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18th July 2022

Department of Natural Resources and Environment Tasmania (NRE)
Minister for Primary Industries and Water, the Honourable Joanne Lesley Palmer

RE: Draft *Animal Welfare Act Amendment Bill 2022*

Dear Minister and NRE members,

Thank you for the opportunity to make submissions on the draft *Animal Welfare Act Amendment Bill 2022*.

On behalf of the International Association of Canine Professionals (IACP), we implore you to **not** enact legislation that prohibits or restricts the use of pronged collars in the state of Tasmania (section 8 Cruelty to animals, subsection (b), new (ja), on page 5 of the draft Bill).

The IACP is a professional organisation dedicated to the education, development, and support of canine industry professionals worldwide. We represent over 2,400 members on six continents, in 40 countries - including active members across Australia and in Tasmania. Our members consist primarily of dog trainers and canine behaviour professionals (including military and law enforcement), as well as veterinarians, professional breeders, kennel owners, groomers, avid canine competitors, and other industry parties. We are committed to supporting legislation and standards that protect the welfare of animals in the care of our members and seek to assist the community to cohabit safely with their dogs.

Our members and non-member industry colleagues approached the IACP with a concern in relation to the draft *Animal Welfare Act Amendment Bill 2022*: The proposed ban on pronged collars.

We do not contest the other proposed amendments and support the amended definition of owner to include someone in charge or custody of an animal at the time (section 3A).

Why we contest the proposed pronged collar ban:

How the prong collar works

The definition for pronged collar provided in the draft Bill is as follows:

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

While we are aware of similar collars in use on other animals such as goats, for the purposes of this submission we will focus on the use of these collars on dogs.

The definition refers specifically to a pinch action on the skin. We would like to point out that if used properly the prong collar does not functionally pinch the skin. The prongs act on the nociceptive receptors of the skin to distribute pressure evenly around a dog's neck to reduce the contact area and pinching. Some practitioners refer to it as a "pinch collar", and we believe this name may have evolved from the action required by the person to open the collar and add or remove links - not because it actually pinches the dog's skin.

Prong collars have a Martingale collar style small chain or loop that connects each side of the collar, which prevents the collar from tightening excessively or dangerously - also known as "limited slip". It is this style coupled with the positioning of the blunt prongs that distribute pressure evenly around the dog's neck, which minimises the amount of pressure required overall to communicate with a dog. Further, when correctly fitted, the mechanics also ensure the pressure disperses away from the sensitive throat area to minimise injury to the thorax, trachea and spine¹. Prong collars are conditionally recommended by the American Humane Association as a humane training restraint in certain situations "such as fragile or weak owner; dogs with fragile trachea"².

Though the prong collar may look like it is designed to cause harm, when used as designed they are one of the most humane ways to communicate with a dog. A correctly fitted prong collar in the hands of a trained handler eliminates all the fighting and nagging that can lead to distress, anxiety, and aggression. The science about the related stress is in the research paper *Comparison of Stress and Learning Effects of Three Different Training Methods: Electronic Training Collar, Pinch Collar and Quitting Signal*³.

The mindful use of the application and release of pressure works using negative reinforcement and/or positive punishment - both valid scientific quadrants in operant conditioning learning theory. Negative reinforcement (the removal of something to increase behaviour) activates behaviour by allowing the dog to control pressure. The prong collar acts as a barrier for the dog in drive by exercising pressure when the dog leans into it (pressure is not added by the handler); the dog then can remove the pressure by backing off the collar. This results in a "pressure-less" state which is then reinforced (proper position relative to the handler).

In consideration of the welfare outcomes that this Bill seeks to clarify, we would argue any restraint device or training tool can be misused to cause harm to a dog, or any animal. Harnesses, halters, flat collars, slip leashes can all be incorrectly fitted, left on, cause abrasions, and interfere with the animal's gait. We believe anyone intent to cause harm to an animal will do so, regardless of which device they choose and whether that device is banned or not.

