

Explanatory Memorandum to The Animal Welfare (Electronic Collars) (Wales) Regulations 2010.

This Explanatory Memorandum has been prepared by the Office of the Chief Veterinary Officer and is laid before the National Assembly for Wales in accordance with Standing Order 24.1.

Minister's Declaration

In my view, this Explanatory Memorandum gives a fair and reasonable view of the expected impact of The Animal Welfare (Electronic Collars) (Wales) Regulations 2010. I am satisfied that the benefits outweigh any costs.

A handwritten signature in black ink, appearing to read 'Elin Jones', written in a cursive style.

ELIN JONES AM

23 FEBRUARY 2010

1. Description

The draft Regulations prohibit the use of any electronic training collar capable of causing an electronic shock to any cat or dog. This includes electric shock collars used to control behaviour and those collars which react to hidden electric fences.

2. Matters of special interest to the Constitutional Affairs Committee

These Regulations do not require the consent of UK Ministers but they have been notified to the European Commission under the Technical Standards Directive (98/34/EC). No final comments have been made by the European Commission and the formal standstill period of three months is now completed.

3. Legislative background

The regulations will be made by the Welsh Ministers under section 12 of the Animal Welfare Act 2006. The regulations must be laid before and approved by resolution of the National Assembly for Wales pursuant to section 61(2) of that Act and paragraph 34 of and Schedule 11 to the Government of Wales Act 2006.

4. Purpose & intended effect of the legislation

The purpose of the legislation is to prevent the use of electronic training/impulse collars on dogs and cats. The Animal Welfare Act 2006, implemented in Wales on 27 March 2007 introduced new concepts for the raising of standards of animals in Wales. Specifically section 4 of that Act provides for an offence to have been committed if unnecessary suffering is caused, this includes both mental and physical suffering. Commonly known as electronic shock collars or static pulse training devices, they are considered to conflict with positive reward based training in that the “action” of triggering an electric stimulus is not necessarily directly associated with the behaviour change sought. Further, that the science to date suggests that the use of these collars adversely affects the behaviour of animals and in untrained hands could cause pain or distress.

The legislation bans the use of these devices in Wales but not their sale or possession. By restricting the legislation to the act of using the devices, there are no trade issues and the issue of possession by a person transiting Wales does not arise. This legislation will provide certainty for enforcers on what can be enforced.

The ban on the use of electronic training devices also covers those used in conjunction with hidden electric fences. It does not cover those electric fences commonly used in agriculture where the shock or stimulus occurs when direct physical contact is made with the fence – i.e. the animal directly associates the shock with a physical barrier which is clearly visible to all.

Those affected by the ban include dog and cat owners and trainers who use these electronic shock devices to alter their animals behaviour – the attached

RIA summarises available information as to the extent of their use. No substantive evidence has been provided of any impact on employment in Wales, but anecdotal comments by the industry indicate that no employment issues will arise.

5. Consultation

The details and outcomes of the consultations below are included in the Regulation Impact Assessment (RIA) below.

There have been three consultations on this issue:

a. The first consultation between 15 November 2007 and 8th February 2008 asked a number of questions including the need to implement legislation. There were balanced views about whether a ban on the use of these devices should be made, but in the detail of the correspondence replies, a consistent theme arose i.e. a recognition that the use of these devices can cause problems and 81% of the responses agreed that there was not sufficient law in this area.

b. The second consultation took place between the 4th March 2009 and 27 May 2009. It was considerably delayed because of a legal challenge in the High Court, which was rejected on prematurity grounds. It took forward draft regulations based on the responses received from the first consultation. These draft regulations proposed a ban on the use of these devices subject to certain exemptions. These exemptions included certification by a veterinary surgeon that these devices could be used. On the basis of concerns expressed by the RVCS and others this exemption was dropped. A further exemption was based on the use of “invisible fencing systems” where it would have been allowed for a certain period of time. Police, local authorities, animal behavioural organisations and third sector bodies all asked for this to be removed.

c. The third consultation was held between 21 December 2009 and 9 February 2010 (a shorter consultation period as this has twice been subjected to consultation), following consideration of the responses on the second consultation by Ministers tightened up the original proposals by removing the exemptions subject to use of clinical situations or the use by the police using tasers. The outcomes from that consultation indicated half of the responses still sought a complete ban that 22% were neutral, but of that 22%, agreement in principle of a complete ban was mooted. The remainder was divided -16.8% did not want any ban for any collar related issues and 11.2% did not want a ban on fencing systems. Critically it was pointed out that the current wording would prevent the use by veterinary surgeons of the use of equipment in appropriate clinical treatments. Consequently the title of the Regulations has changed to show that it is in direct connection with the use of collars. That would still allow the police to use tasers in the event that there is no alternative method of dealing with a dog that has truly become dangerous and still allows e.g. the insertion of microchips for identification purposes.

The basis of who should be consulted was very clear. They included the manufacturing industry of the devices and their representatives, the third sector

animal welfare charities who have previously expressed interest, the veterinary profession and animal behaviourists, the police (enforcement), local authorities (enforcement) and members of the public who have previously expressed interest. The consultations have also been published on the Welsh Assembly Government website and responses have been received from members of the public. The first two consultations lasted 12 weeks each with the third consultation, because of the familiarity lasted 6 weeks. Analyses of the outcomes of the responses to these consultations are at Annexes A, B and C. The first two consultation analyses are available on the web, the third analysis has just been posted.

The first consultation explored the concepts and asked a series of questions on training devices for animals. Subsequently, draft legislation was drawn up which reflected views from the consultation. Legislation was developed that sought to ban the use of these devices subject to certain exemptions. These exemptions included the authorisation of a vet to allow people to use remote control devices in treatment and secondly to use invisible fencing systems for a short period of time for training purposes.

The consultation responses to these two exemptions were mainly negative. Local authorities, the police and professional bodies were sceptical and reluctant to accept that these exemptions would work. Given the consultation responses a further consultation was issued with the draft regulations revised to have no exemptions subject to the use by police of a Taser which is designed to stop a person mainly but equally effective on an aggressive animal. That consultation came to a conclusion on the 9 February 2010.

The analyses of the consultations are attached as annexes to this document.

PART 2 – REGULATORY IMPACT ASSESSMENT

6. Options

When this subject was first being considered, it was done so under the background of the commencement of the Animal Welfare Act 2006 (the Act). For the first time for pet animals a number of new considerations had to be taken into account. This includes the “five needs” of an animal under section 9 of the Act. Options ranged from:

1. do nothing,
2. provide appropriate non statutory guidance
3. write a code of practice
4. develop legislation.

Do nothing

Doing nothing is not an option. Section 9 of the Animal Welfare Act places a statutory duty on the person responsible for an animal to ensure its welfare. Allowing the continued use of electronic devices would be inconsistent with this duty given the evidence of harm being presented by both the animal welfare organisations, registration societies and indeed the industry.

Provide appropriate non statutory guidance

Section 9 of the Animal Welfare Act places a statutory duty on animal owners/keepers. To provide non statutory guidance for a statutory obligation was considered not appropriate on this occasion on the basis that it would not necessarily help the animals involved as the electronic devices could still be used. .

Write a code of practice

Under section 4 of the Act, a statutory code of practice may be made. A code made under section 14 means that it would provide evidential status in any proceedings taken under section 9 of the Act. This means that a failure to follow this code is not an offence but non-compliance may be used as evidence where animals have suffered to prove that the owner or keeper of an animal has been negligent in the keeping of that animal in any legal action. This procedure was discounted on the basis that it would still not necessarily help the animals involved as the electronic devices could still be used. The science and commentators, although marginally ambivalent are very clear. Significant problems can accrue for animals from the use of these devices.

Develop Legislation

The introduction of legislation would place a prohibition on the use of any electronic training collar capable of causing an electronic shock to any cat or dog. This option makes it an offence to use one of these devices and is more of a deterrent than the previous options.

7. Costs & benefits

Immediate impact of change will fall on those persons who use these devices routinely. Consultation responses confirm that in many cases these devices

were only used briefly and saved them (the owners) time and effort. Whilst that is one view it does not take account of the welfare of the animal. Annex 4 contains a list of the main areas of research which sustainably gives a view that there are problems with these devices, their usage and the resulting consequences on the animals.

Do nothing

No effect on fiscal issues. There would be no benefit to animals continuing to be trained or restrained by aversive electronic systems.

Provide appropriate non statutory guidance

There would be the cost of officials providing such guidance and publicity costs. In terms of actual cost, this is estimated at £21,463

Write a code of practice

There would be the cost of officials providing such guidance and publicity costs. In terms of actual cost, it would be similar to the above.

Develop Legislation

The costs would be similar to the above except for publication costs.

The benefits of providing legislation include the certainty of being able to comply with the Animal Welfare Act 2006 and a certainty on the enforcement process.

In Wales it is estimated 25% of households in Wales have a dog,¹ and 20% have cats². The 2001 Census indicated that there were 1,209,000 households in Wales. Based on these figures, approximately 300,000 dogs and 242,000 cats reside in Wales. The Electronic Collar Manufacturers Association (ECMA) estimate in 2006 that there were about 6,000 collars being used in Wales but they only have records for 414 collars sold in Wales. Other consultees (Kennel Club) confirm that there are unlikely to be great numbers of collars in use in Wales.

However, ECMA, in the response to the third consultation, say that they have evidence to suggest that the figures of collars used might be substantially higher and that *"in 2010 there are likely to be in the region of half a million collars in use in the United Kingdom. It is not known how evenly spread the distribution is throughout the UK but a proportion of those collars are going to be in Wales, perhaps 50,000"*.

These are subjective figures and the ECMA evidence is unsubstantiated by any sales, or other figures although we do accept that the figures quoted in 2006 are now out of date.

In terms of the number of jobs that may be put at risk, *"ECMA estimate that the electronic training aid industry has a turnover of two to three million pounds a*

¹ Pet Food Manufacturers Association 2008/2009 (figures selected from a small sample size)

² Pet Food Manufacturing Association 2008/2009 (figures selected from a small sample size)

year in the United Kingdom. It is not possible to say with certainty what proportion of this would apply to Wales. We are not aware of jobs in Wales that would be lost as a result of a ban."

Comments have been received in the third consultation from ECMA to suggest that vested interests in training and behaviour are behind the bid for a ban on the use of these devices, but the training cost of a behaviourist are roughly equitable to the cost of an electronic device. Devices can cost anywhere between £100 to £200, or even more depending on the product. Animal behaviourist costs are of the same order. It is recognised that in some cases it may cost more to using positive techniques. It is difficult to place a figure on this because it is the subjective behaviour of an animal that will cause the amount of time to be extended. The discussion on the use of these devices has been ongoing in Wales since 2007. The wider dog and cat ownership community are very much aware of the actions being proposed in Wales.

S12 of the Animal Welfare Act allows the appropriate national authority to "make such provisions as the authority thinks fit for the purpose of promoting the welfare of animals for which a person is responsible, or the progeny of such animals". A number of people have commented that these collars have given them peace of mind. Whilst that is noted, the Animal Welfare Act only allows for the welfare of the animal to be considered. Therefore the question of benefit is whether the animal benefits. Modern thinking about positive training as encouraged by the veterinary professions, third sector organisation, scientific research and in general animal behaviourists is sufficiently strong to recognise that these devices may cause problems for dogs and cats which cannot be ignored.

