

CONSULTATION QUESTIONNAIRE

Please ensure that you have read and understood the consultation document before completing this questionnaire. If you have any queries, please contact us; contact details are provided in the consultation document. When returning this questionnaire, please ensure that you have enclosed your completed Respondent Information Form to ensure that we handle publishing your response in the correct manner. Thank you for taking the time to respond to this consultation.

Information about you

The following questions aim to gather general information about respondents that will aid in the analysis of the responses to this consultation.

Please indicate which of the sectors you most align yourself/your organisation with for the purpose of this consultation (please tick the one most applicable to you):

- | | | | |
|-----------------------------|--------------------------|------------------------------|-------------------------------------|
| Animal Welfare Organisation | <input type="checkbox"/> | Collar manufacturer | <input type="checkbox"/> |
| Dog Society | <input type="checkbox"/> | Local Authority | <input type="checkbox"/> |
| Cat Society | <input type="checkbox"/> | Veterinarian | <input type="checkbox"/> |
| Animal Trainer | <input type="checkbox"/> | Member of the general public | <input type="checkbox"/> |
| Animal Behaviourist | <input type="checkbox"/> | Retailer | <input type="checkbox"/> |
| Pet Owner | <input type="checkbox"/> | Other | <input checked="" type="checkbox"/> |

If 'Other', please specify

Canine & Feline Sector Group advising Scottish Government & DEFRA

Please indicate where you currently reside.

- | | |
|---------------------|-------------------------------------|
| Scotland | <input type="checkbox"/> |
| England | |
| Wales | <input type="checkbox"/> |
| Northern Ireland | <input type="checkbox"/> |
| Republic of Ireland | <input type="checkbox"/> |
| Other | <input checked="" type="checkbox"/> |

If 'Other', please specify country

We seek to provide views on dog and cat health & welfare as a sector to the UK as many of our members work across borders. We include the key welfare organisations, Dogs Trust, PDSA, Blue Cross, Wood Green, Battersea, Kennel Club as well as industry, Pet Industry Federation, and veterinary representation through BSAVA.

Evidence on electronic training aids

This section gives you the opportunity to provide us with any information you may have on any misuse or positive outcomes of the use of electronic training collars

Consultation Question 1 Do you have evidence of any intentional or unintentional misuse or abuse of any type of electronic training aids in Scotland?

Yes
No

If yes, please provide details, including which type of collar or device.

Details:

Whilst we have little evidence of a pattern of abuse, whether intentional or otherwise, of these devices the question rather misses a larger issue. This consultation is concerned at a more basic level with whether these collars are appropriate for use in Scotland. The majority of CFSG members argue that they are not, and that if they were banned questions over the intention behind their use would not arise.

Given the manner in which products are marketed, and the wide range of retailers that offer them for sale, we have no reason than to believe that the dog owners who are using them are, in the vast majority of cases, doing so with the intention of causing significant physical or psychological harm to their pets. However, as cited below through this response the evidence suggests that this is likely to be the consequence of their use.

As an example, this is how two online retailers describe a remote control electronic shock collar:

“This training system is ideal for times when you take your dog along without a leash. It lets you interrupt your dog’s unwanted behaviour with a harmless static correction. Dogs quickly learn to associate the static correction with their prohibited behaviour”.

http://www.drsfostersmith.com/product/prod_display.cfm?c=3307+9+30+24569&pcatid=24569

“The Remote Transmitter sends a signal activating your dog’s Receiver Collar. He receives a safe but annoying electrical stimulation.” <http://store.intl.petsafe.net/en-gb/st-70-basic-remote-trainer>

However, any negative method employed to prevent a particular behaviour in dogs has to be aversive and painful enough in order to stop the undesired behaviour from reoccurring and so it is not clear to dog owners that the use of these devices, even in line with the manufacturers’ instructions, presents a risk to the well-being of dogs.

Consultation Question 2 Do you have evidence of positive outcomes following the use of electronic training aids in Scotland?

Yes
No

If yes, Please provide details, including which type of collar or device.

