

**HOUSE OF REPRESENTATIVES
COMPILATION OF PUBLIC COMMENTS**

Submitted to the Committee on Licensing & Administrative Procedures

For Hearing Date: Wednesday, March 22, 2023 8:00 AM

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Note: Comments received by the committee reflect only the view of the individual(s) submitting the comment, who retain sole responsibility for the content of the comment. Neither the committee nor the Texas House of Representatives takes a position on the views expressed in any comment. The committee compiles the comments received for informational purposes only and does not exercise any editorial control over comments.

COMMENTS FOR HB 2238 by Buckley

Alex Pruett
Self - Veterinarian
College Station, TX

This bill will not do anything to improve the welfare of dogs and create significant burdens on hobbyists who raise dogs in their homes.

Sandy Schneider
self
Leander, TX

This bill presumes that intact adult females are kept for breeding, it has been shown in repeated studies that it is harmful to the health of dogs to be spayed before 2 yrs of age.

Commercial breeder regulation should be based on a commercial activity requirement; and the elimination of this commercial activity requirement would create a policy whereby many home-based hobbyists' mere ownership of dogs would require them be regulated as commercial entities. The requirements of this bill would put unfair and onerous fees and expectations on dog owners that have no interest in breeding dogs or selling them.

It is also important to note that in June 2020, staff of the Texas Sunset Advisory Commission recommended that the Dog and Cat Breeder Act should be eliminated due to fundamental flaws with the law that created it, the program's ineffectiveness, and significant operational costs. Ultimately, the Dog and Cat Breeder Act did not sunset because former State Senator Eddie Lucio moved to "sever" the Commission Staff's recommendation.

The Dog and Cat Breeders Act provides significant statutory exemptions and unenforceable requirements that undermine both the program's goals and Texas Department of Licensing and Regulation efforts. Moreover, program revenues have been found to fall far short of funding the administration of the licensed breeder program; yet despite these disproportionately high administrative costs, the Commission found that Texans still primarily rely on other laws that predate the program.

Cindi Todd

self - retired. previously a dog groomer.

Millsap, TX

I have raised and shown miniature wirehair dachshunds for over 35 years. I show them in obedience, rally, hunting venues and tracking (search and rescue is what is similar to this). I have a litter maybe every 2-3 years and all puppies are pre-spoken for before they are on the ground. This bill, although I do not currently own even 4 dogs total, is seriously flawed. Keeping an animal intact does not mean that animal will be bred. It is healthier to wait several years after sexual maturity before sterilizing the animals in the first place. Many breeds do not even come into season (requirement for being able to be bred) until 2 years of age. Sterilizing before sexual maturity is ALSO not healthy for the animal. This has been proven by veterinary studies. Commercial breeder regulation should be based on a commercial activity requirement, and the elimination of this commercial activity requirement would create a policy whereby many home-based hobbyists' mere ownership of dogs would require them be regulated as commercial entities. Hobby breeders are not commercial entities. We don't make money at this, our dogs have a home with us forever and are not a burden on the government entities.

Current regulations are not enforced and obviously there must not be enough manpower to police. Why not try that before enacting regulations to control my freedom to have animals in the manner I choose and proposing to inspect my house for no just reason?

Julie McDermott

Self

The Woodlands, TX

While you think tightening the licensing and regulations of breeders is a good thing, you will in fact hurting the good and reputable breeders. Good breeders might have more than 5 intact females, however some of those intact maybe older than the age we breed. Most reputable breeders stop breeding their female dogs around 6 yrs of age. We may still hold on to those females, not because we want to breed them, but because they are apart of our family. Reputable breeders care about their dogs. They make sure the females that are being bred are getting everything they need while the are pregnant and when they are not pregnant. Reputable breeders make sure every dog in their kennel is at the correct weight, seen by a vet yearly and are physically in shape. Their dogs are their life. Please do not pass this bill, all you will do is hurt reputable breeders.

I think the object of this bill may to stop the puppy mills, unfortunately this bill won't stop them. Puppy mill breeders are going to keep doing what they want to do, they don't care if they are following laws or regulations.

Teresa Coble, DVM

Uvalde Vet clinic

Uvalde, TX

This bill places undue hardship on citizens and hobby breeders. It should be defeat

Angie Claussen

Self

Houston, TX

I am opposed to this bill. I compete in dog shows so my dogs need to be intact. That does not mean they will all be bred. Sometime s I show dogs for other people so would be over the new threshold.

Torie Steele
Western fox terrier breeders association
Dallas, TX

There are lots of show breeders who work hard to breed healthy well bred dogs. Many never sell a puppy but hold on for show. To make them a commercial breeder and get the same license is not realistic. Many know much more about their breed than veterinarians do. Veterinarians are not trained in breed specific . To force breeders to follow rules that can actually be harmful in some cases . There can be over site like many of our breed clubs require. I am against puppy mills . Many show homes have 5 dogs but don't breed them. They are responsible breeders. Usually one litter a year. So to make rules that apply to everyone just to hit volume breeding is not fair. Please don't make pass this bill

Christen Richter
Self, GHGRC
HOUSTON, TX

To Whom It May Concern:

This bill will not do anything to improve the welfare of dogs and create significant burdens on hobbyists who raise dogs in their homes. I am a Texas resident and OPPOSE this bill. Commercial breeder regulation should be based on a commercial activity requirement; and the elimination of this commercial activity requirement would create a policy whereby many home-based hobbyists' mere ownership of dogs would require them be regulated as commercial entities. It is also important to note that in June 2020, staff of the Texas Sunset Advisory Commission recommended that the Dog and Cat Breeder Act should be eliminated due to fundamental flaws with the law that created it, the program's ineffectiveness, and significant operational costs. Ultimately, the Dog and Cat Breeder Act did not sunset because former State Senator Eddie Lucio moved to "sever" the Commission Staff's recommendation. The staff's findings indicated that the Dog and Cat Breeders Act provides significant statutory exemptions and unenforceable requirements that undermine both the program's goals and Texas Department of Licensing and Regulation efforts. Moreover, program revenues have been found to fall far short of funding the administration of the licensed breeder program; yet despite these disproportionately high administrative costs, the Commission found that Texans still primarily rely on other laws that predate the program. I implore you to OPPOSE this bill.

jessica Largent
self
Richmond, TX

I am a Texas resident and active voter and I oppose to House Bill 2238. I am active in AKC performance events and understand the world of dog breeding as a member of the Golden Retriever Club of America. The hobby breeders do everything to improve the health of their breeds with national standards and health testing. Each national breed club sets standards that all members must abide by and they take them very seriously. This bill will unfortunately not stop unethical breeding and will only hinder those who aim for the improvement of their beloved breed.

Jennifer Delmer
Self/Public School Teacher
San Antonio, TX

This bill goes well beyond federal regulations and is an unnecessary burden on small breeders. In addition, this bill really does nothing to safeguard the well-being of dogs. This is another example of more uninformed attempts in the wrong direction to ensure animal welfare.

Kathryn Dunbar, Ms
Northern texas all terrier assoc
Amarillo, TX

Do not pass this bill

deborah wilkins
none
corpus christi, TX

I do not support this Bill and I feel it exceeds USDA regulation. This Bill does nothing to preserve and protect dogs, dog owners, or dog breeders.

Maxine Petteway-Gray, Mrs
Self. Show dog handler-show dog breeder-groomer
Humble, TX

There are times when I'm handling show dogs that I may have more set amount of intact bitches because you're only allowed to show intact bitches and dogs in the dog show ring. That doesn't mean I'm going to breed all of them a lot of them do not belong to me. Occasionally I will breed a litter of my own so I would be considered a hobbyist. I am not a commercially licensed kennel. I'm not anything to do with agriculture I don't have anything to do with shipping dogs, or any kind of pet, so I feel that is extremely unfair that you would lump all of us into, some black and white space when that law doesn't include any of us. I strongly oppose this bill.

