

**From:** [Elizabeth Jones](#)  
**To:** [Trisha Linebarger](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, June 25, 2020 1:11:23 PM

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From: sunset@sunset.texas.gov On Behalf Of Texas Sunset Commission  
Sent: Thursday, June 25, 2020 1:11:02 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: Ed

Last Name: Jamison

Title: Director

Organization you are affiliated with: Dallas Animal Services

Email: edward.jamison@dallascityhall.com

City: Dallas

State: Texas

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

I submit this written comment opposing the repeal of TLDR's Licensed Breeders Program (LBP). The Sunset Commission Staff Report suggests that only a small share of Texas breeders fall under the purview of this program. It is true that pursuant to the current LBP, the majority of dog and cat breeders will continue to be unregulated. However, just because the program governs a small number of dog and cat breeders does not mean the law is ineffective or meaningless.

The LBP applies to any person who has 11 or more adult intact female dogs or cats and breeds them to sell or exchange at least 20 animals per year. This is a significant number of animals. Most breeders either fall under the threshold and are unregulated or it simply cannot be proven that a breeder has met the threshold due to the difficulty of tracking litters and sales.

However, in cases where a breeder is known to meet the high threshold currently dictated by the law, the ability to inspect and insure humane treatment is even more critical. Large scale breeding operations are ripe for animal neglect given the heightened cost and time needed to care for such a large quantity of animals.

The massive impact of cat and dog breeding cannot be overstated. The City of Dallas impounded over 39,000 cats and dogs last year alone. When large scale breeding operations neglect animals, it is a burdensome situation for the community. Removing dogs and cats from large scale breeding operations often requires tremendous resources to provide care for those animals. Those costs fall on taxpayers if the seizing agency is a governmental agency and otherwise, on nonprofit animal welfare agencies supported by donations. The Staff Report indicates that three licensed breeders were the subject of "publicly documented" seizures. One of those seizures was the result of a LBP inspection. These inspections are critical for the prevention animal neglect and cruelty. Such inspections may provide education, require corrective measures before neglect escalates, and act as a deterrent. Seizures of animals should be a last resort. The rarity of situations requiring the seizure of animals is actually an indicator that the program is working.

In addition to the LBP's importance as a preventive measure for animal neglect, the LBP is a public resource for consumers who wish to make an educated decision when choosing to acquire a dog or cat. When purchasing a

puppy or kitten, a consumer may pay thousands of dollars, even sometimes financing such purchases with store-provided credit cards. The cat and dog sales model is predatory and offers little protection for animals or consumers. The LBP provides consumers with an easily accessible website to conduct research on a breeder when they are considering making a purchase.

Finally, the Staff Report identifies valid concerns about the coverage that the LBP provides. The LBP regulates Texas breeders that are outside of the USDA's purview, but the USDA regulations also do not capture the majority of breeders. Therefore, the LBP should be revised to qualify a licensed breeder as any person who has more than 5 adult, intact female dogs or cats.

Lowering this threshold and eliminating the production number will result in easier identification of qualifying breeders, as well as protections for a greater number of animals. The LBP should not be repealed, but revised to ensure effectiveness.

I appreciate your consideration and attention to this matter.

Any Alternative or New Recommendations on This Agency: NA

My Comment Will Be Made Public: I agree