



Department of National Resources and Environment Tasmania

Submission on the draft Animal Welfare Act Amendment Bill 2022

The Professional Dog Trainers of Australia incorporated organisation, represents hundreds of Australian dog trainers and their tens of thousands of clients.

All our members are devoted to training dogs with the focus being positive outcomes for the dogs and owners.

We 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 Assessment Not Completed

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

“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), or preliminary assessment as it is referred to above, which determines whether 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 key stakeholders should have been identified and consulted:

- Government departments such as Military, Police, Correction Services & working dog handlers;
- Businesses such as dog trainers that rehabilitate dog behaviour, train assistance dogs, hunting dogs, canine chiropractic, physiotherapy, osteopathy and Veterinary specialists;
- General public handlers such as the physically or mentally disabled, small owners that have large dogs, high drive dog, reactive dogs, etc;
- Dog training organisations representing the industry such as PDTA, IACP, etc.

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 on which to base their decisions.



2. PDTA Refutes Unsubstantiated Claims

A number of emotive and misleading statements have been made by several groups opposed to prong collars.

2.1. STATEMENT - RSPCA Tasmanian Website Prong Collars on Dogs 07/06/22

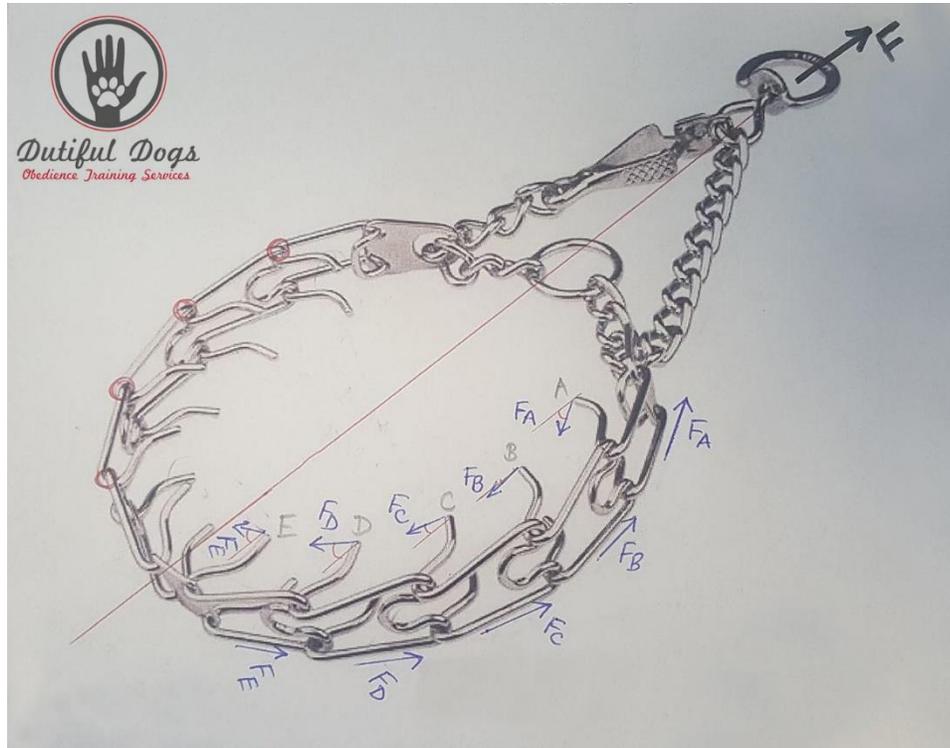
2.1.1. *“Pronged collars have fang-shaped metal links, with blunted open ends turned towards the dog’s neck so that, when the collar is tightened, it pinches the naturally loose skin around the dog’s neck in order to restrict their movement.”*

Please see Attachment A: Letter from Herm Sprenger, the leading manufacturer of prong collars world-wide which states

“.....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.”**

The picture below was created by a person showing the physics of the prong collar operation.

