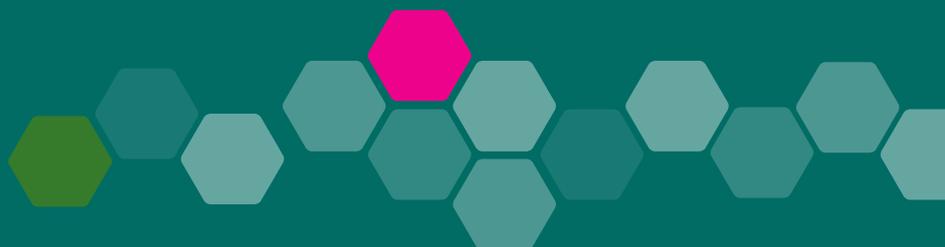


Consultation on potential controls or prohibition of electronic training aids in Scotland



AGRICULTURE, ENVIRONMENT AND MARINE

Consultation on potential controls or prohibition of electronic training aids in Scotland

Analysis of Consultation Responses

**Lucy Robertson
Craigforth**

Contents

Executive Summary	3
Introduction.....	6
Background.....	6
Profile of respondents.....	7
Analysis and reporting	9
Evidence on electronic training aids	11
Existing animal welfare protection	17
Ban or regulations.....	22
Use and financial impact	35
Summary findings	49
Annex 1.....	52
Annex 2.....	54
Annex 3.....	56
Annex 4.....	62
Annex 5.....	77

Executive Summary

Introduction

In November 2016 the Scottish Government published a consultation on potential controls or prohibition of electronic training aids in Scotland. The consultation covered the use of electronic training devices for cats and dogs. It included remote control training collars, anti-bark collars and pet containment fences (also known as electric boundary or freedom fences) using either a static electric pulse, sound, vibration or spray. There were four options proposed: keep the status quo; developing guidance or a statutory welfare code; developing regulations on the use of electronic collars; or banning the use of electronic collars.

A total of 1,032 consultation responses was received. Pet owners formed the largest respondent category at 64% of all respondents. Other categories of respondent were animal trainers (13%), members of the general public (7%), animal welfare respondents (4%), animal behaviourists (4%), veterinary professionals (3%), owners of working dogs (2%), animal care respondents (1%), local government respondents (1%) and pet supplies respondents (1%). The majority of all respondents (60%) currently reside in Scotland and a further 26% in other parts of the United Kingdom.

Overall balance of opinion

Taking all answers together, it was clear that respondents tended to approach the consultation from one of two very different starting points – that electronic training aids are effective and can allow some animals to lead happier lives, or that they are harmful, if not cruel, and far better training approaches are available. As would be expected, respondents overall position on the issue tended to be reflected in their answers across the consultation.

Although no single question acts as a clear proxy, answers at questions covering whether there should be a ban and if so of which devices, suggest that respondents were relatively evenly divided between those supportive of electronic training aids and those opposed to their use. Certain categories of respondent very clearly tended to one side of the argument or the other. In particular, animal care and animal welfare respondents clearly tended to be opposed to the use of electronic training aids. Pet supplies respondents and owners of working dogs clearly tended to be supportive of their use. The largest single category of respondents - pet owners - were relatively evenly divided on the issue.

Support for the use of electronic training aids

Respondents who broadly supported the use of electronic training aids very often drew on personal experience of using electronic training aids, either with their own pets or when working with other people's animals. The majority of these respondents appeared to be referring to using remote training collars, although there were also references to anti-bark collars and boundary fence systems. The comments on boundary fence systems included references to both cats and dogs.

Overall, respondents who supported the use of electronic training aids were likely to make one or more of the following points:

- The use of electronic training aids, including both collars and boundary fence systems, can bring very real benefits to animals that might otherwise have led very restricted lives, or for which euthanasia would have been a likely option. This may include animals for which other training methods had not worked.
- They may be particularly effective for specific types of dogs, including some working dog breeds, which have a very strong instinct to chase other animals and which may not respond to other training cues. Deaf or blind dogs may benefit from the use of vibration collars. Those making this latter point included some respondents who were otherwise very strongly opposed to the use of electronic training aids.
- Particularly based on personal experience, there is no evidence that animals suffer when electronic training aids are used correctly. Most of those who use electronic training aids use them properly. Anything can be open to misuse, but there is no particular association with electronic training aids - if someone is determined to abuse an animal they will find a way to be cruel or neglectful.
- The existing legislation is sufficient to protect animals. It is clear that causing unnecessary suffering to an animal - whether with an electronic training aid or by any other means - is against the law. Enforcing the existing law would be more effective in protecting animals than adding further legislation or regulations. Any statutory controls should be focused on the quality and specification of the devices available.
- The most effective way to address any issues would be through further education. Training or licensing could be either encouraged or required. One option could be devices only being available under supervision and/or after training from a licensed or regulated practitioner. There may also be a case for some form of code or guidance.

Opposition to the use of electronic training aids

Respondents who opposed the use of some or all electronic training aids tended to voice very particular concerns about the use of static pulse devices. As with those who supported the use of the aids, many of the respondents drew on their own experiences as pet owners or of working with animals. Respondents who opposed the use of electronic training aids were likely to make one or more of the following points:

- Using electronic training aids is harmful and/or cruel. In addition to immediate pain or distress, they may cause anxiety-related behaviours, lead to dogs shutting down psychologically, lead to dogs re-directing any aggression at other dogs or people and can cause physical injuries.
- There is no need to use training methods which are punishment-based and dependent on inflicting pain or creating fear. This approach suppresses

behaviour without addressing its underlying cause or the motivation behind it. The electronic training aids themselves are very difficult to use correctly. There are much more effective and humane positive reinforcement training methods available.

- The existing animal welfare legislation is not sufficient to protect animals, not least because it does not prevent the use of static pulse collars. The 'unnecessary' suffering referenced in the Animal Health and Welfare (Scotland) Act 2006 is a subjective concept which is potentially difficult to prove.
- Electronic training aids should be banned, and in particular any devices with a static pulse function should be banned. Any regulations would be very difficult, if not impossible, to enforce and only a ban would offer sufficient protection to animals. Although a ban was clearly preferred, if the Scottish Government does not introduce a ban then strict regulations might at least offer some protection to animals.
- With specific reference to vibration collars, there may be occasions when they could be permitted for use. Suggestions included all vibration collars being acceptable if regulated, through to vibration collars only being acceptable under certain circumstances, such as if all other approaches have failed and euthanasia is the only alternative, or for deaf dogs.

Overall, respondents to this consultation were divided on whether the Scottish Government should take action in this area. Broadly speaking, one group thought that little, if any, change is required. Others called for a ban of the use of electronic training aids in Scotland and of static pulse devices in particular.

Financial Impact

A majority of those answering the relevant questions felt that a ban or stricter regulations would not affect their business. However, some respondents did expect to be affected - for example, around 3 in 10 thought their business would be affected by a ban or stricter regulations on remote training static pulse collars.

The most frequently identified possible effect was dealing with fewer animals suffering from the negative effects of having been trained with an electronic training aid. The next most frequently identified effect was that some dogs would be more difficult or even impossible to train - animal trainers and owners of working dog respondents raised this issue. Other effects identified included loss of sales.

Issues raised about the possible effect of regulations included that this would depend on the detail of any authorisation process for using training aids and in particular on whether those wishing to use or train others in the use of electronic training aids are able to become authorised.

Introduction

This report presents an analysis of responses to the Scottish Government's consultation on potential controls or prohibition of electronic training aids in Scotland.

The consultation covered the use of electronic training devices for cats and dogs. It included remote control training collars, anti-bark collars and pet containment fences (also known as electric boundary or freedom fences) using either a static electric pulse, sound, vibration or spray.

Background

At present there is no specific legislation in place in Scotland for the regulation, manufacture or use of electronic training devices. However, Section 19 of the Animal Health and Welfare (Scotland) Act 2006 makes it an offence to cause a protected animal unnecessary suffering. A "protected animal" is defined in section 17 and in these circumstances would normally relate to any animal under the control of man. Section 48 of the Act makes it clear that "suffering" includes mental as well as physical suffering. If it could be proved that activating, or causing an electric collar to be activated on a dog or cat, caused it to suffer unnecessarily then an offence would have been committed.

In 2007 the Scottish Government issued a consultation paper on the use, sale, distribution and possession of Electronic Training Aids. Since then, the technical specifications of electronic training devices have moved on and instructions for use have improved. There is also now a larger range of electronic training collars and greater availability of these devices with many being sold through the internet. In the past few years some countries have introduced bans or regulated the use of these devices, and there has been further research into the welfare impact of such devices on animals.

There were four options proposed in this consultation:

1. **Status quo.** Produce industry guidance for dog owners and trainers on the proper use of electronic training collars.
2. **Develop guidance or a statutory welfare code.** Produce a code of practice or animal welfare code under Sections 37 and 38 of the Animal Health and Welfare (Scotland) Act 2006).
3. **Develop regulations on the use of electronic collars.** Introduce regulations or legislative controls under Sections 26 and 27 of the 2006 Act.
4. **Ban the use of electronic collars.** Introduce regulations to ban the use of electronic collars in Scotland under Section 26 of the 2006 Act.

The consultation ran from 6 November 2015 to 29 January 2016 and asked 20 main questions.

Profile of respondents

A total of 1,032 consultation responses were received. Of these, 894 were submitted through the Scottish Government’s online consultation hub. A further 138 email or hard copy responses were received.

The consultation asked respondents to indicate which sector they most aligned themselves with for the purpose of the consultation. The information provided formed the basis for developing the respondent categories used throughout the analysis.¹ Respondents who did not identify a sector or selected ‘Other’ have been placed into a category based on further information provided (either at that question or elsewhere within their response). A number of those who selected ‘Other’ noted that they fell into more than one category - for example they were both an animal trainer and a pet owner or an animal behaviourist and an animal trainer. These respondents have generally been placed into the first category they identified.²

A profile of respondents by category is set out in Table 1 below. A list of the groups that submitted a response to the consultation is included as Annex 1 to this report.

Table 1: Respondents by category

Category of respondent	Group	Individual	Total in category	As % of all respondents
Animal behaviourist	4	39	43	4%
Animal care	1	5	6	1%
Animal trainer	12	125	137	13%
Animal welfare	20	25	45	4%
Local government	7	-	7	1%
Member of the general public	-	74	74	7%
Pet owner	1	660	661	64%
Pet supplies, including manufacturers & retailers and trade bodies	3	6	9	1%
Veterinary professional	3	23	26	3%
Owner of working dogs	3	21	24	2%
Total	54	978	1032	100%

¹ Respondents who selected one of the pre-defined categories remain in that category.

² If respondents listed ‘professional’ categories such as animal trainer after pet owner, they have been placed in the first ‘professional’ category they identified.

The majority of responses - 978 or 95% of all responses - were submitted by individuals. The remaining responses - 54 or 5% of all responses were submitted by groups or organisations.

Points to note about the respondent categories are:

- The 'Animal behaviourist' category (4% of all respondents) includes a response from a group at the University of Lincoln which has been carrying out research into electronic training aids.
- The 'Animal care' category (1% of all respondents) is made up of respondents who identified that they run a pet care-related business such as boarding kennels or a dog walking service.
- The 'Animal trainer' category (13% of all respondents) includes two representative bodies (Association of Pet Dog Owners and the Pet Professional Guild). Further comments made within responses suggest that this category includes respondents who work, or have worked, as animal trainers. It may also include some respondents who identified themselves as animal trainers based on experiences of training their own pet(s).
- Respondents who identified themselves as Dog Societies (9 respondents) or Cat Societies³ (3 respondents) have been included within the 'Animal welfare' category (4% of all respondents). This category also includes national animal charities and/or campaigning groups such as the Scottish Society for the Prevention of Cruelty to Animals (Scottish SPCA), the Dogs Trust, the Kennel Club and Scottish Kennel Club and the Scottish Countryside Alliance.
- The 'Local government' category (1% of all respondents) includes a response from the Animal Health and Welfare Strategy Group for Scottish Local Authorities.
- The 'Member of the general public' category (7% of all respondents) includes a joint response submitted by two Members of the Scottish Parliament.
- Pet owners formed the largest respondent category at 64% of all respondents.
- The 'Pet supplies' category (1% of all respondents) includes two trade bodies, The Pet Industry Federation and the Electronic Collar Manufacturer Association (ECMA).
- The 'Veterinary professional' category (3% of all respondents) includes veterinary practices and people who identified themselves as current or former vets or veterinary nurses. It also includes a joint response submitted by the British Veterinary Association, British Small Animal Veterinary Association (BSAVA) and BVA Scottish Branch.

