

Testimony **in Opposition to HB 2477** (relating to the Kansas Pet Animal Act - KPAA)

Submitted by Crystal Swann Blackdeer, Executive Director, Leavenworth County Humane Society, Inc., Lansing KS (CB001LMC)

Mr. Chair and distinguished Representatives:

HB 2477 proposes to significantly raise fees for a program that is under **legislative post-audit**. According to information provided by the AFIP, the audit will assess :

Are the policies and practices of KDA AFI program adequate to ensure fair and consistent inspections that help enhance animal health?

Is the AFI program adequately funded, managed, and staffed to efficiently and effectively carry out its responsibilities?

To what extent have the conditions in commercial breeding operations in Kansas changed since our audit of the AFI program in 2002?

It seems only logical that members of this committee (and the legislators as a whole) would like to have the answers to these questions prior to increasing fees.

It is only fair that the cost of the program be shared by all licensees, but **those who cost most should pay the most**. Those who are unavailable for inspection, who deny access to inspectors, who fail inspections, who fail to comply with licensing deadlines - these are the ones who should be assessed fines and fees to pay for the increased time that inspectors have to spend on them.

Those who repeatedly fail inspections should not continue to be licensed. Three failures and the licensee should no longer be allowed to operate any pet-related business for a period of at least two years.

HB 2477 removes any requirement for USDA licensed breeders and distributors in KS to provide records of or even provide **“adequate veterinary care”** as defined in the KPAA. This is simply ludicrous. There aren't enough KANSAS inspectors to visit all the licensed facilities in our state, or even to investigate all the complaints. There are even fewer APHIS inspectors per USDA licensee. And we all know how efficient federal programs can be. Adequate veterinary care is neither hard nor unreasonable. It is necessary for the health of the animals and for the soundness of the pet animal industry in KS.

HB 2477 fails to address some significant problems as well.

There is still no **Rescue representative on the Governor's Pet Animal Advisory Board**. Rescue networks are an entirely different “animal” than shelters. They are a different category of licensee, and should have their own representation on the Board. The makeup of the current board gives 4 seats to commercial producers (appx 340 licensees), 1 seat to shelters (appx 280 licensees), and NO seat or voice at all to rescue

/ group home networks (67 licensees). Additionally, shelters and rescues register some 2400 foster homes annually, who are not being adequately represented. This longstanding “taxation without representation” should be immediately addressed.

Inspections should be unannounced. Providing prior notice to a licensee just means that animals may be hidden or moved and that inspections will not see operations as they routinely happen. For those who have lived military life, you know that what you see at a scheduled inspection often bears no resemblance to how things are done day to day. LCHS, Inc.'s inspections are unannounced. We're glad to see our inspector every time. We learn and get better. Anyone who is not open to unannounced inspections should give pause. If there's nothing to hide, come visit any time. Legislators should be welcome to visit licensees in their districts any time as well, not just on invitation.

Please bear in mind always that shelters and rescues across Kansas perform herculean public health and safety service, we honor the human-animal bond, we pay taxes and we vote. Most of us do this on shoestring budgets based on fundraising and donations, often taking no compensation for our work. No one goes into sheltering or rescue to make money.

Thank you for your consideration of my input.

