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Sent: Friday, 7 June 2019 4:50 PM
To: dog.standards@dpird.wa.gov.au
Cc: The Dog Line; Colin Seal
Subject: Submission - Health and Welfare of Dogs
Attachments: Written Submission from The Dog Line - Draft Dog Standards and Guidelines_June 7 2019.pdf

Dear Sir/Madame

Please find attached submission prepared by myself as a current Stakeholder and Business owner in Western Australia.

Thank you for the opportunity of presenting my input in to this Draft.

Regards

Colin Seal

The Dog Line
[REDACTED]
[REDACTED]
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Draft Standards and Guidelines for the Health and Welfare of Dogs in Western Australia

Public Submission

RESPONDENT INFORMATION

**Company or Association Represented by this
Submission:** The Dog Line

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Date of Submission: June 1, 2019

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

Thank you for the opportunity to comment on the Standards &
Guidelines for Health & Welfare of Dogs in WA (Draft).

This submission is entirely based on the best of my knowledge and experience as a lifetime dog owner... and as the owner and founder of The Dog Line Pty Ltd.

The Dog Line has been established in Western Australia Since 2003.

We have been assisting people with Dog Problems in the areas of Excessive Barking, Escaping and Training - including off-lead control.

Bark Collars, Radio/Invisible Dog Fences and Remote Dog Training Collars form the majority of our product offering. We also offer advice on the use of these products when introducing a dog and the continued management of their use. This includes a full installation service of the Radio/Invisible Dog Fences.

We also offer products to assist with dog entertainment, particularly when being left at home to give a more holistic approach to Separation Anxiety.

Over the years, we have assisted thousands of dog owners with not only the purchase but advice regarding the effective use products that have shown to be of great value in solving the above issues where many other methods have failed.

It has been my experience that the clients we have assisted have not come to us as the first point of call. They have already experienced quite a journey in attempting to solve unwanted behaviours, habits and actions in their dogs. A journey that has become not only expensive and time-consuming but is often at the stage where the welfare of not only the Dog but the community has been put at risk.

Had these situations not been addressed with the use of Electronic Dog Training Collars, the dog owners would have been left with the option of abandoning or euthanising the dog and may have already faced fines from the shire.

Restricting or Banning the use of Electronic Collars would negatively affect the welfare of dogs in WA.

Dog Bark Collars

The use of bark collars in Western Australia, Electronic, Citronella Spray, Vibration and Ultrasonic have enabled dog owners to retrain their dogs from Nuisance Barking Habits. Barking dog noise is by far the biggest form of noise complaints in our community.

Dog owners face hefty penalties from the shire if they are unable to keep their dogs barking at an appropriate level. Neighbours have been known to threaten dog owners and the welfare of dogs in circumstances where excessive barking goes uncontrolled.

Radio/Invisible Dog Fences

Keeping a dog secure on a property is essential, not only for the welfare of the dog but also for the welfare of the community.

A dog owner is responsible for the result of any incident or accident that may be caused by a dog. A car swerving to avoid a wandering dog endangers lives.

Invisible dog fences have proven to be invaluable to dog owners where no fences exist, adding to the effectiveness

of existing fences and stopping dogs escaping through open gateways.

Many Jurisdictions who have discussed the use of E-Collars have widely accepted that Invisible dog fences are an effective and acceptable method of improving the containment of dogs on properties and the safety of the community.

(I find this point interesting, as this device delivers the same Static and electronic stimulation and deterrent as both Dog Bark Collars and Remote Dog Training Collars).

Remote Dog Training Collars

Dogs owners are required to have full control of their dogs at all times. Dog Training Collars give dog owners the ability to communicate with their dogs at a distance and maintain control.

In my experience, the consistent and correct use of dog training collars has seen positive and long-lasting results.

Developments and advancements in modern dog training collars have seen a great improvement in the types of communication delivered via a dog training collar. Audible tones that can be used for positive reinforcement, vibration only modes that do not deliver an Electronic Stimulation and varying levels of Electronic Stimulation. These options have added to the effectiveness of these training tools for those who have chosen them as their preferred training tool.

Often these training tools have been chosen from the perspective of ensuring the safety of the dog and the

community. There have been incidences where the use of a dog training collar could have stopped the occurrence of a dog attack.