³ Dog Society and Cat Society were separate categories on the consultation questionnaire.

- The 'Owner of working dogs' category (2% of all respondents) includes respondents who selected the 'Other' category and then went on to note a connection with working dogs, including through farming or countryside sports.⁴

Table 2 below gives information on where respondents currently reside.

Table 2: Respondent country of current residence

Country of residence	N	%
Scotland	616	60%
England	256	25%
Wales	4	<1%
Northern Ireland	4	<1%
Other - UK	5	<1%
Republic of Ireland	8	1%
United States of America	63	6%
Canada	18	2%
Australia	16	2%
Other	23	2%
Not known	19	2%
TOTAL	1032	100%

The majority of all respondents (60% or 3 in 5) currently reside in Scotland and a further 26%, or 1 in 4, in others parts of the United Kingdom. The largest proportion of respondents from outwith the UK currently reside in the USA (6%).

Analysis and reporting

The remainder of this report presents a question-by-question analysis of responses given at each of the questions set out in the consultation document.

The results from the closed questions (yes/no, a list of types of devices from which to select etc.), are presented in tabular form. At some questions summary results are included within the main report and full results (usually broken down by respondent category) have been provided at Annex 4. Given the relatively high level of response overall, percentages are presented within the report. However, it

⁴ Please note that a small number of respondents in other categories (such as pet owners) may also have referenced working dogs at some point within their response.

should be noted that the relatively small number of respondents within some respondent categories does mean that percentage values should be viewed as indicative.

The qualitative analysis of further comments focuses primarily on issues of direct relevance to the specific question. In particular, a number of respondents restated their broader support for, or disagreement with, the use of electronic training aids at a number of different questions. The main analysis of this broader issue is presented under Questions 1 and 2.

The terminology used in the report reflects that of the consultation paper. This includes the description of different types of devices and of static pulse remote training collars in particular.

A short method note is appended to this report as Annex 2.

Evidence on electronic training aids

The first two questions invited respondents to provide the Scottish Government with any information on outcomes from the use of electronic training collars.

Question 1: Do you have any evidence of any intentional or unintentional misuse or abuse of any type of electronic training aids in Scotland? If yes, please provide details, including which type of collar or device.

Question 1 asked respondents whether they have any evidence of any intentional or unintentional misuse or abuse of any type of electronic training aids in Scotland. Responses by respondent category are set out in Table 3 below.

Table 3: Question 1 - responses by respondent category

Category of respondent	Yes		No		ALL	
	N	%	N	%	N	%
Animal behaviourist	10	23%	33	77%	43	100%
Animal care	1	20%	4	80%	5	100%
Animal trainer	15	11%	120	89%	135	100%
Animal welfare	11	26%	32	74%	43	100%
Local government	2	29%	5	71%	7	100%
Member of the public	4	6%	68	94%	72	100%
Pet owner	70	11%	577	89%	647	100%
Pet supplies	-	0%	8	100%	8	100%
Veterinary professional	2	8%	23	92%	25	100%
Owner of working dogs	1	4%	22	96%	23	100%
TOTAL	116	12%	892	88%	1008	100%

Of the 1,008 respondents answering this question, 116 or 12% reported having evidence of intentional or unintentional misuse or abuse of any type of electronic training aids in Scotland. The majority of these respondents (70 out of 116) were pet owners. However, the clear majority of pet owners (89% of those answering the question) said they did not have evidence.

As a proportion of a category of respondent, local government respondents and animal welfare organisations were most likely to report that they had evidence of abuse or misuse of electronic training aids in Scotland (29% and 26% of those answering this question respectively).

Of the 149 respondents who made a further comment, 113 had answered 'Yes', 34 had answered 'No' and 2 had not answered the question. Those who had answered 'No' but went on to make a further comment tended to raise similar issues to those who had answered 'Yes'. However, they sometimes noted that their evidence did not apply to Scotland and/or that their comments might not equate to evidence since they were first or second-hand accounts of having witnessed the use or misuse of electronic training aids. Although respondents tended to not specify the specific type of device they were referring to, the majority of comments appeared to be focused on static pulse remote training or anti-bark collars rather than other types of collars or boundary fence systems.

Overall, the most frequently reported evidence of abuse or misuse came from having witnessed others using electronic training aids. Around 2 in 5 of those commenting reported having seen the misuse or abuse of electronic training aids. The majority of these respondents were pet owners themselves. Reports were on a spectrum from having seen a dog wearing an electronic collar, through having seen a static pulse collar being used on a dog, to more detailed reports of seeing harm being done to dogs.

The next most frequently reported evidence (by around 1 in 5 of those commenting) was of seeing, working with or caring for dogs on which electronic training aids had been used. Animal trainers, animal behaviourist and animal welfare organisations were amongst those making these reports. In terms of the impact on the dogs concerned, there were reports of:

- Anxiety-related behaviour or panic responses to seeing a collar or hearing the noise associated with their use. It was suggested that many users will increase the level of stimulation if they do not achieve immediate results and that this often results in the animal attempting to escape or avoid the stimulus. It was also suggested that animals may fail to show a pain response despite increased levels of electronic stimulation or may become habituated to the pain and endure it. It was noted that the pain and stress caused in such situations has a significant effect on an animal's physiology, increasing cortisol levels and heart rate.
- Dogs shutting down psychologically, including global suppression of behaviour or learned helplessness. It was suggested that this is frequently mistaken for an animal being trained, as the animal is subdued and tends not to act or react. In extreme cases, it was suggested that animals may refuse to perform any behaviour - learned helplessness - and will isolate themselves to avoid incurring electronic stimulation.
- Re-directed aggression towards other dogs, their owner or members of the public. It was that animals may suppress aggression which may resurface at

any time, without warning and generally in a more severe form. More specifically, it was reported that using electronic stimulation to reduce behaviours such as barking, lunging and growling may simply suppress the behaviour which could warn of more serious imminent behaviour such as biting. It was further suggested that people and other animals will have no warning before the animal subjected to punishment feels forced to bite.

- Physical injuries to the animal and to the neck in particular.

Although most comments appeared to refer to remote training or anti-bark collars, there was a specific concern raised about the use of boundary fence systems for cats. An animal welfare respondent reported that domestic cats will chose to roam and are highly motivated to do so. There was a concern that preventing this behaviour is likely to negatively affect their welfare.

Other reported evidence of abuse or misuse of electronic training aids included having seen media reports or campaign materials on the subject, and reading or viewing material produced by manufacturers of electronic training aids or by animal trainers who advocate their use. A small number of respondents noted that a number of organisations (including the BSAVA, the Scottish SPCA and the Scottish Kennel Club) which are calling for the use of electronic training aids to be banned or regulated.

A number of references to published literature were cited as evidence and these are set out in Annex 3 to this report. In addition to evidence referenced at Question 1, a number of respondents cited research evidence elsewhere within their response. These references, generally associated with electronic training aids being harmful or ineffective, are also included in Annex 3. Where possible, full reference details have been provided.

Question 2: Do you have evidence of positive outcomes following the use of electronic training aids in Scotland? If yes, please provide details, including which type of collar or device.

Question 2 asked respondents whether they have any evidence of positive outcomes following the use of electronic training aids in Scotland. Responses by respondent category are set out in Table 4 below.

Table 4: Question 2 - responses by respondent category

Category of respondent	Yes		No		ALL	
	N	%	N	%	N	%
Animal behaviourist	11	26%	32	74%	43	100%
Animal care	-	0%	6	100%	6	100%
Animal trainer	44	33%	90	67%	134	100%
Animal welfare	5	12%	38	88%	43	100%
Local government	3	43%	4	57%	7	100%
Member of the public	17	24%	54	76%	71	100%
Pet owner	233	36%	413	64%	646	100%
Pet supplies	7	78%	2	22%	9	100%
Veterinary professional	7	28%	18	72%	25	100%
Owner of working dogs	22	96%	1	4%	23	100%
TOTAL	349	35%	658	65%	1007	100%

Of the 1,007 respondents answering this question, 349 or 35% reported having evidence of positive outcomes following the use of electronic training aids in Scotland. As at the previous question, the majority of these respondents (233 out of 349) were pet owners. However, the majority of pet owners (64%) said they did not have any evidence. The two respondent categories in which a majority reported having evidence of positive outcomes were owner of working dogs respondents (96%) and pet supplies respondents (78%).

A total of 384 respondents went on to make a further comment. Of these, 339 respondents had answered 'Yes' at Question 2, 41 had answered 'No' and 4 respondents had not answered the question. Those answering 'No' and making further comment tended to state their opposition to the use of electronic training aids. However, a small number of respondents did give evidence of positive outcomes but noted that the information did not relate to the use of training aids in Scotland.

Respondents did not always refer directly to the type of device they were commenting on - for example, many respondents referred to e-collars but did not give further detail. Some respondents did not reference any specific type of device. However, the analysis of further comments suggests that around 3 out of 5 respondents were referring to e-collars being used for training purposes. Only a small number of respondents made direct reference to anti-bark collars. Of those who were clearly referring to e-collars, around 1 in 3 made a reference which suggested they were commenting on a static pulse collar or a multi-function collar

with a static pulse setting. Around 1 out of 9 respondents referenced boundary fence systems. Respondents tended to raise similar issues irrespective of the type of device to which they were referring.

Around 7 in 10 of those saying 'Yes' and then commenting at Question 2 focused on their personal experience of training their own dog(s). The majority of these respondents were pet owners, but they also included respondents from other groups including animal trainers, veterinary profession respondents and owner of working dogs respondents. Around 1 in 8 referred to experience of training other people's dogs. This group of respondents included animal trainers, pet owners, animal behaviourists and pet supplies respondents. There was some overlap between those referring to training their own dogs and those referring to working with other people's dogs and/or their owners.

Comments made about training their own dogs were very similar to those made about working with other people and their dogs. The many themes in common included that the use of electronic training aids, including both collars and freedom fences, had brought very real benefits to dogs which might otherwise have led very restricted lives or for which euthanasia would have been a likely option. A number of those making these reports noted that other training methods had not worked with the dogs concerned but that the use of electronic training aids had helped keep the dog, other animals and people safe. A pet supplies respondent suggested that the use of the current generation of electronic collars has helped address anti-social behaviour in dogs which, if left unchecked could have risked the animals' well-being, left the owners with a potential liability and caused nuisance and potential danger to other animals and people. They also noted that whilst reward based training systems are effective for some dogs they are not effective for all dogs.

Those directly referencing their own use of electronic collars sometimes referred to being able to take their dogs to public places without the previous concerns that they could be injured on roads or could chase other animals, including other dogs, cats, sheep or deer. Comments made by animal trainers or behaviourists included examples of working successfully with dogs for which other approaches had failed and for which an electronic training aid probably represented their last hope. A small number of these respondents did suggest that electronic training aids should only be used when other approaches had been tried but failed and/or that a qualified trainer or behaviourist should be involved.

With specific reference to freedom fences, a number of respondents reported that their animals are now able to spend time in a garden without the risk that they might be injured on nearby roads or might be involved in endangering people, other pets, livestock, game or wildlife. Respondents sometimes referenced their pets having an improved quality of life as a result. A pet supplies respondent reported receiving positive feedback from both dog- and cat-owning boundary fence customers who use a fence to keep their pets safely at home.

There was a small number of references to specific types of dogs for which electronic training aids have proved particularly effective. These were:

- Dogs, including some working dog breeds, which have a very strong instinct to chase other animals and which may not respond to other training cues. It was noted that this instinct may be so strong in some dogs that they will be unlikely to choose other options - such as food based rewards - over an opportunity to chase other animals.
- Working dogs in general, and especially dogs working at long distance and/or in situations where they may not be able to hear commands from their owner or handler.
- Deaf or blind dogs, including dogs which develop impairments as they get older.

