

## Pauline Easley

---

**From:** [REDACTED]  
**Sent:** Monday, June 27, 2016 3:14 PM  
**To:** Erule Comments  
**Subject:** Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

C Bradley

**Pauline Easley**

---

**From:** [REDACTED]  
**Sent:** Sunday, June 26, 2016 3:22 PM  
**To:** Erule Comments  
**Subject:** Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Jennifer Viana

## Pauline Easley

---

**From:** [REDACTED]  
**Sent:** Sunday, June 19, 2016 12:18 AM  
**To:** Erule Comments  
**Subject:** Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

We bought a full blooded AKC registered Pomeranian. One of the only dogs I have ever paid for, We bought her from a breeder. After looking at several places that were local, most of them were filthy, the dogs weren't cared for or in small cages. I was not aware that this was some type of common practice, We ended up finding someone out of town that after picking her up didn't appear much better. When we took her to her 1st vet appointment she had worms along with several other issues. It was a nightmare getting her papers and they likely weren't truthful or accurate She recently passed after 13 years . She was one of the best dogs Ive ever had but she had a long history of heath issues which I believe was solely due to the poor breeding practice. These places should have to follow some type of rules, have a license or be monitered

Thank you for your consideration.

Sincerely,

angie poire

## Pauline Easley

---

**From:** [REDACTED]  
**Sent:** Sunday, June 19, 2016 12:13 AM  
**To:** Erule Comments  
**Subject:** Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

nancy salvatierra

## Pauline Easley

---

**From:** [REDACTED]  
**Sent:** Friday, June 17, 2016 4:00 AM  
**To:** Erule Comments  
**Subject:** Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

I had adopted a dog later found out it was from a puppy mill and I was so ashamed at anyone that would think of doing this to any animal for their own benefit. They need to be stopped and arrested. So horrible!

Thank you for your consideration.

Sincerely,

Jo Rabbers

## Pauline Easley

---

**From:** [REDACTED]  
**Sent:** Wednesday, June 15, 2016 3:27 PM  
**To:** Erule Comments  
**Subject:** Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

Thank you for your consideration.

Sincerely,

Christine Wagner

## Pauline Easley

---

**From:** [REDACTED]  
**Sent:** Tuesday, June 14, 2016 12:44 PM  
**To:** Erule Comments  
**Subject:** Please Strengthen Dog Enclosure Standards for Commercial Breeders

Dear Ms. Easley,

As a Texas resident, I appreciate the opportunity to comment on the review of the Dog or Cat Breeders Program Rules. This program is so important to ensuring the welfare of dogs in commercial breeding facilities, and I hope the Department will strengthen the regulations to better protect these vulnerable animals and the consumers who ultimately purchase them.

In particular, I respectfully urge the Department to propose rules to afford breeding dogs more cage space, require a solid resting surface and ban the unsafe and unsanitary practice of stacking dogs' cages on top of one another. Breeding dogs typically spend their entire lives in these cages so these modest improvements are critical to ensuring a basic standard of wellbeing and safety for them.

My last dog was a rescue from a puppy mill. It took me years to heal most, but not all, of the trauma she suffered. Till the day of her death she was terrified of flying insects (Lord only knows why) and would run and hide in the dark till she felt safe enough to come back out. It didn't matter whether I was with her, trying to comfort her, or not. In my opinion, Texas should abolish all forms of puppy mills forever. Responsible breeders treat their dogs and other animals humanely and should therefore be the standard, rather than the exception, for anyone who seeks to breeds dogs &/or other animals!

I realize this submission may arrive after the request for comment deadline. I didn't know about this until today, June 14, 2016.

Thank you for your consideration.

Sincerely,

Bill Gates

**Pauline Easley**

---

**From:** [REDACTED]  
**Sent:** Tuesday, June 14, 2016 9:15 AM  
**To:** Erule Comments  
**Subject:** Dog or Cat Breeders Program (Title 16 - Texas Administrative Code - Chapter 91)  
**Attachments:** Title 16 Review.doc

Please find attached comments from the Pet Industry Joint Advisory Council (PIJAC) on the upcoming review Title 16.