The individual prongs themselves are angled in and blunt at the ends, NEVER sharp. They are not designed to stab like a needle or injure the dog. The prong collar was designed with the safety of the dog in mind. Due to the mechanical design, pressure is distributed evenly around the neck, and this pressure is felt far more readily than that of a check/choke chain, or flat collar. Ergo, less pressure is required to be used by the handler. This is particularly useful for handlers who have strength or mobility issues, or who have very large dogs. Also, important to observe is that there is a martingale chain that connects each side of the collar, which prevents the collar from tightening excessively or dangerously, as can happen with a check/choke chain that is not used appropriately.



The mechanics of the collar, as explained by a mechanical engineer:

F = force applied by the handler.

FA, FB, FC etc = force applied on dog's neck. The tip exerts the force in opposite direction of pull. This is because of the lever effect created by the fulcrum (shown in the red circle).

Now the important part: anatomy, not physics.

A dog's neck is sensitive at the throat and strong at the side and back. FE is force applied at neck and FB & FC are force applied on side of neck.

Now $FA = F \cos(\text{angle made by } FA \text{ and } F)$; similarly, FB, FC etc. If you look at a trigonometry book, the greater the angle between F and the direction of resultant force (FA, FB etc), the lesser is the force. So you can see the force on the neck/throat is almost zero. And the force on the side of neck is almost equal to



what you apply.

2.1.2. *“The damage that pronged collars can do to dogs goes beyond yanking and choking. Depending on dogs’ size, how hard they pull, and how forcefully they get yanked, these collars can cause them serious injuries, including the following:*

- *Intervertebral disc protrusion*
- *Partial or complete fore- or hind-limb paralysis from spinal cord injuries*
- *Damage to the vagus nerve, affecting the functioning of major organs, including the heart, lungs, liver, bladder, spleen, and kidneys*
- *A crushed trachea, with partial or complete asphyxiation*
- *Crushed or fractured bones in the larynx*
- *A bruised oesophagus*
- *Sharp increases in pressure inside the head, which can cause brain or eye damage and sometimes prolapse of the eye*
- *Bruising and damage to the skin and tissues in the neck, resulting in the formation of scar tissue*
- *Fainting”*

No evidence was provided by the RSPCA to support these claims. The PDTA contacted RSPCA Tasmania and asked for evidence and they admitted they had none.

If the goal of the trainer is to teach the dog to walk at heel for example, the trainer applies small amounts of pressure and release to help the dog understand the benefits of the exercise.

The unique design of the prong collar does not apply pressure to the throat or trachea at all. In fact, it applies pressure to the circumference of the dog’s neck surface, unlike every other collar. It is self-limiting so cannot cause asphyxiation.

We have citations from canine Osteopaths, Chiropractors and Veterinarians that state that, prong collars do not cause these issues, although many other types of restraints can.

Please see Attachment B & C: Letters from Osteopath Sam Sherrington, and Veterinary practitioner Michelle Dalli.



2.1.3. *“Dogs who are repeatedly yanked and choked may become resentful, aggressive, and fearful. Real fences and positive training methods are the kind choice and are much more effective”*

There is absolutely no evidence to suggest any of these statements are true.

Suggesting that professional trainers only repeatedly yank and choke dogs demonstrates a very limited understanding of dog training. Balanced trainers get outstanding results, if they were simply yanking and choking which apparently creates a resentful and aggressive dog, there would not be outstanding results.

2.1.4. *“These collars are a cruel and unnecessary tool to modify canine behaviour.”*

The RSPCA provides no basis on which to make such a conclusion.

People have come to lose trust in the RSCPA as they have been exposed making these false claims.

We have over 6000 signatures not to ban the prong collar, so there is a significant proportion of the public who do not consider the collars to be cruel. Please read the reasons for signing the petition and it should be obvious that for many people this tool saved their dog.

https://www.change.org/p/amendments-to-the-apca-be-halted-until-proper-key-stake-holder-consultation-has-occurred?utm_content=cl_sharecopy_33386884_en-AU%3A0&recruiter=52756518&recruited_by_id=23aa0b70-b010-0130-8680-3c764e051fb4&utm_source=share_petition&utm_medium=copylink&utm_campaign=psf_combo_share_initial&utm_term=psf_combo_share_initial&fbclid=IwAR3mCuDw6UYsTk-t6t7OAWDjzb_0fl4QG4-1QLMfz_8VgnLaqHAdNd_F5uQ



2.1.5. *“Unfortunately, while it is illegal to import pronged collars under Australian customs legislation, the sale and use of pronged collars is not illegal.”*

False, it is legal to import with permission from the Minister.

