

# 2785

Gelnett, Wanda B.

**From:** Jewett, John H.  
**Sent:** Tuesday, October 20, 2009 8:57 AM  
**To:** Gelnett, Wanda B.; Cooper, Kathy; IRRC  
**Cc:** Stephens, Michael J.  
**Subject:** FW: IRRC Number 2785

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

A comment on 2785:

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**From:** Mimi Clark [mailto:mpclark@worldnet.att.net]  
**Sent:** Monday, October 19, 2009 9:12 PM  
**To:** CHBComments@state.pa.us  
**Cc:** Jewett, John H.; Stephens, Michael J.  
**Subject:** IRRC Number 2785

As a concerned Pennsylvania citizen, I respectfully submit the following comments in support of the Department of Agriculture's proposed rulemaking regarding standards for commercial kennels. The notice was published in the Pennsylvania Bulletin on September 12, 2009 (7 Pa.Code CHS. 28 and 28a). After reading of the comments presented by one PVMA member in the public hearing on Friday October 16, 2009, I feel that I must respond with logical support for these standards. I have faith that our appointed Canine Health Board is presenting the proper regulations for our Pennsylvania kennels, and I do not want the financially driven bias of the unscrupulous breeders to undermine this valuable progress.

The Bureau of Dog Law Enforcement within the Department of Agriculture is charged with implementing and enforcing the Dog Law, which was passed to ensure the humane care and treatment of dogs in the Commonwealth. In 2008, the Pennsylvania General Assembly passed significant amendments to the Dog Law and created the Canine Health Board to establish appropriate ventilation, humidity, ammonia, and lighting ranges for commercial kennels, as well as consider alternative flooring options to those set forth in the law. This Board has been selected to represent all vested parties, is fairly balanced in their representation and as a whole, has the potential to regulate independently of lobbying interests who have financial gain as their motivation at the expense of humane and ethical treatment of the dogs. The proposed regulations are the result of the Canine Health Board's recommendations for those standards.

These above mentioned laws and regulations are needed because of the pervasive and rampant disregard for humane and ethical treatment of the breeding dogs in Pennsylvania's commercial breeding operations, puppy mills. The irony is not lost that those most vehemently opposing any regulations are those that might have to sacrifice a fraction of their hundreds of thousands of dollars in profits to improve the living conditions of their source of revenue, and as a result produce a healthier puppy. They might use the excuse that these rules are too complicated and expensive equipment is needed to pass the inspections. My reply is that is part of the cost of doing business. If breeders cannot operate the minimal climate control required, then they are most likely too primitive to be capable of operating a farm that is safe for producing food for human consumption, let alone healthy and sound puppies.

Ventilation:

The proposed regulations require that "ventilation be achieved through a mechanical system that will allow for 8 to 20 air changes per hour, keep consistent moderate humidity, keep the kennel from becoming too hot, keep ammonia levels and particulate matter low, and to keep odor minimized...". While generally I support these standards, it is well established that a minimum of 10 air changes per hour should be required in all animal spaces. As a result, I recommend that the required air changes per hour be changed to reflect this standard.

I commend the Department of Agriculture and the Canine Health Board for proposing a requirement that kennels use a mechanical ventilation system that provides ventilation, heating, and cooling. Such a system is imperative to ensure the health and comfort of dogs housed in kennel facilities.

**Lighting:**

I commend the Department of Agriculture and the Canine Health Board for acknowledging the importance of exposure to natural light and a diurnal cycle for dogs housed in a kennel environment. I fully support the lighting requirements proposed in these regulations.

**Flooring:**

I fully support the flooring requirements proposed in these regulations.

Based on the foregoing comments, I fully support the proposed regulatory package presented by the Department of Agriculture and the Canine Health Board with the recommended changes, and encourage implementation of the new regulations as expeditiously as possible. In honor of my rescued puppy mill breeder, as we work to heal and rehabilitate her, we thank you for your time and consideration. Please help stop this mistreatment from happening to any more dogs.

Sincerely,

Marian Clark  
Camp Hill, PA  
717-571-4661