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IRRC Chairman Arthur Coccodrilli
333 Market Street, 14th Floor
Harrisburg, PA 17101

October 20, 2009

Dear Chairman Coccodrilli,

I am writing this letter due to concerns about the proposed changes in regulations as outlined in Chapter 28a of the Canine Health Board Standards for Commercial Kennels. Although I am well aware these changes are supposed to create better conditions in kennels and am certainly in favor of that, I am concerned that some of the changes will actually be detrimental to the health and welfare of the animals.


One of my concerns is contained in Section 28a.2 which calls for mechanical ventilation to be implemented if the temperatures are above 85 degrees. The reality is that newborn puppies cannot maintain their own body temperatures until after 10 to 14 days of age. Supplemental radiant heat or infra red heat lamps are routinely used to create an average air temperature between 90 or 96 degrees Fahrenheit in the whelping area. This provides the best safety, health, and well-being of the young litter of puppies and is essential for their viability and survival. This mandate would create a separate violation for each puppy and mother and for a breeder to watch as puppies would die from hypothermia.

In number 8 under Section 28a.2, a kennel owner is required to have between 8 - 20 air changes of 100% fresh air per hour in each room. The actuality is that when the temperature is under 40 degrees three complete air changes per hour are sufficient. Again, I feel the proposed mandate is excessive and not necessary for the health of the animals.

Another part of the proposals I feel should be reviewed is Section 28a.3 which requires a breeder to have a kennel with lighting which would actually be unhealthy for the animals! I feel these mandates exceed the authority in mandating a mixture of natural and artificial lighting. If you carefully examine the mandated criteria you will see that the proposed lighting of 50 to 80 foot candles would be an intensity that would be inhumane to the exposed animals.

I hope that you will review the proposed mandates as I am concerned with the detrimental effects that some of the proposals would have on the animals. Although the changes are designed to help create better conditions, I feel that some of the mandates would do more harm than good.

Sincerely,


Allen Zimmerman
840 Weaverland Road
East Earl, PA 17519