

**From:** [Elizabeth Jones](#)  
**To:** [Trisha Linebarger](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, June 24, 2020 3:54:14 PM

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From: sunset@sunset.texas.gov On Behalf Of Texas Sunset Commission  
Sent: Wednesday, June 24, 2020 3:41:28 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: Gary

Last Name: Poon

Title: Executive Director

Organization you are affiliated with: Houston Humane Society

Email: gpoon@houstonhumane.org

City: Houston

State: Texas

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

Dear Texas State Legislature,

I have been made aware through my advocacy work for animal welfare rights that the Texas Licensed Breeder Program is being considered for repeal at the advice of the Sunset Staff Report and Sunset Advisory Committee. Not only do I STRONGLY OPPOSE repealing the Texas Dog & Cat Breeder Law, I instead ask you to STRENGTHEN IT. Eliminating this program would leave dogs and cats in large scale breeding facilities at extreme risk of maltreatment for the sake of profit. It is the Texas Sunset Advisory Committees job to remind the legislature of the risks to these animals and their potential adopters. This legislation was designed to enact basic standards of care in large scale breeding facilities while preventing animal cruelty before it happens. This program not only prevents Texas breeders with a history of animal cruelty from becoming licensed, it also prevents animal cruelty from happening in these types of facilities. We MUST keep this program in place in order to track breeders, keep them in check, and enforce animal cruelty charges.

We WILL see an uptick in large-scale animal cruelty seizures, burdening taxpayers and non-profits alike, if we do not keep this program in place.

Thousands of neglected and abused animals from illegal AND legal breeding facilities come through our doors every year through our Animal Cruelty Unit.

If we do not better regulate breeding, we will see stories such as this one from a rescue of 50 puppy mill dogs out of Louisiana, where breeding is not regulated by any state laws.

<https://www.click2houston.com/news/2017/07/20/houston-humane-society-helps-find-homes-for-suspected-puppy-mill-dogs/>.

This is just ONE story of the Houston Humane Society rescuing animals from horrendous conditions in a puppy mill, conditions buyers would never have known when they purchased these dogs from the pet stores that are supplied by these types of breeders. The PAIN and SADNESS we see on these animals' faces, the pain and sadness we feel when we find deceased or nearly deceased animals from these "backyard breeders" is often unbearable. We can only imagine what we would see if the only law in place was repealed.

Often legislators and the public think the USDA can do this work, they cannot. This program is needed to regulate Texas breeders that are outside of the USDA's purview. The USDA indicates that Texas is the 8th largest state in terms of breeders, however, the USDA monitors about 25% of them.

It is IMPERATIVE to these animal's and the public's safety to keep this program in place AND strengthen it. It will only get worse otherwise. The Houston Humane Society strongly OPPOSES the repeal of the Texas Dog & Cat Breeder Law.

Sincerely,

Gary Poon  
Executive Director  
Houston Humane Society

Any Alternative or New Recommendations on This Agency:

The Houston Humane Society and recommends statutory changes to the law to strengthen the Texas Licensed Breeders Program. Improvements are needed to prevent cruelty and protect these animals in breeding facilities. I'd like to see the removal of the unenforceable requirement that only breeders selling twenty puppies/kittens or more must be licensed. TDLR inspectors have admitted it is nearly impossible to determine if an unlicensed breeder is being truthful about their sales numbers, especially since many sales are untracked cash transactions.

I also recommend reducing the breeding females requirement from 11 to five - the same as the USDA requirement. The high number of female animals required before a breeder must be licensed results in the majority of complaints against breeders being about unlicensed facilities.

My Comment Will Be Made Public: I agree