Who uses the prong collar

The use of prong collars in training and ongoing management allows for our members to effectively do their jobs - whether working dogs in military, police, and security applications, or with pet dogs that require more effective control in the community. This is not to say our members use prong collars on every dog at all; they make an assessment and should be able to have appropriate restraint devices and training tools available for use as the case deems it necessary. As an organisation, we believe in the Least Intrusive, Minimally Aversive (LIMA) approach to dog training (see [IACP LIMA Position Statement](#)).

It will be difficult to see how military, law enforcement and security personnel will be able to work with dogs suitable for patrol work without any tools to control trained behaviours. Even if an exception or exemption is written for such application of a pronged collar, we are faced with professionals that will not want to risk prosecution and the battle that may follow in seeking exoneration from such a charge. Not to mention that military, police, and security working dogs already deployed and trained using these devices are a significant financial investment that will go to waste if they cannot be utilised for purpose with those devices.

When Germany enacted a similar prohibition, they had to pull nearly forty percent (40%) of deployed canines from work. This resulted in increased pressure on the remaining canine and non-canine teams working in the field.

Our professional dog training members who work with pet dogs in the community - both owned and in the pound or rescue system - have told us their clients have come to them to be responsible dog owners. They are seeking assistance so their dogs can be good canine citizens - to train their dogs with the support of devices like prong collars so they can be effectively controlled when exercising in public. They know the *Dog Control Act 2000*, Part 3, Division 1 indicates they must be in control of their dogs in the community, and for many dogs the prong collar safely facilitates this.

We predict an increase in euthanasia rates in pounds, shelters, and rescue organisations as a direct result of enacting a prong collar ban. Those citizens of Tasmania, as well as the military, police and security personnel that currently use prong collars will be faced with the impossible decision between the risk of prosecution for animal cruelty and surrender or euthanasia of their beloved dog.

Euthanasia of otherwise healthy animals takes a toll on our veterinarians and euthanasia technicians - an industry already facing one of the highest suicide rates around the world. Restraint devices such as the prong collar keep dogs alive, safe with owners that love them, and out of the pound/rescue system.

Conclusion

The IACP does not support inhumane or dangerous training. As an industry leader, we recognise the need to protect animals, after all our motto is "In Safe Hands". We agree abuse of dogs and misuse of devices in the name of husbandry and/or training is a deplorable practice. We believe the existing animal cruelty legislation and other proposed amendments in this draft Bill will be sufficient to prosecute and stamp out inhumane and

dangerous training, without the need to enact prohibitions or restrictions in using the prong collar.

Members of the IACP are subject to a Code of Conduct and have access to industry Best Practices and Standards⁴. We provide Certification Programs for dog trainers, including a prong collar knowledge assessment in partnership with Herm Sprenger.

As a professional association, we understand both the concerns of our members, and the concerns of the citizens of Tasmania. We do not support the pronged collar ban amendment in Section 8 Cruelty to animals, subsection (2), new (ja), as it is written. We request this amendment is removed from the draft Bill entirely. We do not contest the other proposed amendments and support the amended definition of owner to include someone in charge or custody of an animal at the time (Section 3A).

We would be grateful for the opportunity to have a representative from our organisation be a part of further reviews to the *Animal Welfare Act 1993*. We also request that the IACP be considered as a key stakeholder and representative body for canine industry professionals and be invited to participate in any future discussions on determining standards and requirements impacting dog care and training, so that it may serve the intentions of the legislation without placing unnecessary restrictions on professionals, and thus limit their ability to serve their communities.

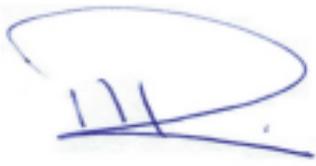
Respectfully,



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2. The American Humane Association's *Guide to Humane Dog Training* (booklet), Appendix B Problems/Dangers in Use of Other Equipment
3. *Comparison of Stress and Learning Effects of Three Different Training Methods: Electronic Training Collar, Pinch Collar and Quitting Signal* <https://bit.ly/3DaMi4c>
4. IACP position statements
<https://www.canineprofessionals.com/position-statements>