Details:

Whilst we do not have any evidence ourselves of a positive outcome following the use of an electronic training aid, a commonly cited reason for using a remote control electronic training aid is to prevent a dog from attacking sheep and risk being shot by a farmer as a result. This justification for usage ignores the long term psychological damage caused to the dog, which has been proved through extensive independent research. In addition, there is a risk that when being used to prevent sheep chasing, the dog may be encouraged to chase further as it would have been chasing the sheep whilst receiving the stimulus and without any pre-warning. It is our view that using an electronic collar for this purpose is wholly unnecessary given that most dog walkers will simply keep their dogs on leads when around livestock. This is also the advice of the National Farmers Union, and the majority of canine welfare charities.

The industry may also argue the collars can help with recall, but it is our experience that recall can be effectively achieved through positive training methods and that using electronic devices for recall is unnecessary. In fact, studies have found that punishment-based training is not effective at reducing the incidence of problematic behaviours, and its use seems to be linked with the increased occurrence of potential problems (see response to Question 5 for more information).

Existing animal welfare protection

Currently, the Animal Health and Welfare (Scotland) Act 2006, sections 19 and 24, makes it an offence to cause a protected animal “unnecessary suffering” and to fail to meet the needs of an animal.

Consultation Question 3 Do you believe that this is sufficient to protect animals who wear electronic training aids?

Yes

No

Don't Know

Please explain why.

It is the majority opinion of CFSG's that the use of these devices poses an unnecessary risk to cat and dog welfare and is contrary to the principles of the Animal Welfare Act (Scotland) 2006.

Current guidance in relation to the Act makes no mention of electronic training aids.

Furthermore, it is difficult for the user of the aid (or framers of the law) to assess whether they are causing unnecessary suffering and the instructions accompanying the aids are insufficient to permit accurate assessment of any level of suffering with each individual dog, particularly in relation to shock collars. After all, size and temperament are crucial factors in assessing what a dog can withstand. As stated previously; many users of such devices are unlikely to intend to cause their pet significant suffering but may not fully understand the consequences of their use. Whilst they may not be deliberately causing suffering, the

suffering may not be obvious to an enforcement officer because even within a single breed, dogs have been shown to have a variable capacity for coping with aversive stimuli (Vincent & Mitchell, 2006).

The British Small Animal Veterinary Association (BSAVA) states that “shocks and other aversive stimuli received during training may not only be acutely stressful, painful and frightening for the animals, but may also produce long term adverse effects on behavioural and emotional responses.” This would suggest therefore, that other consequences of dog behaviour that the Scottish Government has sought to tackle could be made worse by continuing use of electronic devices.

Research commissioned by the Department of Environment, Food and Rural Affairs (Defra) showed that there were significant long-term negative welfare consequences for a proportion of the dogs that were trained with ESTDs – namely electronic shock collars (Defra commissioned study AW1402, 2013). 25% of dogs showed signs of stress compared to less than 5 percent of dogs reacting in this way to positive training methods. Furthermore, 33% of dogs yelped at the first use of an electric shock collar and 25% yelped at subsequent uses. The researchers subsequently conducted a reanalysis and, in a paper published in Plos ONE, made the stronger conclusion that the routine use of e-collars even in accordance with best practice (as suggested by collar manufacturers) presents a risk to the well-being of pet dogs. (Cooper, J.J, Cracknell, N., Hardiman, J., Wright, H., Mills, D. (2014) *The Welfare Consequences and Efficacy of Training Pet Dogs with Remote Electronic Training Collars in Comparison to Reward Based Training*. PLoS ONE 9(9)).

With regards to cats, it is the use of electric shock fencing for the containment of cats that needs consideration. Cats Protection believes that those who acquire an animal should be prepared to provide for its welfare needs in accordance with the Animal Welfare Act 2006 and should ensure their environment protects their animal from Road Traffic Accidents and painful stimuli. Recent research has shown that owned male domestic cats will range an average of 100m from their home and owned female domestic cats an average of 50m. Despite being well-fed and neutered and therefore having no need to roam in regards to hunting and mating, owned domestic cats still chose to perform this behaviour suggesting they are highly motivated to do so. Prevention from performing this behaviour is likely to negatively affect their welfare.