2.1.6. *“The use of these collars is banned in Victoria under the Prevention of Cruelty to Animals Regulations 2008. However, as yet, Victoria is the only jurisdiction to ban these harmful collars. Tasmanians care about the treatment of dogs and implore the State government to take action to stop this cruel practice”.*

Prong collars were banned in Victoria with zero consultation from key stakeholders and based on no evidence whatsoever. The Governments own due process was not followed.

The PDTA will be speaking to Victorian Government soon.

There was an unsuccessful attempt to ban prong collars in WA recently.

We refer you to one of the submissions:

<https://www.agric.wa.gov.au/sites/gateway/files/Canine%20Education%20and%20Training%20Association%20Written%20Submission%20redacted.pdf>

2.2. STATEMENT RSPCA Tasmanian Website Time to Ban Cruel Prong Collars 12/06/22

2.2.1. *“Walking a dog that pulls on leash is not only frustrating – but it can also be dangerous. So it is common for concerned pet parents to look for simple solutions. These sees some turning to cruel things like prong collars.”*

We totally agree with the first two sentences. Walking a dog that pulls can be dangerous for lots of reasons and people do look for alternatives, especially if they have strength or mobility issues, or have very large dog or have a reactive dog, the list goes on.



2.2.2. *“Pronged collars have fang-shaped metal links, with blunted open ends turned towards the dog’s neck so that, when the collar is tightened, it pinches the naturally loose skin around the dog’s neck in order to restrict their movement.”*

Refer 2.1.1.

2.2.3. *“These collars are considered harmful, as they are used to correct unwanted behaviour through inflicting pain as punishment.”*

They are a training aid, the experience the dog gains is based on how the trainer wants that to be. We use these collars to communicate to dog’s behaviours we feel are desirable.

2.2.4. *“Studies have shown that the use of prong collars, choke chains and shock collars are physically dangerous to dogs.”*

No evidence was provided to show the prong collar is physically dangerous to dogs when used correctly. Further, note I have spoken *in person* to a dog trainer in the behavioural unit of the RSPCA who shared that they use slip/choke leashes exclusively.

Refer Attachment D: RSPCA clearly showing RSPCA from all over Australia using choke leashes they apparently don’t support.

The slip leash they are using is a recognised safety leash and the PDTA do not have any concerns about its correct use. For the RSPCA to call a tool they use themselves physically dangerous discredits their input on this matter as having bias.

Whilst many dogs can be successfully trained *without* the use of prong collars, there remains a significant number that cannot.

In that number are many highly aggressive, predatory and dominant dogs that if not exposed to these specialist tools and trainers, will be a high risk to animals, adults and children in our community.



2.2.5. *“Prong collars work by putting pressure on a dog’s throat which can lead to severe injuries of their thyroid glands and trachea. This can lead to other serious health problems down the road like hypothyroidism, weight gain, ear infections, hair loss, skin issues and even organ failure. Other injuries caused by prong collars include eye injuries, thinned corneas, and glaucoma due to the increased pressure on the dog’s eyes from being choked.”*

These statements are false.

Refer 2.1.2.

2.2.6. *“Recent studies have confirmed that the use of prong collars is emotionally damaging to our canine counterparts – so they are not only therefore a danger to them, but also to us. In fact, dogs who are already reactive on walks and who already suffer from leash anxiety were found to become more anxious and agitated upon prolonged exposure to uncomfortable and painful prong and choke collars, with the collars leading to greater stress in dogs, and therefore a higher risk for potential aggression and bites on owners.*

These collars are nothing short of cruel – and they do not successfully modify canine behaviour.”

RSPCA can provide no studies or evidence that support these statements.

