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Special Deputy Secretary Jessie L. Smith
Pennsylvania Department of Agriculture
Department of Dog Law
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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Smith:

On behalf of The Humane Society of the United States, the nation's largest animal protection organization, I thank you for the opportunity to comment on the proposed Canine Health Board Standards for Commercial Kennel Regulations, developed in accordance with Act 119 (IRRC Number 2785). At the request of the Bureau of Dog Law, we have not alerted our membership to the comment process or the development of the proposed regulations. We trust that these comments, submitted on behalf of our more than 671,000 members and supporters in Pennsylvania, will be accorded appropriate weight.

The HSUS greatly appreciates the time, effort and expertise of the Department in developing the proposed regulations. The Department has called on the significant expertise of the Canine Health Board in developing regulations that, in our view, reflect the legislative intent of Act 119.

Importantly, the Department has clearly stated the type and cost of any equipment upgrades that may be necessitated by the proposed regulations. We appreciate that every kennel operator may not be fully versed in the technical aspects of ventilation systems that will allow them to meet the suggested standards. Fortunately, kennel ventilation systems are readily available, and reasonably priced, that will allow them to meet the proposed requirements regardless of their individual grasp of ammonia levels, humidity levels, etc.

To that end, the accepted standard rate of air exchange for kennels is a minimum of 10 complete air changes per hour. The HSUS regularly recommends this standard to animal sheltering facilities. While there is no federal requirement dictating air exchange rates in commercial kennels, the Office of Laboratory Animal Welfare of the National Institutes of Health states, in its Institutional Animal Care and Use Committee Guidebook, "The range of daily temperature fluctuations should be kept to a minimum (e.g., $\pm 2^{\circ}$ F) to avoid large demands on the animals' metabolic and behavioral processes. Relative humidity should be controlled (e.g., 30% to 70%). In general, an air exchange rate of 10 to 15 changes per hour is

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considered an acceptable standard." For these reasons, we recommend that the regulations be improved to require a minimum of 10 air exchanges per hour.

The HSUS supports the remaining proposed regulations as submitted. We are grateful to the legislature and the Department for its dedication to improving the welfare of dogs in commercial kennels, and feel that the proposed regulations, with the improved air exchange standards recommended above, will meet that goal.

Sincerely,

Sarah Speed
Pennsylvania State Director
Humane Society of the United States