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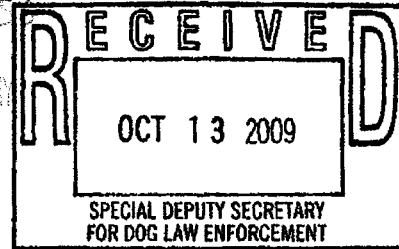
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October 5, 2009

Pennsylvania Department of Agriculture
Bureau of Dog Law Enforcement
2301 North Cameron Street
Room 102
Harrisburg, PA 17110

2009 OCT 28 AM 9:54

INDEPENDENT REGULATORY
REVIEW COMMISSION



Re: Temporary Guidelines for Commercial Kennels
FYI: Personal comments are the last paragraphs

Dear Secretary Smith:

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).

Background:

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. The proposed regulations are the result of the Canine Health Board's recommendations for those standards.

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.


Conclusion – Personal Comments:

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 promulgation of the new regulations as expeditiously as possible. Thank you for your time and consideration.

 In all honesty, I believe that ALL puppy mills should be shut down forever. It is one of the most selfish, greedy, and inhumane acts of exploitation in this world. Animals are used and abused over and over until their internal organs are actually falling out of their abused bodies. Plus, there are millions of animals that are euthanized daily at Humane/Animal Societies and millions of other unfortunate animals who die terrible deaths on the streets or by their ignorant, sadistic owners. There is no need for puppy mills, period. Humans are supposed to be intelligent, caring creatures but I have yet to see any real laws implemented for the humane treatment of animals. If you allow puppy mills to operate, then there needs to be monthly inspections of all mills enforcing strict, humane treatment of these helpless animals who are considered “property and \$\$ machines”. It’s an absolute disgrace.

And remember, the way a person treats an animal is a direct indication on how they will treat another human being. It’s a known fact that if a person abuses animals, he/she will abuse humans – 95% of the rapist, murders, child molesters, abusers started with animal abuse --this is why animal abuse needs to be a FELONY and not a slap on the hand. Wake up people.

Sincerely,


Debbie Durigon
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