

[Redacted]

From: [Redacted] >
Sent: 16 November 2016 11:19
To: Voas AP (Andrew); [Redacted]
Subject: Follow up to our recent meeting
Attachments: Guideline for Obedience Training Organisation Criteria_24 February 2016.docx; 20161027 [Redacted] electronic collar - Scottish government.pdf; 20161027A Scotland - Submissions and accompanying [Redacted] electronic collar.pdf

Categories: Print

Hi Andrew & [Redacted]

Thanks for your time on the 27th October, as promised here is the follow up from ECMA™.

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- **Link to the Kiwi video referenced in our discussions:**

<http://tvnz.co.nz/seven-sharp/dogs-get-electric-shock-treatment-in-aid-kiwi-population-video-6495131>

- **Confirmation that Victoria don't recall any legislative phase-in of the electronic collar regulations.**

We expect that the provisions were immediate on the Regulations being made.

- [REDACTED]

- **PDF's of the documents we left with you**

Please let me know if there is anything I have missed and I look forward to hearing from you.

Many thanks

[REDACTED]

[REDACTED]

t: [REDACTED] e: [REDACTED]

petsafe.net | sportdog.com

Radio Systems Corporation | PetSafe Limited
Chorley Business & Technology Centre, Building N1, Euxton Lane, Chorley, PR7 6TE, United Kingdom

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Guidelines for Organisation to be considered by the Minister as an “Approved Obedience Training Organisation”

What is an approved obedience training organisation?

An approved obedience training organisation is an organisation which has been approved by the Minister to provide a training course to its members to become instructors as per the Domestic Animal Regulations 2015 (DAR), and their instructors provide an approved dog obedience assessment program.

How does an organisation become an approved obedience training organisation?

The Minister may declare, by notice published in the Government Gazette, that an organisation is a recognised organisation if:

- the organisation has applied to the Minister to be declared an approved obedience training organisation
- the Minister is satisfied that the organisation meets the criteria set out in the relevant guidelines; and
- the organisation does not represent owners of dogs of a breed whose importation into Australia is prohibited under the Customs (Prohibited Imports) Regulations 1956 of the Commonwealth

In order for an organisation to be approved, the Minister must approve the organisations training course it provides to members to become qualified dog instructors (DAR 52(8)) and the assessment program for dogs to be assessed (DAR 52(3)). Once the Minister is satisfied with the organisation meeting the requirements of DAR 52 the organisation is approved and has the ability to provide training program and dog training assessment.

How long can a training organisation be approved?

The Minister may approve an organisation under DAR52(4) for a period of up to 36 months if it satisfies the following criteria—

- it is an organisation established for the purpose of representing the interests of other dog training organisations as well as individual dog trainers;
- it provides training and education programs relating to dog training to its members;
- it has prepared and distributed to its members a code of ethics relating to dog training that is endorsed by the organisation and is binding on its members.

What are the benefits of being an approved obedience training organisation?

Dogs that have undergone obedience with an approved training organisation will receive a reduced registration fee with their Council.

What is obedience training?

Obedience training is training of a dog that enables the dog to successfully complete—

- an assessment program administered by the Victorian Canine Association Inc. which results in the award of an obedience title recognised by the Australian National Kennel Control; or
- an assessment program approved by the Minister and conducted by a qualified dog trainer.

What is the Ministers skill assessment program?

As an approved obedience training organisation under DAR52(3), the Minister may approve an assessment program if the organisation provides assesses a dog in the following skills:

- heeling or walking with handler
- sociability with other dogs
- staying on command (known as the stay test)
- coming to handler on command (known as a recall test)
- absence of aggression towards humans or another animal.

Who is deemed a qualified dog trainer?

A qualified dog trainer is a person who—

- is a current member of an organisation approved by the Minister; and
- has completed to the satisfaction of that organisation a training course approved by the Minister and administered by that organisation.