Robin Duke
Hobbyist dog breeders
Richards, TX

Most dog owners in Texas are not breeders. Those of us that actually attend dog shows are hobbyist breeders have never sold or placed a dog into a commercial environment. We follow AKC guidelines and adhere to strict and ethical breeding practices. To be lumped into a group of commercial breeders is offensive at best.

Jeanne Stancliff
South Texas Collie Club
Manvel, TX

HB 2238 - This bill does nothing to insure the wellbeing of any dog or cat. It only gives those wanting to stop people from having pets or animal companions another foothold on stopping people from getting that which adds so much to our lives.

It has been proven that people with pets live longer and have more productive lives than those that never had a pet. Service dogs help people with different medical problems function at their highest level.

Many people that own more than 5 intact females, never breed or only breed occasionally. For a dog to compete in conformation events they must be intact.

I agree that puppy mills are bad, but this bill hurts the honest, hobby breeder and does nothing to stop the over crowding and bad conditions of puppy mills.

Jane Bates
Conroe Kennel Club
Montgomery, TX

STRONGLY OPPOSE!

Scott Savant
Myself
Amarillo, TX

I don't believe that it's anyone's business how many dogs I have or don't have ,worry more about the homeless and gas prices than how many dogs people own !!!

Jacob Bonne4
Self
Texarkana, TX

This bill infringes on already established law and only serves to benefit the government, not the animals, nor the breeders. I vote NAY.

Teresa Coble
Uvalde Vet clinic
Uvalde, TX

Please kill this bill. Regulations have NO EFFECT on puppy mills and back yard breeders because they v will simply go on as they are but will cause undue impact on the responsible breeders.

Scott Bowman
self (retired)
Leander, TX

I strongly oppose HB 2238. It is overly restrictive and unnecessary. Licensing oversight would be burdensome on the state and annoying to those who do occasional breeding. If the committee really needs something to regulate, why not ramp up efforts to curtail loose dogs and enforce leash laws in our communities?

Cathy Sharp, Mrs
Self Retired engineer
Bellaire, TX

Please do not pass house bill 2238. I show golden retrievers and keep my old dogs long after they are through showing. This would greatly discourage all the people doing hospital therapy, field work, agility and conformation. We need to encourage ethical owners contributing to the world not penalize them. This bill was drafted without considering the ramifications. This is an irresponsible and thoughtless bill.

Jennifer Harper
Self
Pinehurst, TX

Please vote against this bill!!!

Jill Parsons
Myself
Cypress, TX

This should only apply to those who actually breed dogs. Let's clamp down on puppy mills! These people who produce doodles every 5 seconds and have no care for health testing and betterment of the dog are the ones causing harm. People who cage animals just to breed are the ones who need regulating.

Sally Thorpe
Self
Loveland, TX

I am opposed to this bill.

Sue Obannon
Self
Iola, TX

I am opposed to this bill. I have raised and shown purebred dogs for over 50 years and this bill would negatively affect my ability to keep doing so

Karina Whittington
Self software engineer
Trenton, TX

I oppose HB 2238, I am involved in a rare breed of dog that had less than 80 puppies born in the United States in 2022. Less than 100 born in all of North America in 2022. I am one of 2 breeders located in the southern United States and 1 of 2 breeders located period west of the Louisiana State Line. I live in a county outside of city limits and own 5 intact females, 2 active breeding females and 3 possible upcoming females, 2 of which are under 1 year. I don't even know if they will pass breed club health testing requirements and if they don't then I will find a loving pet home for them. In a purebred breed that is incredibly rare, estimated under 600 in North America). Every dog who has excellent health and temperament is essential. Not only that, these dogs are livestock guardians and provide a service to homesteaders, ranchers and farmers. In my opinion there are much better ways to solve the problems attempted to be solved by this bill. I don't even have a kennel facility as my dogs sleep in my bed and are part of the family. We compete in dog shows, dog sports and just enjoy going out and about to do training and advocating for our breed. I am also a member of my National Breed Club's Board of Directors which is based out of Texas as a Not for Profit. My breed is also a Giant Breed and it is highly inadvisable to alter prior to 18 months ideally 2 years as it impacts the dogs development. Many dog enthusiasts keep their dogs intact to keep them at peak physical condition or because hormones have lasting benefits to the dogs. It is essential you reconsider this bill from a different approach and maybe consult those who are highly invested in wellbred purebred dogs who have studied countless hours and are heavily involved in better the future of dogs if your goal is to stop puppy mills and bad breeders, current laws don't even stop those types now and this won't change it, the only breeders who follow the laws are the ethical hobby breeders doing everything in their power to produce happy healthy puppies and have well cared for females with consistent health screening.

Kendall Herr
Self and DFWLRC Membership
Gainesville, TX

This will negatively impact hobby breeders. We breed quality dogs to exhibit in shows and working events. Hobby breeders take great care with pedigrees, health clearances and temperament, putting their dogs in good forever homes. Hobby breeders rarely have a quality purebred dog end up in a shelter as they will take their puppies back for any reason at any age. This bill will not affect the large puppy mills, who are the problem, but will hurt those who take very seriously breeding quality dogs on a small scale for shows and performance events,

Micaela Escobar
Self, Generation Dispatcher
Georgetown, TX

Good Morning,

I am a Texas resident that is opposed to House Bill 2238. I am hobbyist/breed enthusiast. My breed is Doberman Pinschers. I compete with my dogs in multiple dog sports including conformation, obedience, barn hunt, FastCAT, rally, and dock diving. My dogs are kept intact, unless it is deemed medically necessary to alter them. I worked in the Veterinary industry for years and I do not believe in pediatric spay/neuter, which is spaying or neutering before a dog's growth plates are closed. There are studies that prove the negative effects of pediatric spay/neuter. I am a responsible pet owner that does not leave my females unattended when they are in season because I do not believe every dog should be bred. I do not want unplanned litters. I do have plans to breed my female dog in the future, but this does not make me a commercial breeder. I am a Generation Dispatcher in the energy industry, that is my career.

But I believe in preservation breeders, and hope to become one. I love my breed that supported me through my spouse's deployments and alerts me to coral snakes and other threats in our yard where my daughters play. I hope to produce wonderful family companions for others. Without preservation breeders doing what they can for the betterment of the breed, the breeds that the general public see and love would cease to exist.

Preservation breeders/hobbyists do not make a profit. In fact, I have spent 15,000 or more in the past year to obtain my females champion title, performance titles and health testing. That's one dog. Breeders who do it right don't make money.

Sponsors have indicated their belief that this will bring Texas in line with federal USDA regulations. However, this bill drastically expands state law and goes significantly beyond federal regulations, which apply to those with more than 4 breeding females and are selling dogs sight unseen. This bill will not do anything to improve the welfare of dogs and create significant burdens on hobbyists who raise dogs in their homes.

The AKC believes that commercial breeder regulation should be based on a commercial activity requirement; and the elimination of this commercial activity requirement would create a policy whereby many home-based hobbyists' mere ownership of dogs would require them be regulated as commercial entities.

Changing the licensing thresholds will force those who meet the new definition to:
Open their private homes or facilities to inspections following an application and at least once every 18 months thereafter
Pay at least a \$300 permit fee for every license year
Meet ambiguous housing standards for the dogs in their care
Submit to a criminal background check.
Submit a yearly report and yearly application for licensure accounting for all animals held at a facility.

Chris Gray
Self/Dog Trainer
Spring Branch, TX

It is not uncommon for me as a dog trainer to be housing more than the stipulated number of intact females in this bill. This bill will not improve conditions for animals, but rather will turn law abiding citizens into criminals as it economically impacts hobby breeders and professional trainers. These are the people that are the most responsible when it comes to breeding practices and animal care.