As a result of the evidence cited above, it seems that use of electronic devices, foremost electric shock collars, can cause an element of suffering, and therefore their use is not compatible with the Scottish legislation protecting animal welfare, and the goal of the Scottish Government towards the same.

Consultation Question 4 Do you think that Scottish Government guidance or a statutory welfare code is required?

- Yes
- No
- Don't Know

Please explain why and what you would like to see in place.

Details:

We have significant concerns that issuing guidance on how to use electronic shock training devices may 'legitimise' their use and in doing so, cause more dogs to be trained in this way by owners who may or may not follow and understand guidance.

This view is supported by recent research undertaken by the University of Lincoln which examined dogs who had been trained using remote control training collars under the supervision of professional dog trainers selected by the Electronic Collar Manufacturers Association (ECMA). The study concluded that even when ESCs were used by professionals following an industry set standard, there were still long term negative impacts on dog welfare. The studies also demonstrated that positive reinforcement methods were effective in treating livestock chasing, which is the most commonly cited justification of their use. Further, in the later study by the University of Lincoln, three out of four randomly selected professional dog trainers did not follow manufacturer's best practice. Thus it is reasonable to expect that a significant proportion of even professional shock collar users do not follow ideal practice.

This reinforces our view that, in regards to shock collars, even working with the industry to draw up guidance for dog owners and trainers to advise how to use e-collars 'properly' would be unwise given the inconsistencies in how even professional dog trainers use them, and also that they are not necessary in dog training in the first instance.

We also have significant concerns about how compliance with any guidance on the use of electronic training aids could be enforced.

For this reason, the majority of CFSG members believe that banning these types of devices is the clearest and most enforceable means of addressing this issue.

Ban or regulations

This section will allow us to gather views on a potential ban or stricter regulations.

Consultation Question 5 Thinking about the current legislation, which one of the following do you think is necessary?

- | | |
|---|---|
| A complete ban of certain devices
the view of the KC & PIF | <input checked="" type="checkbox"/> Not |
| Stricter regulations | <input type="checkbox"/> |
| A combination of bans and stricter regulations depending on devices | <input type="checkbox"/> |
| Scottish Government guidance or a statutory welfare code | <input type="checkbox"/> |
| Nothing, current legislation is sufficient | <input type="checkbox"/> |
| Don't Know | <input type="checkbox"/> |

Please explain why.

Details:

Different organisations take different views on where this line should be drawn appropriately. The animal welfare sector is united in its belief that shock collars how no

place in a society respectful of animal welfare. Whilst most organisations support a ban of all types of negative behavioural enforcement, there is not a unanimous view of spray and scent devices.

Defra's Code of Practice for the Welfare of Dogs in England, of which CFSG recently completed a review, specifically states that you should; "only use positive reward based training. Avoid harsh, potentially painful or frightening training methods." The veterinary body, BSAVA, recommends against the use of electronic shock collars and other aversive methods for the training and containment of animals.

Dogs Trust would like to see a full ban on the sale and use of static pulse, spray and sonic collars as well as boundary fence systems. However, it does recognise that when used correctly, vibrating collars can have a use in the training of deaf dogs. In this case, it is of critical importance that they are correctly introduced and used and that the collar itself only vibrates and does not have other functions, such as an electric shock mode. Under such conditions, Dogs Trust believes that consideration should be given to a very tightly regulated exemption for the use of vibrating collars to train deaf dogs only.

Kennel Club, representing dog breeders across the whole UK, supports the ban on shock collars, yet takes a more nuanced view on other devices, arguing that better guidance can eliminate much inappropriate use.

One member of CFSG, the Pet Industry Federation, argues that a ban would be too limiting as in certain cases shock collars can be used as a last resort where an owner considers euthanasia may otherwise be necessary. They argue that the devices should be controlled at the point of sale, and only provided by suitably qualified people that are comfortable that the buyer can use it responsibly. These suitably qualified people would be vets, trainers or behaviourists.