What criteria must the 'qualified dog trainer' course meet for it to be approved?

The Minister may approve under DAR52(8), a instructors training course if it provides for:

- training in appropriate equipment used to train dogs
- practical obedience training of dogs
- a written or oral examination on the theory of dog training
- a practical examination of a person's dog training skills
- a probationary or learning period of at least 100hours in which the trainee is under the supervision of a qualified dog trainer

What is required to be provided to the Minister by the obedience training organisation?

See attached criteria form and note suggested methods of evidence.

Should I be registered as a Domestic Animal Business - Training with my Local Council?

A domestic animal business is an enterprise which carries out the training of dogs or cats for profit. 'For profit' is defined as receiving a fee or reward for services rendered.

DAA Approved Obedience Training Organisation
CRITERIA FORM

APPLICANT INFORMATION

| | | |
|--|---------------|-------------|
| Organisation Name: | | |
| ABN: | Office Phone: | Office Fax: |
| Email: | | |
| Council Domestic Animal Business Number (only required if the organisation offers the training of dogs): | | |
| Website: | | |
| Postal Address: | | |
| City: | State: | Post Code: |
| How many training affiliates does the organization represent: | | |
| <input type="checkbox"/> Attach details in Appendix 1 table | | |

CONTACT INFORMATION

| | | |
|---|---------|------------|
| Contact 1 Name: | | Role: |
| Phone: | E-mail: | Fax: |
| City: | State: | Post Code: |
| Contact 2 Name: | | Role: |
| Phone: | E-mail: | Fax: |
| City: | State: | Post Code: |
| Designated Council Liaison Name: | | Role: |
| Phone: | E-mail: | Fax: |
| City: | State: | Post Code: |
| List of Board/ Committee Members names and role (where applicable): | | |

MEMBERSHIP INFORMATION

| |
|--|
| Total number of current members: |
| Number of new members in the preceding 12 months: |
| Total number of members in attendance at the preceding AGM (where applicable): |

QUALIFIED DOG TRAINERS

| |
|---|
| How many qualified dog trainers does the organization have? |
| <input type="checkbox"/> Attach list of names |
| How many qualified dog trainer were approved in the preceding 12 months? |
| Provide evidence that an instructor training manual and examination has been developed and implemented by the organisation: |
| <input type="checkbox"/> Attach relevant documents |
| How does the organisation record the probationary or learning period of 100 hours for new instructors: |
| <input type="checkbox"/> Attach relevant documents |

COMPLIANCE OF MEMBERS

How is the Code of Ethics (or equivalent document) enforced?

Number of investigations into breaches of Code of Ethics (or equivalent document) conducted in the preceding 12 months?

Number of non-compliances identified in the preceding 12 months?

Type of non-compliances identified in the preceding 12 months?

Number of disciplinary hearings / grievance hearings in the preceding 12 months?

Outcomes of any disciplinary hearings / grievance hearings in the preceding 12 months?

- Verbal Warnings: _____
- Warning Letters: _____
- Suspensions: _____
- Fines: _____
- Removal of Membership: _____
- Other: _____

List the organisations documented procedures / processes / protocols for reporting and handling incidents:
(ie animal cruelty, diseased animals, dog attacks)

- Attach relevant documents or illustrate where information is documented

Provide evidence that a complaints database is kept by the organisation:

- Attach relevant documents

Has a copy of the complaints database been provided to DEDJTR for the preceding 12 months?

- Attach relevant documents

EDUCATION OF MEMBERS

Provide evidence of the information provided to members to educate them on Victorian legislation:

- Seminars
- Hard copy materials
- Training days
- Online materials
- Electronic Media
- Other:

List details of how and when this information was provided:

Provide evidence of how members are informed of the Conditions of Application for Obedience Training Organisation status:
(ie included in Code of Ethics or equivalent)

Provide evidence that an annual training calendar has been developed and implemented by the organisation:

- Attach relevant documents and evidence

How is the organisation informing members that they must comply with all state and local government laws?

