

2785

From: Brownfield, Jill [jbrownfiel@state.pa.us] on behalf of AG, CHBcomments [CHBComments@state.pa.us]
Sent: Sunday, October 18, 2009 5:35 PM
To: dhain@pahouse.net; IRRRC; kebersole@pasen.gov; Kennedy, David C. (AG); Kerry Golden; MULLER, JENNIFER; Smith, Jessie L; Thall, Gregory (GC); wgevans@pasenate.com
Subject: FW: Canine Health Board Comments

INDEPENDENT REGULATORY
COMMISSION
2009 OCT 19 AM 10:22
RECEIVED

-----Original Message-----
From: Arthur E. Dunham [mailto:adunham@sas.upenn.edu]
Sent: Thursday, October 15, 2009 10:24 AM
To: AG, CHBcomments
Subject: Canine Health Board Comments

I am writing to strongly endorse the regulations created and proposed by the Canine Health Board. I testified as an expert on vertebrate environmental physiology before the Canine Health Board on the conditions necessary to ensure that dogs kept in kennel conditions are free of environmentally induced physiological stress. The regulations adopted by the Canine Health Board, if followed by kennels, will largely accomplish this critical goal. Any kind of kenneling which allows exposure to environmental conditions that result in physiological stress are inhumane and are not allowed by federal regulation in colonies that maintain animals (including dogs) that are used in laboratory research. We should at least provide dogs destined to be pets with an equivalent standard of care.

The regulations as written by the Canine Health Board are based in scientific research and on advice provided by scientific experts. These regulations will ensure that any commercially bred dog will be given adequate light, heat, ventilation, air quality, flooring, and social exposure and interaction to minimize environmentally induced physiological stress. These essential factors that were all omitted from the recently enacted dog law so it is critical that these additional regulations go into effect.

In addition, I strongly support these changes for the following reasons:

1. Pennsylvania's reputation has been tarnished by being branded a "puppy mill" capital which allows dogs to be raised in inhumane conditions.
2. For the first time, commercially bred puppies and dogs will have a guarantee of an environment that will promote - not hinder - behavioral and physical health and which will help protect dogs and the ultimate owners from the often tragic consequences of an inadequate and stressful kennel environment.
3. It is time that Pennsylvania was a leader in humane care of animals, rather than always appearing in the news for the numerous abuses that occur here. This regulation will ensure humane care.
4. The Canine Health Board received testimony from dozens of experts which informed the current regulations which are some of the first truly scientifically informed canine breeding regulations in the USA. The Commonwealth received this extensive expertise at no cost simply because the experts believe that the scientific data mandate that we change how we treat commercially bred dogs. The regulations as written by the Canine Health Board are a road map for doing so.

The Canine Health Board is to be commended for reaching out into the scientific community and allowing its members to contribute to this important process. I was impressed by the caliber of questions asked by members of the Canine Health Board during my testimony who, I understand are all veterinarians and members of the PVMA. I am also impressed by the use of the scientific information provided by the experts by the Canine Health Board in formulating

these regulations. It is unfortunate that the legislative committee of the PVMA did not avail themselves of the opportunity to become educated on these critical issues that affect animal welfare.

Sincerely,

Arthur E. Dunham Ph.D.
Professor and Associate Chair
Biology Department
University of Pennsylvania
433 S. University Ave.
Philadelphia, PA 19104-6018

--

Arthur E. Dunham
Professor and Associate Chair
Department of Biology
University of Pennsylvania
415 S. University Ave.
Philadelphia, PA 19104-6018
Tel: 215-898-4117
FAX: 215-898-8780
adunham@sas.upenn.edu