In terms of the use of electronic training aids, a number of respondents noted that they did not believe that the animals had suffered as a result of their use. With specific reference to boundary fences, it was suggested that both dogs and cats learn very quickly to avoid the area around the fence and that after an initial training period (during which they may have received a shock) they will retreat at the point that their collar vibrates or beeps. There was a small number of reports of animals no longer wearing a collar but still respecting the boundary created by the fence. A number of those referencing training or anti-bark collars also tended to suggest that the use of any static pulse feature had tended to be restricted to an initial and brief early training phase and that their animal very rapidly learned to respond to either a vibration or sonic function.

A pet supplies respondent reported that there is an abundance of research covering issues of relevance including looking at the possible impact on welfare of using electronic collars. However, they did suggest that where animal welfare issues are concerned the scientific research process inevitably incorporates a considerable degree of subjective assessment. This point supported their view that the research evidence should inform the development of policy in this area but should not be the primary determinant of any changes to policy or legislation.

As at Question 1 there were references to published evidence but principally to Defra-commissioned research from the Universities of Lincoln and Bristol and cited in the consultation paper. The consultation paper noted that these studies looked at the physical characteristics of static pulse collars and the physiological, behavioural and psychological consequences of their use in dog training.

More generally, concerns were raised that much of the published evidence is either out of date and/or reviews collars directly under the control of an operator (as opposed, for example, to looking at boundary containment systems).

Existing animal welfare protection

The next two questions covered existing animal welfare protection. The Animal Health and Welfare (Scotland) Act 2006 makes it an offence to cause a protected animal 'unnecessary' suffering and to fail to meet the needs of an animal.

Question 3: Do you believe that this is sufficient to protect animals who wear electronic aids?

Question 3 asked respondents whether the provisions of the Animal Health and Welfare (Scotland) Act 2006 are sufficient to protect animals who wear electronic training aids. Responses by respondent category are set out in Table 5 below.

Table 5: Question 3 - responses by respondent category

Category of respondent	Yes		No		Don't know		ALL	
	N	%	N	%	N	%	N	%
Animal behaviourist	12	29%	27	64%	3	7%	42	100%
Animal care	1	17%	5	83%	-	0%	6	100%
Animal trainer	54	40%	71	52%	11	8%	136	100%
Animal welfare	6	14%	35	83%	1	2%	42	100%
Local government	4	57%	2	29%	1	14%	7	100%
Member of the public	27	38%	44	62%	-	0%	71	100%
Pet owner	263	41%	324	50%	59	9%	646	100%
Pet supplies	6	67%	2	22%	1	11%	9	100%
Veterinary professional	8	32%	17	68%	-	0%	25	100%
Owner of working dogs	16	67%	4	17%	4	17%	24	100%
TOTAL	397	39%	531	53%	80	8%	1008	100%

NB: Percentages may not sum to 100% due to rounding

A small majority of respondents (53% of those responding) did not believe that the provisions are sufficient to protect animals who wear electronic training aids. The majority of animal behaviourists (64%), animal care respondents (83%), animal trainers (52%), animal welfare respondents (83%), members of the public (62%) and veterinary profession respondents (68%) were of this view.

Pet owners were evenly divided on this issue while the majority of local government respondents (57%), pet supplies respondents (67%) and owner of working dogs respondents (67%) believed the current provisions to be sufficient.

A total of 757 respondents went on to make a further comment. Of these, 269 respondents had answered yes at Question 3, 442 had answered no, 43 had not known and 3 respondents had not answered the question.

In their further comments, those who considered the existing legislation is sufficient most frequently went on to suggest that, if used correctly, electronic training aids can be valuable and effective tools which do not cause harm or suffering. Around 1 in 2 comments made one or both of these points. As an example, a pet supplies respondent suggested that there is considerable evidence that a good quality, latest-generation collar used properly is an effective and welfare-compliant training tool.

As at other questions, respondents sometimes referenced their own experience of using electronic training aids to support their view, with general themes similar to those at Question 2. Some respondents were of the view that most of those who use electronic training aids use them properly and/or that pet owners would not invest in potentially expensive training aids if they did not genuinely believe them to be in the best interest of their pet(s).

With specific reference to boundary fence systems for cats, it was suggested that these fences allow an owner to fulfil their requirements under the Act to protect their pet from suffering, injury and disease. The pet owner respondent highlighting this issue reported that in the period from January 2011 to December 2014 the Scottish SPCA received only 23 complaints about electronic training aids, none of which were about boundary fence systems. They also reported that, after investigation, no further action was considered necessary in any of these 23 cases.

Around 1 in 6 suggested that the existing provisions make it clear that causing unnecessary suffering to an animal -whether with an electronic training aid or any other means – is against the law. Associated comments included that the provisions could and should be used more extensively to address issues of animal cruelty and neglect. Other frequently-made comments included that:

- Any training tools are open to misuse in the wrong hands and that if someone is determined to abuse an animal and inflict suffering they will always find a way.
- Compulsory education, training or some form of licensing could be considered.

The most frequently made point by those who did not believe existing provisions are sufficient was that they do not prevent the use of electronic training aids and, by extension, do not prevent the suffering to animals which these respondents consider electronic training aids to inflict. Around 2 in 5 respondents made this point, sometimes raising similar concerns about the effect of electronic training aids

as emerged at Question 1. Two animal welfare respondents noted that the current guidance for the Animal Health and Welfare (Scotland) Act 2006 makes no mention of electronic training aids. Also as at Question 1, respondents frequently suggested that electronic training aids are ineffective and/or that there are much better and more effective approaches for training animals. Around 1 in 3 raised this issue.

With specific reference to the framing of the offence itself, the principal issue raised was that 'unnecessary' suffering is a concept which is subjective and potentially difficult to prove. As an example, a pet owner respondent who is also a Procurator Fiscal Depute reported that they had previously prosecuted people under the 2006 Act but that it can be difficult to establish "suffering" unless the results of the criminality are at a catastrophic level. A veterinary profession respondent referenced animal welfare legislation in Norway as providing greater clarity by stating that when being trained an animal should not be put under fear, hurt or unnecessary strain on purpose.

Further points made about the 2006 Act included:

- The instructions which come with electronic training aids would not be sufficient to ensure an accurate assessment of any level of suffering being caused to an individual animal. The animal welfare respondent highlighting this issue went on to suggest that most users are unlikely to intend to cause suffering to their pet but would have been misled by how the aids are marketed. They also suggested that suffering may not be obvious to any enforcement officer involved since even within a single breed, dogs have been shown to have a variable capacity for coping with aversive stimuli.
- Even if it is possible to assess the physical suffering that may have been caused, it is not possible to assess the psychological trauma which an animal may have suffered and which may be equally profound.
- Prosecuting under section 19 of the Act would present some very particular challenges, including proving beyond reasonable doubt that the user had intended to cause unnecessary suffering.⁵ The animal welfare respondent raising this issue also highlighted other exceptions which might be used by a defendant whose defence was based on attempting to improve a dog's behaviour - for example that any pain inflicted might be presented as being "for a legitimate purpose", as "proportionate" or as part of conduct that was, "in the circumstances that of a reasonably competent and humane person". They also suggested that the Crown would be unlikely to offer evidence about alternative, positive training methods.
- It would be difficult to use section 24 of the Act to prosecute someone for carrying out an activity that is common practice, and this section might even be used to support electronic collar use, for example, it could be argued that

⁵ Under the 2006 Act an offence under section 19 does not need to involve deliberate cruelty and there is no requirement to prove intent. It is an offence to cause an animal to suffer if you should have known that an animal would suffer due to your actions or neglect.

the use of the collar was made necessary by the need to protect the animal from injury. This might deter a prosecutor from pursuing a case.

Other points raised included that many people may not be familiar with the 2006 Act, with a veterinary profession respondent referring to a People’s Dispensary for Sick Animals Animal Wellbeing (PAW) report from 2015 which found that 69% of pet owners were unfamiliar with their responsibilities under animal welfare legislation across the UK.

Question 4: Do you think that Scottish Government guidance or a statutory welfare code is required?

Question 4 asked respondents whether Scottish Government guidance or a statutory welfare code is required. Responses by respondent category are set out in Table 6 below.

Table 6: Question 4 - responses by respondent category

Category of respondent	Yes		No		Don't know		ALL	
	N	%	N	%	N	%	N	%
Animal behaviourist	25	60%	7	17%	10	24%	42	100%
Animal care	4	67%	1	17%	1	17%	6	100%
Animal trainer	62	46%	51	38%	23	17%	136	100%
Animal welfare	22	54%	14	34%	5	12%	41	100%
Local government	5	71%	1	14%	1	14%	7	100%
Member of the public	38	54%	21	30%	12	17%	71	100%
Pet owner	327	51%	192	30%	123	19%	642	100%
Pet supplies	1	13%	5	63%	2	25%	8	100%
Veterinary professional	16	64%	8	32%	1	4%	25	100%
Owner of working dogs	6	27%	13	59%	3	14%	22	100%
TOTAL	506	51%	313	31%	181	18%	1000	100%

NB: Percentages may not sum to 100% due to rounding

Overall, a very small majority (51% of those answering this question) thought that Scottish Government guidance or a statutory welfare code is required. However, the analysis of further comments at Question 4, along with comparison with answers given at the next question, suggest that a proportion of those who selected that a statutory welfare code or guidance is required actually favour legislation to ban the use of electronic training aids. Around 1 in 2 of those who had selected ‘Yes’ at Question 4 made a further comment calling for a ban on the use of

electronic training aids. Of the 506 who had answered 'Yes' at Question 4, 323 then went on to select the option of a complete ban on certain devices at Question 5. A degree of uncertainty or lack of clarity around the question may also explain the relatively high proportion of respondents (18% of those answering the question) who selected 'Don't know' at Question 4.

Amongst those answering 'Yes' at Question 4 but not then calling for a ban, around 1 in 4 referenced guidance or a code within their further comment. However, it was not always clear that this was in preference to a statutory welfare code. Around 1 in 7 referenced a statutory welfare code. These respondents were more likely to be clear that they favoured a statutory welfare code over guidance. Those who explained why they favoured a statutory approach tended to suggest it would carry more weight, offer greater clarity and/or, by extension, be more likely to protect animals.

The other relatively frequently made comments by those favouring a code or guidance were:

- This approach could help protect animals by sending a clear message as to what is and is not acceptable when using electronic training aids.
- Any code or guidance could not restrict the use of electronic training aids unless certain conditions are met. The most frequently made suggestion was that they could only be used under supervision and/or after training from a licensed or regulated practitioner.
- More generally, some form of education, training or licensing should be either encouraged or required.
- Any legislation, statutory code or even guidance is only really effective if consistently enforced. It will be important to ensure that those breaking any regulations or code are held to account.

Of those who had answered 'No' or 'Don't know' at Question 4 and then made a further comment, around 3 in 10 went on to call for a ban of some or all electronic training aids. Amongst the remaining respondents, the most frequently made comment was that no change is necessary, including because there is no evidence that there is a problem to be addressed or that the current animal welfare provisions are sufficient – around 1 in 2 of those answering 'No' or 'Don't know' and not calling for a ban were of this view. Other comments included that any code or guidance would be difficult or impossible to enforce and would not remove all risks of accidental or deliberate misuse of an electronic training device. As with those who favoured a code or guidance, there were also calls for users to undergo training in the correct use of any electronic training aid.

Ban or regulations

The second section of the consultation gathered views on a potential ban or stricter regulations.

Question 5: Thinking about the current legislation, which one of the following do you think is necessary?

At Question 5 respondents were asked to select from one of six options. Responses by respondent category are set out in Table 7 below.

The greatest proportion of respondents (44% of those answering the question) favoured a complete ban on certain devices. A majority of animal behaviourists (58%), animal care respondents (83%), animal welfare respondents (67%) and members of the general public (56%) favoured this approach. The 'Nothing, current legislation is sufficient' option was favoured by 28% of those answering the question. A majority of pet supplies respondents (56%) and owner of working dogs respondents (65%) favoured this approach.