An independent survey commissioned by the Kennel Club last year found that 73 per cent of the Scottish public are against the use of electric shock collars and 74 per cent would support a Government ban.

Dogs Trust holds the position that the use of electronic training collars, as well as punishment-based training techniques in general, poses a significant risk to dog welfare which the majority of CFSG members agree with for the following reasons:

- Recent research commissioned by Defra concluded that the routine use of electronic training collars even in accordance with best practice (as suggested by collar manufacturers) presents a risk to the well-being of pet dogs (Cooper et al., 2014).

- The application of an electric shock has been associated with a physiological stress response in dogs (Shalke et al., 2005) as well as behavioural signs of distress (Cooper et al., 2014) and pain, fear and stress (Schilder and van der Borg, 2004; Beerda et al., 1998). In addition, research has shown that other aversive stimuli that cannot be anticipated, such as sound blasts, tend to induce a physiological stress response and behaviours indicative of stress (Beerda et al., 1998).

- There is great potential for the misuse of equipment that uses punishment to train

dogs, either through ignorance or deliberate intent.

- The use of punishment techniques may suppress behaviour without addressing the underlying cause/motivation for the behaviour. This means that other behaviour problems may be likely to arise.

- The use of punishment techniques may reduce a dog's ability to learn. A survey of dog owners found that dogs whose owners favoured physical punishment tended to be less playful, whilst dogs whose owners reported using more rewards tended to perform better in a novel training task. This study concluded that high levels of punishment may have adverse effects upon a dog's behaviour whilst reward based training may improve a dog's subsequent ability to learn (Rooney and Cowan, 2011).

- There is a risk of coincidental events being associated with the punishment, especially if the punishment is poorly timed, or for boundary fence systems, if the animal is not able to see the boundary markings.

- The results of a study on dog training methods suggested that punishment-based training is not effective at reducing the incidence of problematic behaviours, and its use seems to be linked with the increased occurrence of potential problems (Hiby et al., 2004).

- Punishment techniques, such as the use of static pulse collars, may result in long-term welfare issues such as fear of the punisher. In a study by Schilder and van der Borg (2004) the authors concluded that dogs that had received electric shocks learnt that the presence of the owner announced the reception of shocks.

All of this leads the majority of CFSG to the conclusion that there is no need for the use of aversive training methods, as positive, reward-based training is proven to be at least equally effective, and therefore, a ban is acceptable.

References:

Beerda, B., Schilder, M.B.H., van Hoof, J.A.R.A.M., de Vries, H.W. and Mol, J.A. (1998) *Behavioural, saliva cortisol and heart arte responses to different types of stimuli in dogs*. *Applied Animal Behaviour Science* 59, 365-381.

Cooper, J.J, Cracknell, N., Hardiman, J., Wright, H., Mills, D. (2014) *The Welfare Consequences and Efficacy of Training Pet Dogs with Remote Electronic Training Collars in Comparison to Reward Based Training*. *PLoS ONE* 9(9).

Hiby, E.F., Rooney, N.J. and Bradshaw, J.W.S. *Dog training methods: their use, effectiveness and interaction with behaviour and welfare*. *Animal Welfare* 13, 63-69.

Rooney, N.J. and Cowan, S. (2011). *Training methods and owner-dog interactions: Links with dog behaviour and learning ability*. *Applied Animal Behaviour Science* 132, 169-177.

Schalke, E., Stichnoth, J. and Jones-Baade, R. (2005) *Stress symptoms caused by the use of electric training collars on dogs (Canis familiaris) in everyday life situations*. *Current Issues and Research in Veterinary Behavioural Medicine: Papers presented at the 5th International Veterinary Behaviour meeting*.

Schilder, M.B.H. and van der Borg, J.A.M (2004). *Training dogs with help of the shock collar: short and long term behavioural effects*. *Applied Animal Behaviour Science* 85, 319-334.

Potential ban

Consultation Question 6 In your opinion, which, if any of the devices listed should be banned? (Please select all the devices you think should be banned.)