2.3. ARTICLE RSPCA Leader Interview Dr Katrina Ward 15/07/21

2.3.1. *“There’s better, safer and more effective alternatives to pronged dog collars, behavioural veterinarian Katrina Ward says”.*

One of our members contacted Katrina Ward (AVA Spokesperson) requesting a list of material that support her statements. Katrina refused to provide anything and advised that we can do our own research. Our member requested the information she had as we have reviewed all published information. She declined then stalked and reported our member to another organisation attempting to discredit this member and accused them of “harassing her quite profusely”. She went on to



suggest that we had the wrong Katrina, in spite of her original correspondence being sent to and replied from her business website www.katrinaward.com.au.

(Full transcript available on request).

2.3.2. *RSPCA Tasmania described the pronged collars to have "fang-shaped metal links, with blunted open ends turned towards the dog's neck so that, when the collar is tightened, it pinches the naturally loose skin around the dog's neck in order to restrict their movement".*

See response 2.3.1.

2.3.3. *Dr Ward said "there were much more useful ways of dog training. She said it was a form of punishment. We know of the adverse affects, we don't need to use them these days."*

See response 2.3.1.

2.3.4. *"Dr Ward said the collars went against proactive health care, something that vets consider very important."*

The alternatives are, killing a dog, leaving it locked in a backyard, using drugs.

See response 2.3.1.

2.3.5. *"She said they caused damage. "I've seen them in a handful of cases. Dr Ward said there were physical impacts from using the collar, including damage to underlying nerves and blood vessels. "It's designed to cause stress," Dr Ward said. She said it could impact the neuroendocrine system, heart and kidney because of the stress."*

See response 2.3.1. Also note that there have been no reported cases to the RSPCA Tasmania of cruelty using prong collars.



A handful of cases would be a very small data sample, not worthy of being called evidence to ban a training aid. We can provide evidence of positive outcomes due to the use of the prong collar. As this information was provided by Dr Katrina Ward, the same person who refused to share any evidence with us, we question these statements and would require proof as our members who have used the prong collar many times, have seen no such evidence.

2.3.6. *"They're not that popular, so it shouldn't impact people to ban them. "There are better and more effective alternative options out there." Drawing comparison with corporal punishment in schools, Dr Ward said we've moved away from that, and ought to move away this type of punishment for dogs."*

If there is no impact, the ban is unnecessary. They may not be 'that popular' due to most dogs having no need for this tool, however no consideration is being given to those that do and how it will impact their every-day life.

It is a form of discrimination, direct or deliberate discrimination, if a physically or mentally impaired person can no longer walk their dog or even leave their house.

It is a Workplace Health and Safety issue for Government departments such as the Police, Military, Corrections personnel; Dog Trainers; Dog Chiro/Physio/Osteo/Veterinary specialists and staff; working dog handlers; assistance dog trainers, hunting dog trainers, etc.

The result when positive reward-based training has failed is long term medication, which rarely works, rehoming, or killing the dog.

Poor use of prong 'may' cause some distress; however, correct use of medication can cause these side effects:

- nervousness
- anxiety
- uncontrollable shaking of a part of the body
- agitation fast or irregular heartbeat
- agitation, fever, sweating, confusion, fast or irregular heartbeat, shivering, severe muscle stiffness or twitching, hallucinations.



2.4. INTERVIEW Channel 7 RSPCA CEO Jan Davis 22/06/22

2.4.1. *"Pronged collars are really evil things. They've got really sharp spikes. When you pull on a lead they actually poke into the dog's neck," RSPCA Tasmania chief executive officer Jan Davis told reporters."*

Prong collars do not have "really sharp spikes" nor do they "actually poke into the dog's neck".

In another press release Jan Davis stated they were blunt.

"They are evil"

An inanimate object cannot be evil.

We asked Jan Davis for evidence, she replied she didn't have any.

Refer 2.1.1.

2.4.2. *"They're used supposedly for training dogs. They're not that common but any example is one too many."*

They are used for training dogs.

Refer 2.3.6.