How can the organisation show that each member has received and agreed to the conditions of being a member?

CHECKLIST OF REQUIRED ATTACHEMENTS

- 1. Application Letter to the Minister of Agriculture – Jaala Pulford MP
- 2. Proof of Incorporation Status (if applicable)
- 3. Copy of the Council Domestic Animal Business Certificate/s
- 4. Copy of the Constitution or equivalent (where applicable)
- 5. Copy of the Annual Report as presented and accepted at preceding Annual General Meeting (AGM) (where applicable)
- 6. List of membership attendance at previous AGM (where applicable)
- 7. Copy of the Code of Ethics
- 8. List of qualified dog trainers
- 9. List of training affiliates – Appendix 1
- 10. Copy of Instructors training manual
- 11. Copy of Instructors examination
- 12. Copy of the annual training calendar for the preceding 12 months
- 13. Copy of the complaints database for the preceding 12 months

DECLARATION

We, [Organisation Name] agree that as an obedience training organisation we must:

1. Ensure that the organisation is aware of and fulfil our legal responsibilities and obligations.
2. Ensure that members are adequately informed of the conditions of being an approved obedience training organisation and qualified dog trainers.
3. Ensure that all sub group/ subsidiary membership forms have provision for including the Council Domestic Animal Business (Training) number.
4. Ensure that all membership forms have provision for signing that they agree to abide by the Code of Ethics or equivalent documents.
5. Ensure that all membership forms have provision for signing that they agree to abide by the AO Conditions of Application – member requirements.
6. Ensure that the organisation does not represent owners of dogs of a breed whose importation into Australia is prohibited.
7. Ensure that the organisation and affiliates do not train dogs to set on or urge to attack, bite, rush at, chase or menace persons, animals or anything worn by the persons.

Signature of applicant:

Date

Role:

APPENDIX 1 – TRAINING AFFILIATES

| | |
|---|--|
| Group Name: | |
| Contact Name: | |
| Address: | |
| Email: | |
| Phone: | |
| Number of dogs trained for reduced registration in previous 12 months: | |
| Total number of members: | |
| Total number of qualified dog trainers: | |
| Council Domestic Animal Business registration number*: | |
| Group Name: | |
| Contact Name: | |
| Address: | |
| Email: | |
| Phone: | |
| Number of dogs trained for reduced registration in previous 12 months: | |
| Total number of members: | |
| Total number of qualified dog trainers: | |
| Council Domestic Animal Business registration number*: | |
| Group Name: | |
| Contact Name: | |
| Address: | |
| Email: | |
| Phone: | |
| Number of dogs trained for reduced registration in previous 12 months: | |
| Total number of members: | |
| Total number of qualified dog trainers: | |
| Council Domestic Animal Business registration number*: | |
| Group Name: | |
| Contact Name: | |
| Address: | |
| Email: | |
| Phone: | |
| Number of dogs trained for reduced registration in previous 12 months: | |
| Total number of members: | |
| Total number of qualified dog trainers: | |
| Council Domestic Animal Business registration number*: | |
| *provide a current copy of the Council issued registration certificate for DAB - TRAINING | |

CONDITIONS OF APPLICATION

REQUIREMENTS FOR BEING A MEMBER/ TRAINER/ AFFILIATE OF AN OBEDIENCE TRAINING ORGANISATION

All members of the organisation have been informed on the requirements to:

LEGISLATIVE REQUIREMENTS

1. Comply with Victorian State and Local Government Legislation, Regulations and Codes of Practice applying to the welfare, keeping, training and management of dogs.
2. Ensure that all dogs that are three months of age and over are microchipped and registered with the municipality in which they reside prior to training.
3. Ensure existing council registrations are renewed by 10 April each year.

