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**From:** Brownfield, Jill [jbrownfiel@state.pa.us] on behalf of AG, CHBcomments [CHBComments@state.pa.us]  
**Sent:** Tuesday, October 27, 2009 4:00 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: Public Comments Re: Canine Health Board Recommendations

**From:** NPM@NPPMWATCH.COM [mailto:NPM@NPPMWATCH.COM]  
**Sent:** Monday, October 26, 2009 6:03 PM  
**To:** AG, CHBcomments  
**Subject:** Public Comments Re: Canine Health Board Recommendations

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INDEPENDENT REGULATORY  
COMMISSION

October 26, 2009

TO: The Canine Health Board  
The Independent Regulatory Review Committee  
The PA Dept of Agriculture/Bureau of Dog Law

For decades, dogs in Pennsylvania have languished in large scale commercial breeding kennels with no guidelines in place to regulate flooring, temperature, humidity, ammonia levels, lighting, exercise and other environmental controls that serve to provide a healthy atmosphere for thousands of dogs forced to produce litters for the commercial pet trade.

It's time for Pennsylvania to end a blatant double standard: dogs in breeding kennels are treated like livestock yet once puppies whelped at these same kennels are transported to retail venues they are inevitably ensured the lifestyle of a companion animal and conditions that are considered standard in a private home.

Dogs are not livestock and it's wrong for commercial breeders to deny these dogs an environment that does not rise above or even meet what is customarily afforded pigs, goats, cows or chickens.

The Canine Health Board recommendations hold the potential to improve and benefit the health and wellbeing of all breeder dogs - not to mention the health and wellbeing of their puppies - and should be implemented immediately.

While there are numerous studies that outline how controlling temperature, humidity, ammonia levels, lighting, exercise and flooring affect the health and welfare of dogs kept in testing laboratories, there are no printed studies that document any of the conditions within commercial breeding kennels primarily because those most active and influential in this industry insist and continue to keep their practices and methods as hidden and secretive as possible since the majority of consumers would be outraged to see how helpless canines are exploited to perpetuate what amounts to a cruel and inhumane industry based upon greed.

Were commercial breeders proud of the conditions in which they kept their breeding stock, pet shops would proudly post the names of these breeders/kennels on their puppy cages and not withhold identifying information until AFTER a consumer has completed the sales transaction.

It is not the fault of Pennsylvania residents and consumers that those who have made millions of dollars by breeding dogs in substandard conditions must now invest their money to create an environment that includes the most basic of environmentally controlled conditions for the living, breathing and sentient beings that produce their revenues. No one forced these breeders into the canine breeding business and certainly no one is forcing them to continue earning their income in this industry. In fact, had the commercial breeders kept their breeding stock in acceptable living conditions to begin with, regulatory intervention would not be needed.

Since 2006, and in every public comment period relating to the revamping of Pennsylvania's dog laws, the overwhelming majority of comments have come from PA residents, consumers and constituents who are in favor of regulating the commercial canine breeding community.

Without a doubt Pennsylvanians have a desire to ensure the health, safety and welfare of the breeder dogs trapped within these commercial breeding facilities and it is abundantly clear that those individuals who choose to continue earning a living by breeding dogs should only be able to do so after implementing the standards established by the Canine Health Board's recommendations.

Sincerely yours,

Jenny Stephens