Stakeholders Meeting May 28 2019 - Draft Standards and guidelines for the Health and Welfare of Dogs in Western Australia. Section 13.

Having attended the Industry and Stakeholder meeting with DPIRD on May 28, 2019, it came to light in the discussion that there were 3 main areas that have been identified as being of concern to the parties who developed the document in relation to section 13.

Who should be consulted before an Electronic Collar is to be recommended, Separation Anxiety and the fitting and length of time the collars should be worn which, when discussed revolves around the issue of preventing Pressure Necrosis. I cover these 3 areas separately below.

I would like to note that it was mentioned on a few occasions there was no clear representation from Industry and stakeholders in the discussion that to the development of the Public Consultation Supporting Paper for the Draft Standards and guidelines for the Health and Welfare of Dogs in Western Australia. Section 13.

In my opinion, the Supporting Document appears weighted against the use of Electronic Collars, even to the point of mentioning the banning of these devices.

The use of the term 'Electric Shock Collars' paints an unrealistic and negative picture of these training devices. Even though this term is used in the current Dog Act it has now well known to have become outdated and recognized as an inaccurate term.

Who Should Be Consulted if an Electronic Dog Collar is to Be Used?

As mentioned above, dog owners have often sort other alternatives prior to looking at the Electronic Collars.

Often, timing and urgency are a real factor in the situations dog owners face when considering their options. These products, as mentioned in the Discussion Paper do offer a faster solution which lends itself towards them being part of an overall management program.

The ability of a dog owner to deliver a consistent training message to the dog is often impractical. Dog's at home, while dog owners are at work, cannot be given the consistent training messages they need to change habitual behaviours

It should be noted that the intention of the dog owner who utilizes these products is an intention based out of the concern for the welfare of the dog and the consideration for the surrounding community.

A dog presented to a Vet for examination at a Clinic would not display the same behaviours, habits or emotions they would in their normal environment where these problems are occurring.

Separation Anxiety

From my experience, the term 'Separation Anxiety' is a very broadly used term, one which encompasses many levels of behaviours exhibited by dogs left alone. The degree or measure of Separation Anxiety or the severity is often never mentioned.

Learnt behaviours and habits that have developed have often been termed as Separation Anxiety. For example, dogs barking at normal neighbourhood activity (possibly triggered at one point by an angry neighbour) or dogs escaping from a property when an owner leaves, may not require anything more than regular and consistent training which can be delivered with the use of Electronic Dog Collar

It is common for dog owners to be in a situation where it is necessary for the dog to be left alone, medication may need to be considered however the behaviour, habits and retraining still need to be addressed. Quite often the separation anxiety is not to the degree where medication may be necessary.

Advice on enriching the dogs' environment for these periods of separation is then also a consideration.

Pressure Necrosis

It is good to note that the draft and supporting paper do not have any mention of Electronic Dog Collars 'Burning Dogs'

it is hoped by the gradual elimination of this 'Myth' that the community, in general, become more aware of the issue as being one of Pressure Necrosis and so will be more inclined to take action to avoid this.

(I will note also that this also applies to the term Shock Collar... when this term is no longer used the public will be able to make a more informed decision about using these training tools)

Pressure Necrosis in relation to the points in the Draft.

I can see from the draft that there are several areas that relate directly to the issue of pressure necrosis.

Section 13

S13.1 (d) a collar is not left on the dog for more than 12 hours in any 24 hour period.

S13.1 (g) the collar is checked regularly to ensure it is fitted and working correctly

G13.1 An Electronic Collar should not be left on an unsupervised dog.

The above points can be modified to be inclusive of each other and created as a guideline, in a way as to educate the public as to the reasoning behind the guideline in relation to 'Pressure Necrosis'

Pressure Necrosis through friction and rubbing causing sores which can lead to infection

The correct fitting and regular checking of the collars is essential. However, insisting on the removal of the collar for a 12-hour period may interrupt the training routine needed

to ensure the dog receives a consistent training message. Alternative 'correction probes' are now being offered to help assist with rubbing issues.

A Remote training collar is usually only required for a short period of time, however, they may be needed to be left on the dog for longer periods to ensure the dog does not become 'Collar Aware' and only respond and follow commands when the Electronic Collar is fitted.