Melissa Keshlear
Breed and show mini dachshunds
Belton, TX

I am a Texas resident that is opposed to House Bill 2238
I think the rules in place cover the necessary actions for breeders of dogs and cats to take.
More rules just muddy the waters

Christal Prince
Kennel Club of Texarkana Inc
Hooks, TX

This is going to far and just falling into the hands of animal rights activists. Breeding license whether you are breeding or not? Many of us show dogs and dogs that are shown in confirmation must be intact. These shows bring a tremendous money to local economies!
This will only penalize law abiding citizens. The inferior breeders will continue to produce litters and pay the fees. It is well known now that spay/neuter to early is detrimental to a dogs development. The kennel clubs of Texas will all oppose this! That is a lot of voters

PAULA BRINER
my self
Weatherford, TX, TX

Stop letting animal rights people from controlling what we do with our pets and hobbies. I show and breed cats as a hobby. I sell the excess kittens not suitable for showing. I have a rare breed and make wonderful pets. The proposed law presumes that intact adult females are kept for breeding, and it would be incumbent on cat owners to prove that the cats are not being kept for breeding purposes. There are veterinary purposes influencing whether cats and dogs are spayed or neutered and this is a decision best left to the owners and their veterinarians. Because the proposed law fails to take into account actual commercial activity (or lack thereof), this would create a situation in which mere ownership of cats (or dogs) in private homes would subject the owners to treatment and regulation as commercial entities. Moreover, it eliminates all distinctions between commercial entities, pet owners and hobby breeders.

Changing the licensing thresholds will force those who meet the new definition to:

- Open their private homes (including bedrooms and bathrooms) to inspections following an application and at least once every 18 months thereafter
 - Pay at least a \$300 permit fee for every license year
 - Meet ambiguous housing standards for the dog and cats in their care
 - Submit to a criminal background check when applying for licensure
 - Submit a yearly report and yearly application for licensure accounting for all animals held at a facility
-

Toni Jones
Self
San Antonio, TX

This bill will do nothing to improve the care of animals, specifically cats and dogs. It was recommended that the original law be sunset and as such this law should not be passed.
We need to spend our resources on things that affect all Texans; not bad breeder bills.
This is also extremely unenforceable, as the last bill demonstrated.
Please consider not voting for this bill.
Thank you!

PAULA BRINER
Texas Country Cats
Weatherford, TX, TX

I am writing to oppose the proposed legislation which would impact hobby breeders without providing any significant benefit on their pets.

Currently, dog and cat breeders in Texas are required to obtain state licenses if they own 11 or more intact females and sell 20 or more cats/dogs in a license year. House Bill 2238, House Bill 274, and Senate Bill 876 are identical bills that will lower the licensing threshold in Texas to 5 intact females over 6 months of age, and will remove the requirement that a breeder must sell 20 dogs before a license is required.

The proposed law presumes that intact adult females are kept for breeding, and it would be incumbent on cat owners to prove that the cats are not being kept for breeding purposes. There are veterinary purposes influencing whether cats and dogs are spayed or neutered and this is a decision best left to the owners and their veterinarians. Because the proposed law fails to take into account actual commercial activity (or lack thereof), this would create a situation in which mere ownership of cats (or dogs) in private homes would subject the owners to treatment and regulation as commercial entities. Moreover, it eliminates all distinctions between commercial entities, pet owners and hobby breeders.

Changing the licensing thresholds will force those who meet the new definition to:

- Open their private homes (including bedrooms and bathrooms) to inspections following an application and at least once every 18 months thereafter
- Pay at least a \$300 permit fee for every license year
- Meet ambiguous housing standards for the dog and cats in their care
- Submit to a criminal background check when applying for licensure
- Submit a yearly report and yearly application for licensure accounting for all animals held at a facility

The above does almost nothing to ensure better care of cats and dogs in private homes and creates a significant invasion of privacy. Further, the proposed law potentially interferes in decisions which should be left to the owners in consultation with their veterinarians.

It is also important to note that in June 2020, staff of the Texas Sunset Advisory Commission recommended that the Dog and Cat Breeder Act should be eliminated due to fundamental flaws with the law that created it, the program's ineffectiveness, and significant operational costs. Ultimately, the Dog and Cat Breeder Act did not sunset because former State Senator Eddie Lucio moved to "sever" the Commission Staff's recommendation.

The staff's findings indicated that the Dog and Cat Breeders Act provides significant statutory exemptions and unenforceable requirements that undermine both the program's goals and Texas Department of Licensing and Regulation efforts. Moreover, program revenues have been found to fall far short of funding the administration of the licensed breeder program; yet despite these disproportionately high administrative costs, the Commission found that Texans still primarily rely on other law

Nikki McClendon, Mrs.
Self
Pearland, TX

Against!!!

Mistelle Stevenson
Self
Waxahachie, TX

This bill is intrusive to individual privacy and dictates decisions that should be left to the pet owner and their veterinarian because it does not distinguish between a private citizen, a rescuer, commercial breeder and hobby breeder. This bill does nothing to better the care of the pets and gives more power to the state ... this bill takes us one step closer to becoming California ... don't vote for this over reach of state power and control.

Kent Taylor

Self..... retired from medical radiology

Daingerfield, TX

I oppose this bill as written. I do not breed, but I show purebred cats (all of which are neutered) and am a member in good standing with The International Cat Association. The bill may be intrusive and does nothing to improve the quality, nor care for animals themselves.

Carolyn Byars, Retired

Mistelle Stevenson Breeder

Midlothian, TX

the proposed legislation. Currently, dog and cat breeders in Texas are required to obtain state licenses if they own 11 or more intact females and sell 20 or more cats/dogs in a license year. House Bill 2238 (<https://s3.amazonaws.com/fn-document-service/file-by-sha384/23020750346ebd81d73832e91f44905f6eb03bbb9f59cd4f41bfb5b68c1b1f4868bb06dbfb322cadb06e791b7551b068>), House Bill 274 (<https://s3.amazonaws.com/fn-document-service/file-by-sha384/83597d775435aa03dbed2a34cd3637da13ad32f0d92b961072d9e3bb1b7d337e61d3b586647285375ce8f2aee030c0a9>), and Senate Bill 876 (<https://s3.amazonaws.com/fn-document-service/file-by-sha384/05905e03fc26936fb105850a8c82a8763960340b8fa833b745aea03322a73ea6cbf999074cae2297e3b404aac7bb9d1e>) are identical bills that will lower the licensing threshold in Texas to 5 intact females over 6 months of age, and will remove the requirement that a breeder must sell 20 cats before a license is required. The proposed law presumes that intact adult females are kept for breeding. It would be incumbent on cat owners to prove that the cats are not being kept for breeding purposes. There are veterinary reasons influencing whether cats and dogs are spayed or neutered, a decision best left to owners and their veterinarians. Because the proposed law fails to take into account actual commercial activity, this would create a situation in which mere ownership of cats in private homes would subject owners to treatment and regulation as commercial entities. Moreover, it eliminates distinctions between commercial entities, pet owners and hobby breeders.

Changing the licensing thresholds will force those who meet the new definition to: a) open their private homes (including bedrooms) to inspections following an application and at least once every 18 months thereafter; b) Pay at least a \$300 permit fee for every license year, c) Meet ambiguous housing standards for the cats in their care; d) Submit to a criminal background check when applying for licensure and e) Submit a yearly report and application for licensure accounting for all animals held at a facility

The above does almost nothing to ensure better care of cats and dogs in private homes and creates a significant invasion of privacy. Further, the proposed law interferes with decisions which should be left to owners and their veterinarians.

In June 2020, the Texas Sunset Advisory Commission recommended that the Dog and Cat Breeder Act should be eliminated due to fundamental flaws with the law that created it, the program's ineffectiveness, and significant operational costs. Program revenues were found to fall far short of funding the administration of the licensed breeder program. Despite these disproportionately high administrative costs, the Commission found that Texans still primarily rely on other laws that predate the program.