Please select all that apply.

Remote training collars

- Static pulse Unanimous
- Spray Except for Kennel Club & PIF
- Sonic Except for Kennel Club & PIF
- Vibrate Except for Kennel Club & PIF

Anti-bark collars

- Static pulse Unanimous
- Spray Except for Kennel Club & PIF
- Sonic Except for Kennel Club & PIF
- Vibrate Except for Kennel Club & PIF

Boundary Fence Systems

- Static pulse Except for Kennel Club & PIF

Don't Know

Please explain why.

Details:

The majority of CFSG in its position that electric shock devices should be banned. The Kennel Club & PIF differ in opinion on the other devices.

BSAVA recommends against *all* aversive methods for the training and containment of animals recognising that electronic devices that employ shock as a form of punishing or controlling behaviour, and that other means that rely on aversive stimuli are open to potential abuse and that incorrect use of such training aids has the potential to cause welfare problems.

Battersea Dogs & Cats Home never uses aversive training aids to deal with the 5,000 dogs they rescue each year and it is their firm view that if positive behavioural methods are appropriate for the most challenging behavioural cases, then all dogs in Scotland can be trained in this way. Dogs Trust strongly believes that there are alternatives to the electronic training aids and only uses reward-based methods to train dogs in their care. Dogs Trust is strongly calling for a ban on the sale and use of static pulse, sonic and spray collars and boundary fence systems, but recognises that further consideration should be given to a very tightly controlled exemption for the use of vibrating collars for the training of deaf dogs.

The Kennel Club does not wish to see a ban on devices other than the electric shock devices as the evidence is not there to the same extent as it is for electric shock devices and they could be used under advice. The Pet Industry Federation (PIF) agrees with this position as

long as these types of devices are only sold to owners under guidance from a veterinary surgeon, an accredited dog behaviourist or a retailer that has been trained by the manufacturer.

The scientific understanding of dog behaviour has moved forward a great deal in the past 20 years, and recognises that reward based training is the best way of dealing with difficult behaviour. As these training techniques are widely, and successfully, used without requiring the use of punishment, there is no need to use techniques which risk negative welfare of dogs. We have strong concerns over all aversive training aids but recognise that the electric shock collars applied by human intervention are the greatest risk to welfare and CFSG are unanimous that these should be banned.

Potential regulation

Consultation Question 7 - In your opinion, which, if any, of the devices listed require regulation? (Please select all the devices you think should be regulated.)

Remote training collars

- Static pulse
- Spray
- Sonic
- Vibrate

Anti-bark collars

- Static pulse
- Spray
- Sonic
- Vibrate

Boundary Fence Systems

- Static pulse

Don't Know

Please explain why.

Details:

CFSG unanimously support a clear ban over regulation on the electric shock devices. Most members wish to see a clear ban on the other devices although this is not a unanimous position as the Kennel Club and PIF are of the view that regulation can ensure the other devices are used under best practice.

Consultation Question 8 - If the use of electronic training aids was regulated, what conditions should be required for the authorisation of their use? Please explain why you think that this is necessary.

Comments:

The majority of CFSG members would like a full ban on most devices. The Kennel Club and

PIF have suggested regulating the sale of electronic devices and will have provided more details on this in their submissions. If regulations were to be considered on the other devices listed, CFSG would be happy to offer advice if requested.

Consultation Question 9 If the use of electronic training aids was regulated, which bodies would be best placed to authorise the use of electronic training aids? Please explain why.

Comments:

Ideally any regulation would be overseen by those with expertise in dog training and behaviour such as the Animal Behaviour and Training Council (ABTC) or Kennel Club Accredited Instructor (KCAI), although both of these organisations only work with positive training methods and would not recommend the use of electronic training aids.

Pet Industry Federation argues that the use of these aids should be controlled through vets, trainers and behaviourists, which suggests again that those like the ABTC are well placed to provide this advice. Those with a commercial interest in the use of these devices should not be in a position to advise Government on their use, as there would be a demonstrable conflict of interest in their advice.

