

Linda Barrett

19 July 2022

Department of National Resources and Environment Tasmania

Submission on the draft Animal Welfare Amendment Bill 2022

Thank you for the opportunity to present a submission on the above subject.

My name is Linda Barrett, founder and operator of Pawfect Manners Dog Training. I have been a full-time professional dog trainer for more than 14 years and a dog training enthusiast the 30 years prior to that. I run private one-on-one training, group classes, behaviour consultations, behaviour assessments for Local Government, VCAT/Court hearings, train therapy dog teams to be accredited under the Victorian Government and provide board/train programs.

I am an accredited Dog Trainer & Behaviourist, on the Board of Members - Professional Dog Trainers Australia PMDT (Inc), a member of International Association of Canine Professionals IACP, and a member of Australian Association of Professional Dog Trainers AAPDT (Inc).

I am a qualified dog trainer recognised by the Minister of Agriculture in Victoria.

I have major concerns with the recent reviews to the Draft Animal Welfare Amendment Act 2022.

Specifically:

7. Section 8 amended (Cruelty to animals)

Section 8 of the Principal Act is amended as follows:

(a) by inserting in subsection (2)(c) "may" after "subjects or";

(b) by inserting the following paragraph after paragraph (j) in subsection (2):

(ja) uses a pronged collar, or a similar collar, on an animal; or

(c) by omitting "section 8A." from the definition of pest register in subsection (3) and substituting "section 8A;"

(d) by inserting the following definition after the definition of pest register in subsection (3):

pronged collar means a collar, designed for use on animals, that consists of a series of links or segments with prongs, teeth or blunted

open ends turned towards the animal's neck so that, when the collar is tightened, it pinches the skin around the animal's neck.

1. RISK IMPACT STATEMENT

Risk Impact Statement (RIS) for the draft Amendment *Animal Welfare Act 2022* Tasmania was not prepared.

I refer to the following statement located:

[Online Submission Form - Animal-Welfare Amendment Bill | Department of Natural Resources and Environment Tasmania \(nre.tas.gov.au\)](https://nre.tas.gov.au/online-submission-form-animal-welfare-amendment-bill)

“A Regulatory Impact Statement (RIS) has not been prepared following a preliminary assessment that the introduction of these new laws for animal welfare is unlikely to impose new regulatory burdens and impacts on business competition in the animal industries, and potentially the broader Tasmanian community.”

Question 5 of the seven questions in the Risk Impact Analysis (RIA) required to be completed to decide if a RIS is required:

5. Who did you consult and how did you incorporate their feedback? Transparency and accountability are not optional. The RIS encourages you to walk in the shoes of the people, business decision makers and community groups affected by your policy proposal.

If this question was correctly answered the following people, business decision makers and community groups affected by the policy proposal, would have been consulted:

- Military, Police & Correction Services Working Dog Handlers
- Dog Trainers that rehabilitate dog behaviour
- Dog Chiro, Physio and Osteo specialists
- Physically Disabled Handlers
- Assistance Dog Handler and Trainers
- Small Dog Handlers that have large dogs
- Hunting Dog Trainers
- Dog Training Organisations representing the industry eg PDTA, IACP
- Dog Training Businesses

Many of the people, businesses and community groups listed above will be directly impacted by the proposed amendment.

As a RIS was not completed, decision makers have NOT been provided with the necessary evidence base to make decisions.

2. KEY STAKEHOLDERS

The only identifiable key stake holder in relation to this amendment is the RSPCA. I have requested this information from Minister Jo Palmer and it has not been forthcoming at the time of writing.

The RSPCA, PIAA, PPGA & AVA have all make multiple statements about the prong collar on their respective websites and in the media and cite the same references to support their argument.

Not even one of these references, studies or citations mention the prong collar, let alone support their claims that they are cruel and designed to cause fear, pain or injury.

I contacted Dr Katrina Ward, a Tasmanian Vet and AVA representative, as she has made statements to the media about prong collars, requesting further information to support her claims as I had already reviewed all the supposed evidence I could find.

Dr Ward specifically stated she had seen a handful of cases where injury had been caused so I was particularly interested in whether they were reported to the RSPCA, if so when, if not, why not and could she provide evidence as all my other research proved contrary.

Dr Ward became hostile and refused to provide any evidence whatsoever to support her statements.

Finally, I contacted Jan Davis, CEO RSPCA Tasmania and requested information on how many people have been charged with animal cruelty using a prong collar in Tasmania over the last 10 years. She directed me to Lisa Edwards, Chief Inspector of RSPCA Tasmania who advised there had been ZERO people charged with cruelty using a prong collar.

3. THE TRUTH ABOUT PRONG COLLARS

Should you wish to investigate the truth about what a prong collar is, how it works, who uses it and why, supporting scientific evidence, real life examples, then please contact **all key stakeholders**, such as Professional Dog Trainers Association Inc, IACP and any of the people, businesses or organisations that use this tool.

Whilst I have used a prong when interstate, I cannot use one where my business operates as it was unfortunately banned in my State, without consultation, and that has impacted the options I have available to assist my clients such as, mentally and physically disabled, small statured with large dogs, high drive dogs, reactive dogs,

etc. It has also put me at greater risk of injury, whether that be from a dog displaying aggression or the ability to control very strong dogs.

In brief, I have attached a letter from the World's leading manufacturer of the prong collar Herm Sprenger, which states:

“The Herm. Sprenger Metallwarenfabrik GmbH & Co KG hereby confirms that the design of the behaviour modification collar **was made not to puncture or bruise the skin of a dog. Great lengths have been adhered to so as to prevent this occurrence at all, such as angled links and rounded ends.**”

I do not know of any company, organisation or individual that would research, develop, manufacture and distribute world-wide a product to deliberately cause harm to a dog.

4. CONCLUSION

In summary your attention is drawn to the following:

- Due process was not followed and a RIS was not completed prior to the draft amendment.
- A single key stakeholder was consulted in preparing the amendment, in particular the banning of the prong collar and, not the multiple key stakeholders that use the prong collar and are directly impacted.
- Reviews of the position statements/evidence provided by key stakeholders are not undertaken and therefore not checked for accuracy or relevance.

I find it reprehensible that legislation can be developed and/or amended using a single biased key stakeholder using a multitude of emotive statements based on false and misleading information,

I therefore believe that all references to the **banning of the prong collar be removed from the bill amendment** so it can proceed without delay.

Kind regards,

Linda Barrett

Attachment – Letter from HS Sprenger 16/10/18

Herm. Sprenger Metallwarenfabrik GmbH & Co. KG - Postfach 24 53 - D-58634 Iserlohn

K9PRO The K9 Professionals

Candace Spicer

Australia



Ihr/e Ansprechpartner/in:

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Ihr Zeichen: -

Ihre Nachricht vom: Datum

Unser Zeichen: H/Op

Oct.16, 2018

Behaviour modification collar made in Germany

The Herm. Sprenger Metallwarenfabrik GmbH & Co. KG hereby confirms that the design of the behavior modification collar was made not to puncture or bruise the skin of a dog.

Great lengths have been adhered to so as to prevent this occurrence at all, such as angled links and rounded ends.

HERM. SPRENGER
METALLWARENFABRIK
GMBH & CO. KG
ALEXANDERSTR. 10-21
58644 ISERLOHN

i.V. Petra Oppermann