ACCOMMODATION / HOUSING

4. Ensure animals are housed and confined in a safe and secure manner.
5. Provide housing & equipment suitable for the size of the animal and containment requirements.
6. Provide adequate protection from adverse environmental conditions & climatic extremes.
7. Provide adequate ventilation and sufficient space for animals to stand and move freely at all times, including during transportation.
8. Ensure that no part of a pen/cage floor area may be made from wire.
9. Ensure that pens/cages must not be stacked on top of one another.

ANIMAL HEALTH

10. Ensure reasonable protection from disease, distress and injury.
11. Provide prompt veterinary treatment in the case of animal injury or illness.
12. Maintain cleanliness and hygiene in premises where animals are kept.
13. Make every effort to control pests such as fleas, ticks, etc.
14. Ensure that animals are treated regularly for internal and external parasites and vaccinate against common diseases.
15. Provide sufficient exercise to maintain health and fitness.
16. Provide appropriate food and water in clean containers to maintain good health.
17. Ensure animals have access to water of sufficient quantity and quality.
18. Ensure animals be provided with a safe, balanced and complete diet

BANNED PROCEDURES (TAIL DOCKING, EAR CROPPING, DOG DEBARKING)

19. Ensure that the owner or person in charge of an animal must not allow a prohibited procedure to be conducted on an animal.
20. Ensure that the owner or person in charge of an animal cannot show or exhibit an animal, or allow an animal to be shown or exhibited, where the animal has had a prohibited procedure conducted illegally on it.

COLLARS

21. Ensure that the use of collars incorporating protrusions designed to puncture or bruise the animals skin is prohibited.
22. Ensure that electronic collars are only used as specified under the Prevention to Cruelty to Animals Regulations 2008.

DOG WORKING & ENVIRONMENTAL CONDITIONS

23. Ensure that dogs are not pushed beyond their natural abilities by administering drugs or medications to enhance performance.
24. Ensure that dogs are not worked in conditions that may result in them suffering from hypothermia, hyperthermia or dehydration.

DOG TRAINING

25. Ensure that dogs are not trained or worked beyond their willingness and capabilities.
26. Ensure that all training methods used are humane and not cause undue fear, distress or pain.
27. Ensure that dogs are not trained to set on or urge to attack, bite, rush at, chase or menace persons, animals or anything worn by the persons.

DOMESTIC ANIMAL BUSINESSES

28. Where required by law to be a Domestic Animal Business (Breeding, Rearing, Training, Boarding, Pound or Shelter), the owner/ organisation must be registered with the municipality in which they reside or in which the business premises is based.

INJURED ANIMALS

29. Ensure that any animal injured during training is provided with Veterinary attention as soon as possible.
30. Ensure that any injured animal does not undertake training unless clearance is provided in writing by a Veterinarian.

TETHERING

31. Ensure that dogs are only tethered in accordance with the *Prevention of Cruelty to Animals Act 1986*, Regulations and Code of Practice for the Tethering of Animals.
32. Ensure that dog tethering systems limits the risk of tangling and prevent overlap of adjacent chains.

