



Cymdeithas Frenhinol Atal Creulondeb i Anifeiliaid Royal Society for the Prevention of Cruelty to Animals

20 January 2014

William Powell AM
Chair, Petitions Committee,
National Assembly for Wales,
Cardiff Bay,
Cardiff,
CF99 1NA

Dear William Powell AM,

Re: P-04-445 - 'Save our Welsh cats & dogs from death on the roads'

Thank you for your letter in relation to P-04-445, 'Save our Welsh cats & dogs from death on the roads'.

RSPCA Cymru is very pleased to be invited by the Petitions Committee to provide further information following the petitioner's more recent correspondence.

Further to this, the issues raised by the petitioner have been considered in detail by scientists in the RSPCA's Companion Animals department. Please see enclosed a response prepared by the department, based on scientific evidence.

It is hoped this clearly demonstrates why the RSPCA is deeply concerned by any proposals to remove the ban on electric collars linked with invisible boundary fencing or hidden fencing.

We welcome the Welsh Government's assertion made in February 2013 that no significant proposals have been brought forward to suggest changes to the legislation are warranted. Further to this, we understand the legislation will be reviewed this year, and we look forward to closely engaging with that process to ensure animal welfare does not take a backwards step in Wales.

RSPCA Cymru is also concerned that the policy of the Kennel Club may have been misunderstood as part of this campaign, as may have been inferred by correspondence received by the Petitions Committee. We welcome that the organisation is not seeking legislative change in Wales in relation to these

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Noddwr Ei Mawrhydi Y Frenhines
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devices.

It is imperative that the Animal Welfare (Electronic Collars) (Wales) Regulations 2010 are not amended in any way which impinges upon the welfare of animals, and the attached paper provides detailed information further to this.

As ever, should you require any further information, please do not hesitate to get in touch.

Yours Sincerely,

A handwritten signature in purple ink, appearing to read 'C. O'Brien'.

Chris O'Brien
Public Affairs Manager, RSPCA Cymru



Evidence Paper

ELECTRONIC BOUNDARY FENCES - JANUARY 2014

RSPCA Cymru is pleased to submit the following evidence to the National Assembly for Wales' Petitions Committee, concerning petition P-04-445. This follows a request from the Committee Chair, William Powell AM, for further information following recent correspondence from the petitioner.

1. RSPCA'S POSITION ON ELECTRONIC BOUNDARY FENCES

- a) The RSPCA opposes the use of electronic training devices, including fences to train and control dogs and cats, as demonstrated by RSPCA policy¹ and position².
- b) Based on the principles of learning theory, the electric stimulus delivered by a collar has to be aversive, causing pain or fear, to effectively inhibit the unwanted behaviour for example, preventing a dog or cat escaping from the garden.
- c) There is evidence which shows that the application of an electric stimulus can cause both a physiological stress response³ and behavioural responses associated with pain, fear and stress in animals⁴.
- d) Recent Defra funded research shows that, at least in a proportion of animals trained using e-collars, there is a negative impact on welfare⁵. Furthermore, the use of e-collars does negatively impact on the welfare of some dogs when trained even when the training is being carried out by professionals using protocols based on advised best practice⁶.
- e) There is great potential for misuse of these devices, either through ignorance or malice by those intent on deliberate cruelty. In addition, the intensity and duration of the shock can be altered by the user. This can result in a high end shock being delivered which far exceeds the level at which the shock is aversive to the animal.

2. ELECTRONIC TRAINING DEVICES AND THE DELIVERY OF PAINFUL STIMULI

- a) With regard to specific points in the petitioner's letter, the RSPCA does not agree with the implied notion that just because animals of the same species cause pain to one another it is acceptable for humans to do so to another species. For example, dogs are very complex

¹ '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.

² As an example, see www.dogwelfarecampaign.org.uk

³ 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.

⁴ Tortora, D.F. (a982). Understanding Electronic Dog Training Part 1. *Canine Practice* 9 (2), 17-22.. Beerda, B., Schilder., M.B.H., van Hoof, J.A.R.A.M., de Vries, H.W. and Mol, J.A. (1998) Behavioural, saliva cortisol and heart arte responses to different types of stimuli in dogs. *Applied Animal Behaviour Science* 59, 365-381.

⁵ Cooper, J., Wright, H., Mills, D., Casey, R., Blackwell, E. Van Driel, K., Lines., 2013. Studies to assess the effect of pet training aids, specifically remote static pulse systems on the welfare of domestic dogs. Report to Defra.

⁶ Cooper, J., Cracknell, N., Hardiman, J., Mills, D., 2013. Studies to assess the effect of pet training aids, specifically remote static pulse systems, on the welfare of domestic dogs; field study of dogs in training. Report to Defra.

communicators reliant upon very subtle changes in body language to communicate to one another which humans could never replicate or time in the same way as dogs can. This elaborate repertoire of behaviour allows dogs to avoid aggressive encounters which could otherwise be injurious.

- b) The stimulus delivered by the collar should not be compared to a nip given by an adult to its offspring in the wild. This suggests that the stimulus delivered by the collar will be no more painful than a nip which is not the case as the intensity and duration of the stimulus delivered by the collar can be altered to such a level that physical lesions can be caused⁷. In addition, the experience of the shock, in dogs for example, will be affected by the dog's temperament, previous experiences, frequency of application, location of shock, thickness of hair and the level of moisture on the skin⁸. Thus even if the collar was set to deliver a stimulus believed to be the same as a nip it may in fact cause more pain than intended.