Dog Bark Collars, are often required to be left on for longer periods to ensure the dog receives an instant and consistent training message. As above the objective is also to avoid 'Collar Awareness' with the ultimate goal of the dog only needing the Bark Collar for a reasonable length of time for a training period to enable the change of bad habits into consistent desired behaviours collar may not be necessary for the future.

Electronic Dog Fences, it essential that in order to maintain the permanent safety of the dog that a containment collar be work for longer periods. Of course, ensuring that the collar is checked regularly.

Necrosis as a result of allergy or skin reactions

As mentioned in the Stakeholders Meeting there has been discussion regarding Necrosis developing as a result of allergies or the skin reacting to the metals on the probes. Alternative metals (and compounds) have been offered for many years to owners who find their dog may have a reaction.

It should be noted that what is produced by the collar in the form of the 'Static Correction' is not related to the issue of 'Pressure Necrosis'. Any collar, haulty, harness or dog coat has the potential to cause Pressure Necrosis.

The Impact of Social Media on the subject of Pressure Necrosis in attempting to shape the opinion of Electric Dog Training Collars in the eyes of the general public

It is evident from the various surveys that have been seen on Social Media (fake news) and the related Images that have been bandied around that Pressure Necrosis is being used a 'scapegoat'. It is clearly an attempt to influence the uninformed public in their decisions regarding the use of Electronic Dog Training Collars. Where in fact there is just as much evidence and some far nastier images where regular collars or harnesses have caused the Pressure Necrosis in dogs.

With regards to Pressure Necrosis, it is not a reason for restricting or Banning Electronic Dog Collars. However, it points out a need for suppliers and trainers to be very proactive in advising dog owners to be aware of the importance of checking any item fitted to their dog for any period of time.

Health and Welfare of Dogs in Western Australia (Draft)

PART 1

INTERPRETATION

The use of the term “electric shock” in the definition of electronic collars shows lack of evident information on how e-collars truly operate.

Even though this term is used in the Dog Act, it is now extremely outdated and considered to be a biased term. This is not an accurate description of the way electronic collars function and the term “shock collars” biases public opinion about the devices, preventing careful consideration of the value and the costs of using these training tools for animal welfare.

At low levels, the term “shock” is hardly fitting to describe the effects produced by electronic training collars, since there is virtually no effect beyond a pulsing, tingling or tickling sensation on the surface of the skin. The word “shock” is loaded with biased connotations”

(Lindsay, S.R. 2005. Handbook of Applied Dog Behavior and Training. Vol 3, Procedures and Protocols. Blackwell Publishing, Ames Iowa. pages)

Electronic collars utilise electronic stimulation, not electric shock.

As described by the International Electrotechnical Commission (IEC), Electronic Stimulation (ES) is an artificial stimulation to the skin by means of a mild electric current or field. It is similar to [Transcutaneous Electrical Nerve Stimulation \(TENS\)](#).

TENS stimulates nerves and sensory receptors artificially... and does not cause injurious consequences. In fact, it is mostly used to help cope with chronic pain in humans.

Therefore, in electronic collars, the ES travels through the two contact points which touch the skin of dogs. Now, if the contact points are 60mm apart, the ES is contained to the skin, just into the superficial tissue of the dog.

This is why the ECMA (Electronic Collar Manufacturers Association) requires that the contact points which touch the skin should be 60mm apart - in order to confine the ES only into the superficial tissue.

Therefore, electronic collars when used in low-level Electronic Stimulation do not cause pain or harm to dogs. Again, it does not deliver an electric shock. This is why calling it a “shock” collar is not a fitting term.

PART 2

4. Crating of Dogs

G4.1C “A dog should not be confined in a crate with the crate door closed unless; the period of time does not exceed 2 hours a day during daytime hours.”

This guideline is unworkable in many situations such as during long transport of dogs and dog shows, also where the safety of the dog is of importance.

5. Tethering of Dogs

G5.1 “Dogs should not be tethered for a period exceeding two hours in any twenty-four hour period.”

This is an unworkable Guideline for people who require long term tethering of the dog. Graziers, Dogs at Shows, Dog Trainers and people travelling would require longer-term Tethering. The Standard at S5.2 covers this issue, where a dog must be trained to accept tethering and be kept safe.