Another benefit in banning the use of these devices in Wales is the question of aggression and especially aggression in large and powerful dogs. Research (University of Philadelphia) shows that using aggressive techniques can lead to an animal that is more aggressive.

In summary, the fourth option of legislation provides for certainty of complying with the Animal Welfare Act. It demonstrates that the Welsh Assembly Government is promoting animal welfare in line with s12 of the Animal Welfare Act, which is supported by the research carried out to date, that the costs are no more than if these devices were bought in the first place. It has no impact on employment in Wales, which was agreed by the industry.

8. Consultation

There have been three consultations on this issue.

a. The first consultation between 15 November 2007 and 8th February 2008 asked five questions relating to whether different types of collars should be treated differently, that certain devices be treated differently, that containment systems which allow an animals to move away be allowed, of whether s4 of the animal welfare act on unnecessary suffering was sufficient to protect animals and lastly whether this was sufficient by itself. 81% of the responses indicated that the current law is insufficient.

b. The second consultation took place between the 4th March 2009 and 27 May 2009. It was considerably delayed because of a legal challenge in the High Court, which was rejected on prematurity grounds. It took forward draft regulations based on the responses received from the first consultation. These draft regulations proposed a ban on the use of these devices subject to certain exemptions. These exemptions included certification by an appropriate professional body that these devices could be used. Such was the professional concerns expressed [by the RCVS] about certification and the use of the collars themselves was this exemption was dropped. A further exemption was based on the use of “invisible fencing systems” where it would have been allowed for a certain period of time. Police, local authorities, animal behavioural organisations and third sector bodies all asked for this to be removed. The outcome of that consultation is available on the Welsh Assembly Government’s web site.

c. The third consultation was held between 21 December 2009 and 9 February 2010 A shorter consultation period was held as this has twice been subjected to consultation. Following consideration of the responses on the second consultation, the original proposals were tightened by removing the exemptions subject to use of clinical situations or the use by the police using tasers. The outcomes from that consultation indicated half of the responses still sought a complete ban, that 22% were neutral, but of that 22%, agreement in principle of a complete ban was mooted. The remainder was divided -16.8% did not want any ban for any collar related issues and 11.2% did not want a ban on fencing systems. Critically it was pointed out that the current wording would prevent the use by veterinary surgeons of the use of equipment in appropriate clinical treatments. Consequently the title of the Regulations has changed to show that it is in direct connection with the use of collars. That would still allow the police to use tasers in the event that there is no alternative method of dealing with a dog that has truly become dangerous and still allow e.g. the insertion of microchips for identification purposes.

The basis of who should be consulted was very clear. They included the manufacturing industry of the devices and their representatives, the third sector animal welfare charities who have previously expressed interest, the veterinary profession and animal behaviourists, the police (enforcement), local authorities (enforcement) and members of the public who have previously expressed interest. The consultations have also been published on the Welsh Assembly Government website and responses have been received from members of the public. The first two consultations lasted 12 weeks each with the third consultation, because of the familiarity lasted 6 weeks. Analyses of the outcomes of the responses to these consultations are at Annexes A, B and C. The first two consultation analyses have been available on the web for some considerable time; the third has only just been posted.

The first consultation explored the concepts and asked questions. Consequently draft legislation was drawn up which reflected views from the consultation. Legislation was developed that sought to ban the use of these devices subject to certain exemptions. These exemptions included the

authorisation of a vet to allow people to use remote control devices in treatment and secondly to use invisible fencing systems for a short period of time for training purposes.

The consultation responses to these two exemptions were mainly negative. Local authorities, the police and professional bodies were sceptical and reluctant to accept that these exemptions would work. Given the consultation responses a further consultation was issued with the draft regulations revised to have no exemptions subject to the use by police of a Taser which is designed to stop a person mainly but equally effective on an aggressive animal. That consultation came to a conclusion on the 9 February 2010.

A consequence of the banning of the use of these devices is that it might compromise European Community concerns. Draft regulations have been submitted twice under the Technical Standards Directive (98/34/EC) which requires a standstill period of three months. However in both cases, no formal responses were given by the European Commission.

9. Competition Assessment

The competition filter test	
Question	Answer yes or no
Q1: In the market(s) affected by the new regulation, does any firm have more than 10% market share?	Not Known - information not provided by the industry
Q2: In the market(s) affected by the new regulation, does any firm have more than 20% market share?	No
Q3: In the market(s) affected by the new regulation, do the largest three firms together have at least 50% market share?	No
Q4: Would the costs of the regulation affect some firms substantially more than others?	Yes
Q5: Is the regulation likely to affect the market structure, changing the number or size of businesses/organisation?	No
Q6: Would the regulation lead to higher set-up costs for new or potential suppliers that existing suppliers do not have to meet?	No
Q7: Would the regulation lead to higher ongoing costs for new or potential suppliers that existing suppliers do not have to meet?	No
Q8: Is the sector characterised by rapid technological change?	Yes
Q9: Would the regulation restrict the ability of suppliers to choose the price, quality, range or location of their products?	No

About 6 companies are involved in this business, none based in Wales and several of them are linked into wider trading empires, some in the USA, some in Europe and linked into Japan. The sector has matured to produce electronic shock or stimulus devices on animals and has a turnover of between £2 to 3m employing, we were told about 20 to 30 people GB alone. These devices will still be able to be bought, they will simply not be able to be used in Wales.

10. Post implementation review

It will be appropriate to keep this in view. The current Companion Animal Welfare Enhancement Scheme (CAWES) in Wales provides for close working with local authorities and the third sector. Local authorities have a responsibility under the Animal Welfare Act (s30) that they may enforce legislation. The Animal Welfare Act 2006 is an Act that has common commencement provisions. That effectively means that anybody (with appropriate resources such as the RSPCA) can prosecute for offences under this Act.

It will also be appropriate to review the legislation, once further long term research is completed to ensure that the legislation is still fit for purpose.

Annexes

Annexe 1 - 1st Consultation Analysis

Annexe 2 - 2nd Consultation Analysis

Annexe 3 – 3rd Consultation Analysis

**First Consultation 15 November 2007 and 8th February 2008
on the Use of Electronic Training Aids**

Report of Responses

Number of responses received: 173

Consultees:

Note: 3 consultees wished to keep their identities private

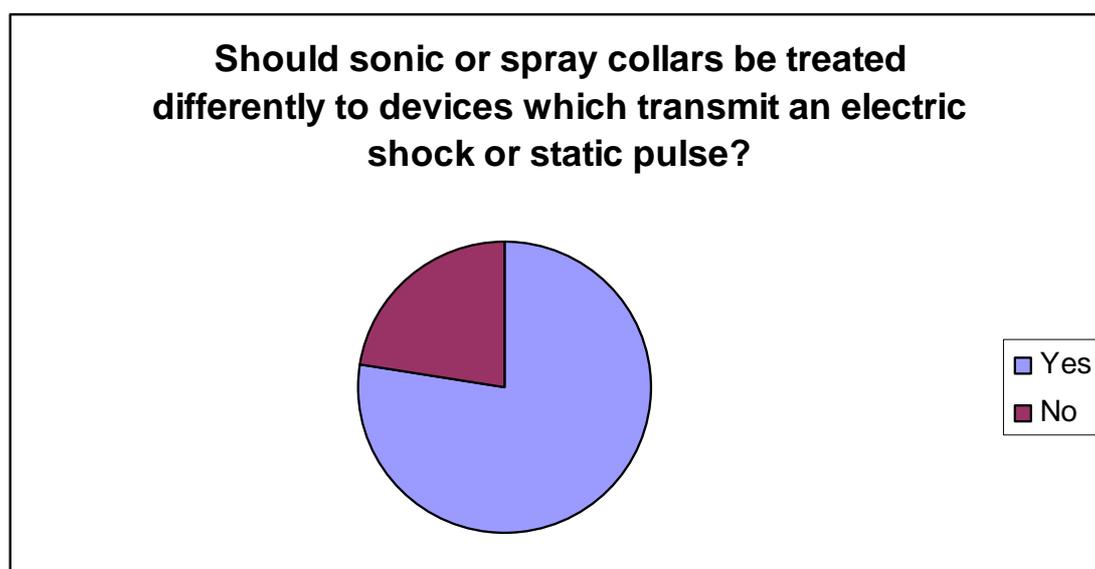
1. A P Thomas
2. A Dog's Life
3. Aberystwyth Dog Training Club
4. Afon Veterinary Centre
5. Alan Harper-Smith
6. Amanda Morris
7. Angie Bowles
8. Animal Aid
9. Assarts & Gawcott Gordon Setters
10. Association of Pet Behaviour Counsellors
11. B O Rees
12. Barry Lockhart
13. Bethan Jenkins AM
14. Bob Worton
15. British Association for Shooting and Conservation (BASC)
16. Brynle Williams AM
17. C Lloyd
18. Carl Sargeant AM
19. Carol Jacobs
20. Carol Moore
21. Cenydd Phillips
22. Ceri Jones
23. Chief Constable Richard Brunstrom
24. Chris Bonner
25. Christopher Parker QC
26. Cibyn Veterinary Clinic
27. Cllr Richard Bertin
28. Cat's Protection
29. DA Bowen
30. DA Gordon
31. David Crampton
32. David Jenkins
33. Deborah Perreau
34. Deputy Chief Constable Peter Vaughan
35. DogFence
36. Dog's Trust
37. Dr Doolittles Vet
38. Dr John Todd
39. Dr Jonathan Gregory

40. EGP Davies
41. Electronic Collar Manufacturer's Association
42. Farmers Union of Wales
43. Faye Mansour
44. Fiona Richards
45. G Jenkins
46. G Jones
47. GC Dog Training North Wales
48. Gail Gwesyn-Price
49. Geoff Davies
50. Geoffrey McLean
51. Georgina Russell
52. Glenys Butler
53. Graham Dunn
54. H Baldwin
55. H Jones
56. Heather Price
57. Heelworks
58. Holly Freeman
59. Ieuan Merriman
60. J Anderson
61. J Ansell
62. J E Giles
63. J G Jones
64. J Harper
65. J Watkins
66. J Williams
67. James D Cox
68. Jan Bevan
69. Jan Dowling
70. Jane Davidson AM
71. Jane Williams
72. Janice Olbrechts
73. Janis Wyn Morgan
74. Joan Hicks
75. Jocelyn Davies AM
76. John Griffiths AM
77. John Hardwick
78. John Thorn
79. Jonathan Beels
80. Julie Lloyd
81. Julie Wren
82. K Jordan
83. Karn Whalley
84. Kate Morgan-Lloyd
85. Kennel Club
86. Kevin Shuker
87. Kim Howe
88. L Curtis
89. Lady Diane Hayman-Joyce IP

90. Lara Coulstock
91. Laura Hannah
92. Lesley Bartholomew
93. Lord Dafydd Elis-Thomas AM
94. Lord Geoffrey Langford
95. Loren Powell
96. Louise Flack
97. Louise Gorrigan
98. M Baldwin
99. M Walsh
100. M Walters
101. Marcus Jones
102. Mark Hooson
103. Martin Edmunds
104. Martyn Jones MP
105. Mary Lake
106. Matt Lloyd
107. Maureen Hughes
108. Meleri Tweed MRCVS
109. Mr Williams
110. N Powell
111. Nancy Bland
112. Nick Ainger AM
113. Nick Higgin
114. Nicola Heselton
115. Nigel Williams
116. National Search And Rescue Dogs Association (NSARDA)
117. Owen Lloyd
118. P Lambeth
119. PAC Products Limited
120. PE Curtis
121. Pam Shaw
122. Pat & James Williams
123. Paul Green MSc (Psych) BSc
124. Paul Harris
125. PDSA
126. Penny Johnstone
127. Pet Advisory Committee
128. Pet Care Trust
129. Peter Carroll
130. Peter Neumark
131. R L Roberts
132. Rhoda Fletcher
133. Rhys Gwinnett
134. Robin Morgans
135. Roger & Amelia Burrage
136. Roger Gale MP
137. Rosemary Butler AM
138. RSPCA
139. S Beech

