, sanitary conditions and food preparation."

## 10. §Section 21.28. Food, Water and Bedding

**Item (a), Page 48:** Amend as follows . "Dogs kept in kennels shall be fed at least twice [once] each day unless certified in writing by the Veterinarian of Record for a medically justifiable cause [otherwise directed by a veterinarian.]"

**Item (b), Page 49:** Amend as follows ... "Potable water shall be available to the dogs at all times unless certified in writing by the Veterinarian of Record for a medically justifiable cause [other wise directed by a veterinarian.]"

**Item (d), Page 49:** Amend this to read ... "Bedding sufficient for the animal's well-being shall be provided [used] in primary enclosures and shall be kept clean, dry and maintained in that manner on a daily basis."

## 11. §21.29. Sanitation

**Item (a), Page 50:** Amend this to read ... "[Kennels, including the kennel building, areas in which dogs are housed, all interior surfaces] The primary enclosure of each dog, outdoor runs associated with both indoor and outdoor kennels, [and drains and gutters] shall be sanitized daily (every 24 hours), using only those disinfecting products approved by a licensed veterinarian. All areas of the kennel, including the kennel building, areas in which dogs are housed, the primary enclosure of each dog, drains, gutters, runs, and outdoor exercise areas shall be kept in a state of good repair. All vegetation / grass / weeds shall not exceed a height of 8 inches. [and outdoor runs and exercise free of weeds.] All areas of the kennel shall be cleaned at least once a day [daily or as often as possible] to assure they are free of any accumulation of debris, excreta or disease hazard."

**Item (b), Page 50:** Replace last sentence as follows ... "When a group of dogs is done exercising and is removed from the exercise area, the exercise area must have all stools removed before other dogs are placed in the exercise area".

**Item (c), Page 50 – Add...** "The primary enclosure shall be dry prior to the dog returning to its primary enclosure."

## 12. §21.30. Condition of Dog

**Page 52:** Fourth line, insert words mental and before the word “physical.”

Amend next sentence ... “A dog sheltered at a kennel shall be in good physical and mental health, free of infectious and contagious disease, parasites and /or stereotypes. [or appears to be in poor health]. If a dog exhibits signs of injury, poor physical condition or an infectious or contagious disease, the kennel owner shall provide the State dog warden or employee of the Department with proof of adequate veterinary care which addresses the specific issues of the dog.

The Committee believes that dogs who whelp more than one litter every 12 months must be examined by a veterinarian. Page 50: Consider adding the following ... Female dogs bred more than one time in 12 months will require an annual complete physical exam, including a CBC. All dogs in a breeding facility will receive a physical exam at least once in every 24 month period. This will include a check for any disease, infection, congenital defect or other condition for which veterinary care is appropriate.

## 13. §21.41. Kennels – Records, General Requirements

We suggest that kennels records contain written Veterinarian Certification for any surgical procedure and made available during the inspection process for the following procedures:

- Debarking
- C sections
- Tail docking
- Ear cropping
- Dewclaw removal
- Spay/Neuter

Rabies – It is our understanding, as confirmed by Dr. Newton, that Pennsylvania presently requires that to be valid, a rabies vaccination be certified by a veterinarian. We are not certain whether the Bureau is currently checking for such veterinary certificates at establishments where the kennel owner is administering vaccinations. As rabies vaccines must be administered intramuscularly, it is essential that the Bureau require kennel owners to demonstrate competence in administering a vaccine through a certification process before allowing an individual to do so. We strongly suggest that recertification of the kennel owner or person giving injections be required every 3 years.

Additional information should be made part of the standard recordkeeping and part of the inspection report as follows, if not already included:

- \* Number of Dogs Produced
- \* Number of Dogs Sold
- \* Number of Dogs Given or Transferred to others
- \* Number Born in Litter
- \* Number of Animals Euthanized
- \* Reasons for Euthanasia and Method Used

**Item (b), Pg. 54:** Add the word “dealer” as follows in the second sentence ... “operator, dealer or agent to purchase, accept ...”

### **Miscellaneous**

Sections that address similar issues should be combined into one section, i.e., housing.

Overall the Regulations need to be formatted and organized much better. Keeping all of one topic together and not segmented would provide more clarity and ease of use.

This Committee believes that it is important for kennels to utilize veterinarians whose veterinary practice is primarily rendered to companion animals.

We support the ASPCA’s written comments except on the issue of flooring, where we feel a solid floor will provide the most benefit to the dogs, and therefore that wire flooring should be prohibited in all instances.

**WEEKLY KENNEL CERTIFICATION**

FOR THE WEEK OF \_\_\_\_\_, 2007

I, \_\_\_\_\_, owner of the \_\_\_\_\_

kennel, hereby certify that the following activities occurred on a daily basis during the week of

\_\_\_\_\_, 20 \_\_\_\_ :

- A. \_\_\_\_\_ (#) litters were whelped.
- B. \_\_\_\_\_ (#) puppies were born.
- C. \_\_\_\_\_ (#) puppies died or euthanized.
- D. \_\_\_\_\_ (#) dogs were euthanized. (Please set forth the number of dogs and the method of euthanization for each dog)
- E. \_\_\_\_\_ (#) dogs were injured. (Please set forth the date and time and describe any incident in which a dog has been injured. Identify the date and time veterinary care was administered and identify the veterinarian.) Please retain all records of veterinary care.

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F. The following procedures were conducted: (set forth the number and the identity of the veterinarian performing the procedure)

- \_\_\_\_\_ (#) Tail Docking \_\_\_\_\_ (veterinarian)
- \_\_\_\_\_ (#) Ear Cropping \_\_\_\_\_ (veterinarian)
- \_\_\_\_\_ (#) Claw Removal \_\_\_\_\_ (veterinarian)
- \_\_\_\_\_ (#) Caesarian Section \_\_\_\_\_ (veterinarian)
- \_\_\_\_\_ (#) Debarking \_\_\_\_\_ (veterinarian)
- \_\_\_\_\_ (#) Spay/Neuter \_\_\_\_\_ (veterinarian)

\*\*\*\*\*

I, \_\_\_\_\_, hereby state the facts set forth above are true and correct to the best of my knowledge, information and belief. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Signature)

I am unable to make the above certification for the reasons set forth below:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Signature)