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**Testimony before the Internal Regulatory Review Commission regarding Department of
Agriculture Canine Health Board Standards for Commercial Kennels**

Good afternoon. My name is Cori Menkin, Senior Director of Legislative Initiatives for the Government Relations Department of the ASPCA. I'd like to thank the Commission for the opportunity to speak today on the proposed canine health board standards for commercial kennels.

I am speaking on behalf of the over 225,160 Pennsylvania residents who are supporters of the ASPCA. The ASPCA is here to encourage passage of the proposed regulations in order to better regulate the commercial dog breeding industry in Pennsylvania and to ensure the well-being of dogs housed and bred in commercial kennels in the Commonwealth.

The ASPCA has already submitted its formal comment on these regulations to IRRC. I want to reiterate to the Commission today that it is critical that the temperature, humidity, and ventilations standards in the proposed regulations be approved as quickly as possible. With record high temperatures all summer, it is not difficult to understand why this is necessary. Any delay in passing these regulations will undoubtedly result in prolonged suffering of dogs in Pennsylvania's commercial kennels as a result of exposure to extreme temperatures.

While the ASPCA supports passage of these regulations, we also recognize that the provision regarding flooring for nursing mothers is controversial, at best. The ASPCA does not support the use of wire flooring in commercial kennels. However, there is an apparent oversight in the current language of the Dog Law with respect to nursing mothers with puppies. While the law does not allow for dogs over 12 weeks of age to be housed on wire flooring, it also does not give the Department of Agriculture the authority to require that puppies under twelve weeks of age be housed on solid or slatted flooring. This discrepancy in the law is one that should be resolved at the next legislative opportunity, to ensure that the intent and spirit of the 2008 revisions to the Dog Law are carried out. In the interim, the proposed language regarding flooring for female dogs with nursing puppies will at least ensure that these dogs are not forced to live entirely on wire during whelping. If and when the law itself is corrected to resolve this discrepancy, the regulations will need to be changed accordingly.

I therefore urge the Internal Regulatory Review Commission to approve the proposed regulations as expeditiously as possible. Thank you.