140. S Burndred
141. S Davies
142. S Havells
143. S Lloyd
144. S McAlpine
145. S R Breakspear
146. S R Capel
147. S Wallace
148. Sarah Collick
149. Sarah McCarthy-Fry MP
150. Sarah Nathan
151. Sharon Lloyd
152. Shona Moon
153. Sister Myfanwy
154. South & West Wales King Charles Cavalier Spaniel Club
155. Sue Downie
156. Susie Hobby
157. Sylvia Wallace
158. Tellington Touch Training for Dogs
159. That's My Dog Inc
160. Thomas Lloyd
161. Tim Gruffydd-Jones
162. Tina Taylor
163. Tony Baldry MP
164. Trish Law AM
165. Val Bethell
166. Val Palmer-Smith
167. Valentine Walsh
168. Wagtail UK Ltd
169. Will J Harper
170. Wood Green Animal Sanctuary

Question 1: Should sonic or spray collars be treated differently to devices which transmit an electric shock or static pulse?		
	Number of Responses	Percentage
Yes	24	77
<i>Of which support a ban on e-collars</i>	18	75
<i>Of which are against a ban on e-collars</i>	6	25
No	7	23
<i>Of which support a ban on e-collars</i>	3	43
<i>Of which are against a ban on e-collars</i>	4	57
Total who responded to this specific question (excludes responses for a blanket ban or those who refer generically to 'training aids'):	31	100



Summary

Many consultees were confused by this question and, as such, responses are unclear.

The following reasons were given against the use of Sonic and Citronella spray collars:

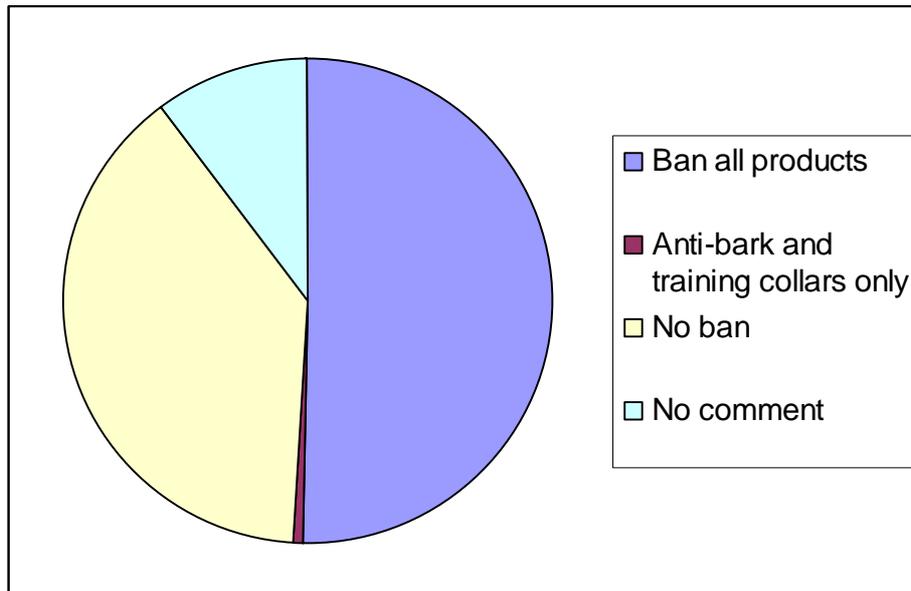
- Smell and hearing are a dog's most sensitive senses
- It was suggested that spraying Citronella into a dog's nose could be compared to the effect of chilli powder in a human nose i.e. extremely painful and long-lasting.

- A dog's hearing is ten times more sensitive than humans, therefore a loud sound could be damaging. Sonic collars could aggravate an already existing aural condition. It was suggested that they are only used under the control and direction of a veterinary surgeon.
- It is believed that spray and sonic collars are ineffective in serious 'stop' situations (e.g. a dog chasing sheep)
- Sonic and spray collars are aversive training devices because, if they work, they change a dog's behaviour through punishment rather than reinforcing good behaviour with reward. They are not designed to tackle the root cause of unwanted behaviour.
- Dogs may be allergic to the substance in the spray collars

For these reasons, it was felt that these methods of training should not be treated differently to electric shock collars. One consultee felt that these methods of training are crueller than using an e-collar.

Consultees who were against the use of electric shock collars felt that sonic or spray collars should be treated differently because they believe that their use is not as cruel as an electric shock – these collars are used to surprise a dog rather than cause it pain.

Question 2: Should all types of electronic collars, stay mats and scat mats which use an electrical delivery system be banned from being used, or just anti-bark and training collars?		
	Number of Responses	Percentage
Ban all products listed above	87	50
Anti-bark and Training Collars only	1	1
No Ban	67	39
<i>Of which agree with a ban on stay mats and scat mats</i>	3	4
No comment (this relates to consultees who only wrote about a specific product that is not listed above (e.g. Freedom Fence) or those who did not feel they had sufficient expertise to answer this question)	18	10
<i>Of which commented only on Freedom Fence</i>	17	94
<i>Of which felt they lacked expertise</i>	1	6
Total:	173	100



Summary

There were no consultees who felt that stay mats or scat mats should be excluded from the ban. Many felt that electric 'stay' or 'scat' mats should be banned because they cause the dog pain and do not give it a visual boundary, as a cage would. 3 consultees who were against a ban on electric training products felt that these devices should be banned, along with electric leads.

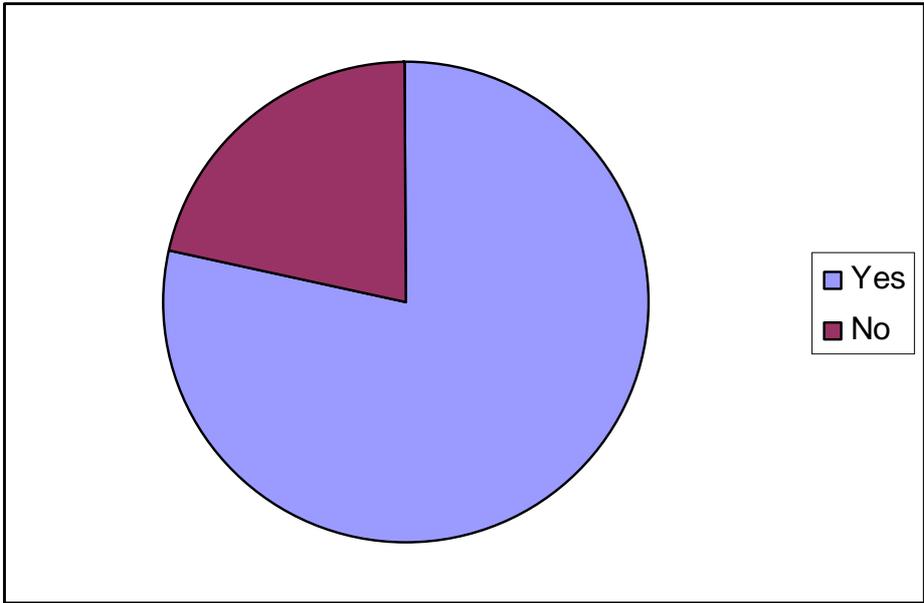
One consultee felt that it would be impossible to distinguish between devices such as scat mats and 'hot wires' used to contain larger animals e.g. in zoos.

There was some confusion over the wording of this question. One consultee felt that the term 'delivery system' was unclear. If the intended meaning was that the device induces a shock, it was considered by this consultee that all devices should be banned. However if the intended meaning was that the device is controlled electronically, it was felt that the better differentiation of devices is whether they deliver an electrical impulse to the dog. Legislating on the means by which a device is controlled wasn't thought to be appropriate. It was commented that any legislation would need to be worded extremely carefully to avoid confusion. The following wording was suggested to cover devices that should be banned: *Devices that are designed to apply an electrical charge across electrodes*

Many consultees felt that anti-bark collars should be banned because they are counterproductive in so much as they do not address the issue that is causing the dog to bark e.g. separation anxiety.

Many consultees felt that these devices should not be used under any circumstances on domestic flight animals such as cats or horses.

Question 3: Should fence containment systems be allowed as the animal is able to move away from the fence which it cannot do with an anti-bark or training collar?		
	Number of Responses	Percentage
Yes	36	78
No	10	22
Total who responded to this specific question (excludes responses for a blanket ban or those who refer generically to 'training aids'):	46	100



Summary

Many consultees who believed that electric shock collars should be banned felt that electric fencing should be exempted due to its role in stopping animals escaping properties, potentially onto a busy road (this was believed to be particularly useful for cats).

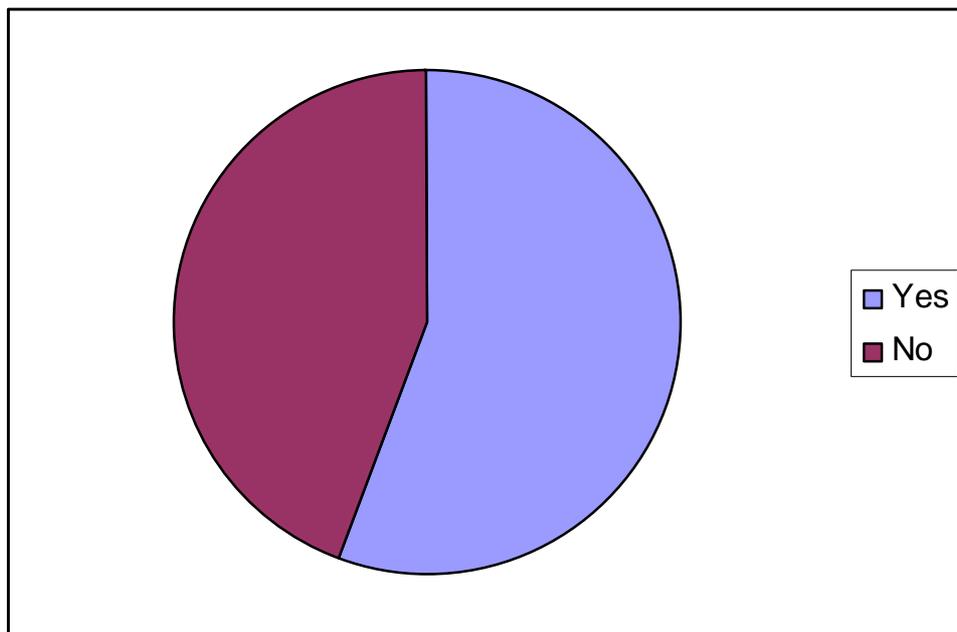
The following points were raised:

- Sellers should be licensed to ensure they have sufficient knowledge to train owners correctly.
- Indoor fences should be banned as the animal may not be able to move sufficiently far away from the 'fence' to avoid being shocked.
- Although some consultees supported the need for a ban, it was noted that the use of electric fences to contain livestock should not be banned, as they are more hardy than domestic animals. However, concerns were also raised that if 'invisible' fences were banned, some owners may

resort to visible electric fencing, as used to contain livestock, which delivers a much stronger shock to the animal.

