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Federated Humane Societies of Pennsylvania

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Reply to:
Anne Irwin
Bucks County SPCA
P.O. Box 277
Lahaska, PA 18931

August 15, 2010

Independent Regulatory Review Commission
333 market Street, 14th Floor
Harrisburg, PA 17101

Dear Commissioners:

I am writing on behalf of the member societies of the Federated Humane Societies of Pennsylvania to comment on the Final Form Regulation No. 2-170 Canine Health Board Standards for Commercial Kennels. This regulation does not apply to kennels operated by humane societies, but it does affect the welfare of dogs in Pennsylvania.

With respect to flooring, Section 28a.8 (e) creates an exception for nursing mothers which is inconsistent with the language of the Dog Law. The law is explicit that no dog over 12 weeks of age be kept on metal strand flooring. The regulation attempts to create a compromise where an adult dog is housed with puppies under twelve weeks of age, stating that "at least 50 percent of the flooring of the primary enclosure shall comply with the standards established by section 207(i)(3) of the Dog Law." This contradicts the statute and sets up a situation, not only for metal strand to be used in 50 percent of the enclosure, but also for other violations to exist, like rusty wire, sagging floors or floor materials that could not be properly sanitized. The exception should be removed.

Section 28a.4(5)(b)2 states that devices to monitor temperature and humidity will be provided by the PA Department of Agriculture. In its analysis the Department provides no information about cost. We are concerned about the cost of providing these devices for one class of kennels. The Dog Law Restricted Account is funded primarily by the sale of dog licenses and it funds all of the many activities of Dog Law, involving stray dogs, dangerous dogs and inspection of all classes of kennels. Dog wardens are being furnished with increasingly technical equipment at a time when they are relying on an aging fleet of vehicles. At some point the Department will need to prioritize expenses in able to continue its important functions to protect dogs in many different situations. This is one place to look.

Thank you for taking our views into consideration.

Sincerely,



Anne Irwin
President, Federated Humane Societies of PA

From: Anne Irwin [airwin@bcspca.org]
Sent: Tuesday, August 17, 2010 9:55 AM
To: IRRC
Subject: Comments on Canine Health Board Standards for Commercial Kennels
Attachments: Kennel Reg comments 2010.doc

Dear Sirs:

Attached please find brief comments on Canine Health Board Standards for Commercial Kennels submitted on behalf of the Federated Humane Societies of PA.

Sincerely,
Anne Irwin
215 794-7425 ext. 104