

# 2785

**From:** Holmes, Judith A [jholmes@smartgrp.com]  
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**To:** CHBComments@state.pa.us  
**Cc:** Kaufman, Kim; Jewett, John H.; Schalles, Scott R.; Smith, James M.; Wilmarth, Fiona E.; Stephens, Michael J.; Gelnett, Wanda B.; Harris, Mary Lou  
**Subject:** Proposed regulations

Please support the proposed regulations made by the Canine Health Board

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DEPENDENT REGULATORY  
REVIEW COMMISSION

The proposed regulations include:

**Ventilation** - Requires commercial kennels to have a functional mechanical ventilation system, and in an emergency, the kennel must have operable windows, skylights, etc. When the temperature exceeds 85 degrees, this mechanical ventilation system must be used to reduced the temperature inside the kennel. This proposed regulation also requires breeders to monitor ammonia, carbon monoxide, and humidity levels, as well as requiring them to provide the dogs in their kennels with 8-20 air changes of 100% fresh air per hour in each room of the kennel where their dogs are housed. Many of the dogs in Pennsylvania's puppy mills have ulcers on their eyes from high ammonia levels; others suffer from heat exhaustion in the summer. This section of the proposed regulations will ensure that dogs in the larger commercial breeding kennels are provided with clean, fresh, breathable air.

**Lighting** - This proposed regulation recognizes the needs for dogs in these facilities to have exposure to natural light - or at the very least, a mixture of natural and artificial light. Many of the dogs rescued from these facilities have spent their whole lives in darkness, so this is extremely important. Under the suggested guidelines, dogs are also protected from excessive light, and shaded area will be required in outside exercise areas.

**Flooring** - Under the new dog law, solid or "slatted" flooring is required. This regulation outlines specifics regarding drainage (no dog standing in urine, etc.), degree of sloping, and the materials that can be used (dogs should not be forced to stand on hot or cold metal flooring, for example.)

If passed, the state will not incur any additional costs enforcing these regulations, and any costs incurred by the commercial

kennels will be made up by selling healthier dogs.

THANK YOU

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