Hobby breed

ers aim to produce healthy cats which meet breed standards, rather than for commercial purposes. Enactment of this law, would force many people to stop

Leslie Formolo, Colonel, USAF ret
self
Spring Branch, TX

I support the American Kennel Club's recommendation that commercial breeder regulation should be based on a commercial activity requirement; and the elimination of this commercial activity requirement would create a policy whereby many home-based hobbyists' mere ownership of dogs would require them be regulated as commercial entities. It is also important to note that in June 2020, staff of the Texas Sunset Advisory Commission recommended that the Dog and Cat Breeder Act should be eliminated due to fundamental flaws with the law that created it, the program's ineffectiveness, and significant operational costs. Ultimately, the Dog and Cat Breeder Act did not sunset because former State Senator Eddie Lucio moved to "sever" the Commission Staff's recommendation. Additionally, the Dog and Cat Breeders Act provides significant statutory exemptions and unenforceable requirements that undermine both the program's goals and Texas Department of Licensing and Regulation efforts. Moreover, program revenues have been found to fall far short of funding the administration of the licensed breeder program; yet despite these disproportionately high administrative costs, the Commission found that Texans still primarily rely on other laws that predate the program. Finally, this is not what I believe the Texas State Government should be focused on, nor why I voted for my local and state representatives.

Cheryl Allie
Self
Grand Saline, TX

I am opposed to this bill. It will place responsible small hobby breeders under laws applicable to commercial breeders. This will cause undue restrictions in an effort to prevent abuses already covered under other laws. It will also put further financial stresses and work load on the already overburdened State agencies responsible for overseeing and enforcing these new requirements.

Michelle Reeves
self - Veterinary Hospiatl Administrator
Cleveland, TX

This Bill will significantly hurt breeders and Handlers that show dogs in licensed events. Females must be intact to participate in these events. Professional Handlers make a living showing these dogs. The law should remain the same at 20 intact females as this is reasonable number to require licensing. I am a breeder of show dogs and I have 2 daughters that are Professional Handlers and they would be put out of work in this profession if this bill passes. Please concentrate efforts on leash laws and stray animal laws and leave responsible breeders alone.

Andrew Rutherford
Self Lover
Porter, TX

HB 2238
By definition, this would make preservation breeders be forced into puppy mill like factories of producing as many puppies as possible, for the highest rate and at the lowest cost.

Passing this bill could easily breed many breeds INTO extinction due to poor management and unnecessary government involvement.

Thomas McIntire
Texas Bulldog Club
Abilene, TX

This bill exceeds the federal regulations for commercial kennels. There are many thousand people in Texas who raise AKC registered dogs for sporting events , Conformation, obedience, agility., therapy.and service , who own as many as five intact females. Many Older females who are retired from their designated work are too old to spay as it would pose a serious health risk . I along with the millions of Texans who fit this catagory urge you to oppose HB 2238 and its companion bills.

Jenny Hamons
Self. Retired.
Moody, TX

Please consider voting against this bill. It adds more regulations to the quality breeder. Those that don't love the breed, but follow the money will not be detained from selling poor quality animals.

I

Hobby breeders aim to produce healthy cats which meet breed standards, rather than for commercial purposes. Enactment of this law, would force many people to stop breeding because of the invasions of privacy and other burdens imposed by this law. The proposed law infringes on the privacy rights of Texans, does not ensure better treatment for the cats and dogs in their care the administrative costs will almost certainly outweigh any stream of revenue. Please do not advance this Bill.

Andrea Scott
self
College Station, TX

This bill will penalize preservation breeders who are working to improve their breed. Enforcement of current laws on commercial breeders will do more to curb the surplus pet population in Texas. This bill will also intrude unnecessarily on the lives of thousands of Texans who have dogs that they wish to keep intact past 6 months of age for a variety of personal reasons, including the dog's health and competing with the dog in a variety of dog sports. This is a) government overreach, and b) could negatively impact dog sports in Texas, which brings money into a variety of communities through show site fees, hotel, gas, and restaurant bills for those who travel to show and events. Commercial breeders should be regulated, and they currently are. Hobby breeders, often people working over decades to preserve and improve their chose breed, should be supported. This bill penalizes the small breeder, while doing nothing to encourage enforcement of current regulations on the commercial breeders.

Amanda Pratt
Scout's Legacy Service Dogs
FLOWER MOUND, TX

My name is Amanda Pratt and I am the CEO of Scout's Legacy Service Dogs. I am approaching you today to oppose the bill HB2238 the will require anybody with 5 intact females to receive a breeding license. I strongly urge you to reconsider voting this into affect, as the repercussions will not protect those who are trying to breed correctly, but encourage those who are in it for commercial use only.

A few things to point out in this bill. 5 females being 6 months and older is easy to achieve. Which means pet people could reach that quickly, but they won't ever know the laws well enough to know they need to apply for this license. For my line of work, I constantly have service dogs in training coming in and out of my home who are intact. I am at 5 intact females over 6 months right now. Keeping service dogs intact until 2 years of age is best for their health and longevity of work life. These dogs are not just pets, but lifelines for those who need them most. Jeopardizing their health puts their handlers at risk for more issues later on.

Lastly, as a breeder of Golden Retrievers who breeds for service dog work, I don't breed my dogs just for the hell of it. I health test, title, and work my breeding stock only to have 2-3 litters a year. That is no where near enough to cover expenses on the money placed into the program. Breeding is not something quality people do to make money, but to improve the breed. You have to grow out your puppies for 2 years, and not everything you raise will make it to the breeding stages. So again, 5 intact females thinking they will all be breeding, is unattainable for quality people.

I highly suggest the government cracks down on the current laws. Too many times breeders will report those who are breaking the laws, or who have obvious animal abuse/hoarding scenarios, and Animal Control will not do anything. If we can't even control people with the current laws in place, how are we supposed to control them with the stricter laws? This new bill will hinder more quality dog and cat breeders who are helping the animal population than stop the issues we have today.

Our shelters are full of pets who bred by accident or people who want their dogs to have at least one litter. I worked in the rescue world for years, I have seen a lot. The breeders who did commercial breeding and followed USDA laws were the ones who contributed to the shelter population. The breeders you are trying to stop are the ones who step in and help, because they make sure to not overwhelm themselves with dogs to ensure they are there for their puppies for the lifetime of that dog. More programs for the poor populations to receive spay and neuter help would be best to help the dog population. And more ways to get information on dog care is even better. Those of us who work with animals everyday are not the ones who are given the voice to speak on these issues, and that is why we are failing our animals.

Vicki Jo Harrison
The International Cat Association President
San Antonio, TX

I am the President of The International Cat Association (“TICA”) which is an international cat registry headquartered in Harlingen, Texas. I am writing to oppose the proposed legislation which would impact hobby breeders and negatively impact TICA, a Texas non-profit corporation.

We oppose the proposed legislation. Currently, dog and cat breeders in Texas are required to obtain state licenses if they own 11 or more intact females and sell 20 or more cats/dogs in a license year. House Bill 2238, House Bill 274, and Senate Bill 876 are identical bills that will lower the licensing threshold in Texas to 5 intact females over 6 months of age, and will remove the requirement that a breeder must sell 20 cats before a license is required. The proposed law presumes that intact adult females are kept for breeding. It would be incumbent on cat owners to prove that the cats are not being kept for breeding purposes. There are veterinary reasons influencing whether cats and dogs are spayed or neutered, a decision best left to owners and their veterinarians. Because the proposed law fails to take into account actual commercial activity, this would create a situation in which mere ownership of cats in private homes would subject owners to treatment and regulation as commercial entities. Moreover, it eliminates distinctions between commercial entities, pet owners and hobby breeders.

Changing the licensing thresholds will force those who meet the new definition to: a) open their private homes (including bedrooms) to inspections following an application and at least once every 18 months thereafter; b) Pay at least a \$300 permit fee for every license year, c) Meet ambiguous housing standards for the cats in their care; d) Submit to a criminal background check when applying for licensure and e) Submit a yearly report and application for licensure accounting for all animals held at a facility. The above does almost nothing to ensure better care of cats and dogs in private homes and creates a significant invasion of privacy. Further, the proposed law interferes with decisions which should be left to owners and their veterinarians.