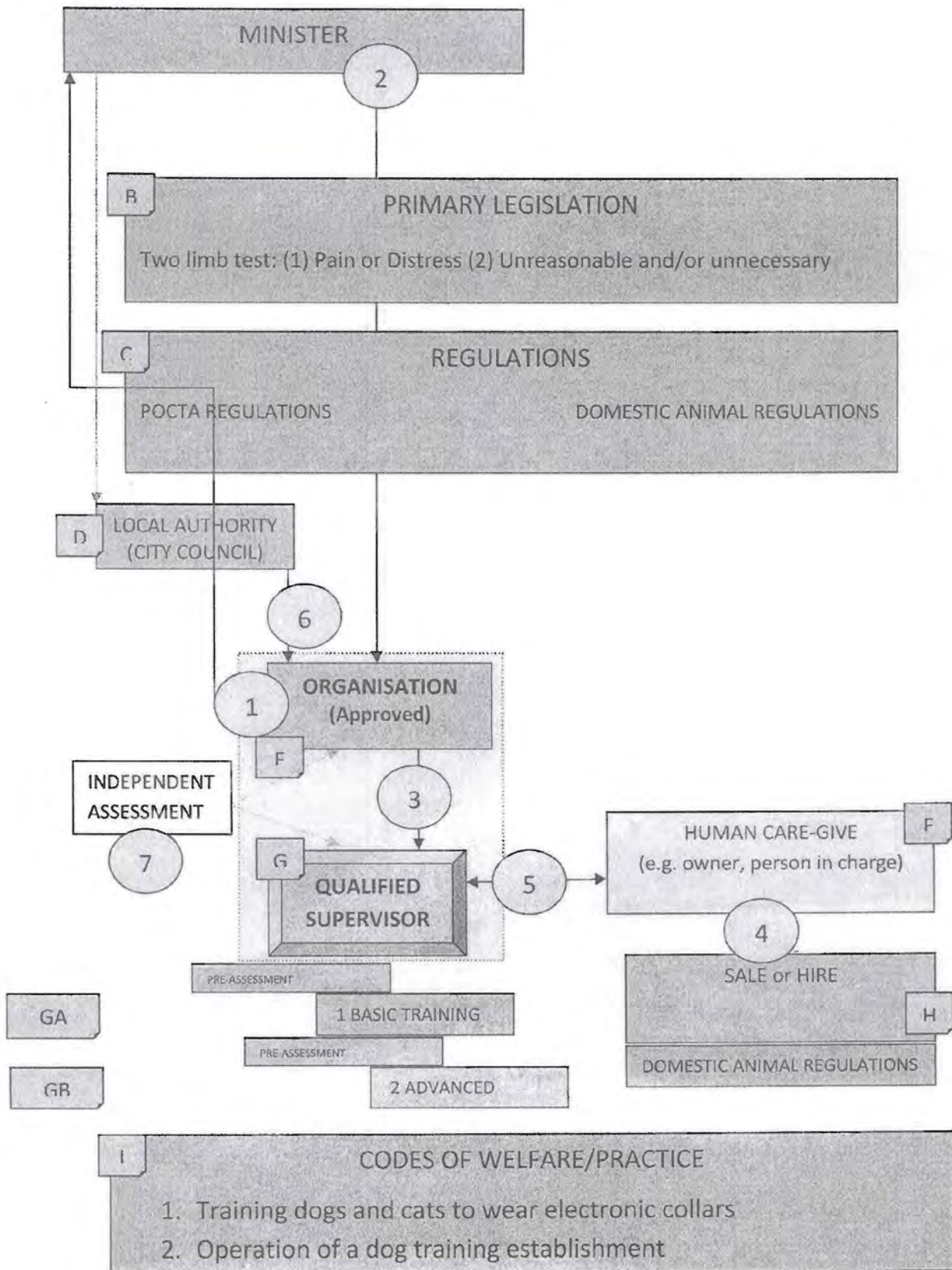
33. Ensure that pregnant bitches more than 7 weeks gestation, whelping bitches and lactating bitches with puppies are not tethered.
34. Ensure that puppies under 16 weeks of age are not tethered.

TRANSPORT

35. Ensure that animals are transported in a safe and secure manner.
36. Ensure that animals are not transported in the boot of a sedan type car.
37. Ensure that when on the back of a ute or trailer that the animal/s are appropriately tethered or caged.
38. Ensure that when travelling, animals are provided with adequate ventilation.
39. Ensure that sealed transport containers have multiple ventilation holes on at least three sides of the container.