2.4.3. *"Ms Davis "This has been worked with stakeholders and of course the RSPCA. In general, our community really want stringent rules around how animals should be treated," she said."*

We are not aware of any Stakeholders being involved in the development of the amendment to the bill, with exception of the RSPCA. We have requested further information from Minister Jo Palmer however, this information has not been supplied.

Also Refer 2.3.1 as Dr Katrina Ward may have been considered a stakeholder.



People who have no experience or say that they have seen the prong collar used a handful of times are not source that should be considered.

Beyond doubt, these stakeholders cannot be legitimately used to make decisions for legislation.

3. Misleading Information Provided by RSPCA

We requested information from the Jan Davies CEO, RSPCA Tasmania to support her statements to the media.

Her replies were that she used the information available from RSPCA Australia and went on to say that:

“I have not gone back and checked each reference – but my recollection is this is the only source I used in preparing the comments.”

On reviewing the reference lists of position statements provided by organisations such as the RSPCA and Pet Professional Guild, **none of the claims made about prong collars can be substantiated.**

3.1. Rooney NJ & Cowan S (2011) *Training methods and owner dog interactions.*

Links with dog behaviour and learning ability.

This is an owner survey so causation cannot be claimed.

The study does **not specifically look at prong collars** and lists aversives as: shoving, hitting, tapping, rubbing the nose in waste, collar lift (which collar type is not advised) or yank.

Tools are vaguely mentioned in a list but there are no numbers are provided.

3.2. Overall KL (2007): *“Editorial: Considerations for Shock and “Training” Collars: Concerns from and for the Working Dog Community”*

This is an **opinion piece** by researcher and behaviourist Karen Overall mentions prong collars/choke collars but does not separate the two.



She mentions data which show the medical concerns of using choke/prong collars and references specific studies.

However, on reading those specific studies, and looking further to the studies they then reference, no mention of a prong collar is found.

3.3. Blackwell EJ et al (2008)

The relationship between training methods and the occurrence of behaviour problems, as reported by owners, in a population of domestic dogs.

Another owner survey which does not look at tools whatsoever.

In fact, this study provides factually incorrect statements about which categories of operant conditioning training methods fall under, i.e. “time-out and other techniques’ described as negative reinforcement (R-), are in fact Negative Punishment (P-).

And again, the study lists Positive Punishment as techniques such as Shaking, Scruffing, smacking etc., which have nothing to do with training tools or legitimate training techniques.

3.4. Grohmann K, Dickomeit MJ, Schmidt MJ et al (2013)

Severe brain damage after punitive training technique with a choke chain collar in a German shepherd dog.

This is the last reference supplied in our query about training tools which is a case study of a single German Shepherd Dog that was hung (helicoptered) by a choke chain causing brain damage.

Again, prong collars are not mentioned in this case study and the abuse described has **nothing to do with legitimate training techniques.**

This is not how choke (or check chains), should be used and it’s concerning that these types of case studies are used as evidence against training tools at all, let alone generalised to other training tools such as the prong collar.

The above case study was mentioned in the 2017 literature review by *Fernandes et. al*
‘Do aversive-based training methods actually compromise dog welfare?’



Fernandes refers to the above case study and explains why it was **not included** in the literature review because the:

“case report was excluded from the sample, because it reports an isolated incident, which clearly limits the strength of the conclusions that can be drawn.”

Yet it is clearly cherry-picked by the RSPCA to strengthen their position.

I refer to the above references provided by the RSPCA but this cherry-picking and misleading referencing to studies is prevalent across all welfare groups that argue for the Force Free training approach.

The RSPCA believes such collars should be banned across Australia. Many dog trainers and animal welfare groups support this view.

The RSPCA have stated that *“Of (the 6000 dogs per year) dogs euthanised, the majority of cases are because of severe behavioural issues (68.78%). This includes aggression and severe anxiety that the RSPCA is not able to or has not been able to treat through behavioural modification programs”*

Whilst true that the RSPCA does not support the use of Prong collars, their statistics of successful rehabilitation of dogs with behaviour problems is **dismal**.

In terms of Prong collars not being supported by Dog Trainers, the Professional Dog Trainers of Australia has hundreds of members that are qualified professional dog trainers, whom all support the correct use of the Prong collar.