Question 4: Do you believe that the provision prohibiting “unnecessary suffering” in section 4 of the Animal Welfare Act 2006 is sufficient to protect animals who wear electric shock or static pulse collars or come into contact with “scat mats”? If not, why not?

	Number of Responses	Percentage
Yes	10	56
No	8	44
Total who responded to this specific question:	18	100



Summary

The majority of consultees who commented on this question felt that the provision prohibiting “unnecessary suffering” in section 4 of the Animal Welfare Act 2006 was sufficient to protect animals who wear electric shock or static pulse collars or come into contact with “scat mats”. However, the following suggestions were made:

- The onus should be placed on the owner to be able to prove that they used the device for a good cause.
- Higher penalties should be introduced
- There needs to be a better means of enforcing the legislation

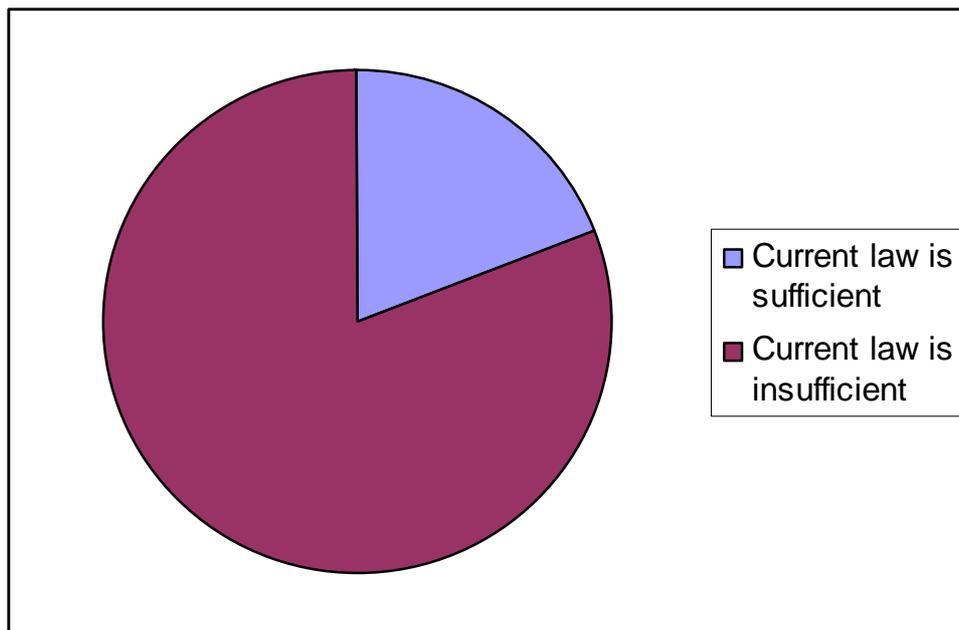
Those who did not agree that current legislation is sufficient to protect animals who wear/come into contact with electric shock devices gave the following comments:

- Further legislation is required to promote the ‘welfare’ aspect of the Animal Welfare Act 2006

- It would be extremely difficult to police the use of these devices as they are primarily used in private dwellings – it would rely on the owner of the device ‘being caught in the act’
- There would be difficulty acquiring evidence of use
- There would be difficulty proving that the animal had suffered, particularly as there may not be any physical injury
- There will be a difference of opinion regarding ‘responsible use’
- Training benefits could outweigh the welfare benefits

Question 5: In addition to question 4, under existing law each court case involving the use of these devices would have to be considered on their own merits. Do you think that is sufficient or do you believe that legal certainty via Regulations should be introduced. If so, why?

	Number of Responses	Percentage
Current law is sufficient	4	19
Current law is insufficient	17	81
Total who responded to this specific question:	21	100



Summary

The majority of consultees who responded to this question felt that, under current law, a ban would be particularly difficult to enforce. It was suggested that prosecutions may rely on veterinary evidence, which could be inconsistent due to the complex behavioural/welfare issues involved in each case. It was also suggested that a ban would not work unless it was extended to include the possession of electronic training aids as well as trade.

**Second Consultation 4th March 2009 and 27 May 2009
Summary of the consultation responses on
Electric Training Devices**

51 responses were received during the consultation process from a diverse range of people and organisations; from professionals such as dog trainers and behaviourists, vets and manufacturers of electric training devices, to the public, some of who were users of the products. The number of respondents from each category is displayed in the table below.

The majority of respondents (57%) were in favour of a complete ban on the use of electric training devices in Wales. 27% of the respondents were against a complete ban and 16% of the respondents did not state an opinion about whether a ban should be implemented, but commented on the content of the legislation itself. This final category also includes responses stating that legislative action should be delayed until the results of Defra/Companion Animal Welfare Council's study were published.

Out of those who felt that a complete ban should not be brought into force, 50% felt that there should be no ban whatsoever, 21% felt that there was a place for these products, if used under the supervision of a professional (e.g. dog behaviourist) and 29% felt that electric fence containment systems should be exempted.

31 respondents commented on the content of the legislation, specifically on the following regulations:

Regulation 2 – definition of an electronic device (2 comments).

Concern was raised regarding whether the definition of “electronic device” was sufficiently clear. In addition, that the current definition does not include such devices which are composed of more than one unit (e.g. a collar and remote control device).

Regulation 3 – provides for offences in relation to the use of an ETD on a dog or cat (7 comments).

Richard Brunstrom (North Wales Police) felt that it would “be difficult to evidence who attached or caused to be attached an electronic device to an animal”, therefore it was proposed that an offence should be created for possession as well as use. Clarity was also requested regarding whether the person to be prosecuted would be the owner or the person who attached the device.

There was also concern that the regulations have been restricted for use just on cats and dogs, where they can be used on any animals. It was suggested that the regulations are expanded to include any animal governed by the Animal Welfare Act 2006.

Regulation 3 was rejected by one organisation because “...it would not fulfil the Welsh Assembly Government's mandate and responsibility under the Animal

Welfare Act 2006 (the “Act”) to promote the welfare of animals” as “It would expose many thousands of cats and dogs to greater risk of death in road accidents and dogs to death by shooting by farmers with savaged livestock or death by euthanasia because they have behaviours out of which they cannot be trained by any other means”.

Finally, concern was also raised by police forces in Wales about regulation 3(1) (“A person commits an offence if he or she.... (a) attaches an electronic device to a dog or a cat”). This therefore would make it illegal for a police officer to use a Taser on a dangerously out of control animal. Examples used were aggressive dogs or animals that had strayed onto a public highway. A defence for the use of Tasers by the police force was requested, for public safety reasons.

Regulation 4 – provides for defences in cases where an ETD is used on a dog or cat (21 comments)

As raised under Regulation 3, it was also felt that Tasers fell under this regulation, therefore a defence should be made for police officers to use them when the need arises for public safety purposes.

It was felt that Regulation 4(a) is extremely subjective and would be very difficult to determine whether it could indeed generate an electric shock. This would be very difficult to enforce.

There were many concerns raised that the wording “attached by or under the direction of a veterinary surgeon”, in Regulation 4(b), requires amending. One consultee stated that it “is far too vague and will lead to difficulties in interpretation for both members of the public and practising veterinary surgeons. Such situations that require veterinary guidance would normally be described to require ‘direct and continuous supervision of a veterinary surgeon’ thereby ensuring that the devices are not misused by the client, and if misused by the veterinary surgeon the misuse can be directly addressed by RCVS complaints and appeals systems”. There was also concern that, if a veterinary surgeon got a reputation for using these devices, they may have an influx of interested parties to have their collars put on legally.

Only one consultee who commented on this regulation felt that it was fit for purpose i.e. “Paragraph 4(b) which provides the defence “was attached by or under the direction of a veterinary surgeon” allows responsible owners to pursue referral to appropriately qualified trainers who may wish to use an electric shock collar as part of a systematic training programme, following proper assessment and diagnosis of the animals training and welfare needs. In the absence of any statutory regulation of dog trainers, it is appropriate to use Veterinary Surgeons to oversee and supervise the use of electronic devices”.

There were also many calls for the ban to be a blanket ban and for there to be no exemptions whatsoever.

Regulation 5 – provides for defences in cases where an ETD is used on a dog or cat (11 comments)

4 respondents argued that electronic fence containment systems should be exempted from the ban. These arguments included the fact that they are used to contain livestock. It was thought that the 2-month time limit was too short and that dogs will continue to “test” the system so the training will be pointless. Others argued that the 2 month limit is unenforceable.

It was also expressed that this particular regulation required clarification, as it was unclear. Phrases such as “physical barrier” were vague and confusing.

It was also suggested that fence containment systems should only be issued under veterinary guidance and then its use monitored.

It was recognised that causing pain is not an appropriate method of confinement. There was concern that the stimuli received by the dog from the fence containment system may be associated with visitors/passing objects, which may trigger aggression.

Regulation 6 – provides for penalties for the offences established in regulation 3 (1 comment)

It was suggested that a ban on future ownership of animals should be included as punishment.

Regulations 7, 8 and 11 - post-conviction powers (3 comments)

It was felt that it was inappropriate to consider applications of this measure for offences contained in the regulations. Any offence would be committed under the Animal Welfare Act 2006. Queries were also made regarding the definition of “disposal”.

One consultee expressed her particular support for these provisions.

Regulation 17 – powers of entry and search (2 comments)

Concern was raised that this may have been drafted incorrectly as it relates to Section 24 (power of entry under a warrant for the purpose of affecting an arrest) of the Animal Welfare Act 2006 rather than Section 23 (power of entry under a warrant to gather evidence). It was also queried whether the police force would be the only body able to enforce this legislation, as local authorities play the bigger enforcement role under the Animal Welfare Act 2006.