'A combination of a ban and stricter regulations depending on devices' or 'Scottish Government guidance or a statutory welfare code' was supported by 10% and 9% of those answering the question respectively. Those supporting guidance or a welfare code included the majority of local government respondents (57% of those answering the question). Of the remaining respondents, 5% favoured stricter regulations and 3% did not know.

A total of 645 respondents went on to make a further comment, although a number of these referred back to comments made at previous questions. This applied particularly to respondents who either selected a complete ban on certain devices or that the current legislation is sufficient. The comments which were made had a very similar focus to that set out in the analysis of comments at Questions 1, 2 and 3.

A complete ban on certain devices

Those who sought a complete ban on certain devices (around 1 in 2 of the 645 respondents commenting) tended to raise very similar issues as at Question 1. Although these respondents were calling for a more wide-ranging ban, they sometimes raised very particular concerns around static pulse based devices. However, some respondents questioned why the option available was for 'a complete ban on certain devices' and made it clear that they were calling for a complete ban of all electronic training aids.

Most frequently respondents stated their opposition to the use of training devices and methods which they consider to be punishment-based and dependent on inflicting pain or creating fear. This was sometimes associated with a view that the use of such devices is unethical and has no place in a civilised society.

Table 7: Question 5 - responses by respondent category

Category of respondent	A complete ban of certain devices		Stricter regulations		Combination of ban and stricter regulations		Guidance or statutory welfare code		Nothing, current legislation is sufficient		Don't know		ALL	
	N	%	N	%	N	%	N	%	N	%	N	%	N	%
Animal behaviourist	25	58%	5	12%	2	5%	4	9%	6	14%	1	2%	43	100%
Animal care	5	83%	-	0%	1	17%	-	0%	-	0%	-	0%	6	100%
Animal trainer	54	40%	8	6%	11	8%	13	10%	48	35%	2	1%	136	100%
Animal welfare	28	67%	1	2%	8	19%	1	2%	4	10%	-	0%	42	100%
Local government	1	14%	-	0%	1	14%	4	57%	1	14%	-	0%	7	100%
Member of the public	41	56%	-	0%	8	11%	2	3%	21	29%	1	1%	73	100%
Pet owner	281	43%	36	6%	62	10%	66	10%	182	28%	21	3%	648	100%
Pet supplies	1	11%	2	22%	-	0%	1	11%	5	56%	-	0%	9	100%
Veterinary professional	11	44%	1	4%	6	24%	3	12%	4	16%	-	0%	25	100%
Owner of working dogs	1	4%	1	4%	3	13%	2	9%	15	65%	1	4%	23	100%
TOTAL	448	44%	54	5%	102	10%	96	9%	286	28%	26	3%	1012	100%

It was also frequently suggested that training using electronic training aids is ineffective or not as effective as alternative positive-reinforcement or reward-based approaches. Other concerns raised about the use of electronic training aids included that they:

- Present a risk to the welfare of animals. Harm may be physiological but may also be psychological. In particular, it was suggested it may result in long-term welfare issues such as fear of the punisher.
- Suppress behaviour without addressing its underlying cause or the motivation behind it. This can in turn lead to other behaviour problems.
- Are very difficult to use correctly and create a risk that the animal associates coincidental events with the punishment, especially if that punishment is poorly timed, or for boundary fence systems, if the animal is not able to see the boundary markings.

A number of respondents explained why they favoured a ban as opposed to stricter regulations, guidance or a statutory welfare code. The need for clarity and a simple, straightforward message was highlighted. There were concerns that any regulations would be very difficult if not impossible to enforce and that any guidance could simply be ignored. These respondents tended to the view that only a complete ban would offer sufficient protection to animals.

Stricter regulations

Respondents who commented on their preference for stricter regulations (41 respondents) tended to focus on the possible focus of those regulations. This issue is explored further at Questions 8 and 9, but in summary respondents most frequently suggested that users of electronic training aids should be required to undergo some form of training in their correct use and/or that devices should only be available through or for the use of qualified animal trainers or behaviourists.

Other comments included that electronic training aids should only be available for use as a last resort or that there should be regulations on the equipment itself. One suggestion was that regulation should focus on the levels of discomfort it is possible to administer and that the Scottish Government should work with manufacturers to ensure that devices are effective but do not cause pain to an animal.

A pet supplies respondent suggested that secondary legislation would offer a practical and cost-effective approach to establishing standards covering the quality of products and their use without causing the negative consequences which would result from a ban. As a manufacturers association they also noted their commitment to working with government and other key stakeholders to ensure that high-quality, easy to use and safe products are available.

A combination of bans and stricter regulations depending on devices

The 69 respondents favouring a combination of bans and stricter regulations and who commented sometimes raised similar concerns as those favouring a complete ban, including that the use of electronic training aids can inflict pain and suffering and that there are better approaches available. Around 1 in 4 called for a ban on either static pulse devices or static pulse training or anti bark collars. There was also a small number of respondents who stated that boundary fence systems should not be banned and who noted the very real advantages which a boundary fence system had brought to their pet(s).

Around 1 in 3 suggested that there were some types of devices or some reasons for use which could or would be acceptable if regulated. Where specific further information was supplied, most respondents tended to reference either boundary fence systems or alternatives to static pulse collars and vibration collars in particular.

With specific reference to vibration collars, there was a range of opinion as to when they should be permitted for use. Suggestions included all vibration collars being acceptable if regulated, through to vibration collars only being acceptable under certain circumstances, such as: if all other approaches have failed and euthanasia is the only alternative; or for deaf dogs. An animal welfare respondent (who had called for a complete ban) noted that, when used correctly, remote training vibrating collars can have a very specific use in the training of deaf dogs. They suggested that consideration should be given to a very tightly regulated exemption for the use of remote training vibrating collars to train deaf dogs only.

There were concerns about the use of alternatives to static pulse collars. For example, a veterinary profession respondent commented that there is a lack of research and evidence concerning the welfare implications of collars using noise, vibration, ultrasonic sound or the spray of water or citronella. They had concerns that such approaches may be stressful for a dog and called for their use to be covered by a code of practice until there is scientific research to demonstrate that their use does not pose a welfare risk. They also suggested that further evidence be collected on the use and effectiveness of boundary fence systems and suggested that their use should be covered by a code of practice in the meantime. An animal welfare respondent with concerns about boundary fence systems suggested it is unethical to confine an animal without any visual definition which it can see or understand and to inflict punishment when it moves beyond this area.

Scottish Government guidance or a statutory welfare code

A total of 62 respondents who favoured Scottish Government guidance or a statutory welfare code went on to make a further comment. Some of these referred back to comments made at Question 4 and overall, the views expressed were very much in line with those who had answered 'Yes' at Question 4.

Most frequently, respondents suggested that electronic training aids can be effective tools if used properly and responsibly. Other issues raised or suggestions

made included that some form of education, training or licensing should be either encouraged or required and that this could include devices only being available under supervision and/or after training from a licensed or regulated practitioner.

Nothing, current legislation is sufficient

The 130 respondents who thought that no change is required and went on to comment frequently referred back to their previous comments.

Most frequently, respondents pointed to being effective training tools when used correctly. Around 1 in 3 made this point, sometimes supporting their case by referencing their own experience or training their own or others dogs. Some respondents also noted that they are not aware of any occasions on which others have used an electronic training aid in a way that has harmed an animal.

The other frequently made comment was that the current legislative framework, and in particular the protections offered by the Animal Health and Welfare (Scotland) Act 2006, are sufficient to safeguard the welfare of animals. There was an associated point that enforcing the existing law would be more effective in protecting animals than adding further legislation or regulations.

Other points raised included that:

- Some of the shortcomings that may have existed in some early training models (such as the lack of warning functions and the inability to easily adjust and limit both application time and intensity of impulses) appear to have been addressed by some manufacturers. The owner of working dogs respondent raising this issue noted that the latest ECMA specification is more stringent in these areas and suggested that any Scottish Government Guidance could usefully reflect these higher standards.
- Any statutory controls should be focused on the quality and specification of the devices available and on challenging manufacturers or sellers of sub-standard devices. Suggested controls included limiting the duration of any static pulse with a prescribed delay before the collar can be activated again. Another suggestion was that the strength of any static pulse the collar discharges should be calibrated to the size of the dog.

Question 6: In your opinion, which, if any of the devices listed should be banned?

Questions 6 and 7 asked which if any of a range of specific devices should be banned or regulated. Full results at these questions are set out within Annex 4 to this report, summary results are set out below. Respondents could select as many or as few options as they wished or could select 'Don't know'. However, there was no option to indicate no ban or no regulations. The percentages in Tables 8 and 9 are calculated against the base number of total respondents (n=1032).

Table 8: Question 6 - responses by device type

Type of device	Remote training collar		Anti-bark collar		Boundary Fence Systems			
	N	%	N	%	N	%	N	%
Static pulse	529	51%	530	51%	415	40%		
Spray	427	41%	421	41%				
Sonic	425	41%	425	41%				
Vibration	307	30%	337	33%				
<i>Don't know</i>							65	6%

A small majority (51% of all respondents in both cases) favoured remote training and anti-bark static pulse collars being banned. Those taking this view included the majority of animal behaviourists, animal care respondents, animal welfare respondents, members of the public and veterinary profession respondents. As at other questions, pet owners were evenly divided on this issue – 49% favoured a ban on static pulse remote training collars and 50% favoured a ban of static pulse anti-bark collars.

Those favouring a ban of other types of devices also tended to favour a ban of static pulse collars – this means that the group of respondents favouring bans of other types of devices is generally a sub-set of those wishing to see static pulse collars banned. Equally, those favouring a ban of remote training devices also tended to favour a ban of anti-bark devices. A consistent 41% of respondents favoured a ban of spray and sonic remote training and anti-bark collars. The majority of animal care and animal welfare respondents favoured a ban. The majority of animal behaviourists favoured a ban of spray and sonic remote training collars and spray anti-bark collars.

The proportion of respondents wishing to see vibration collars banned was lower than for other types of device at 30% for remote training collars and 33% for anti-bark collars. Animal care respondents were the only category of respondent in which a majority wished to ban vibration collars. There were also around 100 respondents who wished to see static pulse, sonic and spray remote training collars banned but did not wish to see vibration remote training collars banned. The equivalent group for anti-bark collars around 75 respondents.

Overall, 40% of respondents called for a ban of boundary fence systems. The majority of animal behaviourist, animal care respondents and animal welfare respondents favoured a ban. There were around 65 respondents who wished to see all remote training and anti-bark devices banned but did not wish to see boundary fence systems banned.

Although 703 respondents made a further comment, many of these comments either referred back to or reiterated points made at earlier questions. This applied particularly to those who did not wish to see any devices banned and those who wished to see all, and particularly static pulse, devices banned. The analysis below focuses on *other* issues raised and in particular issues raised about other types of devices. The numbers of respondents commenting specifically on other types of devices tended to be relatively low (ranging from around 30 respondents commenting on vibration collars up to around 75 commenting on spray collars). A small number of these respondents reported that they are unfamiliar with certain of the devices listed and did not feel able to comment. This tended to apply to either boundary fence systems or spray collars.

The most frequently made additional comment was to stress that any device which relies on punishment-based training should be banned and that this applies not just to static pulse collars but to vibration, sonic and spray collars and to boundary fence systems. The concern was that all these devices inhibit behaviour by creating a fear response, but do nothing to address the reason why the dog is behaving in that way. An animal welfare respondent suggested that using aversive training is essentially like putting ear plugs in when someone is screaming for help.

Anti-bark collars

Specific issues raised about anti-bark (as opposed to remote training) collars included:

- They do not address the reason why the dog is barking. For example, a dog which barks when left alone may be suffering from separation anxiety, which needs to be addressed by helping the dog overcome that anxiety. An anti-bark collar is more likely to make things worse by increasing the anxiety being experienced.
- Further, if the need to bark is suppressed rather than addressed the dog may adopt other harmful behaviours - such as chewing and over-grooming – in order to alleviate stress.
- Anti-bark collars can be activated other than by the dog barking. Suggestions included that they can be triggered by vibration in the animal's throat, including when a dog is eating or 'communicating' and by external noises, including another dog barking. The psychological harm this could cause to the dog wearing the collar was highlighted.
- They cannot be justified - as remote training collars might be - as a mechanism to protect a dog and potentially even save its life, for example through stopping it chasing sheep or running onto a road. Given this, alternative training methods should be applied.
- Alternatively, if a dog barks persistently, and to a level which may result in complaints from neighbours, an anti-bark collar could be the only solution which allows the dog to remain in the home.