MODEL OF LEGISLATIVE/REGULATORY CONTROL OF E-COLLARS

REFERENCING VICTORIA (AUSTRALIA) AND ECMA MULTI JURISDICTIONAL DISCUSSIONS



MEMORANDUM

To: Andrew VOAS, Veterinary Adviser, Scottish Government

Cc/etal

From: Electronic Collars Manufacturers Association ("ECMA")

Reference ECMA-AV-20161027A

Date: 27 October 2016

Subject: **REGULATION OF ELECTRONIC TRAINING AIDS**

A. COLOUR CODE:

1. GREEN: Relevant law (i.e. Primary Legislation, Regulations, Codes of Welfare/Practice)
2. BLUE: State governance bodies
3. PINK: Private business e.g. (Approved, Licensed) dog training organisation and representative (i.e. "qualified supervisor") - Collar provider (e.g. retailer, wholesaler, rental provider)
4. BEIGE: Public individual/human caregiver (i.e. owner, person in charge)
5. YELLOW CIRCLES: Pathways of governance control (e.g. application, license, auditing, compliance and enforcement, sale and hire)
6. PURPLE SQUARES: Key reference points (to facilitate discussion and explanation of process)
7. NO COLOUR: Initiatives being discussed on the basis of being potential improvements

B. FULLY INTEGRATED SYSTEM GOVERNING RESPONSIBLE USE, COMPLIANCE AND ENFORCEMENT

8. The Victorian model illustrates a comprehensive integrated system at primary and secondary legislative level. The system enables full control and accountability in respect of compliance and enforcement along the entire system of e-collar use i.e. from sale/hire to use by the supervisor-and-end-user.

9. Notably the concerns of governors and interest groups regarding inappropriate use of the e-collar are addressed by ensuring that ALL use of e-collars is conducted only under the supervision of an approved organisation and one of its "qualified trainers".
 - 9.1. Strict prescriptive requirements are in place in respect of the training, licensing and functioning of the "qualified supervisor.
 - 9.2. For example, this includes a mandatory veterinary check, pre-use assessment of the owner and dog to determine *if* the e-collar is the appropriate training tool, and a mandatory documented ongoing and follow-up program.
 - 9.3. Additionally, the "qualified supervisor" is authorised to function only under the license of a training organisation that has been formally assessed, approved, and licensed by the Minister.
10. The integrated system provides an efficient "fit for purpose" model promoting the "appropriate use" (cf. minimal use) of the e-collar thereby benefiting all stakeholders, and appropriately tailored to the individual circumstances e.g. of the dog, the owner and the community.
11. The system extends to governing the sale and hire obligations.
 - 11.1. Mandatory requirements associated with sale and hire include, for example, the obligation to advise the purchase/hirer *in writing* of their legal obligations, and collect purchaser/hirer details.
 - 11.2. Only approved e-collars may be used within the jurisdiction and these are identified according to capabilities that comply with technical specifications.
 - 11.3. [Note: Future proofing may be integrated in to the system by requiring product specifications and use to comply with evolving standards of *"good practice and scientific knowledge"*¹].

C. MODEL REFERENCES

12. [1] The system commences by an established dog training ORGANISATION making an application to the MINISTER for status as an "Approved organisation".
 - 12.1. All organisations providing dog training for profit must be approved by the Minister.
 - 12.2. A standard form must be completed providing full and comprehensive details on a range of mandatory fields, including training programs, management, and personnel.
 - 12.3. The dog-training organisation may provide a range of training options, one of which may be the use of the e-collar. Notably only four organisations are currently approved in Victoria, Australia.²
 - 12.4. The law establishes a registration scheme for domestic animal businesses such as dog training establishments and adopting enforceable Codes of Practice for their business operations. Dog training establishments classified as domestic animal businesses are required by the *Domestic Animals Act* to comply with the *Code of Practice for the Operation of Dog Training Establishments*.
13. [2] If/when the application is assessed as meeting ALL necessary requirements then the Minister may license the organisation as an APPROVED ORGANISATION.

