

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

<b>Submission No:</b>	888
<b>Submitted by:</b>	Professional Dog Trainers of Australia incorporated
<b>Publication:</b>	Make my submission and my name public
<b>Attachments:</b>	See attachment
<b>Submitter Comments:</b>	



## State Development and Regional Industries Committee

### Submission on the proposed amendments to the Animal Care and Protection Act 2021

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 some major concerns with the recent reviews the ACAP Bill 2021.

Most concerning are the following: -

#### **Banning of restraint devices, now or in future.**

This contains the very broad and non specific description of “restraint device”, and allows the minister to ban “collars, leads, harnesses, halters and muzzles” at any time.

This wording is so ambiguous that it could easily lead to one of the most **dangerous decisions in animal management ever.**

Collars such as the prong collar are not intended to be used as a restraint device but a training aid. They may become a restraint device if the dog becomes overstimulated and does not listen to cues given by the handler.

The prong collars can help handlers with less dexterity, disabilities, anxiety, and small size remain in control of an overstimulated dog.

#### **This is a public safety issue here.**

The most common use though of the prong collar is to facilitate the occurrence of negative reinforcement. *A dog that 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.



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

### **From the e petition 3736-22**

***Pronged collars can cause serious injury and pain to dogs.***

The PDTA rejects these claims and asks for evidence, citations or studies in which correct use of the Prong collar causes these effects.

Firstly, wearing a prong collar causes no pain or injury. So, the above is a false statement. Secondly, any collar can cause serious injury and pain to a dog if misused.

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.**

If there are dogs being abused, **this is due to the person not the tool.** Those people should be charged under the current cruelty laws.

A collar, an inanimate object has no power to be cruel.

***Pronged collars have metal spikes which are placed around a dog's neck to inflict pain especially when pulling on a lead***

Please note that, there are **no "spikes"**, the prongs are rounded, not sharp and they are not designed to inflict pain. The above is a nonfactual statement.

Please see attachment from Herm Sprenger.

They are a training tool, they are not used nor should be to restrain or restrict a dog, they are used to facilitate negative reinforcement for correct behaviour.



***Pronged collars are considered to be an abusive form of control based on pain and fear and cause dogs to become distressed, anxious and aggressive***

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

We request any reference materials that claim these outcomes.

We have over 6000 signatures NOT to ban the prong collar, so they are not at all considered to be abusive.

***Injuries from collars range from skin irritation and neck punctures to crushed and collapsed tracheas, spinal cord and back problems.***

The design of the prong collar does not cause irritation. The materials used in the manufacturing of **ALL collars** *can* cause allergic reaction.

This is most commonly evidenced by discolouration of the fur of light coated dogs. Other dogs with sensitive skin *can* develop a redness or rash. This is an allergic reaction to the nickel component found in stainless steel. **Many collars are made from stainless steel.**

Herm Sprenger makes a prong collar known as "currogan" which is stainless steel without any nickel. This solves 99% these problems, the 1% are due to the dogs allergies and often cannot wear any collars.

Neck punctures are not a result of prong collar use, **this is a false statement.**

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.**

I 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 from Osteopath Sam Sherrington.



***It is illegal to import pronged collars but not illegal to use them in Queensland.***

In fact, it is **not illegal** to import prong collars into Australia, they are a restricted import and legal to import with permission from the Minister.

***The use of pronged collars is not supported by the RSPCA and recognised dog training and welfare organisations.***

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 recognised Dog Training organisations, 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

([https://www.change.org/p/amendments-to-the-apca-be-halted-until-proper-key-stakeholder-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](https://www.change.org/p/amendments-to-the-apca-be-halted-until-proper-key-stakeholder-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))

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 Training organisations do not support prong collar use is also, **a false statement.**

***Research shows that pronged collars suppress behaviour but does not change behaviour, and leads to emotional and behavioural issues.***

Please provide such research. We have no evidence any such outcomes.

