

2785

From: Brownfield, Jill [jbrownfiel@state.pa.us] on behalf of AG, CHBcomments [CHBComments@state.pa.us]
Sent: Tuesday, October 27, 2009 6:52 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: Comments on IRRRC #2785/Canine Health Board Standards for Commercial Kennels
Attachments: hsvma_PA_kennelstandards.pdf

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2009 OCT 28 AM 9:30
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ACTION COMMISSION

-----Original Message-----

From: Pam Runquist [mailto:prunquist@hsvma.org]
Sent: Tuesday, October 27, 2009 5:52 PM
To: AG, CHBcomments
Cc: Smith, Jessie L
Subject: Comments on IRRRC #2785/Canine Health Board Standards for Commercial Kennels

Please consider the attached comments from the Humane Society Veterinary Medical Association in relation to IRRRC #2785/Canine Health Board Standards for Commercial Kennels. Please let us know if you have any questions and thank you for the opportunity to submit comments.

Pam Runquist
Director of Veterinary Advocacy
Humane Society Veterinary Medical Association prunquist@hsvma.org
Tel: (530) 759-8106

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**HUMANE SOCIETY
VETERINARY MEDICAL
ASSOCIATION**

27 October 2009

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2009 OCT 28 AM 9:38

Special Deputy Secretary Jessie L. Smith
Pennsylvania Department of Agriculture
Bureau of Dog Law Enforcement
2301 North Cameron Street, Room 102
Harrisburg, PA 17110

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Salinas, Calif.

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Dixon, Calif.

Susan B. Krebsbach, DVM
Oregon, Wis.

RE: Comments on IRRC #2785, Canine Health Board Standards for Commercial Kennels

Dear Special Deputy Secretary Smith:

On behalf of The Humane Society Veterinary Medical Association (HSVMA), I am writing to offer comments on the proposed Canine Health Board Standards for Commercial Kennel Regulations in Pennsylvania (IRRC Number 2785). HSVMA is a professional organization, representing more than 1,300 veterinary professionals nationwide, with a focus on the welfare of all animals, including canine companions. We wish to acknowledge the expertise of and express our appreciation for the diligent efforts of our nine veterinarian colleagues on the Canine Health Board.

Any environment, such as a commercial dog kennel, in which large numbers of animals are housed in close proximity, presents significant herd health challenges. Infectious viral and bacterial agents such as canine distemper virus, canine parvovirus, bordatella bronchiseptica and canine parainfluenza virus (both common agents of kennel cough), as well as protozoal parasitic agents such as giardia and coccidia, are all relatively easily transmitted under such conditions. In addition to physical concerns such as housing materials, ventilation, and routine cleaning and disinfection programs, efforts to minimize animals' stress levels are important factors in protecting animal health and comfort. We believe the proposed regulations take these factors into consideration and are based on sound animal health data and research. In particular, we want to emphasize our strong support of the standards proposed for kennel temperature, ventilation and flooring

TEMPERATURE: The Board's recommendation regarding a maximum ambient temperature of 85 degrees Fahrenheit is sufficient to generally guard against discomfort and potential hyperthermia in most healthy adult dogs.¹

VENTILATION: The Board's recommendation regarding ventilation, stipulating an air exchange rate range of 8-20 exchanges per hour is adequate to reasonably minimize the presence of air-borne pathogens.² We understand others have noted that a minimum air exchange rate of 10-15 exchanges per hour would provide even greater protection for the animals' health, and we would support this narrower range as an improvement.



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FLOORING: The Board's recommendation requiring solid flooring is the best flooring option to insure the health, safety and comfort of kenneled dogs. Indeed, solid flooring is the industry standard among shelter medicine practitioners and in animal shelters nationwide, where flooring must be safe and easily cleaned and disinfected.³

The HSVMA is dedicated to promoting the humane treatment of all animals, both for the sake of the animals themselves and for the benefit of the public, including the future owner-guardians of dogs confined at commercial kennels. We support the application of veterinary medicine for the betterment of animal welfare and we are pleased the Board utilized its considerable expertise to recommend standards that will enhance animal well-being in Pennsylvania kennels. For these reasons, the HSVMA supports implementation of the proposed regulations.

Thank you for your consideration of HSVMA's commentary.

Sincerely,

Barbara Hodges, DVM, MBA
HSVMA Veterinary Consultant

¹ Animal Welfare Act (AWA). Title 9 Animals and Animal Products: Chapter 1-Animal and Plant Health Inspection Service, Department of Agriculture; Subchapter A-Animal Welfare; Part 3 Standards; Subpart A- Specifications for the Humane Handling, Care, Treatment and Transportation of Dogs and Cats. Section 3.2, Indoor Housing Facilities, p. 54.

² Environmental Enrichment Information Resources for Laboratory Animals (1995). *Dog and Dog Housing* chapter, by Robert Hubrecht, Universities Federation for Animal Welfare, p. 43.

³ University of California at Davis, School of Veterinary Medicine, Koret Shelter Medicine Program website FAQs. <http://www.sheltermedicine.com/portal/faq.php?zoomget=774>. Accessed Oct. 27, 2009.