¹ Refer s10 Animal Welfare Act 1999 (New Zealand)

² <http://agriculture.vic.gov.au/pets/domestic-animal-businesses/training-establishments>

14. [3] The training programs of an approved organisation must be conducted by a qualified dog trainer who is a member of one of the approved organisations. Each QUALIFIED SUPERVISOR (TRAINER) is certified to train at one of two levels of competence.
 - 14.1. The level 1 basic training license (e.g. sit, stay, come commands) is a pre-requisite to the level 2 advanced training license.
 - 14.2. The level 2 advanced training may involve a range of specialised programs that includes, for example, protective dog training, and the use of electronic collars.
 - 14.3. The requirements of the training stages are set out in the *Domestic Animal Regulations*.
 - 14.4. Notably the POCTA regulations also set out the specifications of the training, competencies and technical specifications (of an approved/permitted e-collar).
15. [4] The sale or hire of e-collars is governed by regulations
16. [5] All use of an e-collar MUST engage the services of a qualified supervisor. The conditions associated with preliminary checks through to follow-up are set out in the relevant Codes of Practice.
17. [6] The ORGANISATION is regularly audited by the LOCAL AUTHORITY (CITY COUNCIL). Non-compliance by the Approved Organisation (including its representatives e.g. one of its qualified supervisors) may result in the Ministerial license being revoked. The entire system (e.g. application, auditing, and training) operates on a user -pays model.
18. [7] To facilitate consistency, reputational integrity, and objective accountability of the training and competence of the qualified supervisor, discussion has addressed the appointment of an independent contractor to create and assess the qualified supervisor on initial and regular intervals.

D. DISCUSSION POINTS

19. The approved organisation and its qualified supervisor share a "co-accountability" which fits neatly within an integrated system of compliance and enforcement that includes, for example, audits, revocation of license, and prosecution.
20. Competencies of the qualified supervisor.
 - 20.1. The competencies are formally assessed by written and oral examinations of both the theory and practical skills of the qualified supervisor in respect of relevant subjects.
 - 20.2. Reference to the Victorian system demonstrates an extensive list of procedural requirements³ to be undertaken whenever the collar is being contemplated for use, and marries these requirements with the contents of the training course⁴. It is notable that these requirements and course contents are set out in regulations and supporting Codes of Practice.
 - 20.3. For example, the Victorian training course provides for, and assesses⁵:

³ <http://agriculture.vic.gov.au/agriculture/animal-health-and-welfare/animal-welfare/animal-welfare-legislation/victorian-codes-of-practice-for-animal-welfare/code-of-practice-for-training-dogs-and-cats-to-wear-electronic-collars>

⁴ <http://agriculture.vic.gov.au/pets/dogs/training-and-behavioural-problems/obedience-training>

⁵ <http://agriculture.vic.gov.au/pets/dogs/training-and-behavioural-problems/obedience-training>

