

2785

RECEIVED

From: Helenno5@aol.com
Sent: Wednesday, November 11, 2009 8:03 AM
To: IRRC
Subject: United Against Puppy Mills-CHB Kennel Regulations- Public Comment
Attachments: UAPM_CHB_102709_Comments.pdf

NOV 12 11 12

Dear IRRC Officials,
Attached you will find United Against Puppy Mills' (UAPM) Canine Health Board Public Comments.
***Please place our letter of Public Comment at the appropriate place on your website.
Thank you for following up on my request.

Helen Ebersole

Helen Ebersole M.S.
Pres./Co-Founder
Zoning Chair
unitedagainstpuppymills.org



United Against Puppy Mills
P.O. Box 7202
Lancaster, PA 17604

www.unitedagainstpupmills.org

Working Together to Break the Chain of Cruelty

Pennsylvania Canine Health Board
c/o Department of Agriculture
Bureau of Dog Law Enforcement
2301 North Cameron Street
Room 102
Harrisburg, PA 17110

Dear Canine Health Board,

I am writing on behalf of United Against Puppy Mills, one of the Commonwealth's largest not for profit advocacy groups focusing on the health, welfare and care of the breeder dogs. many that spend their lives in Pennsylvania's large scale commercial breeding kennels. In 2006, UAPM presented Governor Rendell with the signatures of more than 30,000 Pennsylvania residents for the purpose of requesting the introduction of legislation that would improve the standards of care rendered to tens of thousands of dogs confined within these commercial facilities. Today UAPM maintains an active membership whose chief concern is the welfare and wellbeing of Pennsylvania's breeder dogs.

United Against Puppy Mills supports all of the regulations recommended by the Canine Health Board ("CHB") and believes that collectively they will provide long awaited relief to the dogs - many who have suffered for years in silence. Additionally, we believe these recommended regulations will have a direct and positive impact not only on the puppies born at these facilities but on countless Pennsylvania consumers who purchase puppies at Pennsylvania's retail pet shops and directly from Pennsylvania's commercial breeders.

United Against Puppy Mills has reviewed the comments to the CHB regulations which have been submitted by organizations representing national and Pennsylvania-based purebred groups, as well as other state-based canine organizations. These groups readily admit that the CHB's recommended regulations do not directly affect their members or the dogs owned by those members. Even so, these groups have attempted to cast a negative shadow upon the findings of the CHB by pointing to a lack of published scientific studies to justify the need for many of the proposed regulations along with the financial ramifications some commercial breeders may possibly incur when complying with the requirement to implement:

natural light;

air changes to control humidity, ammonia levels, carbon monoxide, odors, particulate matter and disease;

solid flooring;

access to a partially shaded exercise area; and

ventilation to ensure temperatures do not rise above 85 degrees

Further, United Against Puppy Mills has identified specific research pursuant to ammonia levels and lighting that lend additional credence to the CHB's recommendations:



United Against Puppy Mills
PO Box 7202
Lancaster, PA 17604

www.unitedagainstpupmills.org

Working Together to Break the Chain of Cruelty

Ammonia Levels:

Ammonia Emissions and Animal Agriculture

<http://agenvpolicy.aers.psu.edu/Documents/BeckerGravesAmmonia101.pdf>

along with

Public Health Statement for Ammonia
Agency for Toxic Substances & Disease Registry
Department of Health and Human Services

<http://www.atsdr.cdc.gov/toxprofiles/phs126.html#bookmark09>

Based on the above sources, UAPM offers the following opinion on ammonia levels:

OSHA safety standards for humans call for no more than 35 ppm/15 minutes. Inasmuch as poultry has been documented to have decreased body weight in 25 ppm conditions, this is clearly a level where damage is being seen. Therefore, levels should be required to be maintained comfortably below these damaging levels and a maximum level of 10 ppm would be reasonable to create a safe environment for the workers and the dogs.

