

Sir Roger Gale, MP.  
House of Commons,  
London SW1 0AA

19th March 2019.

Dear Sir Roger,

We would like to thank you for kindly organising and inviting us to contribute to the recent parliamentary round table on Electronic Training Devices (ETDs). The time set aside for the discussion was much appreciated. However, due to the nature of the issue and its complexity, it was not possible for us to cover everything in depth. For some topics we were unable to provide as comprehensive a response as we would wish. We are therefore hopeful that the following will provide further clarity on our position as well as additional useful information, and as a courtesy we will be sharing this letter with Jamie Penrith and his colleagues from the meeting.

### **The evidence base to support a ban on Electronic Training Devices.**

Analysis by the Association of Responsible Dog Owners (ARDO) of the RSPCA's position and consultation response to Defra on the proposed ban of ETDs suggested that their evidence was lacking in original research articles and that of those, none supported their policy or position opposing the use of ETDs to train and control cats and dogs. As a group we are concerned at ARDO's effort to discredit the evidence provided by the RSPCA and their rejection of information from other robust and valid sources including scientific literature review papers by expert/specialist bodies and individuals within different industries, the veterinary profession and academia. We would assert that there is sufficient evidence to show that the application of an electric stimulus can result in behavioural and physiological responses associated with pain, fear and distress and that a ban on the use of ETDs can be justified on these grounds. Further, scientific evidence indicates that reward based methods are more effective than aversive methods and the latter is not necessary. We have included a literature review<sup>1</sup> kindly produced by Dogs Trust which summarises this evidence.

Practical experience gained by dog trainers and behaviourists has also shown that ETDs can compromise welfare and in some cases, their use can result in new behaviour problems, such as aggression to people. Thousands of dog trainers and behaviourists use reward based methods to achieve long-term behaviour change, including reliable recall as demonstrated by the practitioners present at the meeting. Each of our organisations employs or accredits training professionals who achieve the highest possible results without using electronic collars.

### **Use of electronic training devices for livestock worrying**

Livestock worrying was used as a strong justification for the use of ETDs. However, data from five Police Forces<sup>2</sup> suggests that the majority of livestock worrying offences (nearly 7 in 10) occur from unaccompanied dogs i.e. stray or latch-key dogs. Appropriate enrichment in the domestic

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<sup>1</sup>[https://www.dogstrust.org.uk/news-events/news/the%20welfare%20impact%20and%20efficacy%20of%20canine%20training%20methods\\_v4.pdf](https://www.dogstrust.org.uk/news-events/news/the%20welfare%20impact%20and%20efficacy%20of%20canine%20training%20methods_v4.pdf)

<sup>2</sup> <https://www.npcc.police.uk/Publication/livestock%20worrying.pdf>

environment and securing gardens to stop dogs roaming would be unquestionably more effective and better for dog welfare than the use of an ETD. For the minority of livestock worrying cases which involve dogs being walked with an owner/walker, keeping a dog on a lead in the vicinity of livestock will be the most effective route to preventing livestock worrying. Further, practical experience has shown that successful and long term behaviour modification of predatory behaviour is achievable without the use of ETDs.

It was suggested that since the introduction of regulations to Wales in 2010 there has been a significant increase in livestock worrying incidents as well as dog bites. We would question the evidence to substantiate such claims and heed caution in applying causation to what is undoubtedly a very complex multifactorial issue.

### **Livestock fencing compared with electronic containment fencing**

During the meeting it was suggested that the position held on electronic containment fences to contain dogs and cats was inconsistent with that for electric fencing used for managing livestock. The two situations are entirely different. Electric livestock fencing generally follows a visible boundary or is marked with white tape which is not the case for buried or hidden boundary fences and which require the dog or cat to learn the position of a boundary in the absence of any geographic features. Moreover, viable alternatives to livestock fencing are not as readily available for livestock as they are for companion animals due to the economic cost and in some areas, the practical difficulties posed by fencing large areas of land.

We further believe that the probability of livestock leaving a bound area, compared with cats and dogs, is less likely as the welfare needs of livestock can generally be provided for within the area. Dogs and cats are more likely to be strongly motivated to leave an area to gain access to something which they highly value or to avoid something which they are frightened of and thus are more likely to try and leave the area and receive an electric stimulus as a consequence.

### **Regulation of the behaviour therapy and training industry**

As we hope was clear in the meeting, we are united in our support for the regulation of the behaviour and training therapy industry. In its current state, there are an overwhelming number of practitioners available as well as countless terms describing their ethos, approach, methods, techniques and equipment. This is hugely confusing for owners and concerning when outdated methods and techniques continue to be embraced by some individuals. Unlike vets, who are regulated by the Royal College of Veterinary Surgeons, there is no Government recognition of a single UK regulatory authority for those practicing in the behaviour industry despite there being an urgent need for a regulatory framework within the sector to protect dog welfare. Regulation of the industry must not be seen as an alternative to banning the use of ETDs though.

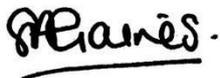
To maximise efficacy of ETDs, the key criteria of aversive training techniques - immediacy, level of aversiveness, and consistency - must be met and this requires a skilled person. While regulation may be seen to help achieve this, thereby restricting the use of such devices to limited individuals, it needs to be noted that a significant number of reputable behaviour therapy and training organisations oppose the use of techniques which may still cause pain or distress, regardless of

efforts to use according to industry best practice, and would not consider the use of ETDs as necessary or acceptable.

These organisations include: Kennel Club Accredited Instructors, Animal Behaviour and Training Council, the Association of Pet Dog Trainers, the Association of Pet Behaviour Counsellors, and the COAPE Association of Applied Pet Behaviourists and Trainers. Together, this represents around 2,000 professional dog trainers and behaviourists, all of whom have signed a code of conduct against using electric shock training devices.

We strongly believe the UK Government should continue with its plan to ban the use of these devices and give dog welfare the protection it deserves. ETDs are unpleasant, potentially very harmful in both the short and long term and - very importantly - are not necessary. We are urging you to support and encourage the passage of legislation which would achieve this.

Yours sincerely,

A handwritten signature in black ink that reads "S. Gaines" with a horizontal line underneath.

Dr Samantha Gaines, Head of Companion Animals, RSPCA Science and Policy group.

On behalf of:

Michael Webb, Head of Policy and Public Affairs, Battersea Dogs & Cats Home.

Dr Jenna Kiddie, Head of Dog Behaviour and Charlotte Longster, Senior Public Affairs Officer, Dogs Trust.

Holly Conway, Head of Public Affairs and Angela White, Kennel Club Accredited Instructor, The Kennel Club.

Dr Julia Wrathall, Chief Scientific Officer, RSPCA Science and Policy group.