The petition that we started has 6000 + signatures NOT to ban the prong collar. Refer 2.14.

Australian Defence Force, Police dog units, Correctional Service Dog Units etc all support prong collar use.



Above Police dog handler Shane Kynock with very happy Police dog wearing prong and e collar.

The National Dog Trainers Federation also support prong collar use.

So, suggesting that Dog Trainers do not support prong collar use is also, **a false statement.**

4. The Facts about the Prong Collar

4.1. What is a Prong collar?

The prong collar is a specialist training aid that is vital for handling and training some dogs, commonly used when other methods have proven unsuccessful.

It is a widely misunderstood training aid due to it being foremostly judged on its looks and the assumption that it is a barbaric device intended to “stab” a dog’s neck.

Contrary to collars like the check/choke chain or slip leashes, the prong collar is self-limiting. It applies even pressure and is a gentler on a dog’s neck than the quick jerk and impact of a check/choke chain or the steady, relentless pressure of a flat collar or constant pull of a head collar. The self-limiting tightening action of the prong collar also makes it a safer choice for strong pulling dogs. A prong collar can only be pulled tight to



a certain level, unlike the check/choke or slip collar, which has unlimited closing capacity and in careless or abusive hands, can cause asphyxiation.

The prong collar makes use of smaller surface area, which means that instead of more pressure being needed to communicate with the dog, risking undue pressure on the trachea, less pressure is used, and that pressure is distributed around the neck.

4.2. Who uses Prong collars?

Prong collars are very popular amongst some focus groups you may know, and some you may not.:

- Military Working Dog Handlers
- Police Dog Handlers
- Correction Services Dog Handlers
- Dog Trainers that rehabilitate dog behaviour
- Dog Chiropractic, Physiotherapy and Osteopathic specialists
- Small dog handlers who have large dogs
- Working Line Dogs
- Physically Disabled Handlers
- Assistance Dog Handler and Trainers
- Hunting Dog Trainers world-wide.

4.3. Why do these groups/individuals use Prong collars?

Firstly, it is imperative to stress that a prong collar is NOT a tool needed for every dog. Very few dogs require them but those that do, NEED them.

Prong collars are used when other options are not providing any progress in a reasonable amount of time. Dogs will be put to sleep, remain out of control or be banished to a life in a cage or yard if these tools are not available to assist people in training certain dogs.

Correctly used this training aid can provide the breakthrough owners of difficult dogs have been previously unable to find.



4.4. How is a Prong collar used?

The most common use of the prong collar is to facilitate negative reinforcement. *A dog offers the correct behaviour to reduce and eliminate collar pressure.*

Negative Reinforcement is a quadrant of operant conditioning, used successfully in the training of all species, including humans. Operant Conditioning is a scientifically proven (all four quadrants), unquestioned conditioning process.

Operation Conditioning (also known as instrumental conditioning) is a process by which humans and animals learn to behave in such a way as to obtain rewards and avoid punishments. It is also the name for the paradigm in experimental psychology by which such learning and action selection processes are studied

ref:[http://www.scholarpedia.org/article/Operant_conditioning#:~:text=Operant%20conditi oning%20\(also%20known%20as,action%20selection%20processes%20are%20studied.](http://www.scholarpedia.org/article/Operant_conditioning#:~:text=Operant%20conditi oning%20(also%20known%20as,action%20selection%20processes%20are%20studied.)

”

5. Studies supporting use of prong collar

What is **not referenced** in the position statements of welfare organisations and the current bill, is evidence **that supports the use of training tools**; and specifically prong collars, for example:

5.1. *Salgirli (2012) Comparison of Stress and Learning Effects of Three Different Training Methods: Electronic Training Collar, Pinch Collar and Quitting Signal* stated:

“The research resulted in high learning effect for the pinch [prong] collar and electronic training collar, on the other hand [force free] quitting signal showed a lower learning effect. A force free quitting signal means to end the session and is the approach taken in positive reinforcement only training that avoids aversives.