Spray collars

Specific issues raised about spray collars included:

- Spraying anything on or near a dog's face can still cause distress and a fear response.
- Collars which spray citronella may result in citronella getting into the eyes, nose and mouth of the animal wearing the collar and possibly of animals nearby. This could be harmful to any dog involved, particularly given the sensitivity of its senses.
- The animal will be left to experience the smell and hence be exposed to any harm being done long after the behaviour the spray collar was supposed to prevent has passed. This will not only mean any harm is prolonged but also that the dog will not associate the spray with the unwanted behaviour.
- Spray collars have the potential for being triggered by adjacent animals, again meaning the dog can make no connection between unwanted behaviour and being sprayed.
- Compressed air is more effective and is not harmful if used properly.

Sonic collars

Specific issues raised about sonic collars included:

- Sonic devices can harm an animal's hearing.
- Not only the animal wearing the collar could be harmed, other nearby animals could also be affected.
- Collars that emit sound act more as a distraction technique and could be permitted with guidance.

Vibration collars

Specific issues raised about vibration collars included:

- Vibration collars may have a role to play in training deaf or blind dogs.
- Collars that vibrate can act more as a distraction technique and could be permitted with guidance.

Boundary fence systems

Further comments about boundary fence systems suggest that some respondents were referring to electric containment fences of the type routinely used to contain livestock and which would give a shock to any person or animal touching the fence. However, the focus of the consultation is on boundary fence systems which involve an animal wearing a collar which activates when the animal approaches the boundary. Specific issues raised about these types of boundary fence systems included:

- An animal could be endangered if it is unable to leave an area in an emergency, such as in the event of a fire or if another dog, and particularly an aggressive dog, enters the property and the contained dog is unable to escape it.
- Boundary fences can cause particular problems if the animal does pass through but is then unable to return to a safe area.
- They may be acceptable as long as the animal has a clear option to move away.

Question 7: In your opinion, which, if any of the devices listed should be regulated?

Question 7 asked which if any of a range of specific devices should be regulated. As noted above, full results at these questions are set out within Annex 4 to this report and summary results for Question 7 are set out in Table 9 below. Percentages in are calculated against the base number of total respondents (n=1032).

Table 9: Question 7 - responses by device type

Type of device	Remote training collar		Anti-bark collar		Boundary Fence Systems			
	N	%	N	%	N	%	N	%
Static pulse	428	41%	415	40%	361	35%		
Spray	361	35%	352	34%				
Sonic	357	35%	350	34%				
Vibration	322	31%	310	30%				
<i>Don't know</i>							81	8%

The proportion of respondents indicating that devices should be regulated ranged from 30% for anti-bark vibration collars up to 41% for remote training static pulse collars. However, it should be noted that a very significant proportion of those calling for regulation had previously called for a ban at the Question 6. Analysis of further comments suggest that this may be for one of two reasons:

- Some respondents equated regulation with a ban – in other words they were expressing support for regulations which would ban the use of a device.
- Others also wished to see a ban but would support regulation as preferable to no change should the Scottish Government decide not to introduce a ban.

Table 10 below sets out the number of respondents who called for each type of device to be regulated but not also banned.

Table 10: Question 7 - responses by device type, with respondents calling for a ban on the same device at Question 6 removed

Type of device	Remote training collar		Anti-bark collar		Boundary Fence Systems	
	N	%	N	%	N	%
Static pulse	79	8%	70	7%	100	10%
Spray	84	8%	83	8%		
Sonic	81	8%	83	8%		
Vibration	115	11%	93	9%		

Once those also calling for a ban have been removed, the proportion of respondents indicating that devices should be regulated ranged from 7% of all respondents for anti-bark static pulse collars up to 11% for remote training vibration collars.

Of those who had called for one or more device to be regulated having not already called for that device to be banned, 60 respondents went on to make a further comment. These further comments very much reflected the types of issues raised by those commenting at Question 8 below

Question 8: If the use of electronic training aids was regulated, what conditions should be required for the authorisation of their use?

Question 9: Which bodies would be best placed to authorise the use of electronic training aids?

A total of 736 respondents made a comment at Question 8 and 662 respondents made a comment at Question 9. There was some cross-referencing between comments at these two questions and hence they have been analysed as a single set of data; 759 respondents commented at one or both questions. However, around 1 in 2 respondents focused on their opposition to regulations - either because they favoured a ban or because they thought that no changes are required. A number of those who called for a ban or did not think regulations were required also suggested that effective regulation would in any case be difficult if not impossible.

Amongst the respondents who went on to comment on conditions or bodies (around 450 respondents) around 1 in 9 noted that they wanted to see some devices banned (generally static pulse devices) and others regulated. A small number of respondents suggested that some devices should be regulated and others not; again it was generally that the regulations/conditions applied to static pulse devices should be stricter than those for other devices. It should also be noted that those suggesting conditions and/or bodies did not always favour the

regulatory approach and included those calling for a ban or for no change. However, these respondents did make suggestions against the possibility that the Scottish Government proceeds with this option.

In terms of specific conditions, respondents most frequently focused on conditions which should be met before electronic training aids can be accessed or used. The commonly made suggestion (by around 1 in 4) was that there should be some form of training or education around correct and responsible use of electronic training aids. Some but not all of these respondents provided further information on the type of education or training that might be appropriate. Most of these comments pointed to in-person training but there were also references to online tuition. For example, a veterinary profession respondent suggested that devices could require an activation code which is only provided when the tuition has been completed and an online assessment passed. An animal trainer respondent suggested that online tuition might be appropriate for users of boundary fences.

However, many of those calling for education or training suggested that pet owners should only be able to use a device (with most references appearing to apply to collars) having been trained by and/or under the supervision of a qualified, certified or licensed animal trainer or behaviourist. Around 1 in 7 suggested this condition. Some of these respondents also suggested that pet owners should only be able to access a device through this route and that being allowed to use a device should be dependent on having successfully completed a training course with the trainer or behaviourist who had supplied the device. Animal behaviourist or trainers were particularly likely to have made this suggestion, but respondents taking this view also included pet owners, animal welfare respondents and veterinary profession respondents. An animal trainer respondent proposed a standardised training process should be developed and that trainers and behaviourist should be required to use this process.

Another suggested route through which devices could be accessed was from veterinary practitioners and/or only with the express permission of a veterinary professional. Around 1 in 8 suggested vets could be involved in the distribution of training aids – these respondents included pet owners, animal behaviourist and animal trainers. There was some overlap between those suggesting devices could be accessed through animal behaviourist or trainers and through vets.

Other respondents focused on who should be able to use electronic devices, under what circumstances and/or the types of animals on which devices could be used. The most frequently made suggestions were:

- That certain devices should only be available for use by qualified, certified or licensed animal trainers or behaviourists – around 1 in 8 made this suggestion, including animal welfare respondents, animal behaviourists, animal trainers and pet owners. The suggestion was occasionally linked specifically to the use of static pulse devices.
- That devices should only be available for use on animals of a specific type or performing a specific function - such as deaf dogs, breeds of dog prone to

excessive barking, gun dogs, farmer's dogs or dogs that work at a distance and/or should only be allowed under specific circumstances – such as if all other training methods have failed and/or if euthanasia was the only other option. Around 1 in 8 suggested one or more of these conditions and, as before, the suggestion was occasionally linked specifically to the use of static pulse devices. Animal welfare respondents, animal trainers, pet owners, veterinary profession and owner of working dogs respondents were amongst those suggesting these types of conditions could be considered.

Other suggestions included that there should be a lower and upper age limit for animals on which devices can be used but that further restrictions could be set at a vet's discretion. This was connected to a suggestion that there should be compulsory health checks for any animal for which the use of an electronic training aid is being considered.

There were also suggestions around the devices themselves or other conditions which could be placed on their access or use. These included:

- That there should be restrictions on the types, models and quality of devices that can be sold. Specific suggestions included that: there should be limits on the level of static pulse that a device can discharge or, more specifically, on the current and voltage output over a range of resistances; that any chemicals involved should be approved for use on animals; that the Scottish Government should draw up a list of approved devices; and that approved devices should carry a registered mark to that effect. There was an associated suggestion that the use of unregistered devices should be the subject to criminal proceedings and should be reported by the Scottish SPCA to the Procurator Fiscal. A pet supplies respondent specialising in boundary fences highlighted that recent cheaper imports which are available on market or auction type sites do not meet the guidelines which ECMA manufacturers have drawn up as an industry standard.
- That there should be restrictions on the outlets through which devices can be purchased and in particular that it should not be possible to buy them online. This was sometimes associated with both the potential for poor quality, sub-standard devices to be easier to access online and/or with being able to obtain devices without any advice, information or training.
- That devices should only be available to over 18s or that people should have to undergo a background check.
- That anyone using a device should need to register that device and/or that there should be a record of serial numbers or traceable identification codes. This was sometimes connected to a licensing system for devices and/or those using them.

In terms of which bodies would be best placed to authorise the use of electronic training aids, a number of respondents identified more than one type of body. The most frequently identified bodies were:

- Professional bodies for animal trainers or behaviourists and/or behaviourists or trainers who had been licensed or accredited by them. Around 3 in 10 of those commenting on conditions and/or bodies suggested these types of bodies or individuals. A range of professional bodies were suggested including the Animal Behaviour and Training Council, the Association of Pet Behaviour Counsellors, the Institute for Modern Dog Training, the Association of Pet Dog Trainers, Pet Dog Trainers of Europe, the Centre of Applied Pet Ethology and the Pet Professional Guild British Isles.
- Animal welfare organisations, such as the Scottish SPCA, Blue Cross or the Dogs Trust. Around 1 in 5 suggested groups of this type. With specific reference to the Scottish SPCA it was noted that they already have a network of inspectors covering the country. It was also suggested that animal welfare organisations would have a clear focus on the best interests of the animal involved.
- Veterinary practices or veterinary associations or professional bodies such as the Royal College of Veterinary Surgeons. Around 1 in 5 suggested organisations or bodies of this type. Those who gave a reason for suggesting vets sometimes noted that they have a presence across the country, would already possess the necessary knowledge and skills that may be required and may know the animals and owners involved.

Other bodies suggested (by smaller numbers of respondents) included Police Scotland, local authorities, the Scottish Government or Defra⁶, canine organisations such as the Kennel Club or breeders' associations and countryside-focused groups, such as the Landowner's Association or the National Union of Farmers.

There was also the suggestion that it may be better to create a new organisation to carry out this function. A pet owner respondent amongst those suggesting this approach commented that self-regulation can lead to the problem of self-interest, and it would therefore be better to have a body which brought together a combination of interested parties such as manufacturers, welfare groups and animal trainers. Another suggestion, in this case from an animal behaviourist, was for an independent advisory body with funding provided by the industry.

⁶ This is an area of devolved responsibility and Defra has no jurisdiction over this matter in Scotland.

Use and financial impact

Pet owners

Questions 10 to 19 sought information to help inform any decisions on business and regulatory impact that may be required. Questions 10-12 were targeted specifically at pet owners but respondents within other respondent categories also tended to answer the questions. The analysis presented here includes all information provided.

Question 10: Have you ever bought an electronic training device? If yes, please specify which device(s) you have purchased.

Overall, 520 respondents reported that they had bought an electronic training device. However, not all of these respondents provided further information about the type of device(s) bought. Equally, a small number of respondents who had not answered the initial question at Question 10 did provide further information.

Information provided elsewhere, and particularly at Question 2, suggests that many of the devices being used have more than one function. In particular, there were references to remote training collars with a static pulse but also a vibration and/or sonic setting. Some boundary fence system users and suppliers referenced a sonic or vibration 'first warning' as an animal approached the fence, followed by a static pulse if the animal attempted to cross the fence.

