

27 May 2009

Response to the Welsh Assembly Consultation on the Animal Welfare (Electronic Devices)(Wales) Regulations 2009

INTRODUCTION

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and represents over 11,000 members. Our chief interest is to protect and promote the interests of the veterinary profession in this country and we therefore take a keen interest in all issues affecting the veterinary profession, be they animal health, animal welfare, public health, regulatory issues or employment concerns.
2. The BVA welcomes the opportunity to participate in the consultation process on the Animal Welfare (Electronic Devices) (Wales) Regulations 2009. This issue has been considered within the BVA and the response, which follows, is based upon comments received from the BVA membership.

BVA POSITION

3. It is the view of the BVA that there is currently insufficient scientific data on the use of electronic devices and that the Welsh Assembly should await the completion of the Defra Study, "AW1402: Studies to assess the effect of pet training aids, specifically remote static pulse systems, on the welfare of domestic dogs" which will be completed in 2010, and the publication of the Companion Animal Welfare Council (CAWC) report, on the use of electronic pulse training aids, before adopting any legislation on electronic training devices for animals. In addition the BVA believes that prematurely legislating on this issue could impact on the ability to effectively enforce the regulation.
4. The BVA believes that containment using electrical barriers has been well established in many animal species, including cattle, pigs and horses, and this legislation should not impact on the use of this method of enclosure.

5. In addition, the BVA believes that attention should be taken to ensure that electronic devices are fitted correctly to the animal and the contained area should provide access to shelter, food and water and shouldn't restrict movement.
6. The BVA agrees with the view of its division, the British Small Animal Veterinary Association (BSAVA), that shocks received during training can be acutely stressful, painful and frightening for the animal and also may produce long term adverse effects on behavioural and emotional responses. The BVA strongly recommends the use of positive reinforcement methods in training dogs wherever possible and supports investigation of positive reinforcement training methods that could replace those using aversive stimuli.

CONSULTATION RESPONSE

7. Paragraph 4a-c – The BVA believes that a veterinary surgeon should not be placed in a position to judge the necessity of such a system for training purposes. However, the BVA are concerned that if such a clause was removed then presumably any dog given a cardiac pacemaker or faradism treatment would put the owner in jeopardy of prosecution as such a device could be judged to be prohibited due to its function.
8. Paragraph 5 – The BVA believes that “a visible physical barrier” should be further defined.

CONCLUSION

9. Although we have made comment on the regulation under consultation, and understand the public interest in this issue, we are concerned that this legislation is due to be adopted before the scientific evidence on which it could be based has been evaluated.