

BLACK HORSE ANIMAL HOSPITAL

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Commenting on "Proposed Canine Health Board Standards for Commercial Kennels (9/12/09 issue of the Pennsylvania Bulletin)".

To whom it may concern,

This letter is to offer public comments to the proposed regulations of the Canine Health Board. Let me start by letting you know who I am and why I am qualified to comment on this matter.

I am a licensed veterinarian from Lancaster County, PA. and my name is Willard L. Stoltzfus, VMD. I am a 1993 graduate of the University of Pennsylvania and I have been in private practice since then. For almost that entire time I have been involved with dog breeders and the industry in general. This includes not just medical care, but housing and other canine husbandry issues as well. There are only a handful of veterinarians who have this level of experience in this field in Pennsylvania, so I believe I am uniquely qualified to address the proposed regulations.

For the past 16 years I have observed what works and what does not in the best interest of the health of these animals, and I have consistently pushed for and recommended the husbandry practices which are best. I can tell you without a shadow of a doubt that promulgating the current guidelines into law would be a huge step backwards for the overall health of the dog.

The first issue is that of flooring. When I first entered the profession, many dogs in kennels were at ground level on solid flooring. It quickly became obvious that this was a disaster medically. Dogs routinely were lying in their urine and feces and cleanliness was difficult to achieve and maintain. Even more importantly parasites were much more difficult to control as the dogs immediately re-infected themselves. Diarrhea and weight loss were commonplace. In every case without exception the health of the dogs improved dramatically after being moved off the floor and away from their own feces. Current guidelines call for solid or slatted flooring which puts the dogs right back where they were when I first found them 16 years ago.

The second issue is that of "outdoor exercise areas." Again, when I first started many dogs were outside on the ground, and flea and tick infestations were common, as well as skin infections from mud and dirt. Moving the dogs indoors is what I recommended, and it improved the health of the dogs. Now once again government interference and senseless regulations are dictating that these dogs must be sent back outside where they will again be at risk for ectoparasite infestations. And I may also add that forcing dogs to move outside also significantly increases their chance of exposure to rabies through contact with wild animals, primarily skunks and raccoons.

The third area of major concern is with the proposed heating and ventilation requirements. Not only do these requirements lack any scientific or real evidence basis they are also practically impossible to achieve, both from a practical application and financial standpoint. Even more important than that is the complete lack of real benefit to the dogs medically. There is no evidence whatsoever that this kind of micro-management of the environment provides any health benefits to the dogs. Medical logic would even suggest that air flows of the proposed magnitude (20 air exchanges per hour) could actually be detrimental to the animals allegedly being helped. It is clear to this experienced veterinarian that this regulation provides no benefits and is in reality detrimental.

In summary, the regulations proposed by the Canine Health Board are impractical, extremely difficult to achieve, and medically detrimental to the animals. It should be thrown out completely and re-evaluated from a scientific point of view instead of political and emotional avenues.

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