Table 11 presents summary data based on types of device selected at Question 10. The analysis assumes that respondents may have selected the functions available through devices which they have purchased - for example that if someone has bought a device which had both a static pulse and a vibrate setting they may have checked both functions when completing their consultation response. Equally, the information available does not identify whether more than one device may have been bought. The summary figures below represent the number of respondents who reported at least one purchase of a device of that type and which performs that function. Percentages below are calculated against total number of respondents (n=1,032) and full results (by respondent category) are included within Annex 4 to this report.

Table 11: Question 10 – Reported incidences of purchasing, type of device by function

Type of device	Remote training collar		Anti-bark collar		Boundary Fence Systems	
	N	%	N	%	N	%
Static pulse	362	35%	70	7%	132	13%
Spray	52	5%	61	6%		
Sonic	103	10%	31	3%		
Vibration	198	19%	47	5%		

Around 1 in 3 respondents (35%) reported that they had bought a static pulse remote training collar. Around 1 in 5 (19%) had bought a vibration remote training collar. More respondents had bought remote training than anti-bark collars with the exception of spray collars. Around 1 in 8 respondents had bought a boundary fence system.

Question 11: From where did you purchase your device?

Overall, 536 respondents provided information at Question 11. Respondents were only able to select one option. However, in their other comments a small number of respondents noted additional routes through which they had made purchases. In total, 557 purchases were reported.

The summary figures below represent the number of respondents who reported having made at least one purchase through each route. Percentages below are calculated against the total number of respondents who reported any purchase (n=536) and full results (by respondent category) are included within Annex 4 to this report.

Table 12: Question 11 – Purchase route

Purchase route	N	% of respondents who had purchased a device
Direct from a manufacturer	317	59%
Online e.g. Amazon/eBay	112	21%
Animal trainer or behaviourist	52	10%
Pet store	33	6%
Distributor (for a manufacturer)	17	3%
Other (not known)	13	2%
Other retailer e.g. countryside sports shop	7	1%
Online specialist retailer (other than manufacturer)	4	1%
Veterinary practice	2	<1%
TOTAL	557	

Percentages do not sum to 100% due to rounding

The majority of those who had purchased an electronic training aid had purchased a device from the manufacturer (around 2 in 3 or 59%). Around 1 in 5 (21%) had purchased a device through a general online retailer. Although not one of the provided options, around 1 in 10 (10%) reported that they had bought a device from an animal trainer or behaviourist.

Question 12: How much did your device cost?

Overall, 532 respondents provided information about the cost of devices they had purchased at Question 12. Respondents were only able to select one option. The percentages below are based on the number of respondents answering this question (n=532). Summary results are presented below and full results (by respondent category) are included within Annex 4 to this report.

Table 13: Question 12 – Cost of device

Cost	N	%
Under £50	46	9%
£50-£100	97	19%
£100-150	123	23%
Over £150	209	39%
Don't know/can't remember	57	11%
TOTAL	532	100%

Percentages do not sum to 100% due to rounding

Of the 532 respondents answering this question, the highest proportion (39%) reported having purchased a device which cost over £150, while 23% reported having purchased a device costing between £100-150. In the lower price brackets, 19% reported having spent between £50-100 and 9% under £50.

Other points to note are:

- There is a correlation between having bought a more expensive device and having bought a boundary fence system - 39% of those who reported spending over £150 had reported buying a boundary fence system. However, only 25% of those who had bought a device reported buying a boundary fence system.
- There was also a correlation between having paid under £50 for a device and having purchased online from a site such as Amazon or eBay - 21% of devices were purchased online but 70% of those spending under £50 had used this online purchase route.

Manufacturers/retailers

Questions 13 to 15 were targeted at manufacturers and retailers and sought information on how introducing any ban or regulations might affect their business in the electronic training device industry. However, respondents across the different respondent categories sometimes answered this question. The analysis presented here has been restricted to answers given by respondents in categories in which respondents are most likely to have a relevant business interest: animal behaviourists, animal care respondents, animal trainers, pet supplies respondents, veterinary profession respondents and owner of working dogs respondents.

Question 13: Would your business/company be affected by any ban or stricter regulations put on the use in Scotland of any electronic training aids listed?

Question 13 asked respondents whether their business would be affected by any ban or stricter regulations put in place. Summary results are set out in Table 14 below and full results are included within Annex 4 to this report.

Table 14: Question 13 - responses by device type

Type of device	Yes		No		Don't know		ALL	
	N	%	N	%	N	%	N	%
Remote training collar								
Static pulse	59	31%	116	61%	15	8%	190	100%
Spray	17	10%	130	80%	16	10%	163	100%
Sonic	24	14%	128	77%	14	8%	166	100%
Vibration	45	25%	116	66%	16	9%	177	100%
Anti-bark collar								
Static pulse	37	21%	129	72%	13	7%	179	100%
Spray	15	9%	131	82%	14	9%	160	100%
Sonic	14	9%	133	83%	14	9%	161	100%
Vibration	27	16%	126	76%	12	7%	165	100%
Boundary fence system	28	16%	131	77%	12	7%	171	100%

Percentages may not sum to 100% due to rounding

For all devices, a majority of those answering the question answered that a ban or stricter regulations would not affect their business. Amongst those who did think their business would be affected, the highest proportion of respondents (31%) thought they would be affected by a ban or stricter regulations on remote training static pulse collars, followed by remote training vibration collars.

A total of 84 respondents went on to make a comment. Taking their answer on static pulse remote training collars as an indicator, 44 said their business would be affected, 27 said it would not be affected, 9 did not know and 4 had not answered that question.

The most frequently identified possible effect was dealing with fewer animal suffering from the negative effects of having been trained with an electronic training aid. This group of respondents included those who had answered 'Yes', 'No' and 'Don't know' at Question 13 and included animal behaviourists, animal trainers and

a veterinary profession respondent. Many of these respondents stressed that they would be delighted to see any reduction in business which results from banning or regulating electronic training aids.

Otherwise, the most frequently identified effect was that some dogs would be more difficult or even impossible to train - animal trainers and owner of working dog respondents raised this issue. Other effects identified included:

- A loss of sales. This was an issue raised by pet supplies and animal trainer respondents. A supplier of boundary fence systems was amongst these respondents and reported that any ban on boundary fences would have a very serious effect on their business in Scotland.
- That any ban in Scotland could ultimately make a ban in other countries more likely and hence could have a negative impact on businesses operating outwith Scotland in the longer term.
- An increase in the number of dogs being trained using reward-based techniques. This was identified by a small group of animal behaviourists and animal trainers. There were also occasional references to turning away clients who insist on using electronic collars.

Those who tended to answer that their business would not be affected or who did not know sometimes noted that they did not operate in Scotland. Otherwise, a number of trainers or behaviourists did suggest that either the number of dogs they work with and/or the types of issues dogs have could change. Most frequently, they reported that they could see a welcome decrease in the number of dogs being brought to them because they had been damaged through the use of electronic training aids.

Question 14: If known, how many listed electronic training aids has your business sold to users in Scotland within the 2014/15 financial year?

Question 15: If known, please provide an approximate annual profit obtained from sales of electronic training devices per year. If possible, please indicate what proportion of those sales were in Scotland or the UK.

Only 15 respondents provided relevant information at one or both of Questions 14 and 15. However, 2 of these respondents did not wish their response to be published and the information provided is not included in the analysis below. The remaining 13 respondents were made up of 8 animal trainers, 3 animal behaviourists and 2 pet supplies respondents. Six respondents were based in the USA, 3 in England, and one each in Scotland, the Republic of Ireland, Canada and Australia.

In terms of the number of aids sold to users in Scotland and the country in which the provider is based (in brackets):

- Five respondents reported having sold remote training static pulse collars. Numbers sold were: 500+ (USA), 200 (England), 8 (England), 5 (Scotland) and 2 (USA).
- Three respondents reported having sold remote training vibration collars. Numbers sold were: 5 (Scotland), 1 (England) and 1 (USA).
- Three respondents reported having sold anti-bark, static pulse collars. Numbers sold were: 50 (England), 5 (England) and 3 (USA).
- One respondent reported having sold anti-bark, vibration collars. Numbers sold were: 3 (USA).
- Four respondents reported having sold boundary fence systems. Number sold were: 60 (England), 52 (England), 10 (England) and 4 (USA).

Ten respondents provided some information around the approximate annual profit, although it was not always clear whether or how this profit related to any sales in Scotland. The information provided included

- Four USA-based respondents reported having made a profit in the USA (ranging from \$250-\$40,000) but having made no sales in Scotland. An Australia-based company reported a profit of AUD\$8,000 but no sales in Scotland.
- A Canada-based respondent reported a profit of \$500,000+ of which around 20% may have come from UK, including Scottish, sales. A USA-based respondent reported a profit of \$900. This company had also reported sales in Scotland.
- The Scotland-based respondent who had reported sales in Scotland also reported a £100 profit.
- An England-based respondent reported that their company had not made a profit in that year because it had been sold, and another reported that their company was going through a managed decline but had made a £5,000 profit. Both of these respondents had reported sales in Scotland.

Dog trainers/behaviourists/manufacturers/retailers

Questions 16 and 17 were addressed to dog trainers, behaviourists, manufacturers and retailers. As at Questions 13 to 15, respondents across the different respondent categories sometimes answered this question. The analysis presented here has been restricted to answers given by respondents in categories in which respondents are most likely to have a relevant business interest: animal behaviourists, animal care respondents, animal trainers, pet supplies respondents, veterinary profession respondents and owner of working dogs respondents.

Question 16 asked respondents whether a ban or restriction in Scotland on the use of any of the electronic training aids listed would have an effect on their business or organisation. Summary results are set out in Table 15 below. Full results, by respondent category, are set out within Annex 4 to this report. Percentages are calculated against the number of respondents at each question.

Question 16: Would a ban or restriction in Scotland on the use of any of the electronic training aids listed have an effect on your business or organisation?

Table 15: Question 16 - responses by device type

Type of device	Yes		No		Don't know		ALL	
	N	%	N	%	N	%	N	%
Remote training collar								
Static pulse	54	29%	122	65%	13	7%	189	100%
Spray	20	12%	131	79%	14	8%	165	100%
Sonic	27	16%	130	77%	12	7%	169	100%
Vibration	39	22%	125	71%	12	7%	176	100%
Anti-bark collar								
Static pulse	34	19%	130	74%	12	7%	176	100%
Spray	19	12%	131	80%	14	9%	164	100%
Sonic	20	12%	130	80%	13	8%	163	100%
Vibration	26	16%	125	76%	14	8%	165	100%
Boundary fence system								
	26	15%	132	77%	13	8%	171	100%

Percentages may not sum to 100% due to rounding

The results at Question 16 are broadly in line with those at Question 13 and for all devices, a majority of those answering the question answered that a ban or stricter regulations would not affect their business. Amongst those who did think their business would be affected, the highest proportion of respondents (29%) thought they would be affected by a ban or stricter regulations on the use of remote training static pulse collars, followed by remote training vibration collars (22%).

A total of 68 respondents went on to make a comment, although many either referred back or made a similar comment as at Question 13. Additional issues raised at Question 16 included:

- An animal trainer organisation which operates in Wales reported that their organisation does not allow the use of static pulse or boundary collars under any circumstances and that the banning of static pulse collars in Wales has had no negative impact.
- An owner of working dogs respondent was concerned about the effects of uncontrollable dogs worrying ewes around lambing time and lambs being

aborted or injured ewes needing to be culled. They suggested that responsible dog owners would rather their dogs were contained or trained than risk the possible shooting of their pets if they were involved in such an incident.

Question 17: Please describe what effect restricting the use of electronic collars to authorised persons would have on your business or organisation?

A total of 101 respondents made a comment. Question 17 focused on the effect of restricting the use of electronic collars (as opposed to a ban or stricter regulations). However, many respondents did refer back to previous comments (at Questions 13 or 16) and many of the issues raised were broadly the same as at earlier questions.

Around 1 in 3 suggested that restricting the use of electronic collars would have no effect on their organisation. This included a small number who noted that they would not seek authorisation to use electronic collars. Many of the other issues raised were also similar to those raised around a ban and regulations, including that there would be fewer traumatised dogs to deal with, or that some dogs would be harder to train and, if they could not be trained, that euthanasia might be the only option. A small number of respondents also pointed to possible loss of sales and one to a very significant and damaging loss of sales.

