

**Opponent Testimony on HB 2297
presented to the
House Committee on Agriculture and Natural Resources
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Chairperson Rahjes and members of the Committee:

Thank you for the opportunity to provide testimony on House Bill 2297 (HB 2297). HB 2297 would make legal the ownership, veterinary care, and rabies immunization of raccoons for the purpose of keeping such animals as pets and would invalidate Kansas Administrative Regulation 28-1-14 subsections (a) and (c). Overall, HB 2297 would remove or limit the authority of the secretary of health and environment to prohibit keeping raccoons as pets and prohibit vaccinating raccoons for rabies virus, as well as limit the authority of local health officers, to control the spread of infectious or contagious diseases, namely rabies.

Under current Kansas law, K.A.R. 28-1-14 prohibits the keeping of skunks, raccoons, foxes, and coyotes as pets and prohibits any attempt to vaccinate these wildlife mammals for rabies except if part of a zoological park or research entity. This crucial regulation protects Kansans from unnecessary exposure to rabies virus, which is a nearly 100% fatal disease in both animals and humans and is responsible for an estimated 70,000 deaths globally each year. Thanks to robust public health and animal health efforts that have eliminated canine variant rabies in the United States and significantly limited the spread of raccoon variant rabies, in addition to rabies post-exposure prophylaxis, human deaths from rabies are around 1-3 per year in the United States.

HB 2297 mandates rabies vaccination for raccoons when no such labeled vaccine exists, except for oral vaccination which is administered by the United States Department of Agriculture (USDA) to limit the westward spread of the raccoon rabies virus variant. Vaccinating these animals with a vaccine approved for use in other species and keeping them as pets under the pretense that they pose no risk of rabies transmission is not only flawed logic, but dangerous for the persons or animals that are bitten or scratched by these raccoons. Since raccoons are a rabies reservoir species, the incubation period, clinical signs, and disease transmission of rabies virus is highly variable. In fact, raccoons can shed rabies virus in their saliva without showing any signs or symptoms of disease. Therefore, any raccoon that bites or scratches a person or other domestic animal must be euthanized and tested for rabies, regardless of vaccination status.

Allowing raccoons to be kept as pets would also facilitate the legal movement of raccoons from different geographic areas to Kansas. This is important because, currently, Kansas is free from raccoon variant rabies. History has shown that the translocation of raccoon populations facilitates the spread of rabies virus to naive populations at great cost to the local wildlife, domestic pets,

and public health. The identification of raccoon variant rabies in Kansas would trigger a national containment response that would be costly to Kansans, time-consuming, and stretch already thin resources. We saw this play out recently in our neighbor state to the north. In September 2023, raccoon variant rabies virus was identified in a kitten in Omaha, Nebraska, 850 miles west of where the raccoon variant rabies virus is typically found. This identification yielded a rapid, multi-agency public and animal health response at the local, state, and federal levels. To ensure that raccoon rabies didn't become established in Nebraska, officials trapped, vaccinated, and released feral cats and wildlife in the surrounding area, conducted massive oral rabies vaccination drops for wildlife, and directed intensive surveillance in wild mammals, culminating in the placement of over 18,000 oral rabies vaccine baits and the testing of 515 animals including raccoons, skunks, feral cats, and other species. The investigation concluded that the kitten was translocated from a raccoon rabies endemic state in the southeastern US to Nebraska while it was incubating the rabies virus. After it arrived in Nebraska, it's illness soon became apparent, and it was euthanized and tested for rabies. This one kitten resulted in ten humans needing rabies post-exposure prophylaxis and seven exposed pets. This robust response was necessary to ensure that raccoon variant rabies did not become established in Nebraska. National rabies surveillance data shows that areas with bat and raccoon rabies have 600% higher reports of rabies than areas with bat rabies only. Further, rabies post-exposure prophylaxis, the life-saving medication administered after a person is bitten by a potentially rabid animal, is estimated to be 70% higher in areas that are enzootic for raccoon rabies as compared to areas that are enzootic for skunk rabies, as Kansas is. At a recently estimated cost of \$7,800 for rabies post-exposure prophylaxis, not including hospital costs, administration fees, and emergency room fees, the additional financial burden of rabies post-exposure prophylaxis on Kansans would be significant.

Other than rabies, raccoons carry other zoonotic diseases, which are those diseases that can be transmitted between people and animals. One such example is the parasitic roundworm, *Baylisascaris procyonis*. When these parasites infect humans, especially children, the consequences can be severe and lead to infections in the eye resulting in visual impairment, in the organs, or in the brain resulting in various neurologic complications. This parasite is passed through microscopic eggs in the feces of healthy appearing raccoons and is transmitted to people after they are handling feces or dirt contaminated with feces and accidentally ingest the eggs. Of 37 published cases of *B. procyonis* infection in North America, the median age of infected persons was 1.6 years and 18% of those infections resulted in death, illustrating just how serious this infection can be in children. Children with developmental delays are at an especially high risk because of frequent hand-mouth behaviors, especially in environments where raccoons are present. While treatments are available that might reduce serious disease, no treatments to date are totally effective at killing the parasite after it has infected a human.

Aside from the clear health threats posed by pet raccoons to their owners, HB 2297 mandates that these animals must undergo annual veterinary checkups. Many veterinarians are not trained in handling wildlife but may feel pressured into seeing and/or treating raccoons because of pre-existing relationships with clients in the treatment of their domestic pets or because of the limited availability of veterinary care in specific geographic locations. Whatever the reason, having veterinarians and veterinary personnel handling animals for which they are unfamiliar poses a clear occupational health and safety risk beyond what is expected to be encountered in routine

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veterinary practice. Further, if those persons are bitten or scratched by a raccoon patient, even if previously vaccinated for rabies, the animal would need to be tested for rabies, which is only available on a post-mortem brain sample; therefore, the animal would need to be euthanized to ensure that it was not rabid. The untimely death of these pets would be heartbreaking for the owners of the raccoon and over time would undoubtedly be injurious to the mental health of the veterinarian, as it is such a preventable situation.

The Kansas Department of Health and Environment asks that this Committee recognize the value of existing legislation that prohibits the ownership of wildlife, including raccoons, as pets. Raccoons are inquisitive and intelligent animals that deserve to be respected and live in the wild, not kept as pets in cages where their natural behavior cannot be enjoyed. Without the public health measure in place to prohibit the keeping of rabies reservoir species as pets, both rabies and other dangerous zoonotic diseases threaten the health and safety of our citizens. **We ask that the Committee not support this bill as it will be dangerous to wildlife, domestic pets, and humans and will jeopardize decades long efforts to control the westward spread of raccoon variant rabies and the spread of infectious and contagious diseases in our state.**

We appreciate the opportunity to submit this written testimony in opposition to HB 2297.