Sincerely,

Bob Likins

---

**Robert Likins III**

Vice President of Government Affairs  
Pet Industry Joint Advisory Council (PIJAC)  
1615 Duke Street  
Alexandria, VA 22314  
202-452-1525 x1070  
[REDACTED]



**PET INDUSTRY JOINT  
ADVISORY COUNCIL**  
1615 Duke Street, Suite 100  
Alexandria, VA 22314  
Tel: 202-452-1525

June 8, 2016

**TESTIMONY OF THE  
PET INDUSTRY JOINT ADVISORY COUNCIL  
REGARDING THE REVIEW OF TITLE 16, TEXAS ADMINISTRATIVE CODE, CHAPTER 91  
TO THE TEXAS DEPARTMENT OF LICENSING AND REGULATION**

Nobody cares more about safe and healthy pet animals than does PIJAC. We have, for many years, provided a highly respected animal care certification program intended to ensure that employees are well trained in the care of the animals they sell; a program that is widely utilized not only by persons in the commercial pet trade but also shelters and humane societies throughout the country and one that has even been adopted as a statutory standard in some states. PIJAC has worked closely with the USDA on effective implementation of the Animal Welfare Act for pets since its inception almost fifty years ago, and has joined hands with state agencies to ensure adoption and enforcement of appropriate regulatory standards. Our association has long been recognized as the voice for a responsible and humane pet trade.

As such, we have a tremendous depth and breadth of experience with legislative efforts to verify and certify the health and well-being of animals sold as pets from the time they are born all the way until they are taken home and made part of the family. We have a responsibility to the animals themselves, not to mention our customers.

We at PIJAC applaud the state of Texas for demonstrating its concern for animal welfare. We believe the kenneling requirements as currently presented are generally reasonable and in line with U.S. Animal Welfare Act (AWA) requirements. We encourage Texas, however, to continue to consider emerging science in all its requirements. Comprehensive research is currently being conducted by Purdue University and we would encourage the Texas Department of Licensing and Regulation to consider incorporating those findings into the state's requirements when they become available.

We do wish to express concern that Texas permits anonymous reporting of violations. In order to protect the identity of an individual that is genuinely concerned for the welfare of an animal, we do understand the utility of such an arrangement. In practice, however, unjustified reports or neglect, abuse or unsafe conditions are often used as a harassment technique by activists opposed to the breeding of companion animals. PIJAC recommends that Texas implement a confidential reporting system that would protect someone expressing legitimate concerns but provide an opportunity for someone being harassed to seek relief. We further recommend that a penalty for false reporting be incorporated into the regulations.

We are also concerned by the makeup of the Advisory Committee. While breeders, veterinarians and animal control officers have an expertise in these matters, animal welfare organizations are often advocates for eliminating breeding entirely. PIJAC recommends that, in order to ensure that all constituencies are represented, that registries such as the AKC or ACA and industry trade associations be provided positions on the Advisory Committee.

We thank you for due consideration of our concerns, and would be pleased to provide the Texas Department of Licensing and Regulation with further information or assistance as you deem beneficial in your deliberations.

Sincerely,

Robert Likins  
Vice President, Government Affairs  
Pet Industry Joint Advisory Council



**Pauline Easley**

---

**From:** [REDACTED]  
**Sent:** Tuesday, June 14, 2016 7:35 AM  
**To:** Erule Comments  
**Subject:** Puppy Mills

Please consider the welfare of the puppy mill animals during this legislative session. If you saw some undercover videos, you would be sickened how these animals are treated. It is NOT humane to leave animals in the elements day and night month after month. They need proper housing to protect them from the elements. Wire enclosures are unacceptable.

Please work to strengthen the welfare for these animals.

**Deborah Brown**  
**Deborah Brown Communications**  
**214-649-1773**

[REDACTED]