

NORTH PENN PUPPY MILL WATCH

My name is Jenny Stephens and I'm the director of North Penn Puppy Mill Watch, a Montgomery County based advocacy group that communicates daily with the animal welfare community via our website that is visited by approximately 50,000 viewers every month.

I'm here today not to voice opposition to the entire regulatory packet but, instead, the sections that pertain to flooring for puppies under 12 weeks of age as well as pregnant and nursing mothers and their ability to have unfettered access to exercise.

A review of Act 119 reveals repeated reinforcement that dogs 12 weeks and older **SHALL** have solid flooring.

The omission of a directive for a flooring requirement for dogs 12 weeks and younger is, at best, ambiguous and therefore can not be perceived as a directive to place these puppies on wire – let alone bring their mothers into this type of enclosure - for any specified period of time.

The Bureau of Dog Law has stated in recent press releases that Pennsylvania now has 111 commercial kennels.

A review of the records within the Bureau of Dog Law's inspection report data base was recently performed by NPPMWatch. Based upon the last inspection report for each of these 111 commercial kennels there are currently in excess of 12,000 dogs housed in these large scale breeding facilities.

The flooring regulation, as drafted by the Bureau, presents a serious enforcement issue. Larger kennels housing 3, 4 and even in excess of 500 dogs, already present a sober challenge to the dogs wardens charged with ensuring compliance with the Dog Law.

On any given inspection, wardens will have no way of knowing how long any particular female has been on wire or how old any specific litter of puppies may be.

Additionally, wardens will have no way of knowing whether or not a dog confined to a cage with wire flooring has or has not had an opportunity to exercise that day.

While wire flooring is currently banned in Pennsylvania's commercial kennels, we found the following comment, during our audit, that was entered by a dog warden on an inspection report dated July 20, 2010:

The metal strand flooring shall not allow the feet of a dog to pass through the openings in the flooring. It was suggested to the kennel owner to lay another panel of metal strand flooring on top of the current flooring so that the strands overlap and decrease the size of the holes. The kennel owner could replace the current metal strand flooring with slatted flooring or metal strand flooring that has smaller holes. Or the kennel owner could lay Dri-Dek mats on top of the flooring.

There is NO indication in this report that the dogs referred to are pregnant mothers or puppies under the age of 12 weeks.

While wire flooring is favored by the breeders and has allowed them to rely on gravity to perform the majority of their housekeeping duties for decades, Act 119 clearly specifies cleaning requirements that must be adhered to

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regardless of the composition of the flooring surface.

The revision of the Dog Law was inspired by kennel operators who did not properly care for their dogs and the purpose of the legislation was based upon animal health and welfare issues.

By removing the ability for the use of **ANY** wire flooring in the commercial kennels, the advocacy community may be better assured that the Dog Law is being properly enforced versus asking a dog warden to make determinations they may be unable or incapable of making.

We believe the regulations that provide for a reintroduction of wire flooring to the commercial kennels to far exceed the scope of the Dog Law and therefore must be rejected and revised.

NO WIRE MEANS NO WIRE.

Thank you for this opportunity to comment.

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