Response re blanket ban (i.e. no concessions)		
Type of response	No of responses	Percentage
For blanket ban	29	57
Against blanket ban	14	27
No opinion stated <i>(includes responses neither supporting or attacking the regulations & all calls for delay except one, as response was primarily focused on fencing systems)</i>	8	16
Total:	51	100
Of those who were against a blanket ban		
No regulations whatsoever	7	50
Used under supervision	3	21
Exclude fence systems	4	29
Total:	14	100
Type of respondent		
Type of respondent	No of respondents	Percentage
Dog trainer/behaviourist	11	21
Member of public (no (stated) experience)	7	13
Member of public (with experience)	5	10
Veterinary surgeon (including BVA/BSAVA/RCVS)	5	10
Assembly Member	4	8
Welfare organisation	4	8
Police	3	6
Dog club	3	6
Other (e.g. farming union)	3	6
Breeder	2	4
ETD organisation	2	4
Researcher	1	2
Trading standards	1	2
Total:	51	100

**Third Consultation 21 December 2009 and 9 February 2010
Third consultation on the Animal Welfare (Electronic Devices)(Wales)
Regulation 2010**

All responses received

No	Comment
1	<p>I again welcome the opportunity to comment on the above consultation. Just to recap, I have responded to the earlier consultation papers on the Use of Electronic Training Aids and I stated then that I had no hesitation in supporting moves to ban these hideous devices.</p> <p>I do not take issue with any of the revised draft regulations you have outlined. I am still firmly of the opinion that there can be no justification for the sale and use of these devices and I look forward to the day that these regulations become law.</p>
2	<p>I wish to record my full support for a ban on the use of such devices and for the draft regulations.</p>
3	<p>The statistics in the above mentioned document would have validity if they were not obviously weighted against the use of electronic collars (ETD in your terminology).</p> <p>So, you received 51 responses during your consultation process? Of which just two were from ETD organisations? Can reliable statistical analysis be deducted from this response? ETD organisations, we presume, are the manufacturers who were responding on behalf of the 350-450,000 users, several hundred of whom had taken the trouble to plead the case in writing for the continued use of these essential tools. The users' written responses included a significant representation from among the over 50,000 Welsh ETD using constituents. For some reason, copies of most of these letters written to their MPs and to us were discounted, on the spurious claim that they breached the Data Protection Act.</p> <p>Is democracy justly served by such analysis? Were the users properly and fairly represented?</p> <p>Currently, as we all know, DEFRA has commissioned a thorough scientific investigation into the psychological and physiological effects of ETD use. This investigation should be allowed to be conducted and reported without bias - which we believe and hope to be true. Clearly, open-mindedly and wisely they await the outcome of their sponsored investigation before advising the various governmental bodies, based on solid facts. There seems to be an inordinate rush to enact this vindictive legislation. We are confident that DEFRA's sponsored investigation will ultimately prove the dissenters to be wrong. At which point, it will not be too late to avoid the ignominy of a bad mistake.</p>

Whereas we are sure there are many people who genuinely believe that ETDs should be banned, the rationale for such an attitude could be seriously flawed. Further, in order to ensure a fair and just outcome, the opinions of all 51 respondents should be analysed and weighted, taking into account informed representation versus uninformed opinion and prejudiced views.

In your analysis, respondents fall into three distinct categories: those who...

1. are quite determined and intransigent, come what may, to ban ETDs
2. are open-minded and swayed by genuine scientific investigation, or follow the pragmatic line of common sense
3. have used ETDs to train and/or control dogs to their benefit.

But, there appeared to be an absence of a further category: those who...

1. have used ETDs to train and/or control dogs to their detriment.

This is not surprising, since the category, according to valid, statistical analyses, hardly exists. 90-95% of all users are either satisfied or very satisfied with the equipment. Furthermore, among this very high proportion of satisfied users, a significant number claimed that, whereas originally they were skeptical, fearful or just plain adamantly against the use of such tools, but were desperately in search of a solution to an intractable problem, they are now enthusiastic supporters. All this was despite all the erudite, pseudo-scientific publicity to the contrary. The converts' attitudes were not altered by smart marketing techniques, but by solid, practical and successful experience. To support this, and to remind you, we enclose the same DVD that we submitted to you for your first consultation. Naturally, the long tally of customer letters has increased enormously since the DVD was first produced. Further copies are available on request.

You will see that the amassed, practical evidence in support of the use of ETDs contrasts starkly with the non-existent, negative evidence presented to you by those who object, which is mainly whimsical, since, for the most part, they are acting on hearsay, based on disingenuous propoganda. The case against has been 'championed' by the recently, publicly discredited, and apparently quite unpopular, Kennel Club.

The tabulation of Type of respondent highlights another flaw. There is a high level of hypocrisy among the dissenters. Many professional users prefer to deny their use of ETDs, but we know this to be untrue. This is often through fear of reprobation from the general public and/or their respective professional bodies. But there are large numbers of pragmatic users among trainers, behaviourists, veterinary practitioners, including officers and members of some of the leading detractors - including the Kennel Club and the RSPCA. Dissenters among the general public are

	<p>often genuine in their dislike for the idea... but, most often, they have absolutely no knowledge or experience to support their views. Much of the negative attitude has nothing to do with welfare of dogs, but more to do with self-serving, financial and commercial interests. In order to obfuscate this issue, the dissenters have chosen a political route to a ban, rather than rely on rejection by an increasingly 'dog-aware' nation.</p> <p>For the most part, the only opinions of value are those of the enlightened (and experienced) users... and, soon, the DEFRA funded researchers. Believe it or not, the case put by the 'interested' manufacturers would be of absolutely no value whatsoever, if they did not represent the enthusiastic support of the hundreds of thousands of users, whose beloved dogs are the main beneficiaries.</p> <p>Clearly, the devastating impact of an ETD ban on a very large number of Welsh users has not been adequately evaluated. In this time of economic restraint, very few will be minded to spend small fortunes on behaviourists or professional trainers, and consequently some will be forced to abandon their dogs to the care of the already overburdened dog shelter organisations. The majority, however, for the sake of their dogs, will have no alternative but become criminalised citizens: for the majority, there is no other solution.</p> <p>If you love dogs, please think again.</p>
4	<p>*** welcomes the proposed ban on the use of electronic shock devices on dogs, and congratulates the Welsh Assembly Government for taking this important issue forward.</p> <p>*** has no specific comment to make on the proposed costs of implementing such a ban. However as an organisation that is working towards the day when all dogs can enjoy a happy, healthy life, we are delighted that Wales is leading the way by proposing a ban on the use of these cruel and unnecessary devices. Any associated costs (enforcement by officials or the introduction of physical boundaries) are clearly in the best interests of dog welfare in Wales and would not be, in our opinion, disproportionate.</p>
5	<p>I wish to thank you for the opportunity that you gave us to express our opinion during the consultation on the above regulations and to express our satisfaction with the resulting decision (document dated 21/12/09).</p>
6	<p>These should definitely be banned. We have had dogs into rescue with sore necks and definite increase in neck muscles as a result of their use. They should NEVER be available to the general public and if a full ban is impossible then they should be sold under license to qualified trainers who have been fully trained in their use and can be accountable for the animals welfare.</p>
7	<p>In May 2009 the *** responded to the Welsh Assembly Government's consultation on draft regulations to regulate the use of electronic devices in Wales. In our response to that consultation we indicated that, in our opinion, the draft regulations needed to be tightened and that there were numerous potential loopholes. These concerns related primarily to</p>

Section 4b - Defences - particularly with regards to enforcement and policing of the exemptions.

We are aware that of the 51 responses received during the second consultation, the majority of respondents (57%) were in favour of a complete ban on electronic devices in Wales. Therefore, the *** is delighted that the Minister and Welsh Assembly Government have taken on board our concerns and removed any exemptions from the proposed Regulations. We fully support these revised regulations which now place a complete ban on the use of electronic shock training devices including: remote collars, invisible fences, leads and mats.

*** has always expressed concerns about the use of invisible fences but has pursued the case for a complete ban on remote collars, leads and mats due to the fact that the dog can step away from the fence and therefore be "in control" of the shock. However, boundary fences still work by delivering an electric shock and therefore we deem them to be aversive devices. Thus, if WAG accepts that delivering any type of electric shock to a dog/cat in order to 'train' them is inhumane, then it is logical to accept the argument that it is inhumane regardless of what type of device is being used.

Cost impact

*** believes that the cost of introducing these regulations will be minimal due to the fact that there will be a complete ban. This means that no licences (and associated costs e.g. database, administration of paperwork etc.) will be required to be issued. *** does not foresee any substantial cost implications of these regulations relating to enforcement for three reasons:

1. If an offence was committed, action would be taken by a local authority or authorised inspector who already has the power to deal with incidents under the provisions of the existing Animal Welfare Act (2006).

2. Whilst we accept that there are dog owners in Wales who use electronic training devices, we do not believe the use to be in great numbers. We believe that by regulating against the use of these devices it will discourage their use. With no regulations, many members of the public, who would not otherwise inflict unnecessary suffering on their pet, are already using electric shock collars, fences, mats and leads because they are marketed in a manner that leads people to believe they are a harmless, fast and easy way to train dogs. Further, given that such devices are being sold via mainstream outlets such as Amazon, this sends out a further message to dog owners that they are widely used and therefore harmless and ethical. Conversely, making the use of such devices illegal, would indicate the opposite to somebody who was considering purchasing one.

3. Electric shock training devices are not manufactured in Wales and

	<p>outlets selling these devices often directly sell other products and therefore can diversify. We believe that the impact upon business would be minimal and that the issue should be considered from an animal welfare, rather than a financial perspective.</p> <p>The only other obvious direct cost of these regulations is publicity and education of the public, something which *** would be more than happy to assist the Welsh Assembly Government in doing.</p> <p>Wales has set a precedent and is clearly leading the way on this extremely important welfare issue. The regulations (if passed) will not only put an end to the suffering of dogs who are already enduring the use of these devices but it will also act as a deterrent for anyone contemplating using one.</p>
8	<p>As requested, *** has considered the above document and welcomes the opportunity to provide comment to this consultation. *** opposes the use of electronic shock collars for training and containment of animals. Many electronic devices that employ shock as a means of punishing or controlling behaviour are open to potential abuse and incorrect use of such training aids has the potential to cause welfare problems. Shocks received during training/for containment may not only be acutely stressful, painful and frightening for the animal but also may produce long term adverse effects on behavioural and emotional responses.</p> <p>*** strongly recommends the use of positive reinforcement methods in training dogs and supports investigation of positive reinforcement training methods that could replace those using aversive stimuli.</p> <p>*** wishes to raise a number of issues in relation to the draft regulations that require clarification prior to implementation:</p> <p>Specific comments</p> <p>Section 4</p> <p>*** does not believe that any electric containment systems which deliver an electric shock to companion animals are acceptable and recommend a complete ban until the results of the DEFRA-funded study on this issue is published. *** would assume from the definition in 4(a) that the use of such containment systems is prohibited under this legislation. Clarification is requested.</p> <p>4(c) "is responsible for attaching or allowing the attachment of an electronic device to a dog or cat". Clarification is sought as to whether or not electronic tracking devices such as those used to research cat activity/hunting patterns are included as the desired intent is presumably to avoid attachment of devices that can administer electric shock rather than any "electronic device" per se.</p> <p>4(2) should include the exception of implanting pacemakers for</p>

	<p>therapeutic purposes.</p> <p>Section 5</p> <p>"A person who breaches the prohibitions in regulation 3..." should read "A person who breaches the prohibitions in regulation 4...".</p> <p>As per our comments to the previous consultation (2009), clarification should be made as to whether the owner and the person applying the device are both prosecuted - if they are not the same person.</p>
9	<p>*** welcomes the opportunity to respond to the Welsh Assembly Government's consultation on the Animal Welfare (Electronic Devices) (Wales) Regulations 2010.</p> <p>In its response to the previous two consultations on the Use of Electronic Training Aids, *** expressed its firm opposition to the introduction of a ban on the use of shock collars for working dogs. In light of the further amendments to the proposed Regulations, to introduce a complete ban on all electronic devices, *** again expresses its unequivocal opposition to the proposed Regulations.</p> <p>*** would argue that the provision in section 4 of the Animal Welfare Act 2006 prohibiting 'unnecessary suffering' is sufficient to protect animals wearing shock or static pulse collars, as their use by experienced trainers, as a tool of last resort, will not fail the 'unnecessary suffering' element of the Act.</p> <p>*** is bitterly disappointed to note that, despite previous representations made by the Union, the Welsh Assembly Government is now proposing a complete ban without making any distinction between domestic pets and working animals. Whilst the use of some electronic training aids may well create welfare problems in the hands of inexperienced handlers, *** firmly believes that, as a last resort, these aids can be a valuable tool for experienced trainers when dealing with working dogs.</p> <p>Whilst *** is not concerned with the use of electronic aids for minor anti-social problems, the use of collars, as a last resort, is considered a vital tool in the case of training sheepdogs where over-enthusiastic young dogs need to be deterred from biting sheep during the training process. Members were clear that the use of an electronic device is not required for every dog, but that its occasional use has provided an effective means of controlling adverse behaviour.</p> <p>A sheep dog biting sheep is, in itself, a welfare issue and a cause of unnecessary suffering to the sheep. Banning the use of shock/pulse collars would inevitably result in that dog having to be destroyed out of consideration to both the welfare of the sheep and the economic costs to farmers of the subsequent loss of value due to a damaged carcass.</p> <p>*** is deeply concerned that these proposals will also ban the use of</p>

