

## Inquiry into the Animal Care and Protection Amendment Bill 2022

**Submission No:** 14  
**Submitted by:** [REDACTED]  
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**Submitter Comments:**

State Development and Regional Industries Committee

18 May 2022

Dear Parliamentary Committee,

**Submission on proposed amendments to the Animal Care and Protection Act 2001**

Thank you for the opportunity to make a submission on the proposed amendments to the *Animal Care and Protection Act 2001*. There is no need to modify the Act given legislation currently exists to convict an individual of animal cruelty for the misuse of any training tool.

It is noted that best practice guidelines as outlined in *Queensland Government Guide to Better Regulation May 2019* for the amendment of legislation have not been followed. As a result, key stakeholders and the wider community have not been consulted on the proposed amendments to the Act. This lack of community consultation means the impacts on the community have not been adequately raised for consideration and assessment.

Conclusions thus drawn regarding restraint-based tools, specifically the prong collar, have been made based on unsubstantiated claims and without consultation of key stakeholders and community members whom make use of these tools.

An example is referred to on page 25 of the proposed Bill, which states:

*“Imposing restrictions on the use of prong collars and other devices is justified as they are considered to be inappropriate as a training aid because they cause pain and fear in dogs which is used as a punishment. Research has shown that using aversive training methods including the use of prong collars can cause pain and distress and can compromise the dog’s welfare.”*

I note that prong collars are designed specifically to fairly distribute pressures around the neck (as opposed to a flat collar which does not distribute pressure), alleviating pressure from the trachea itself. Such even delivery of pressure upon neck muscles results in a quick aid and thus reaction from the dog, resulting in less pressure required to deliver any correction.

I request a more comprehensive review of tools be considered prior to drawing such conclusions. The above statement demonstrates a lack of understanding of behavioural sciences and the means in which training tools are most commonly used as a means of Negative Reinforcement (guiding the dog towards the correct behaviour), and not Punishment.

I note that the prong collar as a training tool is not designed to bruise or pierce an animal’s skin, contrary to references made on page 3 of the proposed Bill, which infers that the prong collar “*is designed to bruise or pierce an animal’s skin*”. Again, I advise that the prong collar is designed to distribute pressure, and never to bruise or pierce the skin. Use of the word ‘prong’ is a misnomer, as the ends of the ‘prongs’ are blunted so that they may not cause injury or bruising.

I refer further to page 25 of the proposed Bill, which states:

*“If used incorrectly, prong collars can also cause physical injuries, such as bruising, scratching, and punctures to the skin of the dog. Over time, this can lead to scar tissue developing on the dog. In extreme but rare cases, prong collars have been associated with spinal cord injuries and other severe injuries.”*

This refers specifically to the incorrect use of the prong collar. It is reasonable to state that incorrect use of ANY tool (for example a leash, flat collar or harness) has the potential to cause injury. It is also reasonable to state that correct use of the prong collar does not cause injury to the dog.

Adequate consultation with key stakeholders, including but not limited to:

- Members of the Queensland Government currently utilising these training tools, including Police and Military units
- Certified Animal Training Professionals, working to improve standards of pet ownership and care, community safety and education around responsible pet training and ownership
- Animal Welfare Organisations
- Members of the public who own pets or have pet dogs living in their community

Consultation that includes these stakeholders would generate a more comprehensive understanding of the use of training tools in behavioural modification and the betterment of animal welfare.

There is no need to modify the Act given legislation exists to convict an individual of animal cruelty for the misuse of any training tool. Should it be determined that modification is required of the Act then best practice process should be adhered to and adequate community consultation with relevant stakeholders undertaken.

Yours sincerely,