What we can share though are **these actual studies.**

Salgirli (2012) Comparison of Stress and Learning Effects of Three Different Training Methods:

Electronic Training Collar, Pinch (prong) 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**.

Dinwoodie (2021)

An investigation into the effectiveness of various professionals and behavior 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”.

It is highly important to look at all reference material and make decisions, not just find some general support for a ban.

### **From the E petition 3734-22**

***They (bark collars) rely on painful punishment and negative reinforcement to control dogs and stop barking.***

All of the anti bark collars PDTA have seen have variable levels, starting with tone or vibration and then applying a static pulse starting from low to moderate on some models, low to high on others.

Dogs barking is one of Australia’s highest concerns within councils.

Whilst the collars do punish the barking behaviour and reinforce the quiet behaviour, the alternatives are surgical debarking, considered mutilation by many.

***The RSPCA says if the collars stay on for long periods, they can become embedded in a dog’s neck.***

This is true, but not for bark collars or electric collars, but **every collar or harness**, see attachment of collars grown into a dogs skin. None of these are electric collars.



See attached pictures, none of these were caused by a training collar.

***Electric collars can malfunction, administering no shocks or nonstop shocks.***

The ECMA is a body that manufactures of electric collars have their models tested and approved by ECMA. Collars that are of high quality do not fail causing the collar to deploy. Any failure causes the collar not to deploy.

PDTA recommends only ECMA approved collars should be allowed to be imported and used.

***The anxiety and confusion caused (by using an anti bark collar) can lead to changes in a dog's heart and respiration rates.***

Any time a dog is stimulated, aroused, excited, including barking, cause the dog's heart and respiratory rates change. Changes in respiratory rates are normal part of life for every living being.

Sensationalising normal body functions into symptoms of collar use to push a point is unprofessional.

***The Australian Veterinary Association says the pain and fear generated by electric collars go beyond short-term suffering, creating long-term stress. Dogs can develop anxiety, reduced motivation, increased and redirected aggression.***

Dogs develop anxiety, reduced motivation, increased and redirected aggression without electric collars, but many have been rehabilitated with the use of e collars.

Can the AVA provide studies or evidence to support their opinion?

We have many dogs come to our members that have been heavily medicated by vets under AVA advice.

The medications they prescribe, a most common one is Fluoxetine lists these side effects just to name a few.





Poor use of e collars “may” cause some distress, **but even 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

***The collars are now banned in Denmark, Norway, Sweden, Austria, Switzerland and Germany.***

And they are legal in the other 187 countries of the world.

Breeding dogs, or should I say selective breeding over many years means that many dogs have strong instincts inherent for chasing animals (predation).

Livestock killing is a big problem **all over the world**. The outcomes for defenceless species such as sheep are horrendous, with death and severe injury being the most common.

Sheep can abort their young and be crushed to death in panic driven stampede. Dogs are often shot by farmers or killed by vets.

Leashes and collar (restraint devices) may be useful in *reducing* these attacks, but not only do they compromise the freedom of the dog, but they also fail to prevent the vast majority of attacks which occur after the dog has escaped.

Most importantly though they provide no training for the dog, they do not deal with the actual behaviour.

This means life on leash for the dog, unless he or she can get away.



Dogs that do not have access to livestock can often displace these instincts onto other dogs, cats, adults, and children.

Dogs are predators and unless they have been socialised through early exposure or trained to avoid livestock through remedial training with an e collar, they may always be a liability and dangerous to what they consider prey.

Sadly, there is no scientific evidence that force free training has any success on reducing predation, once the prey drive of a dog has been triggered by the sight or smell of what the dog considers prey, owners with handfuls of treats will be ignored.

Research conducted around the world has consistently shown a high level of efficacy for training conducted with e-collars. Even when the dog is off lead alone, livestock are avoided rather than attacked.

