



VIA EMAIL

October 21, 2022

Sarah A. Simpson, JD
Director of Legal Affairs, Licensing and Enforcement
Indiana Board of Animal Health
Discovery Hall, Suite 100
1202 East 38th Street
Indianapolis, IN 46205

Re: LSA Document #22-259/Economic Impact Statement

Dear Ms. Simpson,

Pursuant to Indiana Code 4-22, as the Small Business Ombudsman, I have reviewed the economic impact analysis for small businesses associated with the rule changes contained in LSA Document #22-259 proposed by the Indiana State Board of Animal Health (BOAH).

Based on my assessment as the Small Business Ombudsman I have concluded that, due to the fact that BOAH currently inspects Indiana's 81 official plants and 50 custom exempt plants and the procedure does not appear to change based on the proposed rule, the BOAH has adapted the rule to meet the least stringent standards possible relating to meat and poultry slaughter and processing plants. The Indiana State Board of Animal Health estimates the total industry cost for compliance would not be impacted, which is further affirmed through no increase to annual reporting, record keeping, or other administrative costs for regulated entities. Additionally, Proposed Rule LSA #22-256 indicates the potential to decrease compliance costs because the incorporated regulations contain a recent amendment to 9 CFR 310.20 that eliminates the requirement to defibrinate livestock blood saved as an edible product.. Finally, with no added industry wide costs the total economic impact is below the established industry wide threshold to be considered burdensome.

Based upon this statement and review, the Small Business Ombudsman supports the proposed rule related to the economic impact to small business if the BOAH conclusion reflects the actual result after promulgation. If you have any questions about these comments, please contact me at majaworowski@iedc.in.gov.

Sincerely,

Matt Jaworowski
Small Business Ombudsman
Manager, Interagency Affairs
Indiana Economic Development Corporation