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From: Brownfield, Jill [jbrownfiel@state.pa.us]
Sent: Tuesday, October 27, 2009 3:27 PM
To: dhain@pahouse.net; IRRC; kebersole@pasen.gov; Kennedy, David C. (AG); Kerry Golden; MULLER, JENNIFER; Smith, Jessie L; Thall, Gregory (GC); wgevans@pasenate.com
Subject: FW: Comments for the Canine Health Board Proposed Regulations

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INDEPENDENT REGULATORY
REVIEW COMMISSION

From: MainLineRescue@aol.com [mailto:MainLineRescue@aol.com]
Sent: Sunday, October 25, 2009 11:07 PM
To: Brownfield, Jill
Cc: thickey1@comcast.net; scrawford@state.pa.us
Subject: Comments for the Canine Health Board Proposed Regulations

Dear Members of IRRC,

I am writing at this time to urge the members of the Independent Regulatory Review Commission to approve the Canine Health Board's proposed regulations. Failing to pass the regulations, as submitted by the panel of nine veterinarians, would allow the worst commercial breeders in Pennsylvania to continue allowing their dogs to suffer in dark, ammonia filled barns, straddling wire flooring

I would like to address some of the comments made by those who would slow the progress Pennsylvania has made:

- 1) I have visited hundreds of Amish and Mennonite dog breeding facilities over the years (some of these were featured on the Oprah Winfrey television program last year) and I have seen hundreds of these "simple" farmers use generators to run their milking operations. Why would it be difficult for the Amish to cool their barns/kennels in the sweltering heat of the summer? It would not be difficult - they use generators in their dairies, why not in their dog breeding facilities?
- 2) There are those who will tell you the cost of implementing the proposed regulations has been underestimated. What these people have not considered is the greater cost to Lancaster County's tourist industry. If every effort is not made to help these animals - to do the right thing, at this time - the animal welfare community will continue to denounce Pennsylvania as a haven for some of the worst puppy mills in the country. We will reach out to people in every county throughout the Commonwealth and bring them to our cause. We will tour these facilities with journalists, boycott milk and vegetables produced in Lancaster County, and use the billboards on our highways to tell motorists from other states that Pennsylvania had the opportunity to help its dogs but decided to allow them to continue to suffer. Should the cost to commercial dog breeders be considered? Consider the cost to Pennsylvania's tourist industry and agricultural community.
- 3) The leadership of the PVMA will once again try to stall this, the final step, toward improving conditions in PA's larger dog breeding facilities, perhaps even push "tenderfoot" hog flooring as an alternative to solid or slatted floors. It is important to note that when our volunteers called the Humane Society of Harrisburg to ask if their dogs were forced to stand on wire flooring, coated or otherwise, they told us "No, that would be cruel. Our dogs stand on solid flooring." We then asked if they didn't think that wire flooring might be more sanitary, dogs

sitting in urine, etc? They said "Well, we don't worry about dogs sitting in feces and urine because we clean every day." And yet, the Vice-President of the Humane Society of Harrisburg Charlene Wandzilak, who also happens to be the Executive Director of the PVMA, has long promoted the use of painful wire flooring in commercial dog breeding facilities. Why would she not want to provide the hundreds of thousands of breeding dogs in Pennsylvania the same safety and comfort she affords the dogs in her own shelter?

All the private clinics and vet hospitals owned by the members of the PVMA's leadership are well lit, have mechanical ventilation systems, and employ fans and/or air conditioning. The dogs in their care also stand on solid flooring to protect their feet and to provide proper support. It is extremely hypocritical of the PVMA to be critical of the standards set forth in the proposed regulations, that they themselves have adopted for their private practices.

4) The leadership of the PVMA has neither polled their members or have informed them of their position regarding the Canine Health Board's proposed regulations. The PVMA shares a lobbyist with some of the worst puppy mill operators in the state - their opinions merely echo that of the commercial breeders, not those of their 1900 members. Why would an organization supposedly in place to promote animal welfare care about the cost of improving the living quarters for hundreds of thousands of dogs in PA's puppy mills?

5) Without proper lighting how can state inspectors determine whether or not a dog is in distress? Without proper air flow/ventilation our rescues will continue to pull dogs from these facilities with ulcers on their eyes and respiratory problems from excessive ammonia/urine build-up. It was more than fair of the Canine Health Board to state a high end temperature of 85 degrees. Imagine sitting in a sweltering barn without a fan in a fur coat. Again, if the Amish can post their puppies for sale on numerous web sites, recharge their cell phones, and receive "economic exemptions" for operating generators in their dairies, they can provide proper ventilation for the dogs in their kennels. Dogs in these kennels should also have access to natural light and windows - imagine staring at the same wall for eight years without any type of stimulus? Little wonder so many of these dogs circle endlessly. Dogs are incredibly intelligent and soon become psychologically damaged when deprived of normal day to day sights and sounds.

6) Please remember that nine veterinarians agreed unanimously on almost every aspect of the proposed regulations. Dr. Karen Overall provided the board with reams of scientific research and numerous case studies in support of the proposed regulations. The board interviewed experts in various fields as well. Everything was/is based on scientific proof. The board was extremely thorough. Everyone had ample opportunity to voice their opinions - and everything was approved. The nine vets were selected by both the Democratic and Republican leadership - with one vet representing the PVMA. The proposed regulations should be passed without any hesitation.

Thank you for considering my comments.

Bill Smith
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