3. ELECTRONIC BOUNDARY FENCES AND DOGS

- a) The RSPCA strongly believes that there are suitable and viable alternatives to the use of electronic boundary fences for the control of dogs, for example, fencing or training and as such they are not necessary. In addition, practical experience gained by members of the Association of Pet Behaviour Counsellors (APBC) shows that electronic boundary fences can compromise welfare and in some cases can result in other behaviour problems not previously present e.g. aggression⁹.

4. ELECTRONIC BOUNDARY FENCES AND CATS

- a) Electronic boundary fences are most likely to be used to contain cats within an area to prevent fatal road accidents which we acknowledge are a significant welfare problem.
- b) The RSPCA strongly believes that those who acquire an animal should be prepared to provide for its welfare needs in accordance with the Animal Welfare Act 2006 and should ensure their environment protects their animal from Road Traffic Accidents and painful stimuli. Our rehoming practice reflects this. When assessing the suitability of a prospective owner, the traffic volume is a consideration along with the needs of the individual cat. A young cat with no experience of a road and which is likely to roam would be highly unlikely to be rehomed next to a busy road.
- c) Owners who wish to contain cats within their garden should consider all viable alternatives such as fencing or the construction of a large enclosure; expert opinion suggests that keeping cats in at night is a good preventative for protecting cats from fatal road traffic accidents⁹.
- d) Based on cat's physical and psychological needs, it is important that the potential impact on cat welfare is acknowledged.
 - i. Recent research has shown that owned male domestic cats will range an average of 100m from their home and owned female domestic cats an average of 50m¹⁰. Despite

⁷ Seksel, K. (1999) Comments on collars policy: No. *Aust Vet Journal* 77, 78.

⁸ Blackwell, E.J., Casey, R.A., 1993. The use of shock collars and their impact on the welfare of dogs: A review of the current literature. Report to the RSPCA.

⁹ www.apbc.org.uk/node/353

¹⁰ Wilson, A., Usherwood, J., Lowe, J., Myatt, J. (2013) Research presented on BBC Horizon 'The Secret Lives of Cats'. Royal Veterinary College. <http://www.rvc.ac.uk/SML/People/awilson/BBC-Horizon-the-secret-life-of-the-cat.cfm>

being well-fed and neutered and therefore having no need to roam in regards to hunting and mating, owned domestic cats still chose to perform this behaviour suggesting they are highly motivated to do so¹¹. Prevention from performing this behaviour is likely to negatively affect their welfare.

- ii. In addition, the use of electronic boundary fences for cats is likely to reduce their ability to manage and control social interactions. A cat's preferred strategy when faced with a social threat such as a neighbouring cat is to use avoidance to keep themselves safe. The decision to fight is generally a last resort due to the risk to health and fitness. The presence of an electric boundary fence may reduce their ability to avoid and/or flee from a perceived threat. In this case the cat may be forced to experience the pain from the electric fence or engage in a fight that it would have otherwise avoided. Strong motivation to escape the fenced area due to social conflicts or other threats will likely mean that low level shocks are not sufficient to keep the cat in and therefore a relatively high level shock would need to be used at all times.
- e) Based on the aforementioned evidence, the RSPCA believes that there is the potential for a negative impact on welfare when using electronic boundary fence systems for cats and this should be subject to further enquiry before introducing any legislative changes.

5. EXEMPTING ELECTRONIC BOUNDARY FENCES FROM THE ANIMAL WELFARE (ELECTRONIC COLLARS) (WALES) REGULATIONS 2010

- a) Prior to any exemption being considered, the RSPCA would require assurance that there are no long term harms to cat welfare. Reversing the ban with an absence of evidence that welfare is not compromised could be a backwards step for animal welfare. It could also lead to irresponsible pet ownership and a prevalence of ineffective, aversive approaches to animal training.
- b) If an exemption were to be granted, there must be a regulatory system in place with effective enforcement. There is great potential for the misuse of electronic training devices (1e) and a regulatory system would be necessary to minimise harm. Such a system would, however, pose significant financial and practical implications.
- c) One such practical implication is ensuring that those who train animals to respond to an electronic boundary fence are suitably qualified to minimise harm. Behaviour organisations such as the Association of Pet Behaviour Counsellors strongly oppose the use of electronic training devices¹² including the use of electronic boundary systems and so there is a risk that those who train may not be suitably qualified, knowledgeable, skilled or experienced. Defra research shows that with regards to electronic training devices there is a negative impact on welfare for at least some dogs, even when trained using best practice.

6. RSPCA'S POSITION ON ELECTRONIC LIVESTOCK FENCING

- a) The RSPCA does not support electronic livestock fencing rather the RSPCA is not against livestock fencing when used appropriately and when correctly managed. In addition:

¹¹ Bradshaw, J. (2013) Cat Sense. New York, USA: Basic Books.

¹² www.apbc.org.uk/node/353

- a. Electronic livestock fencing generally follows a visible boundary or is marked with white tape which is not the case for buried or hidden boundary fences, which require the dog or cat to learn the position of a boundary in the absence of any geographic features; the ability of which requires further research.¹³
- b. Viable alternatives to livestock fencing are not as readily available for livestock as they are for companion animals due to the economic cost of fencing large areas of pasture.
- c. Based on our expertise, we believe that the probability of livestock leaving a bound area, compared to cats and dogs, is likely to be less as the welfare needs of livestock can generally be provided for within the area. Dogs are more likely to be strongly motivated to leave an area to gain access to something which it highly values or to avoid something which it is frightened of thus are more likely to try and leave the area and be punished as a consequence.

¹³ Companion Animal Welfare Council (2012) The Use of Electric Pulse Training Ads (EPTAs) in Companion Animals.