JOINT BVA AND BSAVA RESPONSE TO DEFRA’S PROPOSED BAN ON ELECTRONIC TRAINING COLLARS FOR CATS AND DOGS IN ENGLAND

1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 17,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

2) The British Small Animal Veterinary Association (BSAVA) exists to promote excellence in small animal practice through education and science and is the largest specialist division of BVA representing over 11,000 members.

3) We welcome the opportunity to comment on Defra proposals to ban the use of electronic training collars on cats and dogs in England. We strongly support proposed ban of electric pulse collars and intentions to update the language in the statutory dog and cats code of practice to reflect a legal ban.

4) However, whilst we strongly support proposals to ban the use of electric pulse collars, we continue to call for a complete ban on the sale, as well as use, of electric pulse collars across the UK. Further, we would welcome increased clarity as to what specific methods the ‘noxious sprays’ set out in the consultation refer to.

5) We would also welcome further consideration as to the communications strategies that will be employed to notify owners of the proposed ban and reinforce the advantages of positive reward-based training.

6) Scope of the proposed ban – electric pulse collars

We strongly support the proposed ban of electric pulse collars, however would like to reiterate our calls for a complete ban on the use and sale of electric pulse collars. We strongly recommend positive reinforcement training methods in place of those using aversive stimuli.

The use of electric pulse collars raises a number of welfare issues, such as the difficulty in accurately judging the level of electric pulse to apply to a dog or a cat without causing
unnecessary suffering. 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.\(^1\),\(^2\) It is also of note that these long term adverse effects on behavioural and emotional responses may negatively impact on behaviour of animals towards humans.

Defra's research (AW1402a which ended in 2011) concluded that electric shock collars caused negative behavioural and physiological changes in a portion of dogs, were not more effective than positive reinforcement methods and were open to misuse, as owners either did not read the manuals or they were not provided. In order to reduce the unwanted behaviour, the user would need to apply the electric shock at a level that is sufficiently aversive to achieve a negative emotional response.

Research by Shalke, Stichnoth and Jones-Baade (2005)\(^3\) also showed that the application of electric stimulus, even at a low level, can cause physiological and behavioural responses associated with stress, pain and fear.

Whilst the above research projects were carried out specifically in relation to the use of electric shock collars in dogs, we consider that the principle of risk of misuse of electric pulse collars is equally applicable to other species such as cats.

Further, it is very hard to accurately ascertain the individual impact the use of such devices – static pulse devices in particular - has on animals in terms of stress, emotional response and behavioural responses. Therefore, it would be difficult to assess when unnecessary suffering is being caused and difficult for the user to determine at what point a negative emotional response would be sufficient to cause unnecessary suffering. The impact is also likely to vary between each individual animal, even within a particular breed.\(^4\) With this in mind, we deem the proposed ban of electric pulse collars an appropriate measure to mitigate against any negative welfare consequences for dogs and cats.

We also note the significant body of literature which demonstrates that positive reward-based training is more successful than aversive training in dogs:


BVA CONSULTATION RESPONSE
APRIL 2018

- Behaviour of smaller and larger dogs: Effects of training methods, inconsistency of owner behaviour and level of engagement in activities with the dog C Arhant, H Bubna-Littitz, A Bartels, A Futschik... - Applied Animal ..., 2010 – Elsevier
- Survey of the use and outcome of confrontational and non-confrontational training methods in client-owned dogs showing undesired behaviors ME Herron, FS Shofer, IR Reisner - Applied Animal Behaviour Science, 2009 - Elsevier
- The relationship between training methods and the occurrence of behavior problems, as reported by owners, in a population of domestic dogs EJ Blackwell, C Twells, A Seawright... - Journal of Veterinary ..., 2008 – Elsevier
- Effects of 2 training methods on stress-related behaviors of the dog (Canis familiaris) and on the dog–owner relationship S Deldalle, F Gaunet - Journal of Veterinary Behavior: Clinical Applications ..., 2014 - Elsevier

7) Ban on the sale of electric pulse collars

As highlighted above, whilst we fully support proposals to ban the use of electric pulse collars, we are concerned that allowing the sale and continued legal access to these devices leaves room for their potential misuse and negative impacts on animal health and welfare. With this in mind, in order to comprehensively safeguard animal welfare in this context, we continue to call for a complete ban of the sale of electric pulse collars as well as their use.

8) Updating Codes of Practice for dogs and cats

We would support the updating of the statutory codes of practice to align them with regulations banning the use of e-collars after their adoption and language taken from Scottish Government guidance which provides a more explicit summary of the devices which should not be used.

However, we would caution against over reliance on these codes of practice as the sole vehicle for messaging regarding regulations banning the use of e-collars and devices which should not be used. Research by the Canine and Feline Sector Council has demonstrated that the majority of the public are unaware of the existence of the current welfare codes. We also note that the 2017 PDSA Animal Wellbeing (PAW) report found that only 39% of pet owners surveyed felt that they were familiar with the Animal Welfare Acts, and therefore their responsibilities set out within them.

With this in mind, further consideration should be given to the communication strategies that could be employed to make owners aware of the update to regulations banning the use of electric pulse collars. The Government should work collaboratively with key stakeholders to promote the updated regulations and codes of practice across their various communications channels, aiming to reach owners directly via effective media.

Further, as the Government updates the codes of practice to align them with regulations banning the use of e-collars, it should take this opportunity to strengthen references to positive rewards-based training and provide detailed guidance on where to seek help and guidance to effectively undertake positive rewards-based training methods.

9) Alternative adverse training methods – noxious sprays and containment systems
We note that the consultation sets out that the proposals to ban e-collars covers collars that emit noxious sprays. We would welcome further information regarding the specific methods of aversive training devices that are covered by the term ‘noxious sprays’.

In terms of our position regarding aversive training devices other than electric pulse collars, we note the current lack of research and evidence regarding the welfare implications of the use of other aversive methods of training and control which may be equally stressful for a dog (such as choke collars, choke chains and prong collars, as well as collars using a noise, vibration, ultrasonic sound or spray of water or citronella). Further, as excessive barking can often be a symptom of other health and welfare issues in dogs, eg. physical issues or separation anxiety, we are concerned that anti-bark collars only treat the ‘symptom’ of what may be an underlying physical, emotional or behavioural issue. In light of this absence of evidence, we recommend that further evidence is collected on their use and effectiveness.

Until further research is completed around the impact of other aversive training collars, such as anti-bark spray collars, BVA is calling for a Government code of practice for users, as well as the regulation of the sale of these devices and manufacturer’s instructions, to ensure that the potential adverse effects of use are highlighted to animal owners and consumers.

10) Concluding remarks
We strongly support Defra’s proposals to ban the use of electric pulse collars in cats and dogs on animal welfare grounds. However, we reiterate our calls for a complete ban on the use and sale of these devices to safeguard animal welfare and prevent the misuse of electric pulse collars that would remain legally available.

Whilst we agree that the statutory codes of practice for the welfare of dogs and cats should be updated to reflect the adoption of regulations banning the use of electric pulse collars, due consideration should also be given to other communications channels that can reach owners directly with the key messages surrounding the regulations and the use of positive training methods.

Further, we would welcome further clarity as to what constitutes aversive training methods that ‘emit noxious sprays’ within these proposals.