In June 2020, the Texas Sunset Advisory Commission recommended that the Dog and Cat Breeder Act should be eliminated due to fundamental flaws with the law that created it, the program’s ineffectiveness, and significant operational costs. Program revenues were found to fall far short of funding the administration of the licensed breeder program. Despite these disproportionately high administrative costs, the Commission found that Texans still primarily rely on other laws that predate the program. Hobby breeders aim to produce healthy cats which meet breed standards, rather than for commercial purposes. Enactment of this law would force many people to stop breeding because of the invasions of privacy and other burdens imposed by this law. The proposed law infringes on the privacy rights of Texans, does not ensure better treatment for the c

Ward McAfee
Self
Weatherford, TX

I am registering my opposition to HB 2238, HB 274 and SB 876.

These bills are a direct threat to the hunting, service, performance and pure-bred dogs and all those that are involved with these interests. These bills will only keep the “honest people honest” and will never be self-supporting, it will wind up costing Texas taxpayers untold amounts of money. These bills will never accomplish their goal but will only further the interests of the Animal Rights extremists ultimate goal of ridding the world of pets and livestock. This is TEXAS, a state rich in its history of producing the best dogs and livestock in the United States. HB 274, HB 2238 and SB 876 only serve to punish responsible breeders and dog owners and infringes on their constitutional rights by subjecting them to inspections of their private homes by requiring them to meet the requirements of state licensure even if they never sell a single dog or breed a litter. I urge you to join me in opposing this example of government overreach and freedom infringement.

Sincerely,
Ward L. McAfee
7369 Comer Lane
Weatherford, TX 76085

Jennifer Feeney, Professional Dog Trainer
SuperStar K9s
Kerrville, TX

As an avid dog lover and dog trainer who is familiar with rescues as well as breeders, I am in support of this bill to help regulate dog breeding!

It is way to easy for people to obtain dogs with or without papers to just breed and produce puppies. Also, unfortunately , dog breeders that have multiple females breed multiple times a year, and although they may have restrictions on breeding a puppy they sell in the future, there is little being done to enforce it, often with breeders URGING new owners to wait 2 plus years before spaying or altering a puppy, which had been been proven to result in accidental breedings, as most new puppy owners are not set up to deal with a pups change of hormones as they mature, i,e heat cycles, os male dogs escaping enclosures due to females near by in heat. Putting restrictions and consequences on abilities of breeders, or persons who routinely produces puppies for profit, fun or show world rank and status... is one way of minimizing the mass production of a person who thinks their dog is PROVEN stock to be worthy of breeding. Many breeders these days go by Merit and Character, DNA tests, and Ribbons , to state their dog should be bred... and while that does contribute to future healthier generations of puppies, you can literally find THOUSANDS OF BREEDERS for many of the same breeds doing this many many times a year, in fancy ribbon fronted kennels, that should be seen as Puppy Mills! I have seen first hand many breeders of multiple dogs over the years and while this is not a personal attack against dog breeders in general, I am proud to support this bill, limiting the number of breedings easily done per year by breeder. DOGS ARE NOT ON THE ENDANGERED Species list, yet many breeders will act like THEIR PARTICULAR KENNEL OR NAME is more important than the overall welfare of THOUSANDS OF THE SAME BREEDS that have been offed or surrendered in shelters, or are of a half mix of their type of dog. Until Breeders are willing to help with the shelter crisis of ALL dogs, I think MAJOR changes need to happen and I urge you all to consider these facts I have mentioned. Thank You for Your Time and Considerations on Behalf of Myself and All The Future THOUSANDS MAYBE MILLIONS OF PUPS you will help keep in good homes, and out of shelters!

Kelly Crouch
Self
Cedar Park, TX

I oppose HB 2238. The Dog and Cat Breeders Act has been an abject failure since its enactment. Proponents sold the bill claiming it would reduce "puppy and kitten mills" in the state and be self-funding. It has failed spectacularly on both counts! The June 2020 Sunset Commission Staff Report proves the failure of the Act to protect animals in the state when it reported that only 3 of the 22 SPCA documented seizures from 2012 to 2019 involved TDLR licensees. That is less than 15% of the seizures! The breeder licensing program cannot reasonably be considered anything but a failure with those numbers. It has also failed to be self-funding and is a complete waste of tax dollars that could be put to better use as other existing laws clearly do far more to protect our pets than state licensing of dog and cat breeders has. Proponents grossly underestimated the number of breeders in the state (licensees currently number 158) but won't be satisfied until they convince the state, by hook or by crook, to invasively manage even small in-home hobby breeders. This will significantly add to the cost of the hobby that will drive these small dedicated breeders out of their hobby, which, in turn, makes it much harder and more expensive for pet owners like me who want a pedigreed cat or purebred dog to find their choice of pets. Please oppose House Bill 2238.

Shea Charlotte
Self
Live Oak, TX

I oppose the proposed legislation. Currently, dog and cat breeders in Texas are required to obtain state licenses if they own 11 or more intact females and sell 20 or more cats/dogs in a license year. House Bill 2238, House Bill 274, and Senate Bill 876 are identical bills that will lower the licensing threshold in Texas to 5 intact females over 6 months of age, and will remove the requirement that a breeder must sell 20 cats before a license is required. The proposed law presumes that intact adult females are kept for breeding. It would be incumbent on cat owners to prove that the cats are not being kept for breeding purposes. There are veterinary reasons influencing whether cats and dogs are spayed or neutered, a decision best left to owners and their veterinarians. Because the proposed law fails to take into account actual commercial activity, this would create a situation in which mere ownership of cats in private homes would subject owners to treatment and regulation as commercial entities. Moreover, it eliminates distinctions between commercial entities, pet owners and hobby breeders.

Changing the licensing thresholds will force those who meet the new definition to: a) open their private homes (including bedrooms) to inspections following an application and at least once every 18 months thereafter; b) Pay at least a \$300 permit fee for every license year, c) Meet ambiguous housing standards for the cats in their care; d) Submit to a criminal background check when applying for licensure and e) Submit a yearly report and application for licensure accounting for all animals held at a facility. The above does almost nothing to ensure better care of cats and dogs in private homes and creates a significant invasion of privacy. Further, the proposed law interferes with decisions which should be left to owners and their veterinarians.

In June 2020, the Texas Sunset Advisory Commission recommended that the Dog and Cat Breeder Act should be eliminated due to fundamental flaws with the law that created it, the program's ineffectiveness, and significant operational costs. Program revenues were found to fall far short of funding the administration of the licensed breeder program. Despite these disproportionately high administrative costs, the Commission found that Texans still primarily rely on other laws that predate the program.

Hobby breeders aim to produce healthy cats which meet breed standards, rather than for commercial purposes. Enactment of this law, would force many people to stop breeding because of the invasions of privacy and other burdens imposed by this law. The proposed law infringes on the privacy rights of Texans, does not ensure better treatment for the cats and dogs in their care the administrative costs will almost certainly outweigh any stream of revenue. Please do not advance this Bill.

Rebecca Fletcher
Texarkana Kennel club
De Kalb, TX

These regulation would put young dogs in harms way by forcing owners to spay or neuter dogs at young ages, permanently altering their hormones and impacting their growth and health. Furthermore, this is government overreach of private citizens and their property. The owners will be financially responsible for the health repercussions resulting from this regulation. Hobby breeders are not the problem, rather puppy mills are. This regulation won't prevent puppy mills from over breeding but rather will stop hobbyists with limited funds from being able to produce healthy ethically breed dogs.

Amanda Sones
Self, customer service representative
Spring, TX

Please please pass this bill and bring Texas law into line with standards commonly use in the industry, other states, and the USDA. Please help end animal cruelty.

Laura Weaver
retired/self
The Woodlands, TX

Please support HB 2238. By doing so, you will bring Texas law into line with standards commonly used in the industry, other states, and the USDA. The cruel and inhumane treatment practiced by some puppy mills needs to be stopped. I implore you to vote for this bill to improve the lives of our pets!