	<p>fence containment systems which could have unintentional knock on effects on the wider agricultural industry in Wales. The use of electric fences is an established method of containment for farm animals and horses, and is becoming increasingly popular for dogs. Animals quickly learn that an electric fence is something to be avoided, and the suggestion that this can compromise the welfare of any animal is of great concern to *** in terms of where the Assembly will go with this issue once it has dealt with domestic pets.</p> <p>Whilst *** fully supports the use of existing laws to prosecute anyone who causes unnecessary suffering to animals, it does not believe that the introduction of these Regulations will improve the welfare of working animals.</p> <p>I trust due regard will be given to the preceding comments.</p>
10	<p>We are grateful to Alun Streeter for his letter of 21st December 2009, seeking views of the on this proposed legislation.</p> <p>We are aware that research is currently being undertaken on ‘Studies to assess the effect of pet training aids, specifically remote static pulse systems, on the welfare of domestic dogs’. This research is being conducted by Bristol and Lincoln Universities and the Central Science Laboratory, York.</p> <p>*** strongly recommends that the results of this research be awaited before legislation is developed as the results may be very relevant to and may inform the best approach to take to regulation in this field. Details of the project (No. AW1402), which is due to be completed during 2010, are given at the Defra website:</p> <p>http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=ProjectList&Completed=0&AUID=1607</p>
11	<p>Thank you for your letter of 21.12.09.</p> <p>I fully endorse a complete ban of electronic devices on cats and dogs. I would be happier if the police also had restrictions on the use of Tasers. Before tasers were introduced I am sure they managed to humanely control dogs? I realise that with the increase in the number of Pit Bull type dogs now being used as weapons against them that perhaps Tasers are called for - however this only goes to show that legislation hasn't worked.</p> <p>Since the Dangerous Dogs Act was introduced there should now be NO pitbull types in existence in this country - they would have all died out! Which brings me to the real crux of the problem - the breeding of dogs act.</p> <p>If greater constraints were put on breeders - that is: anyone who breeds a litter of puppies whether intentionally or not - is made more responsible for the welfare of the puppies - i.e.: where they are sold/given to, having</p>

	<p>to have them microchipped OR tattooed, registered (whether pedigree or not), to keep records of where the puppies go to, to be declared for tax purposes, give life time back up help and HAVE TO have them back for rehoming/destruction at their cost if the home can no longer keep them etc., etc., etc....</p> <p>This could not only help with the financial side of legislation but also there would be less dogs going into rescue centres, roaming the streets, terrorising the public/police and less owners wanting to use electronic devices in the first place.</p> <p>Additionally education should be paramount for new owners.</p> <p>PS could someone also look into the cruelty caused by choke chains which in most instances far outweigh electric collars.</p>
2	<p>We live in the country surrounded by fields used by livestock. We have a dog fence to enable our dog to access a large garden safely. The dog has only ever had one shock when trained and responds to the noise like a whistle.</p> <p>My husband is disabled and can't walk any distance. The existence of the dog fence enables him to retain one of his pleasures in life- having a dog. Without the fence the dog would have to be restrained to a small area of the garden and have limited exercise. Ensuring that visitors shut gates is always problematic especially if your mobility prevents you doing so. People with disability have enough restrictions please don't make their life more difficult.</p> <p>Recently there have been three serious incidents in our village relating to dogs being out and about without control. The dog fence is a good option for improving the life of dogs and ensuring that they do not access roads or farm land and cause accidents or animal distress. In fact encouragement of their wider use would make sense in many circumstances.</p> <p>Just a question what about electrical fences for cattle who can't be trained to avoid them?</p>
13	<p>It has come to my attention that Wales is considering a ban on underground fencing for dogs. With 19 years under my wire, so to speak, and my husband's 11, with ***, I would like to respectfully submit, on behalf of our company ***, and the UK's *** representative; our reasoning's as to why this proposed ban is not a good idea.</p> <p>Here on the other side of the pond, an underground fence is most often 'the way' to go for cost effective fencing. One can have a dog, have an underground fence, successfully contain the pet, and still enjoy the view(s) on property.</p>

	<p>The property is rarely disrupted with an underground fence install; literally inches in compared to wooden choices, and does not give off pesticides as it lays in the ground. As an above ground fencing dealer as well with 20 years + experience...during which the United States has had to adjust types of fencing protocols and specific bans (and playground equipment as well) due to hazardous materials once thought to be "safe".</p> <p>Even more important to the overall discussion is the factor which involves those uninformed as to the true value -overall-that such a fence provides. It contains pets, contains them humanely and literally keeps them safe, at home, and away from autos, pedestrians and the like. It is not something that Hidden Fences dealers such as my husband and myself would even consider if it were not humane. The ASPCA, many US pet foundations and adoption agencies in the state support us, as well as our local Veterinary community-and we in turn support them.</p> <p>I also have personally spent many years in service to a community as an Animal Control Officer. A good portion of my time spent was at the scene of a dog hit by car- the ride to the Vets, and in many cases, at the office while the dog was put down. Another portion of my time spent was doing inspections of dogs and all animals, left to themselves; tangled in ropes, chains too tight, and such circumstances that would offend any caring individual normally considering a fenced in, well cared for dog.</p> <p>Yet another portion of my time was spent in telling the children in the family that I was sorry but the family dog was dead, in many cases simply preventable - with the safety that such a fence provides; due to the lack of knowledge, or education in the family. An example being 'those fences won't work (most always due to lack of proper training) or 'aren't humane'. Or inhumane as they are "electric". They are not. The only electricity used is that which runs the transmitter.</p> <p>The advancement in technologies have refined the products on today's market to be the most humane ever, and the portion of trained humane professionals in the fence market has grown with the industry and it's requirements. Requirements not only in the professional field but those of our consumers.</p> <p>With that in mind, I would like to suggest to the board overseeing this particular regulation, spend actual time in the field with the people who know best before acting on any and all conditions in this field. If I were closer, I would invite any and all interested persons to follow me and work for me for a day; as the hands on experience is a terrific overall education experience.</p> <p>I thank you for your attention to this matter, and trust that your decision on this regulation will be made with the best pawstitive outcome for all involved.</p>
14	<p>*** is pleased to respond to the aforementioned consultation, particularly given our involvement in the Animal Welfare Act 2006 and the</p>

	<p>subsequent secondary legislation on prohibited procedures following our response to the initial consultation in January 2008 and the consultation on the Animal Welfare (Electronic Devices)(Wales) Regulations 2009.</p> <p>*** has nothing further to add to the comments made in our response to the 2009 consultation dated 18th May 2009. *** would like it noted that we maintain our opinion that electronic training devices are very rarely, if ever, the first port of call for those training dogs. Reward based training is the norm in the gundog world, with very few resorting to such devices. We repeat that this does not mean that such devices should not be available to those who need them as a technique of last resort.</p>
15	<p>In response to your question about costs, *** would like to make comments under three headings,</p> <ul style="list-style-type: none"> • costs that will be incurred by manufacturers • costs that will be incurred by local authorities • costs that will be incurred by Welsh pet owners <p>The costs fall into two categories, financial costs and emotional/caring costs. In addition to the question of costs of a ban there is the matter of the financial benefits of a ban. Before making this analysis, however, there are fundamental points about the idea of banning electronic training products which need to be addressed.</p> <p>The scientific case against the products on animal welfare grounds has not been made. Even the most vociferous and diehard opponents of electronic training couch their opposition to e-collars in terms of ‘may’ and ‘might’ and ‘could possibly’ because they know that there is nothing remotely like a body of sound scientific evidence to back up their propaganda against electronic training aids. In fact, the scientific evidence supports the continued use of electronic training aids, not a ban on the products.</p> <p>The most telling evidence in favour of the proposition that electronic training aids support the greater good of animal welfare is an absence of reports of actual harm or distress from use of the collars in relation to the actual number being used. *** estimates that in 2010 there are likely to be in the region of half a million collars in use in the United Kingdom.</p> <p>It is not known how evenly spread the distribution is throughout the UK but a proportion of those collars are going to be in Wales, perhaps 50,000. With approaching half a million collars in use across the UK, any tendency for harm or distress in animals that wear e-collars would have resulted in large numbers of documented cases of animals attending veterinary surgeries to repair damage or solve the problems. This is definitely not happening and never has happened.</p> <p>This fact is strongly supported by two concurrent surveys of collar owners from the mid 2000s, each conducted without knowledge of the other, which both found that the collars had solved the problem for over 95% of the responding owners. In one of the surveys, 96% reported no adverse</p>

repercussions on their pet and 97% said that their pet was happy or neutral towards the collar. In addition 71% said that they believed that having the collar had prevented the death of their pet through road accident, shooting by an angry farmer for stock chasing or being euthanased as unrehomable by a welfare agency or local authority.

When the Welsh Assembly Government first consulted on this issue they made a case for a ban on the grounds of the available science. When *** challenged them on this, their 'science' turned out to be no more than the submission from opponents of collars which carefully distorted selections from authoritative science to give the opposite impression to that intended by the writer.

In a recent conversation between *** and the Welsh Assembly Government it was made clear to us that the impetus to bring in a ban on the products derives from political, rather than scientific, considerations. All pretence of a scientific justification has been dropped. We also note that the very limited summary of the responses to the second enquiry made available on the Department's website compared to the publication of all the responses to the first consultation has had the effect of denying the people of Wales access to the facts about electronic training collars, a form of guillotine on the public debate. Regarding the available science, we are not surprised that the Welsh Assembly Government has moved away from any attempt to justify the ban on scientific grounds because even an elementary analysis of the scientific work on welfare issues demonstrates clearly that there are no scientific studies that use modern, standard pattern electronic training devices in a training context and conclude against electronic training collars on welfare grounds. The campaign against electronic training aids serves two obvious vested interests. Ethical dog trainers, whether they use electronic training aids or not, seek to provide the most beneficial service for their clients on the basis of humanity and efficiency. Unethical dog trainers seek to keep their clients as a source of revenue for as long as possible. This objective is not served by the use of electronic training collars which, in the cases when they are appropriate, often make it possible to achieve superior results in less time with benefits to the dog, the owner and the relationship between them. The campaign against e-collars is fuelled partly by economics – dog training is a very competitive and often lucrative business – and partly by an unthinking ideology adhered to by several different lobbying organisations representing the anti e-collar tendency. Some of these are trainer organisations and some promote a strange version of animal welfare. Trainers professing an anti e-collar stance often, on various pretexts, avoid dealing with dogs that are too challenging by the methods they use, thus leaving the difficult dogs unhandled. A number of these trainers solve the problem with the surreptitious and undeclared use of an electronic training aid. In accepting the ideology and rejecting the science, the Welsh Assembly Government has aligned itself with the ideology of the propaganda campaign.