and

Lighting:

The Engineering Toolbox
Illuminance - Recommended Light Levels

http://www.engineeringtoolbox.com/light-level-rooms-d_708.html

along with

Working Party for the Preparation of the Fourth Multilateral Consultation of Parties to the European Convention for the Protection of Vertebrate Animals Used for Experimental and Other Scientific Purposes (ETS 123)
Species Specific Provisions for Dogs

[http://www.coe.int/t/E/Legal_affairs/Legal_co-operation/Biological_safety,_use_of_animals/Laboratory_animals/GT123\(2002\)45rev%20PART%20B%20dogs.pdf](http://www.coe.int/t/E/Legal_affairs/Legal_co-operation/Biological_safety,_use_of_animals/Laboratory_animals/GT123(2002)45rev%20PART%20B%20dogs.pdf)

Based on the above sources, UAPM offers the following opinion on lighting:

Since the light in kennels will come from both natural sources and electrical fixtures it would be appropriate to set the electrical output level at 60 foot candles, a range that is comparable to what is commonly found in a workspace environment and an active searching environment such as a supermarket. In addition it would be appropriate to have a diurnal light cycle with varying intensity from 30 to 70 foot candles available. At night a minimal level of 1 foot candle, such as is commonly found in a public exit corridor, should give sufficient light to alleviate stress but not affect the diurnal photo-period desired.



United Against Puppy Mills

P.O. Box 7202

Lancaster, PA 17604

www.unitedagainstpuppy Mills.org

Working Together to Break the Chain of Cruelty

The commercial dog breeding business has been in existence for decades. It is an industry, however, in which most of its operating methodology remains clandestine and shrouded in secrecy. For that reason, there are little to no published studies that specifically address situations that are unique to breeder dogs in commercial breeding kennels. There are, however, scientific studies that have focused on dogs kept in research facilities and laboratories for breeding purposes, and livestock studies, that clearly support the recommended standards included within the proposed CHB regulations. These regulations will provide Pennsylvania's breeder dogs with more humane conditions, a clean living environment and a healthy atmosphere.

It's important to point out that the CHB's regulations will potentially affect less than 300 commercial breeding businesses in the Commonwealth and that a majority of these specific kennels, based upon information extrapolated from the Bureau's inspection data base as it pertains to the number of dogs sold, earn hundreds of thousands of dollars from the sale of puppies each year. While it is unfortunate that little, if any, of the money produced by these breeding operations has been reinvested into updating kennel equipment and the physical upkeep of structures at and within many of these kennels, it has been determined by Pennsylvania's General Assembly that the living conditions for these dogs - the very dogs responsible for producing profits - be improved so as to stop any possible suffering that's attributed to antiquated living facilities and a generalized and overall lack of care. This decision is further affirmed by advocates across the Commonwealth as well as the members of United Against Puppy Mills.

To their credit, the CHB's proposed regulations have provided commercial breeders with the ability to implement creative ideology to accomplish compliance with the regulations. This is witnessed by kennels who have applied for and been awarded low cost state-based loans and financing through Pennsylvania's Renewable Energy Program. The Renewable Energy Program encourages the utilization of "green" technology and ultimately benefits Pennsylvania and its residents.

It is time for Pennsylvania to be recognized as a humane commonwealth and to turn the corner from being known as the "Puppy Mill Capital of the East." For too long, inhumane commercial kennels have reaped the financial rewards of mass producing puppies with little to no regard for the health and well-being of the puppies or the breeder stock. The standards proposed by the CHB for Class "C" commercial kennels will raise the required treatment of dogs in these kennels to a more humane level and United Against Puppy Mills fully supports and applauds these proposed regulations.

Sincerely,

Helen Ebersole, MS
President

L. Thomas Gemmill, VMD
Veterinary Advisor

Cyndy Baxter, Esquire
Legislative Chair

Jenny Stephens
Executive Secretary