



Office of Small Business and Entrepreneurship  
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April 27, 2015

Jennifer M. Kane  
Paralegal  
NRC, Division of Hearings  
Indiana Government Center - North  
100 North Senate Avenue, Room N501  
Indianapolis, IN 46204-2200

Dear Ms. Kane,

Pursuant to IC 4-22-2-28, the Indiana Office of Small Business and Entrepreneurship ("OSBE") has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document 14-477 proposed by the Natural Resources Commission (NRC). The proposed rule amends 312 IAC 9-3-10 governing commercial deer processors. It amends 312 IAC 9-5-9 governing the reptile captive breeding license. It amends 312 IAC 9-10-4 governing the game breeders and exotic cervidae license. It amends 312 IAC 9-10-9 to governing wild animal rehabilitation permits. It amends 312 IAC 9-10-11 governing the nuisance wild animal control permit. It amends 312 IAC 9-10-15 governing the fish importation permit to remove bowfin and paddlefish from the list of species. It amends 312 IAC 9-10-16 governing the dog training ground permit. It adds 312 IAC 9-10-24 to establish a trapper education permit. It amends 312 IAC 9-11-2 governing the wild animal possession permit to clarify requirement for applicants. Effective 30 days after filing with the Publisher.

The economic impact statement prepared by the NRC will impose annual costs up to \$500 for commercial deer processors to properly dispose of deer carcasses and other parts under 312 IAC 9-3-10. There will be a different permit (aquaculture permit) required to import, raise and sell paddlefish from hatcheries as the result of the change in 312 IAC 9-10-17, which could result in annual administrative costs. The NRC expects the total economic impact is \$10 per year per business (\$10 per hour and 1 hour per year to complete the paperwork). The NRC states there will be a reduction in costs for businesses that have a game breeder and exotic cervidae license since requirements will be less than currently required in 312 IAC 9-10-4(i), (l) and (o). The NRC also expects a reduction in costs for businesses since employees that have nuisance wild animal control permits will have a reduction in continuing education hours with the changes in 312 IAC 9-10-11(d). OSBE does not object to the economic impact to small business associated with the proposed rule. If you have any questions about the comments contained herein please contact me at 232.5679 or [ombudsman@osbe.in.gov](mailto:ombudsman@osbe.in.gov).

Regards,

A handwritten signature in black ink that reads "Erik Scheub".

Erik Scheub