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**From:** Amy Kaunas <AmyK@humanesocietyhbg.org>  
**Sent:** Thursday, April 28, 2022 4:07 PM  
**To:** IRRC  
**Cc:** Admin PA Federated Humane  
**Subject:** Comments on Euthanasia #16A-5726 (IRRC# 3336)

Independent Regulatory  
Review Commission

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I am writing to submit comments on behalf of the Board of Directors for the Federated Humane Societies of Pennsylvania. Please see below.

Per section 31.106 (d) an animal protection organization applying for a certificate (or re-applying) will be inspected by agents of the Board to determine if the equipment and facilities of the organization meet the requirements of the subchapter.

*Suggestion: This "inspection" process simply be performed by the Department of Agriculture during their regular inspection process. What they are looking for under section 31.109 is a simple check list. It would also seem appropriate to advocate an attestation should suffice after the initial inspection again because these are items that are a check list style – note what they are checking on has nothing to do with the drugs themselves.*

According to section 31.108, certificate holders must provide hard copies of the controlled substance logs and invoices for each drug ordered every 60 days.

*Suggestion: Why not make this a retention requirement that mirrors the DEA and allows for inspection by agents at any time? This seems very burdensome for all involved and doubt agents will be combing through these records every 60 days.*

Section 31.109 lists all of the facilities requirements and equipment and supplies a certificate holder should have. Most are very basic and make sense however 31.109(a)(4) requires the room wherein euthanasia is performed to have "at least one exhaust fan".

*Suggestion: An explanation of why such an expense would be needed to provide "adequate ventilation to prevent the accumulation of odors" and what odors euthanasia produce.*

Thank you!!!!  
Amy

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