Issues raised which clearly focused on the possible effect of regulations were that:

- The nature and extent of any effect would depend on the detail of the authorisation process and in particular on whether those wishing to use or train others in the use of electronic training aids are able to become authorised.
- The authorisation process could be time consuming.
- If authorisation was restricted to qualified or certified trainers or behaviourists it would most likely lead to increased business for this group, especially if devices could not be purchased online or at a pet store and without proper training.
- Any restrictions could make electronic training aids seem like an inherently dangerous tool and fewer people may choose to use them – this could then have a knock-on effect on those supplying devices or who train others to use them.
- It can already be difficult to find trainers able to offer training on using electronic training aids, especially in more remote areas. Restrictions would be likely to make this even more difficult and by extension could impact on the number of devices sold.

Pet behaviourists / pet trainers

The final two main consultation questions were aimed at animal behaviourists and trainers. As at other use and financial impact questions, the analysis presented here draws on answers provided by animal behaviourists, animal care respondents, animal trainers, pet supplies respondents, veterinary profession respondents and owner of working dogs respondents.

Question 18: Approximately how many dogs did you recommend the use of electronic training collars for in Scotland in 2014?

A breakdown of the responses given by the 140 respondents who answered this question is set out both in Table 16 below and in the subsequent text.

Table 16: Question 18 - Number of dogs for which electronic training collars were recommended in Scotland

Number of dogs	Number of respondents
0*	122
1-5	11
6-15	4
30	1
TOTAL	138

* This includes a small number of respondents who reported recommending the use of collars but for dogs in other countries.

In addition, a pet supplies respondent reported that there were 52 pets on their system in Scotland at the time and another respondent reported having made recommendations concerning high hundreds if not thousands of dogs.

Question 19: If you sometimes recommend the use of an electronic training collar, generally, do you provide the electronic training collars or do owners purchase the collars themselves?

A total of 74 respondents provided information about how collars are generally acquired if they have recommended their use. Those answering this question included a number who had not answered the previous question or who had reported making no recommendations of use in Scotland in 2014. A breakdown of responses is set out in Table 17 below.

Table 17: Question 19 - Route through which recommended collars are acquired

Route	Number of respondents
I provide the collar	32
Owners purchase themselves	24
It varies	18
TOTAL	74

The largest proportion of respondents - around 2 in 5 - reported providing the collar themselves while around 1 in 4 said that it varies. The remaining respondents reported that owners purchased the collars themselves.

Question 20: Please provide any other comments you may wish to add on a potential ban or regulation of electronic training devices.

At the final main consultation question respondents were asked to provide any other comments they wished to add on a potential ban or further regulation. A total of 550 respondents went on to comment. The majority of these comments referred back to, summarised, expanded on or restated one of two broader positions on this issue. These two positions can be summarised as follows.

- Electronic training aids are effective training devices which, far from threatening the welfare of animals, can allow them to lead healthy and happy lives. This can be evidenced by the numerous animals who might otherwise have been confined to the home or for which euthanasia might have been the only alternative had behavioural issues not been addressed. There are some types of dogs, such as working dogs, for which electronic training aids offer particular benefits. Boundary containment fences have kept both cats and dogs safe and able to access the outdoors. Any changes required should focus on further education rather than a ban or stricter regulations.
- Electronic training aids, and static pulse devices in particular, are harmful to the welfare of animals if not cruel. The harm they do can be both physiological and psychological and may include causing extreme stress and anxiety, repression of aggression or causing an animal to 'shut down'. There are far more humane and more effective methods for training animals based on positive reinforcement. There is a substantial body of evidence which sets out the advantages of positive approaches, or which points to the harmful effects of electronic training aid-based approaches. A ban would be the only or the most effective way to protect animals.

There was also a small number of respondents who submitted extensive additional comments, either at Question 20 or as a statement submitted outwith the Scottish

Government's online consultation hub. In particular, two respondents, (the Electronic Collar Manufacturer's Association (ECMA) and a team which carries out research into electronic training aids from the University of Lincoln), submitted substantive additional comments. Both of these respondents agreed to their response being published and along with all other published responses they can be accessed on the Scottish Government's website.

In summary, points highlighted by the research team from the University of Lincoln included that:

- They are the lead researchers on two Defra-funded research projects looking at electronic training aids, are the authors of the *Companion Animal Welfare Council's Report* referenced in the consultation paper, and have also led a study on the impact of electric boundary systems on the welfare of cats. The findings of the recent research are yet to be published.
- There are important scientific and technical distinctions to be made between remote training collars, anti-barking collars and electric boundary systems and each needs to be considered separately.
- Remote training collars: Further work undertaken since the Defra-funded studies were completed has been published in a PLOS ONE paper (see Annex 3 for full reference). This work suggested stronger evidence of suffering during training than was reported during the Defra-funded study⁷. It also produced evidence of poor timing in the use of devices, even by professional trainers. The team is of the view that, given their findings that the collars appeared to produce no added benefit but posed a greater risk, a total ban or at the very least tight regulation of remote, owner operated or hand held electronic training collars is justified.
- Anti-barking collars: There is very limited research available on the welfare impact of anti-bark collars and further research is required. Vibration collars may be considered to pose the lowest risk and may have value, especially with deaf dogs. By contrast there are grounds for concern about the aversiveness of other anti-bark collars, and the team consider that closer regulation or a total ban is warranted. If they are not to be banned, the inclusion of technical and safety features (as currently supported by the ECMA) for remote training collars is considered essential.
- Electric boundary systems: from an animal welfare perspective, there are solid grounds to differentiate remote collar training systems that at depend on a human operator and boundary systems. Given the known risk of cats straying onto roads and the limitations of alternative approaches to preventing that happening, the team believe that the evidence does not support a complete ban. However, they would support regulation to ensure best practice guidelines are followed.

⁷ although this reanalysis did not produce strong enough results to support an amendment to the Defra-funded paper

Issues highlighted within the ECMA's response have been set out elsewhere within the analysis (for example at Questions 2 and 5). They highlighted that all three of the current groups of devices are consistent with the legal obligations and potential liabilities to dog owners in Scotland. The ECMA also:

- Suggested that there is considerable evidence substantiating the demand to retain these options for dog owners in Scotland.
- Suggested that there is much highly subjective and ill-informed opinion and hearsay which does not recognise the technical capabilities and safety of the latest generation of quality modern-day electronic collar products.
- Concluded that a legislative ban would create a problem for all those involved and would be counterintuitive to the well-being of dogs.
- Noted their commitment to assisting people in responsible care of their dogs and cats and to collaborate with government and wider stakeholders. They noted that ECMA has published materials outlining when it is appropriate to use electronic training aids and how to use them in a way that is safe, supervised and effective.

Finally, a number of other respondents raised issues at Question 20 which have not been covered elsewhere within this report. These included that:

- The consultation document or questions appear to overlook key issues or to be slanted in favour of a preferred outcome. This was suggested both by those calling for or arguing against a ban or stricter regulations. Respondents were asked for feedback on the consultation process and summary results from these question (Questions 21-23) are set out within Annex 5.
- The use of electronic training aids is an ethical issue and any policy decisions should not be driven by financial considerations. An associated point was that the increasing number of other countries that have introduced bans or regulation should not be discounted.
- Public opinion - as evidenced by a Kennel Club commissioned survey - would support a ban of static pulse collars.
- There are other tools available - including prong collars for dogs and electric fencing for livestock which represent an equivalent or greater threat to the welfare of animals than do electronic training aids. It is not clear why the Scottish Government would consider action around electronic training aids if they do not see the need to take action against these other types of device.
- Some of the most highly trained dogs in the world (including Police and Military dogs) are trained without the use of electronic training aids.
- E collars may enable people who would otherwise lack the strength or stamina to keep a harder-to-train dog.
- Any regulation or other control would be better left to local authorities. This would at least allow for the varied circumstances across Scotland to be taken into account – for example the difference between working with a dog

at distance in a rural area and controlling the behaviour of a dog being walked in an urban environment.

Summary findings

The main body of this report has presented a question-by-question analysis of the answers given by the 1,032 individual and group respondents who contributed to this consultation. Not only did a substantial number of respondents make a submission, but there was also a consistently high response rate across the quantitative questions. The proportion of respondents making further comments was also high at most questions.

Taking all answers together, it was clear that respondents tended to approach the consultation from one of two very different starting points – that electronic training aids are effective and can allow some animals to lead happier lives or that they are harmful if not cruel and far better training approaches are available. As would be expected, respondents overall position on the issue tended to be reflected in their answers across the consultation.

Although no single question acts as a clear proxy, answers at Questions 5 and 6 (which cover whether there should be a ban and if so of which devices), suggest that respondents were relatively evenly divided between those supportive of electronic training aids and those opposed to their use. Certain categories of respondent very clearly tended to one side of the argument or the other. In particular, animal care and animal welfare respondents clearly tended to be opposed to the use of electronic training aids. Pet supplies respondents and owners of working dogs clearly tended to be supportive of their use. The largest single category of respondents - pet owners - was relatively evenly divided on the issue.

Respondents who broadly supported the use of electronic training aids very often drew on personal experience of using electronic training aids, either with their own pets or when working with other people's animals. The majority of these respondents appeared to be referring to using remote training collars, although there were also references to anti-bark collars and boundary fence systems. The comments on boundary fence systems included references to both cats and dogs.

Overall, respondents who supported the use of electronic training aids were likely to make one or more of the following points:

- The use of electronic training aids, including both collars and boundary fence systems, can bring very real benefits to animals that might otherwise have led very restricted lives, or for which euthanasia would have been a likely option. This may include animals for which other training methods had not worked.
- They may be particularly effective for specific types of dogs, including some working dog breeds, which have a very strong instinct to chase other animals and which may not respond to other training cues. Deaf or blind dogs may benefit from the use of vibration collars. Those making this latter

point included some respondents who were otherwise very strongly opposed to the use of electronic training aids.

- Particularly based on personal experience, there is no evidence that animals suffer when electronic training aids are used correctly. Most of those who use electronic training aids use them properly. Anything can be open to misuse but there is no particular association with electronic training aids - if someone is determined to abuse an animal they will find a way to be cruel or neglectful.
- The existing legislation is sufficient to protect animals. It is clear that causing unnecessary suffering to an animal - whether with an electronic training aid or by any other means - is against the law. Enforcing the existing law would be more effective in protecting animals than adding further legislation or regulations. Any statutory controls should be focused on the quality and specification of the devices available.
- The most effective way to address any issues would be through further education. Training or licensing could be either encouraged or required. One option could be devices only being available under supervision and/or after training from a licensed or regulated practitioner. There may also be a case for some form of code or guidance.

Respondents who opposed the use of some or all electronic training aids tended to voice very particular concerns about the use of static pulse devices. As with those who supported the use of the aids, many of the respondents drew on their own experiences as pet owners or of working with animals. They were likely to make one or more of the following points:

- Using electronic training aids is harmful and/or cruel. In addition to immediate pain or distress, they may cause anxiety-related behaviours, lead to dogs shutting down psychologically, lead to dogs re-directing any aggression at other dogs or people and can cause physical injuries.
- There is no need to use training methods which are punishment-based and dependent on inflicting pain or creating fear. This approach suppresses behaviour without addressing its underlying cause or the motivation behind it. The electronic training aids themselves are very difficult to use correctly. There are much more effective and humane positive reinforcement training methods available.
- The existing animal welfare legislation is not sufficient to protect animals, not least because it does not prevent the use of static pulse collars. The 'unnecessary' suffering referenced in the Animal Health and Welfare (Scotland) Act 2006 is a subjective concept which is potentially difficult to prove.
- Electronic training aids should be banned, and in particular any devices with a static pulse function should be banned. Any regulations would be very difficult, if not impossible, to enforce and only a ban would offer sufficient protection to animals. Although a ban is highly preferable, if the Scottish

Government does not introduce a ban then strict regulations might at least offer some protection to animals.