Recently in the United Kingdom, that in Wales (where e-collars were banned) attacks on sheep are **400% times greater** than in neighbouring Scotland (E collars are used there.)

Welsh politicians are now considering if the ban should be lifted.

Those who do not approve of e collars have been unable to offer any viable, effective solutions or prove that any harm is being done by the use of electric collars.

The group ARDO (Association of Responsible Dog Training in the UK) offered fifty thousand pounds sterling to any trainer that could rehabilitate a dog that was a known livestock worrier.

This offer was made to any trainer on earth, as long as they used Positive Reinforcement only.

Not one person would take this challenge, to train one dog for FIFTY THOUSAND POUNDS.

In New Zealand the Department of Conservation mandates the use of e-collar training for dogs before they enter protected areas.

The Victorian Government has regulated but not banned e collars, very successfully.

More importantly, e collars have a range of levels, starting so low, no dog can feel the stimulation. We then carefully find the level the dog can ***just perceive***. And use this as a signal motivator.

This allows leaps and bounds on the rehabilitation forefront, well above any other method or training aid.

It would be the lowest level of pressure a dog could experience whilst still motivating a behaviour change.



Whilst many dogs can be successfully trained *without* the use of prong collars or e collars, there still remains a significant number that cant.

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

### **From e petition 3735-22 Prohibit the use of choke collars**

***Queensland residents draws to the attention of the House that current legislation permits the use of Choke (slip) collars.***

It is first important to understand that the collars in question are actually called "check chains". The correct use is to "check" the dog with a swift pull of the leash and release. Not choke the dog.

Secondly, many breeds in the Sitehound group have small heads, and are only safe when being walked in a slip collar.

***Choke collars are considered to be an abusive form of control based on pain and fear and cause dogs to become distressed, anxious and aggressive.***

Considered by whom? Out of the thousands of dog training clubs in Australia, a high percentage (estimated 70% plus) use and recommend check chains. So, it would be a majority that consider them effective training aids.

***The use of choke collars has been directly linked to whiplash, fainting, spinal cord injuries leading to paralysis, crushing of the trachea with partial or complete asphyxiation, crushing and/or fracture of bones in the larynx, dislocated neck bones, bruising of the oesophagus, bruising and damage to the skin and tissues in the neck, brain damage and prolapsed eyes caused by sharp increases in pressure in the head, tracheal and esophageal damage, Severely sprained necks, transient foreleg paralysis, laryngeal nerve paralysis, hind leg ataxia.***

Evidence please, we are flooded by these false claims with no evidence.



***The use of choke collars and leashes are not supported by the RSPCA and recognised dog training and welfare organisations.***

**This is untrue**, in fact 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.

Also please see attachment PDTA 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. But for the RSPCA to support the ban on a tool they use themselves discredits their input on this matter as having bias.

### **Denied access to Reference materials.**

In May 2021, the amendments to the ACAP Act 2021 closed. At that time the proposed ban on check / choke collars, prong collars and electric collars was not included.

They have been added in at the last moment now only two weeks ago.

PDTA have requested information specifically, reference material, citations, studies, and evidence that these bans are created from.

We have emailed the office of Mark Furner, [REDACTED] and the committee and have been advised that they cannot provide this material in time.

Giving us access to materials used to make decisions on the welfare of Australia's dogs and people, remove the suspicion from the public that there is no bias here.

These changes were added to the review a year after public comment closed. Best practice as stated by the Government has not been followed.

When we emailed Mark Furner, he said the matter had been handed to [REDACTED], Manager Animal Welfare Program in the Department of Agriculture and Fisheries, by email at [REDACTED]





I emailed [REDACTED] (27/05/2022) and said the below

“Good afternoon [REDACTED],

I received a letter back from Mark Furners office (attached) and they referred me to you if I had any questions, which in fact I do.