LaDanna Bostwick
DFWLRC
Athens, TX

I strongly oppose this bill. Please fight for the rights of Texans to have our beloved pets and the government in our backyards. There are ethical breeders whom like me do extensive health testing on all dogs who work as service dogs and change the lives of many. We don't need more regulation as there is simple no funding to support this.

Carolyn Mitchell, Rev
Texas Women for Justice
CONROE, TX

Please support HB2238 and prevent the cruelty that is currently happening at unlicensed, large-scale facilities, allow the law to better monitor the industry it was designed to regulate, and bring Texas law into line with standards commonly used in the industry, other states, and the USDA. Thank you.

Paul Peck
BlackGold Labradors, Selah Energy Partners
Haslet, TX

This is a money grabbing overreach that has ZERO to do with protecting the animals. Once again, big government thinks they are the answer for everything...YOU ARE NOT. You want to increase penalties for those found to abuse an animal or run a puppy mill, then feel free... but you have zero right sticking your government noses into the business of good red blooded American dog lovers. In my 25 plus years of experience of working with and around the breeding of hunting dogs. there is no one more concerned with the welfare and proper breeding of their dogs. The proper thing to do is to stick it to those that are found to be harmful and irresponsible with their dogs. We can and do monitor those within our circles and would not hesitate to make a call if something is inappropriate. GET YOUR HANDS OUT OF OUR BUSINESS AND OUT OF OUR POCKETS. DON'T TREAD ON ME AUSTIN.

Lindsay Nieman
Self
Saint Hedwig, TX

I appreciate Texas efforts to address our stray and negligent dog populations, but this is not the way to address it. All current research shows a significant increase in health issues in dogs spayed or neutered prior to 1 age, and most suggest optimum age is 2-6 years old. Responsible owners should be containing their dogs and waiting to alter them. This bill does not help with understaffed enforcement, it just subjects good owners to government overreach. Any laws related to breeders needs to be contingent on the actual breeding and sales activity, not simply possession of intact animals, especially those that are properly contained.

Here are multiple links to research studies showing the negative health impacts of early spay and neuter, which this bill would encourage:

<https://www.akcchf.org/news-events/news/health-implications-in-early.html>

<https://www.aaha.org/publications/newstat/articles/2020-08/data-on-the-consequences-of-early-neutering-continues-to-mount/>

<https://iaabcjournal.org/spay-and-neuter-surgery-effects-on-dogs/>

Also of note, is that dog sport enthusiasts generate extensive revenue as people come from around the country to participate including the Houston World Series of dog shows events held in the summer, along with major shows in Longview, Dallas, and San Antonio. The clubs that host these events are largely run by small hobby breeders that keep intact animals in order to participate. Many would cease to participate under these overreaching regulations.

Marlo Grayson
Self
Van Alstyne, TX

A six month female should in no way be considered as breeding stock. Dr Karen Becker has numerous articles and you tube videos discussing the health risks of early spay and neuter. How do you even police if a bitch is actively being bred? It's ludicrous. As an AKC golden retriever conservation breeder and competitor I have several tgat May never breed but are kept intact for health reasons.

Requiring a license does nothing to mitigate the unethical breeders, the ones not understanding if their pet should actually improve the breed, do nothing to prove their merit against the breed standard, do nothing in regards to critical health and DNA testing for known diseases to mitigate risks. The breeder of mixed breeds will continue to go under the radar or in best case scenario will gain licenses to do the unethical.

Do we need to sensor breeders? Maybe but gaining a licenses is nothing more than creating revenue for the state. Then we offset that by the expenses incurred to oversee it(personnel filing as well as monitoring).

If I had 10 litters a year then maybe that warrants an AKC inspection but not having 5 intact females that may or may not breed.

Cliff Hamons
Self. Retired.
Moody, TX

Please vote against this bill. Once again quality breeders will be pushed out of their hobby allowing the money hungry breeders more access to the public.

Thank you.

Helen McClure
Self, hobby breeder
Burnet, TX

Those of us that own AKC licensed dogs that regularly perform health testing on our dogs and proper vaccines for our litters are not the issue here. It's the numerous backyard breeders or those looking to make money by selling puppies without the adequate health testing for that breed.

Erica Lawrence
self
Spring, TX

I support this proposed legislation. This will allow the law to better monitor the industry it was designed to regulate, and will also bring Texas law into line with standards commonly used in the industry, other states, and the USDA.

Jennifer Conner
self
The Woodlands, TX

I encourage the committee to move HB 2238 to the full legislature. This bill is much needed in protecting a very vulnerable population, animals, that cannot speak for themselves. It is cruel to allow human beings to treat animals with disregard and these practices should be stopped. HB 2238 is much needed and it's about time these loopholes are closed. I support HB 2238 and so should you.

Karen Cavanagh
Karen
The Woodlands, TX

There are far too many animals in this state with no permanent loving home. Breeding should be minimized by all means necessary and I think licensing is a good first step. Please consider the animals who cannot speak for themselves.

Peter Harrison
Self
Pecos, TX

Against this Bill. I have hunting dogs and use them for Veterans and kids. I do not sale dogs.

Gary Poon
Houston Humane Society
Missouri City, TX

On behalf of the Houston Humane Society (HHS) Board of Directors and staff, I'm writing to express my strong support for HB 2238.

Since 2011, the Texas Licensed Breeders Program (TLBP or Program) has provided much-needed oversight of dog and cat breeders in Texas, successfully preventing cruelty at licensed facilities across the state. However, the exemptions in the existing law have inadvertently created loopholes that allow large-scale commercial breeding facilities to circumvent the standards set by the Program. Undocumented cash sales of cats and dogs enable commercial breeding facilities to evade lawful compliance with the TLBP. Additionally, breeders with fewer than 11 breeding females are exempt from meeting the Program's basic standards of care. A facility with a potential for over 130 dogs, puppies, cats, or kittens can operate without oversight. The current loopholes in the TLBP have dire consequences for thousands of animals across the state each year.

As an organization whose mission is to prevent animal cruelty and abuse, HHS supports amending the TLBP to redefine large-scale breeders as commercial facilities with 5 breeding females and remove the arbitrary 20-animal sales qualification easily hedged with cash exchanges, both of which are accomplished by HB 2238. These reforms to the TLBP are critical to ensure that all breeders at commercial breeding facilities meet basic standards of care and maintain a humane environment for animals.

HB 2238 will:

1. Provide better oversight of commercial breeders, improve living conditions for thousands of dogs and cats, and protect consumers.
2. Ensure the Texas License Breeders Program works as lawmakers intended.
3. Apply universal standards to all commercial breeding facilities to eradicate the suffering of all dogs and cats being bred for profit.

Thank you for your support of HB 2238 and your dedication to preventing animal cruelty and abuse in the state of Texas.

Deborah Leiber
self
THE WOODLANDS, TX

I am a Texas resident and a longtime owner and lover of dogs. Please support HB 2238 regulating commercial dog breeders. The Texas Licensed Breeders Law, which regulates large-scale cat and dog breeders needs to be strengthened. Too many breeders are currently not licensed and inspected, and they can and easily skirt reporting sales.

This bill is necessary to prevent the cruelty that is currently happening at unlicensed, large-scale facilities, allow the law to better monitor the industry it was designed to regulate, and bring Texas law into line with standards commonly used in the industry, other states, and the USDA.

Thank you in advance for supporting HB 2238.

Sincerely,
Deborah Leiber

Teresa McKenna, Opposition of Bill 2238
AKC Breeder
Richardson, TX

I greatly oppose this bill as it will do nothing to improve the welfare of dogs and it will place a burden on ethical breeders, who get clearances and raise their dogs in their homes. As a hobby breeder, all my dogs are raised in my home, have DNA testing on the parents, and meet all the code of ethics for my breed club, which requires me to have hip, elbow, heart, and eye clearances from a specialty vet. They live in my home and travel with us on vacation.
We are not the type of breeders that need federal regulation.
Thank you for considering not passing this bill

Sherell A Guichard-Thomas
Self
Lubbock, TX

I believe that commercial breeder regulation should be based on a commercial activity requirement; and the elimination of this commercial activity requirement would create a policy whereby many home-based hobbyists' mere ownership of dogs would require them be regulated as commercial entities. I have shown and trained dogs for over 40 years; rarely breed, but at times had more than 4 females. The law you are proposing is over reaching for hobby breeders.