Use and financial impact – Pet Owners

This section is seeking information to inform any business and regulatory impact assessment that may be required.

Consultation Question 10 - Have you ever bought an electronic training device?

Yes
No

If yes, please specify which device(s) you have purchased.

Remote training collars

- Static pulse
- Spray
- Sonic
- Vibrate

Anti-bark collars

- Static pulse
- Spray
- Sonic
- Vibrate

Boundary Fence Systems

- Static pulse

Consultation Question 11 - From where did you purchase your device?

- Direct from a manufacturer
- Pet store
- Online e.g. Amazon/eBay
- Other

If 'Other', please specify.

Comments:

Members have experience with all of the devices listed above as they were provided for consideration or testing. Devices were never used on dogs but have been used as a visual aid when we have discussed the collars to those with an interest.

Consultation Question 12 - How much did your device cost? Please use the price ranges below.

- Under £50
- £50 - £100
- £100 - £150
- Over £150
- Don't know/can't remember

Use and financial impact – Manufacturers/retailers

We would like information on how introducing a ban or regulations would affect your business in the collar industry.

Consultation Question 13 - Would your business/company be affected by any ban or stricter regulations put on the use in Scotland of any of the electronic training aids listed?

- | | Yes | No | Don't know |
|-------------------------|--------------------------|--------------------------|--------------------------|
| Remote training collars | | | |
| • Static pulse | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Spray | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Sonic | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Vibrate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Anti-bark collars | | | |
| • Static pulse | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Spray | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Sonic | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Vibrate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Boundary Fence Systems | | | |
| • Static pulse | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Please provide details of any effect on your business/organisation.

Details:

Consultation Question 14 - If known, how many of the listed electronic training aids has your business sold to users in Scotland within the 2014/15 financial year?

Remote training collars

Static pulse	
Spray	
Sonic	
Vibrate	

Anti-bark collars

Static pulse	
Spray	
Sonic	
Vibrate	

Boundary Fence Systems

Static pulse	
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Consultation Question 15 - If known, please provide an approximate annual profit obtained from sales of electronic training devices per year. If possible, please indicate what proportion of those sales were in Scotland or the UK.

Details:

Use and financial impact – Dog trainers/behaviourists/manufacturers/retailers

This section allows you to provide information on the use of electronic devices in Scotland.

Consultation Question 16 - Would a ban or restriction in Scotland on the use of any of the electronic training aids listed have an effect on your business or organisation?

Remote training collars	Yes	No	Don't know
• Static pulse	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Spray	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Sonic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Vibrate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Anti-bark collars

- Static pulse
- Spray
- Sonic
- Vibrate

Boundary Fence Systems

- Static pulse

Please provide details of any effect on your business/organisation:

Consultation Question 17 - Please describe what effect restricting the use of electronic collars to authorised persons would have on your business or organisation.

Details:

Use and financial impact – Pet behaviourists/pet trainers

We would like you to provide information on the use of electronic collars in Scotland.

Consultation Question 18 - Approximately how many dogs did you recommend the use of electronic training collars for in Scotland in 2014?

Details:

Consultation Question 19 - If you sometimes recommend the use of an electronic training collar, generally, do you provide the electronic training collars or do owners purchase the collar themselves?

- I provide the collar
- Owners purchase themselves
- It varies

About the consultation

While we have done our best to explain the issues facing us clearly, there may be aspects that you feel that we have not explained well or have not covered at all.

The following questions in this consultation paper are to provide you with the opportunity to raise such points, and to provide us with feedback on the consultation itself.

Consultation Question 20 – Please provide any other comments you may wish to add on a potential ban or regulation of electronic training devices.

Consultation Question 21 – Do you consider that that consultation explained the key issues sufficiently to properly consider your responses?

Yes
No

Consultation Question 22 – Do you consider that you had sufficient time to respond to the consultation?

Yes
No

Consultation Question 23 – Do you have any other comments on the way this consultation has been conducted?

Comments: CFSG welcomes the Scottish Government's return to this issue and their commitment to ensuring high welfare for dogs.