6. Transport of Dogs

S6.2 “A dog must not be transported on the open back of a moving vehicle.”

This standard cover shelter and security of the dog. Both issues can be dealt with by requiring a covered crate to be used to dispense with the need for a tether.

7. Health & Veterinary Care

S7.4 (b) “in the case of a debarking procedure, is performed for a medical reason or as an alternative to euthanasia of the dog when reasonable and documented effort has been made to reduce barking behaviour through other training techniques, and these have not been effective.”

Debarking should be outlawed in the Standards. Debarking is NEVER a solution to a barking dog issue. It merely reduces some of the nuisance ‘noise’... often scar tissue replaces the vocal cords, where the barking noise complaints return. We have in the past been presented with dogs who are have had debarking procedures and are still exhibiting nuisance behaviour and habits.

Dog Bark Collars require vibration to be activated - Debarking removes the ability to activate a Dog Bark Collar to ensure the dog receives appropriate training of the unwanted habit.

Why would we attempt to ban Electronic Bark Collars yet see debarking as an option?

10. Behaviour & Training

S10.2 “*The training techniques or aids used to train a dog and the duration of such training must not cause harm to the dog.*”

This standard needs to be removed. It shows ambiguity and is open to misinterpretation, particularly with the use of the word ‘harm’. The word ‘appropriate’ would better serve the intention of this Standard.

This can also be combined with G10.5 where the behaviour of the dog would dictate that the training is at an adequate length of time.

The use of training tools and techniques as covered in specific sections are more specific to the techniques and tools being used.

The appropriate use of any training method, whether it involves any device or not, is the most important factor. Not the device itself.

G10.2 “*Training of dogs should focus on reward-based training techniques.*”

This guideline should be removed. It implies that any form of aversive training should never be used. Reward plays a major role in all training methods.

Aversive training methods and training tools play an important role in guiding and training dogs to correct behaviours. A pup in a litter is exposed to aversive training

and socialisation not only from the Dam but also from its siblings.

Dog trainers should be encouraged to take a more holistic approach in their methods and recommendations. Reward-based training on its own is not always 100% effective.

I would like to note that advocates of 'positive only' training techniques are often seen to be using negatives in their training. They have been known to imply that 'balanced dog trainers' never use reward (or encouragement) when training their dogs - often creating a divide in the industry itself.

All training methods include the use of reward - and is the fundamental idea behind the end goal of all trainers, to get the dog to a level where aversives are not needed - yet available should the need arise.

Saying that ALL training should be reward based is misleading the general public.

12. Restraint

S12.2 *“Prong collars must not be used on a dog.”*

This Standard needs to be rewritten to focus on the intent of the use of prong collars.

It should focus on the correct fitting and the correct use of the training tool.

Dog trainers do encounter dog owners and dogs where the situation calls for the correct use of a prong collar.

Like with any tool it is not the tool but how it is used that must be considered.

People with Arthritis have found great results from using Prong collars correctly. A poorly fitted flat collar can be more detrimental to the dog than a well-fitted prong collar used in the correct manner.

13. Electronic Collar

In the introduction, it states that ***“Electronic collars are not recommended for the modification of behaviour of dogs”***.

This statement in itself, I believe will bias the public in their submissions regarding Electronic Dog Training devices.

E-collars such as remote training collars and bark limiters are designed to modify a dog's behaviour and improve its relationship to its owner. Therefore, the statement in the draft is highly subjective based more on emotion or public perception that seemingly lack facts about how good quality e-collars work and how to properly use them.

Electronic collars may be banned in some jurisdiction but allowed in another, whether it is local or international, is largely irrelevant. The simple fact that most military and police agencies use e-collars to train their dogs is a huge testament that such training tools do actually work in a safe and effective manner if used properly.

S13.1 (a) *“An electronic collar must only be used on a dog in accordance with the generally accepted method of use. For the purposes of*

these Standards, the generally accepted method of use includes: if a reasonable and documented effort has been made to use other training techniques to modify behaviour and these have not been effective”

The public should be able to make their own decision after seeking advice on whether these tools are appropriate to the dog training needs.

The delay in the use of Electronic Dog Training devices caused by this standard will jeopardise the safety and welfare of the dog.