Kathy Sutton
self- retired veterinarian
Houston, TX

I oppose this bill

Cindy Gray
Self
Magnolia, TX

. I strongly oppose HB 2238. This bill if passed will constitute one of the most restrictive state breeder licensing programs in the United States. It will only serve to punish responsible dog owners and breeders and will expose their private homes to inspection even if they never sell a dog.

Paula Krueger
Self
Granbury, TX

Opposed to this bill. Will not regulate animal welfare in any way.

Nancy Simmons, Mrs.
Self; retired
Flower Mound, TX

HB 2238 if passed will constitute one of the most restrictive state breeder licensing programs in the United States. It will only serve to punish responsible dog owners and breeders and will expose their private homes to inspection even if they never sell a dog. Proponents of this bill have indicated their belief that this will bring Texas in line with federal USDA regulations. However, this bill drastically expands state law and goes significantly beyond federal regulations, which apply to those with more than 4 breeding females and are selling dogs sight unseen. This bill will not do anything to improve the welfare of dogs and create significant burdens on hobbyists who raise dogs in their homes. I am a hobby dog breeder involved in AKC dog shows. This bill will hurt responsible dog owners and breeders. Do not pass this bill, PLEASE!!

Elizabeth Ellis

Self

Bedias, TX

As a pet owner and breeder and hobbyist with AKC events for my own enjoyment I highly oppose this bill! Just because I own 5 dogs and breed very limited should not be cause for regulation. I am not in this for money but my own love of dogs and the spirits we participate in. Focus efforts and legislation on true puppy mills and leave the small hobbyists/ responsible breeders who maybe breed once a year out of this absurd legislation. It is my American right to own, breed and show our dogs responsibly and with dedication to our breeds. Focus on going after animal puppy/ cat mills and those who do not care for their animals and only breed for financial gain.

Stephanie Evans

self

GARDENDALE, TX

The way that HB 2238 reads now is crazy. I know several dog owners who have intact males or females in their homes but do not breed. They actively compete with their dogs in activities that do not allow the dog to be neutered.

Even AKC believes that commercial breeder regulation should be based on a commercial activity requirement, and the elimination of this commercial activity requirement would create a policy whereby many home-based hobbyists' mere ownership of dogs would require them to be regulated as commercial entities.

They would need to open their private homes or facilities to inspections following an application and at least once every 18 months thereafter, they would pay at least a \$300 permit fee for every license year

Meet ambiguous housing standards for the dogs in their care. This is ridiculous, they are running a household not a business.

They would also have to submit to a criminal background check when applying for licensure. Again, this is a private home, not a business. If you want that of businesses then structure it so that commercial activity is a must before they have to license. Make that more clear in the bill. They would also need to submit a yearly report and yearly application for licensure accounting for all animals held at a facility. Again this is a person that loves dogs and can afford to take care of several at a time. They are not hobby breeders- The hobby breeders would have to stick within the guidelines of commercial activity regulations.

This is micromanaging at its finest. I believe that BREEDERS need to be regulated- those that churn out puppy after puppy, have no health testing or parents or puppies. They breed one breed to another just to make a generic "pocket pet" and charge astronomical prices for these mutts.

Please rethink this HB 2238 as it stands for the family that may have some intact dogs to compete with but DO NOT breed.

Danelle Brown

self

Georgetown, TX

As a former Veterinary Tech and current American Kennel Club Judge I am well aware of the the importance of responsible breeders. This bill will NOT help to ensure the welfare of dogs and in fact will drive more prospective owners to the dark and dirty websites of mass producers and scam artists. I have in the past had multiple intact females in my home yet never had more than one litter a year. I sold my puppies on spay/neuter contracts and guaranteed the health of a puppy and would take it back at anytime in it's life if it's owner no longer wanted it. That is what responsible breeders do. To require licensing would put unnecessary burdens on hobby breeders who do it for the love of their breed, not to make a quick buck. By requiring licensing for hobby breeders, consumers will be forced to purchase dogs sight unseen, which is dangerous. Responsible hobby breeders will not only welcome a potential new owner to their home but will most likely require a meeting to make certain the new home is acceptable. This bill would limit the number of people who are reputable from breeding their animals. They aren't the ones filling the shelters with puppies. That's your irresponsible pet owner who lets their dog run loose or has a litter "so my child can see the miracle of birth", and the large scale breeding operations who are turning out poor quality, unsocialized pups as a business. No matter what law you pass irresponsible people will still be out there and you all know that. Making it harder on the average hobby breeder, who occasionally offers well bred, healthy, socialized puppies to the public, isn't the way to go. If the Animal Rights people have their way none of us will be allowed to own well bred, purebred dogs. Please don' California my Texas.

Leslie Walenta
Self
Wharton, TX

I do not agree with the passage of this bill

Kathleen Crea
Self
The Woodlands, TX

I support this House Bill

Ashley Miller
Self
Cumby, TX

This bill does not help animals.
There are many great hobby breeders who show dogs who own more than 4 intact animals and do not make a profit off of them.
As long as buyers are not buying sight unseen these breeders should not be targeted.

We ourselves show and own more than 4 intact dogs and we have people come to our place and meet the dogs and puppies before they buy.

Carolyn Hudson, Ms.
self, retired
The Woodlands, TX

I am in favor of preventing animal cruelty, puppy mills, making stronger rules to protect animals

Heather Miller
Windmill Cardigan Welsh Corgis/Breeder/Owner/Handler
Cumby, TX

Sponsors have indicated their belief that this will bring Texas in line with federal USDA regulations. However, this bill drastically expands state law and goes significantly beyond federal regulations, which apply to those with more than 4 breeding females and are selling dogs sight unseen. This bill will not do anything to improve the welfare of dogs and create significant burdens on hobbyists who raise dogs in their homes.

Linda Smith
Self Retired
TERRELL, TX

I am Strongly Opposed to this Bill. This bill will not do anything to improve the welfare of dogs and create significant burdens on hobbyists who raise dogs in their homes.

Rebecca Barnes

Nolan River Kennel Club, The Siberian Husky Club of Metropolitan Dallas

Palestine, TX

I am adamantly opposed to HB 2238. This bill would punish constituents who have chosen to share their lives with several dogs. Even if they don't breed them, the fact of owning 5 or more intact female dogs would require a yearly license for a \$300 fee and inspection of their home by strangers. It would remove the commercial sales requirement of the current regulations and make it just about owning dogs. Does someone who has a garden have to be licensed as a produce dealer? Does someone who owns 5 cars have to be licensed as a dealer? If they don't breed their dogs, why should they have to be a licensed Breeder?

There are adequate existing regulations in place that have a commercial component, that of actually selling puppies in addition to owning intact female dogs. I ask you to be responsible and respectful of your constituents and stop this overreaching and onerous bill from going any farther.

Susan Hatfield

Dallas Miniature Pinscher Club

Aledo, TX

We respectfully request that HB2238 be defeated as it poses an onerous burden on the small hobbyist breeder who either never sells a dog or sells so few as to not even be considered a "Breeder". As show dogs must be intact, as in sexually unaltered, in order to be shown, this destroys the foundation of the small hobbyists show program, and requires a ridiculous requirement to abide by the same USDA rules that govern commercial operations.

The small hobbyist breeder values their show animals very highly and these dogs are cared for better than any USDA requirements would insist on. Please be our voice in this matter and vote NO on this overreaching bill.