<p>We estimate that the electronic training aid industry has a turnover of two to three million pounds a year in the United Kingdom. It is not possible to say with certainty what proportion of this would apply to Wales.</p> <p>We are not aware of jobs in Wales that would be lost as a result of a ban. The main animal welfare charities, by contrast, have a combined turnover of around £200 million and a strong investment in being right for the sake of being right as a means to continue their fundraising activities. They, like the Welsh Assembly government have turned their back on science in relation to electronic training aids.</p> <p>The regulatory cost that would fall on the local authorities of Wales, however, is considerable. We estimate that there are in the region of 50,000 collar owners in Wales. The number of those dogs that might have to be rehomed as a result of a ban could be in the region of 30,000 and this would place a burden on the animal shelters and local authority budgets of Wales. An average commercial cost of housing a dog is £10 to £15 per day which would total £300,000 to £450,000 a day for the 7 days that local authorities are obliged to keep dogs before having them put down and between £2.1 million and £3.15 million in total. The cost of having a dog legally killed by a vet is around £70 for a lethal injection and an ordinary cremation, totalling a further £2.1 million, although quantity discounts might apply and these could be negotiated with Welsh vets.</p> <p>If the scale proved too great, economies could be made by using the methods adopted during the foot and mouth outbreak of recent years. In addition, the capacity of Welsh local authorities and animal shelters to house these animals for the seven day period would quite possibly be overwhelmed, depending on the time period over which the exodus of dogs from previously happy, settled private homes occurs if Welsh collar owners comply with the proposed ban on use, should it be brought into force.</p> <p>It hardly needs to be stated that such an upheaval in the world of companion dog ownership in Wales would have devastating emotional consequences for the owners whose use of a collar had enabled a difficult animal to settle happily into a Welsh family, or where a dog's wanderings had been happily curtailed by the use of a fence/containment system. Explaining to a Welsh child why his or her much loved pet dog had to go away because of a Welsh Assembly Government regulation is a burden that would fall on parents, not Assembly Government officials or Assembly Members. Even if the numbers mentioned do not manifest as administrative problems in dog welfare for the Welsh Assembly Government to the extent suggested, Welsh dog owners who have electronic training collars will face the silent heartache of knowing that their loved pets are living half the life they could, and were pre regulation, because they have to go for walks on the lead or be tied up or kennelled. Their enjoyment of several of the five freedoms will be curtailed and the cause of animal welfare set back a generation.</p>

There is another trend which makes this situation all the more likely to occur. There is the growing fashion in dog ownership for dogs that are larger and potentially more aggressive, though size is not necessarily the only criterion. The breeds that are becoming popular are Perro de Presa Canario, Cane Corso, Boerboel, Dogue de Bordeaux, Bull Mastiffs and American Bulldogs.

Aside from these currently less common breeds, another example of the problems that would flow from a ban is the upsurge in popularity of the Staffordshire Bull Terrier. Young men and women in under resourced areas of many towns often find that the Staffordshire Bull Terrier they bought or were given as a puppy has grown into an unmanageable adult which ends up in local authority or animal shelter care. There is already a crisis in the animal shelters in such areas resulting from such cases.

Designed by nature and breeding as a fighting dog, if a Staffie develops vices and the owner is unable to cure those vices the owner has to keep the dog tied up or on a lead, try to get it rehomed or have it put down and due to their current popularity and over breeding, particularly in inner city areas where Staffs are commonly kept, rescue societies are already overwhelmed with rescue Staffs and "Staff crosses".

These types of dog can be easily, safely and humanely trained with the use of an electronic training aid but are precisely the type of dog that many behaviourists who want to see a ban on electronic training aids find too challenging. As a taste of the growing problem of unwanted and unmanageable dogs, the Battersea Dogs Home has recently had to inform local authorities that it must to abandon its open door policy which had been in place for the 150 years of its existence.

There seems to be a trend in thinking about animal welfare that does not regard death as a welfare problem (witness the RSPCA's killing last year of ten German Shepherd dogs). Many collar owners pride themselves on the fact that they have saved the life of a dog that used to be impossible to have as part of a family and is now, with the use of the collar, a happy, valued, and much loved family member. If the animal welfare organisations kill animals without a qualm, what price animal welfare?

Finally, we would like to commend to the Welsh Assembly Government the 2009 report by the Companion Animal Welfare Council (CAWC) on a strategic and scientific basis for evaluating welfare issues. We realise that the Welsh Assembly Government has no interest in applying scientific criteria to the proper evaluation of the welfare implications of electronic training aids but we hope that this attitude will change in the future to the great benefit of thousands of Welsh pet owners and their pets.

We append to our response CAWC's principle recommendations as expressed in this report. They indicate the precise roadmap and milestones that would elucidate the welfare implications of electronic training collars for a legislative body that is interested in ensuring that it

	<p>makes sound policy based on sound science.</p> <p>The Principal Recommendations</p> <ol style="list-style-type: none"> 1. Welfare assessment indices for the companion animal species are incomplete. A useful step in developing companion animal welfare assessment protocols would be the identification of the additional work needed to develop and establish the protocols. We set out below how this could be achieved. 2. The Council believes that the further development of companion animal welfare assessment protocols should be undertaken by the private sector, by which we mean the species interest groups, animal welfare organisations and specific activity representative bodies. We do not suggest that the Government and DEFRA should directly support this work but we believe they should facilitate it. The use of welfare assessment as a tool as set out in this report is intended to inform the duty of care that animal owners and carers have under the Animal Welfare Act. As such, we see this as a private sector responsibility. 3. We recommend the establishment of a supervisory body, which would be tasked to ensure the proper development and application of welfare assessment protocols for each species. This body, which would be appointed by the companion animal sector, would ensure the consistent development of welfare assessment protocols for all species to acceptable standards. This body would also have a role in the application and use of welfare assessment by the companion animal activity groups and in the development of codes of practice, including statutory codes. 4. The Council recommends that species working groups be established, to identify the gaps in knowledge, bring forward suggestions for research and to develop the protocols for welfare assessment. The working group activity would be coordinated by the supervisory body referred to in recommendation 3.
16	<p>Thank you for providing me with the opportunity to comment on these draft regulations.</p> <p>I think, at this early stage, it is worth repeating the comments of *** who had, in his capacity of *** and *** responded to earlier consultations on the developing legislation that the *** prohibit the use, under any circumstances, of electric shock or static pulse collars. Again, this policy should not be taken to mean that we oppose the use of such equipment by others; our response is intended only to assist in the production of effective and practical legislation.</p> <p>The provision of these observations should not be taken as an indication that *** accept that they are the lead agency for enforcement of the regulations. Where we identify evidence of offences we will of course take action but it has previously been accepted by Government that the lead statutory authority for enforcement of the Animal Welfare Act are the local authorities. Practically we would also envisage the RSPCA taking the lead role.</p>

	<p>Regulation 1. Interpretation The interpretation of electronic device still does not recognise that such equipment can consist of more than one component, most commonly the collar and a control unit. It would be helpful if the definition were to be expanded to include any part of a device or instrument.</p> <p>Regulation 2. Prohibition on the use of electronic devices In many investigations it may be difficult to evidence who attached or caused to be attached an electronic device to an animal. Effective enforcement of the regulations would be enhanced were an offence of having possession of any part of an electronic device capable of being used to deliver an electric shock to an animal were to be introduced.</p> <p>We are unsure as to why these regulations have been restricted to the use of electronic devices on cats and dogs. Such devices can be used on other animals and it would therefore in my view be logical if the regulations were to apply to any protected animal as defined in the Act. An exemption if needed could be included to allow for the use of such devices on livestock.</p> <p>Regulation 3. Defences We welcome the inclusion the defence at Regulation 4 (2) (b) ‘nothing in these regulations prohibits the use of an electronic control weapon by a constable. This clearly recognises the use of such devices by police officers for reasons of public safety.</p> <p>Regulation 4. Entry and search. We have previously offered comments regarding the drafting of this regulation and its relationship with Section 23 of the Animal Welfare Act 2006. We are content with the revised version of this regulation which has now clarified those earlier issues.</p> <p>However, we must repeat that as drafted the regulations provide no authority for an enforcer to detain or examine any animal that appears to have an electronic device attached, nor has a power to seize any devices or equipment been provided. We have previously mentioned that many devices have a control unit which will normally be found in the possession of the person in charge of the animal involved and it is for this reason that there is a need to stop and search persons believed to be in charge of an animal. For these reasons it is important to consider powers to stop and search persons and their inclusion within the regulations as well as powers to detain and examine animals and equipment reasonably believed to be associated with offences under the regulations. Lastly a specific authority to seize evidence of offences is required.</p>
17	<p>General position on electronic training devices</p> <p>*** policy states that “the *** believes that no technical device should be used or offered for sale where an animal can be subjected to a painful stimulus at the direct instigation of a human or where a painful stimulus is delivered as a result of an animal’s action from which it cannot retreat.”</p>

*** is extremely concerned about the use of electric shock collars and fences to train or control animals, and does not believe that there is any place for these devices in modern animal training. Some of these concerns include:

_ Research clearly shows that the application of an electric shock causes both a physiological stress response¹ and behavioural responses associated with pain, fear and stress^{2, 3} in animals.

_ As electric shocks are aversive to animals, electronic training aids train animals by using positive punishment and negative reinforcement. *** strongly believes that there is no place for these methods in modern animal training and recommends the use of positive reward based methods instead. In addition to the direct welfare concern of subjecting an animal to an aversive stimulus, research has shown that the use of punishment techniques in the training of dogs is actually associated with an increase in the incidence of problem behaviours⁴.

_ There is evidence that electronic training devices can cause a long-term threat to an animal's welfare - animals trained with an electric shock device have been found to show behavioural signs associated with pain and fear both during training and some time afterwards⁵.

_ There is a great potential for the misuse of these devices, either through ignorance or malice by those intent on deliberate cruelty. Research has shown that long-term fear and stress responses particularly occur when the administration of the electric shock is poorly timed with the action of the animal^{1, 7}. In addition, the intensity and duration of the shock can be altered by the user. Many of the collars available produce a high-end shock that far exceeds the level at which the shock is aversive to the animal. There is clear potential for accidental high level shocks or deliberate abuse, causing suffering to the animal.

_ *** therefore does not believe there is any place for these devices in modern animal training.

General comments on the Animal Welfare (Electronic Devices) (Wales) Regulations

As outlined above, *** is extremely concerned about the use of electric shock collars and fences to train or control animals, and does not believe that there is any place for these devices in modern animal training. *** is therefore very pleased that the Welsh Assembly Government (WAG) has taken our views, and those of many others (including animal welfare organisations, vets and members of the public) into consideration and has further revised the draft Regulations.

*** fully supports the decision by WAG to remove the defences from the previous draft of the Regulations. This means that it will now no longer be a defence to show that the electronic device was a) not capable of causing an electric shock to the animal, b) attached by or under the direction of a veterinary surgeon or c) attached in accordance with an electronic fencing system. *** detailed its serious concerns with each of these defences in its last consultation response to WAG, and does not believe that there is any place for electronic devices in modern animal training at all. *** is therefore extremely pleased that these defences have been removed, and in general very much welcomes the revised draft Regulations. The Society's remaining concerns, however, are outlined below.

Specific comments on the Animal Welfare (Electronic Devices) (Wales) Regulations

Numbering sequence

_ The numbering sequence of the Regulations is incorrect.

