

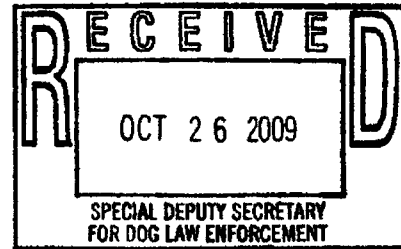
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October 24, 2009

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Canine Health Board
c/o Department of Agriculture
Room 210
2301 North Cameron Street
Harrisburg, PA 17110-9408

INDEPENDENT REGULATORY
REVIEW COMMISSION



Re: Comments to Proposed Rulemaking published
September 12, 2009
Canine Health Board Standards for Commercial Kennels

To the Canine Health Board:

I would first like to thank the Canine Health Board for the hard work and many hours you have spent to identify and recommend standards that will start to address the deplorable conditions currently rampant in Commercial kennels in Pennsylvania. My comments are made from the personal experience as a resident and taxpayer, who unfortunately must live less than a mile downwind of a puppy mill. This kennel houses over 150 dogs in an old hog barn, the dogs never get outside, (the owner has not installed the required exercise runs) get light only from a slit from an opening equipped with an agricultural style drop down curtain, have little heat in the winter and no respite from ammonia and heat and humidity. This kennel "Country Boy Kennel", and many others like it, is the very reason why these standards need to be established.

I do have some concerns that the regulations are not strict enough to specifically establish the requirement that reliable electric power be supplied to a Commercial Kennel. I know this must have been left out for political reasons, since there could be no other reason why in the year 2009 you would entertain the notion that a facility and (industry) that desperately needs modernization standards would leave out - access to public utilities. Please don't pander to the special interest groups that are resisting incorporating a modernization of their facilities. If you do, you will be leaving the state with a logistically impossible enforcement task. The whole point of the new dog law is to get out of this ambiguous territory of non-specific criteria. The necessary changes and standards must be set down as black and white. You will do a disservice to the kennel owners that are getting the bad advice from professional organization, lobbying groups, and legal consultants that they will be able to continue to conduct their operations with the same facilities if they just resist enough! Put them out of their misery, make it clear what is required to implement your standards - ELECTRICITY!

I know you have not been commissioned to look at the dog waste issue, how the state can come up with a new sanitary kennel operation that does not include specific waste handling and disposal procedures is greatly negligent. But I guess those standard will come about through enforcement of EPA laws that regulate pollution, and through USDA food safety laws and from the experts in health at the CDC. Certainly, you as

veterinarians know that this is a health risk that has the potential to harm the public and our companion animals as well as the kennel dogs. It does need addressed before our farms, soils, food and water are contaminated with parasites and pathogens that can not be eradicated.

In closing, let me restate, please make these standards stricter. When organizations like the PVMA come out for commercial interests, not the interest of the dogs they are doing a great harm to your profession. Please put a stop to that erosion of trust, the public looks at our our veterinarians like our dogs look at us, with admiration, trust, loyalty and the security that you know the right thing to do. This is not the "Commercial Kennel Financial Health Standards" but a regulatory document meant to improve the health of these poor dogs. Your work has accomplished a big step in that process. Much more is left to be done.

Sincerely,

A handwritten signature in cursive script that reads "Julie R. Nettke".

Julie Nettke
315 Fairview Rd.
New Providence, PA 17560