In that letter, it mentions “*The recent review of the Animal Care and Protection Act 2001 considered relevant research, submissions and petitions from members of the community about pronged collars, and the effective alternatives available*”

Can you please share the alternative training aids that are as effective as the Prong collar and the relevant research being considered?

It also mentions “*I note that the importation of pronged collars into Australia is prohibited under the Customs (Prohibited Imports) Regulations 1956 (Commonwealth) unless permission has been granted by the Federal Minister for Home Affairs.*”

I’m not sure how that is relevant to whether they are banned for use or not? I know of a manufacturer here in Australia

**Most importantly,** “*The amendment to prohibit the use and possession of pronged collars in Queensland was included because of the adverse impacts they have on the welfare of animals*”

Can you share with us studies and or citations that have given you this misunderstanding?

I eagerly await your reply so our organisation, that represents hundreds of dog trainers Australia wide and their tens of thousands of clients can include this data in our submission, reminder that is due 1st June 2022

**I received a reply (30/05/2022)**

“Dear Mr Courtney

Thank you for your letter. As you are aware, the State Development and Regional Industries Committee is currently considering the Bill. I encourage you to make a submission raising your concerns. I apologise that we are not in a position to provide a detailed response in time for you to incorporate the information into your submission. However, please be assured that the Department of Agriculture and Fisheries will be providing a response to the Committee to issues raised in submissions.”





How can the State Development and Regional Industries Committee be considering banning restraints and training aids based on these points? -

- “These are based on relevant research”
- “There are effective alternatives available”
- “Due to the adverse impacts they have on welfare”

But when asked what these are, they cannot provide them?

This may be because Ms. Crowle was just handed this matter, but that even more so means that we should not add any of these points to the ACAP Bill 2022.

**We formally request that the three petitions are disregarded and not included in the ACAP Bill 2022 and tabled for later discussion.**

**Running out of time because best practice was not followed by Government should not be a reason to not fully investigate these matters.**

### **Reasonable Excuse**

The amendment to the bill indicates that these tools must not be used unless the user has a reasonable excuse.

What exactly is a reasonable excuse? reasonable to whom?

I would expect no less than a flood of legal action based on the term “reasonable excuse”.

Effective training with collars such as prong collars for example allows the dog to make better choices to access freedom and maintain negative reinforcement and access positive reinforcement.

**I would clearly call that a reasonable excuse.**

Without effective training tools and restraint options, 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 restraint tools, or no training tools.

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 week, a small family dog was mauled to death by two unrestrained dogs**

**NINE people have been killed in Australia by dogs in the last 4 years. 3 of those were babies.**

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

**Please do not remove training aids and control devices unless your goal is to triple these numbers.**

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

Unlike the rumours that circulate would have you believe, the prongs do not stick into the dogs neck, but 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.: -

- Military Working Dog Handlers
- Police Dog Handlers
- Correction Services Dog Handlers
- Dog Trainers that rehabilitate dog behaviour
- Dog Chiro, Physio and Osteo specialists
- Small dog handlers who have large dogs
- Working Line Dogs
- Physically Disabled Handlers
- Assistance Dog Handler and Trainers
- Hunting Dog Trainers



The e petitions to ban these tools has attracted some 500 signatures in months of being live.

**We posted an e petition less than 2 weeks ago which has 6000 signatures not to ban any of these tools.**

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 to the committee, by appearing at the hearing and presenting evidence that can give you facts on the use, misuse and regulation of training aids 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 the public hearing regarding this matter.

I do not feel that the Queensland Government has been properly informed on the use of the training aids 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.

Removing these vital training aids, muzzles etc will become a work place health and safety concern to all dog trainers, veterinarians and other dog professionals.

We would also be 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.

**As we were presented with no reference material** to see where the false claims have come from, we requested information from the RSPCA and were given a number of references which are heavily flawed in terms of relating to prong collar or e collar use.

**Please see the following**

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 which mirror statements made on page 25 of the bill as quoted above can be found.