- a. *Training in appropriate equipment used to train dogs*
 - b. *Practical obedience training of dogs*
 - c. *A written or oral examination on the theory of dog training*
 - d. *A practical examination of a person's dog training skills*
 - e. *A probationary or learning period of at least 100 hours in which the trainee is under the supervision of a qualified dog trainer.*
- 20.4. The Victorian regulations establish a prerequisite and ongoing process of decision-making. This process is delegated to the licensed "qualified supervisor". For reference purposes, some of the requirements of the Victorian regulations state⁶:
- f. *Before an electronic collar can be used on a dog or cat, a veterinarian must first have assessed the physical and psychological health of the dog or cat and assessed the animal as suitable for the use of an electronic collar.*
 - g. *Once veterinary approval is given for use of an electronic collar on a dog or cat the animal must be introduced to the use of the collar in accordance with this Code and the collar must be used under the supervision and written instructions of a veterinary practitioner, competent trainer, or qualified dog trainer (dogs only).*
 - h. *Use of remote training and anti-bark collars requires an ongoing review process by the veterinarian, qualified dog trainer, or competent trainer within 6 months of first beginning use and then every 12 months after that first review.*
- 20.5. The Electronic Collar Manufacturers Association ("ECMA") would welcome an invitation to contribute to the course by presenting on the subject of product knowledge. It is noted that ECMA can provide input and materials to course modules such as appropriate use of the products, developed ECMA Codes of Practice, and access to legal advisors on relevant subjects of law e.g. animal welfare and law.
21. Independent discussions have noted the benefits associated with a pre-assessment of applicants seeking to become a "qualified supervisor".
- 21.1. In other jurisdictions concerns have been expressed that qualifying criteria for a person's entry into the qualifying supervisor course may exclude certain subgroups of dog trainers.
 - 21.2. For example, there are perceived differences in qualification between behaviourists, instructors, and trainers. Distinctions have also been made based on "practical experience", and the ability to "diagnose the root of a problem behaviour" as opposed to simply providing training to remedy a behaviour.
 - 21.3. The Victorian integrated system creates a "level playing field" for all potential applicants.
 - 21.4. Notably, the process set out in the Victorian model demonstrates engagement of alternative specialised individuals e.g. the obligation to consult a veterinarian at the outset of the process.
 - 21.5. Other jurisdictions currently considering compliance and enforcement systems have considered the potential benefits associated with the qualified supervisor being able to approach a committee for further assistance, where that committee is made up of representatives from a variety of complimentary disciplines e.g. behaviourists, veterinarians, and/or other dog trainers.

⁶ <http://agriculture.vic.gov.au/agriculture/animal-health-and-welfare/animal-welfare/animal-welfare-legislation/victorian-codes-of-practice-for-animal-welfare/code-of-practice-for-training-dogs-and-cats-to-wear-electronic-collars>

22. While not an established function within the current Victorian system, discussions have also noted the potential benefits of maintaining a central registry of qualified supervisors. One of the potential advantages, for example, would be the comparable ease in which audits (conducted by local councils) could be conducted.
23. Discussions have noted benefits associated with utilising an independent external assessor.
 - 23.1. To facilitate consistency, assessment is critical as an integral part of any instruction, as it determines whether or not the goals of the training course have actually been met.
 - 23.2. The appointment of an external assessor also reduces the potential for inter-organisational variance in training standards, and/or criticism based on real/perceived conflicts of interest.
 - 23.3. This means, for example, that organisations seeking “approved” status (e.g. existing training organisations) and professionals (e.g. veterinarians, behaviourists) must complete the external assessment before being recognised as an advanced “qualified supervisor”.
24. In the Victorian model, the Local Authority (“City Council”) has the responsibility for auditing approved organisations.
 - 24.1. Discussion has noted that for the purposes of consistency and regulatory control (“compliance and enforcement”), the Local Authority may logically be one choice as the body responsible for also conducting assessments.
 - 24.2. It is notable that there is a difference between the City Council being responsible for the training, versus actually doing the training. It is foreseeable that the Council would subcontract out to an identified specialist.
 - 24.3. By way of analogy to illustrate the recommended principles, this system is comparable to obtaining a car driving will license where driving instructors are engaged to teach end users, but the assessment is completed at a government level.
25. Although government has assumed the administrative costs in the past, recent discussions have considered a user pays amendment to the current system e.g. each step in the independently assessed and audited system which includes sales/hire, licensing, qualified supervision utilising a standards-compliant product.

E. FURTHER INFORMATION

26. Further detail is available by referencing the website of the Victorian (Australian) government⁷, or one of the following ECMA representatives:
 - 26.1. [REDACTED]
 - 26.2. [REDACTED]
 - 26.3. [REDACTED]

⁷ <http://agriculture.vic.gov.au/pets/dogs/legal-requirements-for-dog-owners/electronic-collars>

⁸ [REDACTED] t: [REDACTED] e: [REDACTED]
⁹ [REDACTED]
¹⁰ [REDACTED]