S13.1 (b) “a veterinarian has examined the health and temperament of the dog and reasonably believes that the dog is suitable to wear an electronic collar”

A dog in a vet clinic is not in an environment where they will be able to be examined and impartially.

Dogs do not show relaxed behaviour at vet clinics at the best of times.

This Standard will also put an unnecessary delay in seeking balanced advice regarding the use of Electronic Dog Training Collars. Some of these issues may be minor and not related to the health of the dog where a vet would be needed.

The general public would be able to distinguish the need for ‘medical’ advice rather than training advice.

S13.1 (c) the dog is over 6 months of age;

I would generally agree however a dog is trainable at a much younger age and we run the risk of not being able to address the development of good habits at a younger age.

Dog breeds differ in size and development so this Standard can be too broad.

S13.1 (d) a collar is not left on the dog for more than 12 hours in any 24-hour period;

This is covered in my section above regarding Pressure Necrosis

This Standard needs to be looked at again and also moved to become a Guideline that covers the issue of Pressure necrosis.

Along with:

S13.1 (g) the collar is checked regularly to ensure it is fitted and working correctly

G13.1 An Electronic Collar should not be left on an unsupervised dog.

S13.1 (e) the use is in accordance with any instructions for use of the collar provided by the manufacturer”

Agreed. Manufacturers and retailers should be required to also be able to give advice on specific training needs of the dog and the situation at hand.

S13.1 (f) the collar is introduced and used on a dog in accordance with a training program

under the advice of a veterinarian or experienced dog trainer;

I believe this issue would be covered by S13.1(e)

S13.1 (g) the collar is checked regularly to ensure it is fitted and working correctly.

As above - this is related to Pressure Necrosis and needs to be combined with the other Standards and guidelines related to that issue.

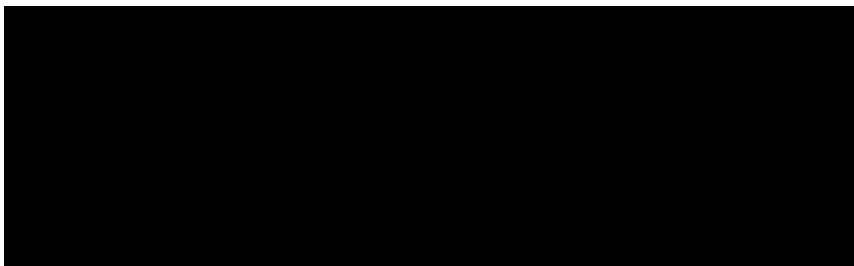
S13.2 (a) A person in charge of a dog must discontinue the use of an electronic collar if there is any trauma to the skin of the dog;

As above - this is related to the issue of Pressure Necrosis

S13.2 (b) the dog displays signs of distress associated with the use of the collar;

A good dog trainer and an informed dog owner know that learning anything new or being exposed to unusual stimuli will create a degree of anxiety to the dog.

Also, any careful trainer would ensure that the anxiety does not increase to a level where the dog is significantly impacted.



S13.2 (c) A person in charge of a dog must discontinue the use of an electronic collar if there is any electronic malfunctioning of the device.

Agreed.

G13.1 “An electronic collar should not be left on an unsupervised dog.”

This beats the purpose of why bark collars and dog fence collars are made. These electronic collars are predominantly used when the owner is not present.

I have covered this in more detail above.

It is essential that a dog is given a consistent and appropriate message in order to reach the goal of modifying a dogs behaviour. The ultimate goal of using any training tool is that the dog will need it less and less and the new habits and routines are established.

A dog becoming ‘Collar Aware’ or not being given the correct and consistent message throughout the day will not achieve the correct long-term training results

This issue is related to Pressure Necrosis also.

Guideline 13.2 “Electronic collars to prevent a dog from barking should not be used where the barking of other nearby dogs may activate the collar.”

Bark collars work by the vibration of the dog’s neck; they cannot be activated by a dog barking nearby.

Guideline 13.3 “Electronic collars should not be used in wet weather.”

Modern and high-quality electronic collars are actually waterproof and submersible so they can be used just as good on wet weather.

G13.4 Electronic collars should comply with technical requirements for Electronic Pet Training and Containment Collars established by the Electronic Collar Manufacturers Association.

Agreed. This organisation covers a good deal of the intentions that are set out the Draft guidelines.