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3 August 2020

Texas Sunset Advisory Commission  
P.O. Box 13066  
Austin, TX 78711

**Re: The Commission's Recommendation to Discontinue the Texas Department of Licensing and Regulation's Licensed Breeder Program**

To whom it may concern:

On behalf of Best Friends Animal Society and our Texas members, I respectfully urge you to reconsider your recommendation that the Texas Department of Licensing and Regulation's Licensed Breeder Program be discontinued.

Pet mills, particularly puppy mills, are a serious problem in the U.S. Because the focus is solely on profit, commercial breeding operations typically cut all possible corners to keep their overhead low, at the expense of the health and well-being of their animals. For the unsuspecting consumer, this frequently results in the purchase of a pet facing an array of immediate veterinary problems or harboring genetic diseases that surface down the line. This creates a financial burden on the consumer and results in many of these animals being surrendered to overcrowded, taxpayer-subsidized shelters. Thus, this is not just an animal welfare issue but a consumer protection concern. The Texas legislature recognized this threat to animal welfare and public health and took steps to remedy it through passage of the Dog and Cat Breeder Act of 2011.

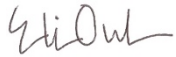
Although the USDA regulates most commercial breeders, the minimum federal standards do not ensure a humane life for dogs. These types of kennels can legally have more than a thousand dogs in one facility, and these dogs are allowed to be confined to very small cages for their entire lives, breeding continuously in order to produce as many puppies as possible for the pet trade. And with the substantial decrease in USDA inspections, serious violations are not being corrected. In other words, having a USDA license does **not** ensure humane or responsible breeding. Therefore, relying on the USDA to regulate Texas dog and cat breeders would be a step backwards for the protection of these animals.

It is critical that Texas continue to license and inspect the breeders within the state, not only to provide better oversight of the USDA licensees, but to ensure that the many breeders within the state who are not USDA licensed will not be able to operate without any oversight or veterinary requirements.

We understand the Commission's concern that there may be unintended loopholes in the program, but if that is the case, it would make sense to address and solve for those issues rather than abandoning the program altogether, as the latter will put countless animals at risk and will create far more problems than it will solve.

Best Friends and our Texas members appreciate the opportunity to submit comments on this matter and we thank you in advance for considering our feedback. Please do not hesitate to contact me if you have any questions.

Respectfully,



**Elizabeth Oreck**

National Manager, Puppy Mill Initiatives

Best Friends Animal Society

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