The force free quitting signal was also found to cause more stress than aversive methods, meaning physical discomfort via electronic and pinch collars was less stressful because the dogs enjoyed the training so much, to have the session ended was the most stressful event to them.

5.2. *Dinwoodie (2021) An investigation into the effectiveness of various professionals and behaviour modification programs, with or without medication, for the treatment of canine aggression* stated:



“success achieved by owners using a slip, choke, or prong collar. Many owners are impressed with the immediate control effected by such training equipment”.

6. Other Considerations

Without effective training tools, people who love their dogs may not take them outside the home, but most will not put the dog to sleep. They may also walk their under socialised, under trained, poorly restrained and possibly dangerous dogs on our streets, just with no prong collar. They may cover up the prong collar and become scared to ask for training advice.

Here is a well know international celebrity with a disability, MS, using a prong collar on her dog:

<https://www.facebook.com/PDTAinc/videos/603526361242307/>





Mark Molochino, Mayor of Townsville, is calling for a task force as he has stated Townsville had a reported **500 dog attacks this past year.**

In Victoria just last month, a small family dog was mauled to death by two unrestrained dogs
TEN people have been killed in Australia by dogs in the last 4 years. 4 of those were babies.

- Talan Peters, a 2 year old boy in Mena Creek, Queensland, 29th January, 2022.
- Name not released, a 5 week old baby boy, Kariong, NSW, 11th July, 2021
- Kamilah Jones, a 1 year old girl, Inverell NSW, 3rd March, 2018.

Removing this training aid, the prong collar, will result in these numbers being tripled.

7. Conclusion

The prong collar has no effective alternative. It is a unique design which applies pressure from the leash to distribute around the circumference of the dog's neck, not just applied to the throat and trachea area as other collar do. Therefore, much safer indeed to use.

Unlike the rumours that circulate would have you believe, the prongs do not stick into the dogs' neck, they run at an angle to the dogs' neck. The prongs are purposely rounded to a smooth finish so not to puncture or bruise the skin.

Prong collars are very popular amongst some focus groups you may know, and some you may not.: -

We posted an e petition and in less than 2 weeks had 6000 signatures not to ban the prong collar.

The wider community and key stakeholders are speaking through us, and our petition and they do not want this to go ahead.

Our organisation is in a position to provide assistance, by appearing at hearings and presenting evidence that can give you facts on the use, misuse and regulation of prong collars if necessary.

We are about education not banning. Educate people how to effectively socialise, train, manage and keep safe their dogs and people in the community.



I formally request that our Board of Members are called to provide information at each stage of the amendment review regarding this matter.

I do not feel that the Tasmanian Government has been properly informed on the use of the prong collar and there are a lot of mistakes in the information you are using as references.

You are making life altering decisions here that could well result in catastrophic outcomes for dogs and humans.

Make no mistake, dogs will be destroyed. People with disabilities will not be able to keep or own dogs if they cannot use a tool, a prong collar, when there is no alternative, no evidence to support that a prong is cruel or any of the other emotive statements made by organisations and people who have probably never even seen, let alone used a prong collar.

Removing this vital training aid will become a work-place health and safety concern to all dog trainers, veterinarians and other dog professionals.

We are prepared to assist in the future of policy making when it comes to the welfare, training, and behaviour of dogs as we have hundreds of dog trainers that specialise in these matters.

Animal Welfare regulations must be based on facts, safety and efficacy of training, behaviour modification and management options.

Not emotional, uneducated or inexperienced persons with bias sharing stories that are not factual or accurate in any way.

The theme that seems to be escaping this initiative is that there is no education encouraged to the general population to learn how to train their dog and use training aids.

Approving this amendment as it stands, without evidence, without consultation from key stakeholders will only see more harm come to dogs and people in our communities.

A handwritten signature in black ink, appearing to read 'Steve Courtney'.

Steve Courtney

President PDTA



Attachment A: Letter from Herm Sprenger

Attachment B: Letter Osteopath Sam Sherrington

Attachment C: Letter Veterinary practitioner Michelle Dalli

Attachment D: Photographs RSPCA using slip/choke leads