- On requesting information from the RSPCA regarding abuse claims regarding prong collars and other tools on May 10th of this year, I was answered within 24 hours with the following references, but no evidence of abuse.

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.

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.

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.





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 my 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 cherrypicking and misleading referencing to studies is prevalent across all welfare groups that argue for the Force Free training approach.

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:

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.

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".

Animal Care and 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 limited time we have had to prepare a submission and get these proposed changes out to the wider community, is insufficient and this should mean that the clauses that seek to ban prong collars, electric collars and restraining devices should be removed from the Animal Care and Welfare Bill 2022 until proper consultation has taken place.

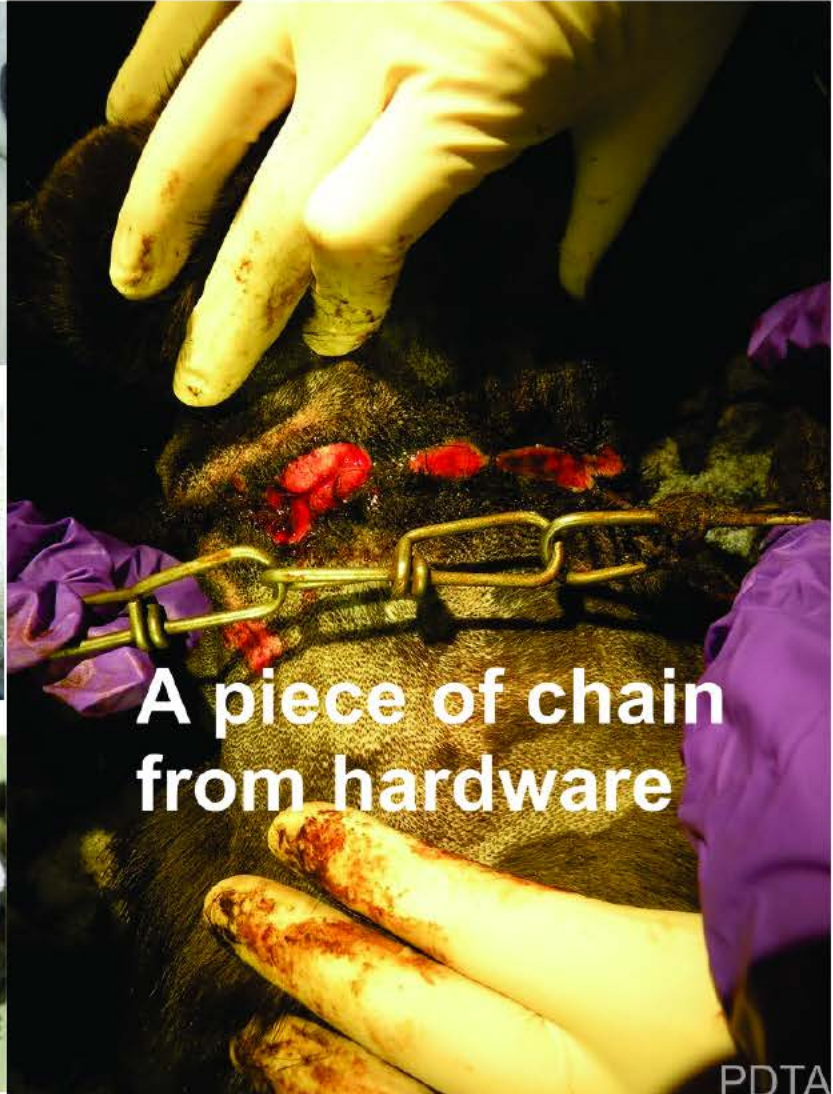
Approving these bans will only see more harm come to dogs and people in our communities.

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

Steve Courtney

President PDTA

# Neck injuries, NONE from training tools



Anything left on an animal for long periods of time can cause these.

**EDUCATION IS THE KEY**



# RSPCA using slip / choke leashes

