

**From:** Luke Rao [REDACTED]  
**Sent:** Wednesday, 5 June 2019 1:04 PM  
**To:** dog.standards@dpird.wa.gov.au  
**Subject:** Response to Draft Standards and Guidelines for the Health and Welfare of Dogs WA  
**Attachments:** Luke Rao Written Submission - Draft Dog Standards and Guidelines.docx

See attached

# Draft Standards and Guidelines for the Health and Welfare of Dogs in Western Australia

## Public Submission Form

### Respondent information

Company or association represented by this submission

N/A

Your name

Luke Rao

Postal / business address

[REDACTED]

Email

[REDACTED]

Phone number

[REDACTED]

### Consent to treat this submission as a public document

Your submission will be made public and published in full on the Department of Primary Industries and Regional Development (department) website unless you ask for it to be confidential. Your name will be included but your contact address will be withheld for privacy.

It is important to note that even if your submission is treated as confidential by the department, it may still be disclosed under the *Freedom of Information Act 1992* or any other applicable written law. Submissions that contain defamatory or offensive material will not be published.

Do you wish this information to remain private and confidential? (Please mark the applicable box).

I acknowledge that this submission  
will be treated as a public document

☒

This submission is confidential

☐

If you have marked your submission as confidential, please identify any specific parts which you feel need to be kept private.

[REDACTED]

## Feedback on the draft Dog Standards and Guidelines

1. Please indicate if you are any of the following:

- ☒ Companion dog owner
- ☒ Working dog owner
- ☒ Sporting dog owner
- ☐ Dog breeder
- ☐ Dog trainer
- ☐ Pet shop owner or employee
- ☐ Other pet business owner or employee
- ☐ Local government employee
- ☐ Local government elected member
- ☐ Rescue organisation employee or volunteer (including foster carer for dogs)
- ☐ Veterinarian
- ☐ Veterinary nurse
- ☐ I do not own or care for a dog
- ☐ Other (please specify) \_\_\_\_\_

2. Should people who own or keep dogs have to comply with minimum standards for the health and welfare of dogs?

Yes. These standards should be evidence based however.

3. Should people who breed dogs have to comply with minimum standards for the health and welfare of dogs?

Yes.

4. Should people who care for dogs in a domestic dog operation have to comply with additional minimum standards for the health and welfare of dogs?

Yes

5. Do you think that the proposed standards and guidelines in the document reflect community values and expectations for the acceptable treatment of dogs?

Not entirely.

6. Do you think that complying with proposed minimum standards in Part 2 - General Care of Dogs will increase the cost of owning a dog?

Yes. Prohibiting the use of prong collars will decrease the safety and consistency in working of working breeds. This is likely to prolong the duration of training needed (either personal or private commercial training), and be associated with greater risk for adverse behaviour in these dogs.

7. Comments or issues relating to Part 2 - General Care of Dogs of the draft Dog Standards and Guidelines. Please indicate the page, section and title for each part being commented on.

If applicable, please identify any evidence of likely costs, benefits or other impacts that may arise from the proposed Standards and Guidelines.

Part 2, Section 3, Article 12-13, Pages 19-21 – prong and E-collars

Banning prong collars outright will seriously detriment the health and safety of a particular demographic of dogs. These tools are not 'inhumane', and do not cause damage or harm to a dog. There is no justification for the proposed banning of them, nor is any evidence cited or quoted to explain this decision.

As the owner of a working line German Shepherd with high drive and the potential for dog aggression, I can say that owning and using a prong collar has saved his life. A simple flat collar is not sufficient to redirect or correct aggressive behaviour, and enables a large dog to drag towards a desired object. Where a prong collar provides pressure around the circumference of the neck, a flat collar provides all of its pressure over the trachea, allowing dogs to choke themselves out on flat collars.

After a dog aggression related event I was advised to consider permanently muzzling my dog or putting him down. By contacting a trainer who directed me in prong collar use in a safe and ethical way I was able to transition from having a dog I had little confidence in to a dog I can now walk past any other dog in close proximity. This would not have been possible without a prong collar.

The rationale to ban them seems to be due to the overwhelming support for 'positive only' training regimes. While I concede this may be sufficient in typical household dogs, when dealing with large working breeds used in sports, this is not feasible and a balanced training approach is required.

The move towards heavy E-collar regulation is also concerning, which I suspect is largely due to stigma and the labelling of them as 'shock collars'. E-collars are essential for 100% off lead reliable recall in a public environment, and serve to make dogs safer for both owners and bystanders. Whilst I do not currently use an E-collar I would love to be able to freely use one in the future without being discriminated as using an 'abusive/inhumane device'. The stimulation setting on e-collars can be varied greatly, such that many dogs are able to function on quite low settings.

8. Do you think the key issues about the general care of dogs have been adequately addressed in Part 2 of the draft Dog Standards and Guidelines? Please provide any suggestions for alternative options.

See above.

No banning of prong collars, lifting the regulations surrounding E-collars.

9. Comments or issues relating to Part 3 - Domestic dog operations of the draft Dog Standards and Guidelines. Please indicate the page, section and title for each part being commented on.

If applicable, please identify any evidence of likely costs, benefits or other impacts that may arise from the proposed Part 3 Standards and Guidelines.

Nil

10. Do you think the key issues about the care of dogs in a domestic dog operation have been adequately addressed in Part 3 of the draft Dog Standards and Guidelines? Please provide any suggestions for alternative options.

Nil

11. Other comments

Please consider both arguments in formulating this proposal – whilst ‘positive only’ training is very vocal and prevalent, it is not the only option.

**Signature**

Luke Rao

**Date**

5/6/19

**Returning this form:**

Please return submissions by 5pm on Friday 7 June 2019

**Email:** [dog.standards@dpird.wa.gov.au](mailto:dog.standards@dpird.wa.gov.au)

**Post:** Dog Standards and Guidelines Consultation  
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WA 6983

**Important disclaimer**

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