Prohibition on use of electronic devices

_ *** remains disappointed that the draft Regulations only prohibit the use of electronic devices. *** believes that there is no place for the use of electronic shock devices in modern animal training (see *** position above) and, for the legislation to achieve this aim, would recommend that the sale and possession of such devices are also prohibited.

_ *** remains extremely concerned that the offences created by regulation 2 are limited to dogs and cats. This would mean that it would not be an offence to attach an electronic device to another species of animal, whether this was for training purposes or with the intention of deliberate cruelty. The problems associated with shock collars are applicable to any species, and as an example, pain caused by an electric shock is a well-documented stimulus for aggression in a wide variety of species⁶. *** therefore believes that it should be an offence to attach an electronic device to any animal.

_ *** is supportive of the exemption to allow the insertion and reading of a microchip for the purpose of identifying a cat or dog in regulation 2(2)(a). However, the Society is disappointed that the wording 'where that is done in accordance with good practice' has been removed from the current draft.

_ *** can understand the decision to include the exemption to allow the use of an electronic control weapon by a constable in regulation 2(2)(b). However, *** is concerned that the use of such a device is likely to directly compromise animal welfare and could also cause more problems than it solves. For example, when a dog uses aggression it is almost invariably because it thinks that it is under some form of threat. When a

dog is in this state, the use of an electronic control weapon is likely to make it feel even more threatened. As a result, this may escalate the dog's level of aggression.

*** would therefore strongly recommend that a review of the use of electronic control weapons, in consultation with independent animal behaviour and welfare experts, is undertaken before a decision is made about whether or not to allow their use on animals. If, following such a review, a decision is made to allow the use of electronic control weapons, *** would strongly recommend that evidence-based guidelines are devised, in consultation with independent animal behaviour and welfare experts, which must be adhered to when using such devices on animals.

*** also believes that a definition for 'electronic control weapon' should be included within the Regulations.

Offences

*** is concerned that there is no cross-referencing between regulation 3(2) and the provisions in the Animal Welfare Act 2006. The RSPCA would recommend that the draft Regulations include wording such as:
The relevant post conviction powers contained in sections X,Y and Z of the Animal Welfare Act 2006 apply in relation to a conviction for an offence under this regulation.

References

- 1 Schalke, E., Stichnoth, J. and Jones-Baade, R. (2005) Stress symptoms caused by the use of electric training collars on dogs (*Canis Familiaris*) in everyday life situations. *Current Issues and Research in Veterinary Behavioural Medicine: Papers presented at the 5th International Veterinary Behaviour meeting*. Purdue University Press, West Lafayette, Indiana.
- 2 Tortora, D.F. (1982a). Understanding Electronic Dog Training Part 1. *Canine Practice* 9 (2), 17-22.
- 3 Beerda, B., Schilder, M.B.H., van Hooff, J.A.R.A.M., de Vries, H.W. and Mol, J.A. Behavioural, saliva cortisol and heart rate responses to different types of stimuli in dogs. *Applied Animal Behaviour Science* 58, 365-381.
- 4 Hiby, E.F., Rooney, N.J. and Bradshaw J.W.S. (2004). Dog training methods: their use, effectiveness and interaction with behaviour and welfare. *Animal Welfare* 13 (1): 63-69.
- 5 Schilder M.B.H. and van der Borg J.A.M. (2004). Training dogs with the help of the shock collar: short and long term behavioural effects. *Applied Animal Behaviour Science* 85 (3-4), 319-334.
- 6 Heacock D., Thurber S. & Vale D. (1975). Shock-elicited aggression by human subjects. *Journal of Social Psychology* 95. pp 55-59
- 7 Schalke, E., Stichnoth, J., Ott, S. and Jones-Baade, R. (2007). Clinical signs caused by the use of electronic training collars on dogs in everyday life situations. *Applied Animal Behaviour Science* 105, 369-380.

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*** would like to reiterate the view that was stated in the response to the consultation that ended in May 2009. *** believes 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 *** believes that prematurely legislating on this issue could impact on the ability to effectively enforce the regulation.

In addition, *** agrees with the view of its division, ***, 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. *** 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

*** believes that the restrictions laid out in paragraph 4a-c would prevent a veterinary surgeon from implanting a pacemaker in an animal or prescribing the use of electronic physiotherapy devices, TENS machines. Both of these devices administer small electrical shocks when attached to an animal and would therefore be prohibited under the proposed legislation.

*** are pleased to note that all references to electric fences have been removed from the proposed legislation.

CONCLUSION

As has been stated previously, *** is concerned that this legislation is due to be adopted before the scientific evidence on which it could be based has been fully evaluated.

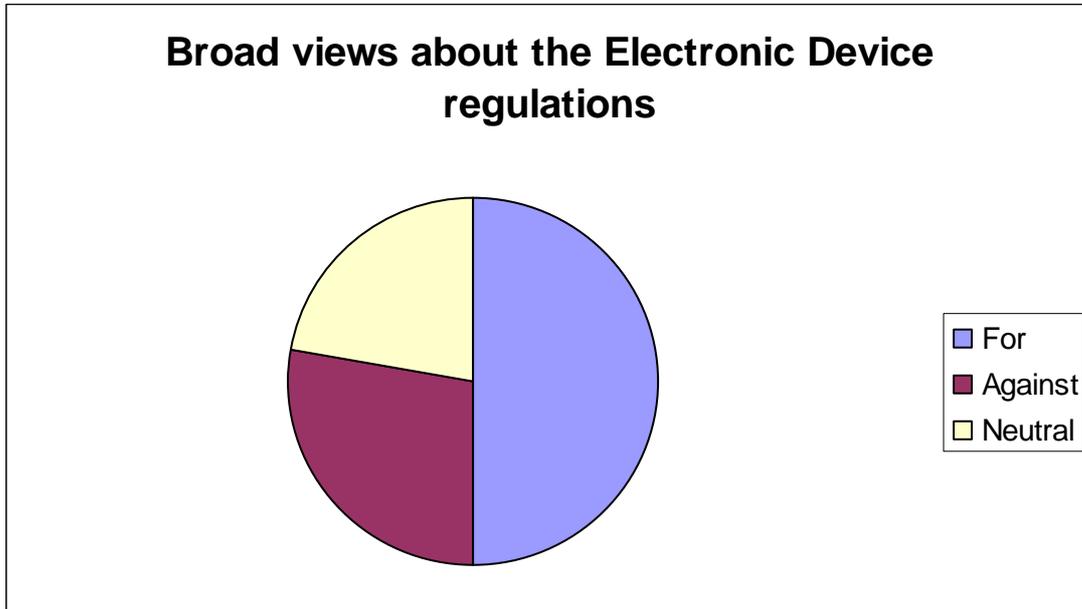
Statistics

Number of respondents: 18

For a ban: 9/18

Against a ban: 5/18

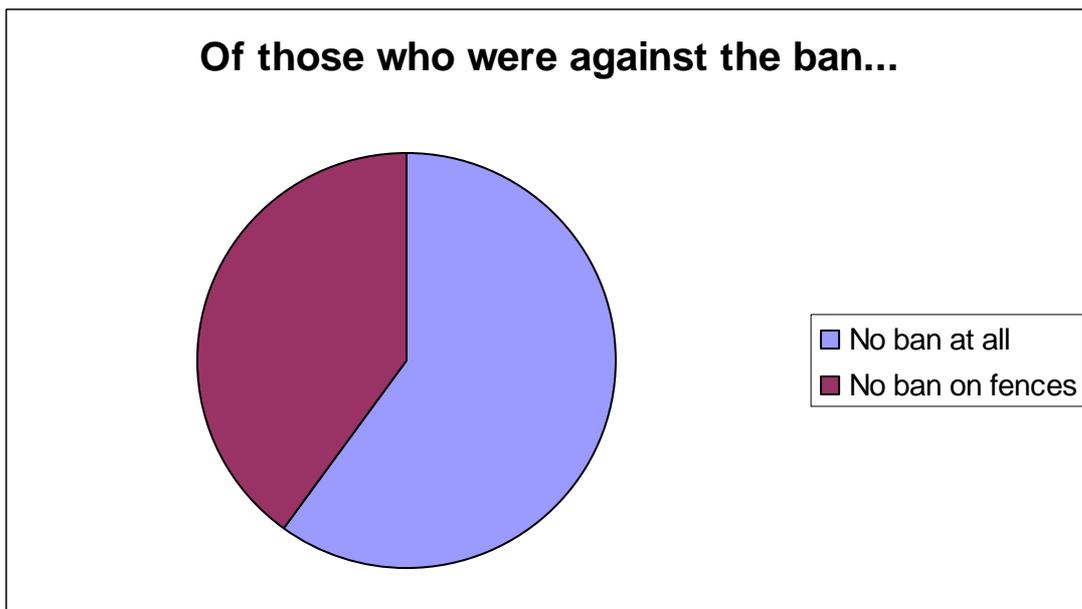
Neutral: 4/18



Of those who were against the ban:

No ban: 3/5

No ban on fencing: 2/5

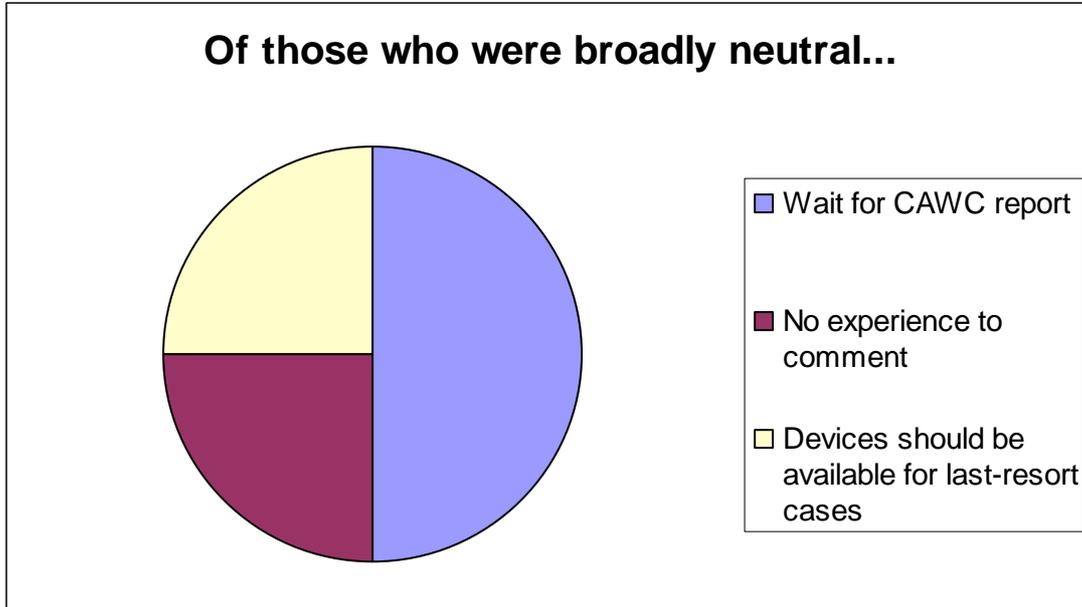


Of those who responded neutrally:

Wait for CAWC report: 2/4

Inexperienced to comment: 1/4

Devices should be available for last resort cases: 1/4



Of those who wanted to wait for the CAWC report:

Agree with ban in principle: 1/2

No comment: 1/2