Thank you,

Susan Hatfield

Joyce yarling

Self retired

Giddings, TX

Regulations written by legislatures seldom solve problems and create benefits intended. Legislators seldom have the true awareness to create a bill that benefits anyone but their own power grab. We need less state and federal regulation. Please vote this bill down.

Kim Cain

Self Secretary

Midland, TX

Dear sirs;

This bill if passed will constitute one of the most restrictive state breeder licensing programs in the United States. It will serve to punish responsible dog owners and breeders and will expose their private homes to inspection even if they never sell a dog. This is not a step that will accomplish what you are after. Hobby breeders that breed seldom but keep dogs for show purposes can not spay their dogs and still show them. So now you would be licensing individuals to own dogs just to participate in a sport.

In addition hobby breeders are not the problem. In general their dogs are beloved pets that live in their homes just like your pets. These breeders follow responsible practices and you do not find these dogs wandering the streets or in the shelters. When they do have a carefully planned litter the offspring are placed with the utmost care for the immediate and long term well being of that puppy.

This would be a huge invasion of privacy to have the government inspecting private homes.

Please consider the true ramifications of this bill and vote "no" .. thank you for your consideration.

Pam Heard
Texas Resident
Rockport, TX

I am a Texas resident and am OPPOSED to this bill. The bill does nothing to improve the welfare of animals and is an intrusion into the rights of Texas citizens.

Jean Durdin
Self
Houston, TX

I oppose the passage of this Bill. Feel free to contact me by phone should you need any other information

PAULA BRINER
me
Weatherford, TX, TX

The proposed law presumes that intact adult females are kept for breeding, and it would be incumbent on cat owners to prove that the cats are not being kept for breeding purposes. There are veterinary purposes influencing whether cats and dogs are spayed or neutered and this is a decision best left to the owners and their veterinarians. Because the proposed law fails to take into account actual commercial activity (or lack thereof), this would create a situation in which mere ownership of cats (or dogs) in private homes would subject the owners to treatment and regulation as commercial entities. Moreover, it eliminates all distinctions between commercial entities, pet owners and hobby breeders.

Changing the licensing thresholds will force those who meet the new definition to:

- Open their private homes (including bedrooms and bathrooms) to inspections following an application and at least once every 18 months thereafter
- Pay at least a \$300 permit fee for every license year
- Meet ambiguous housing standards for the dog and cats in their care
- Submit to a criminal background check when applying for licensure
- Submit a yearly report and yearly application for licensure accounting for all animals held at a facility

The above does almost nothing to ensure better care of cats and dogs in private homes and creates a significant invasion of privacy. Further, the proposed law potentially interferes in decisions which should be left to the owners in consultation with their veterinarians.

It is also important to note that in June 2020, staff of the Texas Sunset Advisory Commission recommended that the Dog and Cat Breeder Act should be eliminated due to fundamental flaws with the law that created it, the program's ineffectiveness, and significant operational costs. Ultimately, the Dog and Cat Breeder Act did not sunset because former State Senator Eddie Lucio moved to "sever" the Commission Staff's recommendation.

The staff's findings indicated that the Dog and Cat Breeders Act provides significant statutory exemptions and unenforceable requirements that undermine both the program's goals and Texas Department of Licensing and Regulation efforts. Moreover, program revenues have been found to fall far short of funding the administration of the licensed breeder program; yet despite these disproportionately high administrative costs, the Commission found that Texans still primarily rely on other laws that predate the program.

The proposed law infringes on the privacy rights of Texans, does not ensure better treatment for the cats and dogs in their care the administrative costs will almost certainly outweigh any stream of revenue. Please do not advance this Bill.

Vickey Willard
Self
Houston, TX

I am very opposed to this house bill. My dogs are members of my family and treated as such. I actively am showing all my pets in competitions and as a hobbyist I wish to support and help improve breed standards.

Lea Bertsch
self - retired public school teacher
Crawford, TX

I am very much opposed to increasing restrictions on the number of breeding dogs from the current number of 11 to 5 in a household. This would have a negative impact on the hobbyist breeder who participates in the performance and conformation of purebred dogs. It is once again an issue that has been brought up numerous times in the past. The problem of regulation of the breeding of dogs in a puppy mill situation has restrictions already in place that can be enforced. As a 50 participant and native Texan in numerous dog events such as conformation, performance, herding, etc. I have attended these events in all areas of the state and I am an AKC breeder of merit. I strenuously oppose increasing restrictions as outlined in HB 2238. This bill would cause me to abandon my hobby and severely restrict my ability to participate in these dog events.

Robin French
Self
La Porte, TX

This bill will have no effect on those people that breed without care, ethics, or responsibility. Passing this will only hurt those that are responsible breeders. Please do not pass this bill

Deborah Rogstad
self - financial analyst
Denton, TX

Oppose HB 2238. Its provisions will only punish responsible dog breeders and do nothing to improve animal welfare.

Ruby Davis
self
Troup, TX

This bill is government overreach at it's finest. A household that owns FIVE intact female dogs or cats should NOT have to submit a license to do so, nor should the home be subject to state inspectors entering their home to inspect the animals and facilities. For goodness sake, this is a HOME!!! I view this bill as ONE MORE ATTEMPT by animal right's activists to take away our rights as Americans to own animals. If they can make it miserable and costly to own a few dogs or cats, then their mission will have been accomplished. PLease put this bill where it belongs, in the trash.

Peggy DeMers, Dr.
Self university professor
Spring, TX

This is over stepping personal freedom

Dede Fox
Dede Fox
The Woodlands, TX

IN FAVOR: Bill will prevent the cruelty that is currently happening at unlicensed, large-scale facilities, allow the law to better monitor the industry it was designed to regulate, and - bring Texas law into line with standards commonly used in the industry, other states, and the USDA.

Susan Tsujimoto
retired
Spring, TX

Thank you, Chairman King and honorable members of the Licensing & Administrative Procedures Committee, for hearing HB 2238 today.

I am a constituent of Representative Sam Harless, and I am writing in support of HB 2238 (Buckley), because this legislation will improve the standard of care for cats and dogs raised by Texas breeders.

From my experience working in animal rescue, nursing mothers and their offspring received the best care when the number of nursing moms, placed with a caregiver, was limited to two moms. For the caregiver, initially providing proper care is not so demanding. The foster takes care of the mom, keeping her fed watered and clean, and mom takes care of her kittens. But as the kittens grow, providing proper care becomes more demanding as the caregiver must see to the needs of both the mom and her kittens. In addition, the kittens need interactive playtime with their human caretaker to become socialized. I understand that fanciers of specific cats or dogs breeds, might have four breeding females, but five or more should require licensing and monitoring to ensure that those cats and dogs, which eventually become our pets, will be properly cared for. HB2238 will do that.

I'd like to urge the Committee to move HB2238 (Buckley) forward for full vote in the House. Thank you for considering this legislation and my testimony in support of it.

Susan Tsujimoto
self (retired)
Spring, TX

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I'd like to urge the Committee to move HB 2238 (Buckley) forward, for a full vote in the House. Thank you for considering this legislation and my testimony in support of it.

Deann Miller
Self
Bastrop, TX

Too restrictive for hobby breeders. Would force dedicated preservation reputable small hobby breeders to leave the state...as several good breeders have done already.

Sherry Clark, DVM
Self Veteranarian
Angleton, TX

My name is Dr. Sherry Clark. I am a practicing veterinarian in Angleton, TX. I have owned Angleton Veterinary Clinic for 29 years. I have concerns that 5 intact females is a very low number when the requirement of selling the offspring is removed. I am aware that there may be language changes to allow certain competition dogs to be excluded but the wording I have seen does not include all competition dogs. It does not address exclusions for pets that may have a medical reason not to perform surgery. It appears this bill wants to license anyone who owns 5 intact female dogs of any kind regardless of the reason for not spaying. Creating legislation for breeders that are unethical is a great idea but the wording in this legislation is so broad that ethical breeders, small breeders, competitors and pet owners with strong personal feelings about anesthesia will be forced to undergo licensure. This idea needs to be fleshed out before changing the current law.
