

**From:** [Elizabeth Jones](#)  
**To:** [Trisha Linebarger](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, July 31, 2020 2:28:51 PM

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From: sunset@sunset.texas.gov On Behalf Of Texas Sunset Commission  
Sent: Friday, July 31, 2020 1:30:31 PM (UTC-06:00) Central Time (US & Canada)  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS DEPARTMENT LICENSING AND REGULATION

First Name: Rhonda

Last Name: Braudis

Title:

Organization you are affiliated with: Texas Humane Legislation Network (THLN)

Email:

City: Pittsburg

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

Public Comments to TSAC regarding Puppy Mill Program:

1. First, let me qualify my response with my experience in the area of Animal Welfare:

- Municipal Animal Shelter Volunteer since 2003
- Board of Directors, 501c3, Azle Animal Shelter Humane Association, since 2006
- Texas Animal Control Association, State honor as Outstanding Volunteer of the Year Award-2006
- Texas Humane Legislation Network, NE TX Ambassador & Volunteer, since 2016

2. Per your report, if "significant statutory exemptions and unenforceable requirements, undermine both the programs goals and the agency's efforts"...the program has not had a significant impact on bringing such operations to justice". I strongly believe these two issues of statutory exemptions and unenforceable requirements, are the cornerstones to strengthen and improve the program, not delete the program.

Deleting the program in its entirety only serves to bring more cruelty, abuse and neglect to dogs and cats, as well as increase the burden to other Texas agencies and taxpayers. Other Texas agencies include: Municipal Animal Services; Law Enforcement; SPCA's; Humane Societies; Rescues; ASPCA's; Veterinarians and the public whose tax dollars help finance animal seizures, and the care of the animals taken into custody. In other words, you are shifting the problem and the cost burden to someone else versus correcting the inefficiencies and effectiveness identified in this report.

Texas can make our laws stronger but not weaker than the USDA federal regulations. USDA's own statistics show that it only monitors about 25 percent of breeders. This fact is a strong indicator that Texas Breeders must be regulated and licensed by Texas for Texans.

To further substantiate my recommendation to strengthen the law and fix the current inefficiencies, I offer this analogy: Hospitals are inspected 1-2 times annually. Hospitals are not closed due to inefficiencies or requirements not being met. The findings in the inspection report are corrected, necessary policy changes and efficiencies implemented. Resulting in the hospital continuing operations to better serve the public.

We all know that unregulated breeders typically abuse and neglect animals.

We must have laws that protect these animals, and the unsuspecting buyers of those unhealthy “pets”. Additionally, strong laws for breeders means we understand the potential cruelty and abuse of these animals; that we understand the human hardships and financial costs associated with seizures of puppy mills; and most importantly, that we understand the hard work and dedication of those who are invested in making Texas a more Humane state for animals, and a safe environment for people. Safety for animals goes hand in hand with safety for people. Facts are, people who abuse and neglect animals, have a propensity to also abuse and neglect people. Let us be proactive for the good of all. Put the focus on Strengthening the law and correcting the inefficiencies identified in this report, not deleting this life saving law. Who can't get behind that?

Any Alternative or New Recommendations on This Agency:

**RECOMMENDATION:** Consider Contracting with agencies who have the required expertise and authorization to inspect, enforce and provide licensing.

Agencies such as Animal Services (typically serve under the Police Departments), SPCA's, Humane Societies, etc. There are efficiencies to use resources and experts already in place versus using TDLR with their current program issues. Get the right experience and authority for the job! Employ the use of Drone's and video technology to help inspect breeding facilities/kennels. Best use of funding, human resources and leveraging technology.

My Comment Will Be Made Public: I agree