- With specific reference to vibration collars, there may be occasions when they could be permitted for use. Suggestions included all vibration collars being acceptable if regulated, through to vibration collars only being acceptable under certain circumstances, such as if all other approaches have failed and euthanasia is the only alternative, or for deaf dogs.

In conclusion, therefore, the respondents to this consultation were divided on whether the Scottish Government should take action in this area. Broadly speaking, one group thought that little, if any, change is required. Others called for a ban of the use of electronic training aids in Scotland and of static pulse devices in particular.

Groups or organisations submitting a consultation response

Animal Behaviourist

Click and Connect Dog Training and Behaviour
 K9 Care Dog Training
 TPR Dog Training, Inc
 University of Lincoln, Research into Electronic Training Devices

Animal Care

The Dog Day Care Centre

Animal Trainer

A-Grade Dog Training
 APDT, UK - Association of Pet Dog Trainers
 Au-Pair Pet Care
 Force Free Rescue Rehabilitators
 G3 Dogs
 Good Dog Ownership School
 Pet Professional Guild
 Safe Paws
 Taydogs dog training
 The Guide Dogs for the Blind Association (Guide Dogs)
 Vonwolf K9 Ltd
 West Midlands Schutzhund Club

Animal Welfare

Animal Behaviour and Training Council
 Animal Concern Advice Line
 BanShockCollars.ca
 Battersea Dogs & Cats Home
 Blue Cross for Pets
 Canine & Feline Sector Group
 Canine Concern Scotland Trust
 Dogs Trust
 Feline Friends (Derbyshire)
 Fond of Northern Dobermanns Ltd.

Animal Welfare (continued)

Forwildlife fundraising group
International Cat Care
Inverclyde Animal Rescue/ Petsearch
OneKind
Scottish Countryside Alliance
Scottish SPCA
Staffordshire Rescue Scotland
Tayside Lochee & District Canine Club
The Kennel Club and Scottish Kennel Club
Tinto Kennels

Local Authority

Animal Health & Welfare Strategy Group - Scottish LAs
Argyll & Bute Council
North Ayrshire Council
Perth and Kinross Council
South Lanarkshire Council
Stirling Council
West Dunbartonshire Council

Pet Owner

Carrbridge Pheasant Shoot

Pet supplies, including manufacturers, retailers and trade bodies

Electronic Collar Manufacturer Association (ECMA)
Invisible Fence (Wessex) LLP
Pet Industry Federation

Veterinary professional

Animalytics
Armac Vets Ltd
British Veterinary Association, British Small Animal Veterinary Association and BVA Scottish Branch

Owner of working dogs

British Association for Shooting and Conservation
NFU Scotland
Scottish Association for Country Sports

Method Note

Processing responses

A total of 1,032 respondents made a submission. The majority of responses were submitted through the Scottish Government's online consultation hub, Citizen Space. Other responses were submitted as emails or in hard copy. Some of these did not to follow the standard structure of the consultation and were in statement form. When such responses contained clear answers to one or more of the 'Yes/No' questions these have been recorded. The remaining content, has been analysed qualitatively under the most directly relevant consultation question. This approach has also been taken to the analysis of further comments made by those using the standard response form.

Quantitative analysis

The results from the closed questions (e.g. Yes/No, or a list of types of devices from which to select), are presented in tabular form. At some questions summary results are included within the main report and full results (usually broken down by respondent category) have been provided at Annex 4. Given the relatively high level of response overall, percentages are presented within the report. However, it should be noted that the relatively small number of respondents within some respondent categories does mean that percentage values should be viewed as indicative.

There were some particular issues associated with the quantitative analysis for this consultation. In particular, further comments made and/or answers given at combinations of questions suggest that some questions *may not* always have been interpreted or answered as intended. Specific issues included:

- There were certain questions at which a pre-defined list of options was given, one of which was an option to answer 'Other' and give further information. The further information given by respondents selecting 'Other' has then been analysed and further options devised as appropriate. It may be the case that some of the respondents who selected one of the original, pre-defined options might have chosen one of the new options had these been available. For example, when respondents were asked to identify their primary reason for answering the consultation, a number of respondents who selected 'Other' went on to make a connection with working dogs. However, some of those who had selected one of the pre-defined categories might have selected the working dogs option had it been listed.
- There were certain questions at which it was only possible to select one of the options given but further comments made suggest that some respondents might have selected multiple options had that been possible. For example, at Question 11 respondents were only able to select one route through which they had purchased a device. However, those who selected 'Other' and then went on to provide information sometimes noted that they had purchased

through multiple routes. It is not clear whether some of those who selected a purchase route may also have purchased through other routes.

- There were occasions on which respondents may have wished to indicate limited or conditional support for an option. In particular, many of those who indicated that they wanted a ban of certain devices (at Question 6) then went on to indicate that they wished to see devices regulated (at Question 7). Further comments suggest that some of these respondents wished to see the devices banned but, if they were not banned, they wished to see them regulated. Others appeared to see regulation as a means to a ban rather than an alternative. In both cases, some respondents appeared to see a connection between their answers at these two questions. However, this was only evident if they made a further comment.
- The intention was that certain of the latter questions (on use or financial impact) should only have been answered by certain types of respondent. In particular, Questions 13-17 were intended for different types of businesses. However, other 'non-business' respondents also sometimes answered these questions, suggesting that some form of clearer signposting or routing might have been helpful.
- There were occasions on which respondents of broadly the same view (based on their further comments) answered the quantitative question differently. This appeared to have been driven by how 'precisely' respondents had interpreted a question. For example, at Questions 1 and 2 respondents were asked about evidence of misuse or effective use of training aids in Scotland. Those who wished to cite evidence from elsewhere sometimes answered 'Yes' i.e. that they had evidence and then made a further comment. Others answered 'No' and noted that the evidence they were citing did not pertain to Scotland.

Issues of interpretation and/or understanding may also have had an impact at other questions. In particular, further comments suggest that not all respondents were clear as to the mechanism through which any ban might be introduced and how this would relate (or not) to either stricter regulation or a statutory welfare code.

Overall, however, there were clear and consistent patterns of answers across questions and these were reflected in the further comments made. This does suggest that the broader picture to emerge from the analysis (namely that respondents were relatively evenly divided between those favouring a ban and those wishing for no substantive action to be taken) is a fair reflection of the opinion of respondents to this consultation.

Published references cited in consultation responses

The references below have been cited by respondents within their further comments. The substantial majority were cited by respondents broadly opposed to the use of electronic training aids (at Question 1 and elsewhere). The formal evidence sources cited as supporting the case for electronic training aids were the DEFRA commissioned reports Cooper et al, 2013.

If a partial reference was provided (for example a surname and date only) the research team have sought to provide a full reference. A degree of judgment may have had to be used in deciding the document or evidence source to which respondent(s) were referring. If this was the case, references have been marked with an asterisk (*).

Please note that, in addition to published references of the type listed below, a number of respondents referred to a range of other, primarily web-based, materials. These included information and videos on animal trainer websites, other material posted on video sharing websites or written material provided by various organisations, including campaign groups.

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Additional quantitative analysis

Respondent country of residence by respondent category.

Respondent category	Scotland		England		Wales		Northern Ireland		Other – UK*		Republic of Ireland	
	N	%	N	%	N	%	N	%	N	%	N	%
Animal behaviourist	17	40%	14	33%	1	2%	-	0%	-	0%	-	0%
Animal care	5	83%	1	17%	-	0%	-	0%	-	0%	-	0%
Animal trainer	59	43%	27	20%	-	0%	1	1%	-	0%	3	2%
Animal welfare	23	51%	10	22%	-	0%	-	0%	3	7%	-	0%
Local government	7	100%	-	0%	-	0%	-	0%	-	0%	-	0%
Member of the public	49	66%	19	26%	-	0%	-	0%	-	0%	2	3%
Pet owner	417	63%	174	26%	3	0%	3	0%	-	0%	3	0%
Pet supplies	1	11%	6	67%	-	0%	-	0%	1	11%	-	0%
Veterinary professional	15	58%	4	15%	-	0%	-	0%	1	4%	-	0%
Owner of working dogs	23	96%	1	4%	-	0%	-	0%	-	0%	-	0%
TOTAL	616	60%	256	25%	4	<1%	4	<1%	5	<1%	8	1%

*Includes respondents noting that they operate in more than one country within the UK

Respondent country of residence by respondent category (continued).

Respondent category	USA		Canada		Australia		Other*		Unknown		Total	
	N	%	N	%	N	%	N	%	N	%	N	%
Animal behaviourist	4	9%	3	7%	2	5%	2	5%	-	0%	43	100%
Animal care	-	0%	-	0%	-	0%	-	0%	-	0%	6	100%
Animal trainer	31	23%	5	4%	5	4%	5	4%	1	1%	137	100%
Animal welfare	3	7%	1	2%	-	0%	2	4%	3	7%	45	100%
Local government	-	0%	-	0%	-	0%	-	0%	-	0%	7	100%
Member of the public	-	0%	-	0%	1	1%	1	4%	2	3%	74	100%
Pet owner	24	4%	9	1%	8	1%	9	1%	11	2%	661	100%
Pet supplies	-	0%	-	0%	-	0%	-	0%	1	11%	9	100%
Veterinary professional	1	4%	-	0%	-	0%	4	15%	1	4%	26	100%
Owner of working dogs	-	0%	-	0%	-	0%	-	0%	-	0%	24	100%
TOTAL	63	6%	18	2%	16	2%	23	2%	19	2%	1032	100%

* Includes small numbers of respondents from (predominantly European) countries. The only countries from which there was more than one respondent were Norway (3) and the Netherlands, France and Sweden (2 each).

Question 6: In your opinion, which, if any, of the devices listed should be banned?

Respondent category	Remote training collars								Anti-bark collars								Boundary Fence Systems		Don't know		Group size
	Static pulse		Spray		Sonic		Vibrate		Static pulse		Spray		Sonic		Vibrate		Static pulse		N	%	
	N	%	N	%	N	%	N	%	N	%	N	%	N	%	N	%	N	%			
Animal behaviourist	28	65	25	58	22	51	11	26	27	63	24	56	21	49	14	33	26	60	-	0	43
Animal care	6	100	6	100	6	100	5	83	6	100	6	100	6	100	5	83	4	67	-	0	6
Animal trainer	65	47	59	43	54	39	26	19	65	47	59	43	53	39	37	27	60	44	6	4	137
Animal welfare	35	78	26	58	25	56	19	42	35	78	26	58	26	58	21	47	23	51	2	4	45
Local government	2	29	-	0	1	14	1	14	2	29	-	0	1	14	1	14	1	14	2	29	7
Member of the public	45	61	32	43	35	47	33	45	41	55	32	43	35	47	33	45	30	41	4	5	74
Pet owner	327	49	268	41	271	41	205	31	332	50	263	40	271	41	216	33	257	39	46	7	661
Pet supplies	2	22	2	22	1	11	1	11	2	22	2	22	1	11	1	11	1	11	1	11	9
Veterinary professional	17	65	9	35	10	38	6	23	18	69	9	35	11	42	9	35	12	46		0	26
Owner of working dogs	2	8	-	0	-	0	-	0	2	8	-	0	-	0	-	0	1	4	4	17	24
TOTAL	529	51	427	41	425	41	307	30	530	51	421	41	425	41	337	33	415	40	65	6	1032

Question 7: In your opinion, which, if any, of the devices listed require regulation?

Respondent category	Remote training Collars								Anti-bark collars								Boundary Fence Systems		Don't know		Group size
	Static pulse		Spray		Sonic		Vibrate		Static pulse		Spray		Sonic		Vibrate		Static pulse		N	%	
	N	%	N	%	N	%	N	%	N	%	N	%	N	%	N	%	N	%			
Animal behaviourist	22	51	21	49	20	47	18	42	21	49	20	47	20	47	16	37	20	47	1	2	43
Animal care	5	83	5	83	5	83	5	83	5	83	5	83	5	83	5	83	4	67	1	17	6
Animal trainer	50	36	45	33	40	29	37	27	50	36	44	32	41	30	38	28	47	34	10	7	137
Animal welfare	25	56	22	49	21	47	23	51	23	51	22	49	20	44	21	47	22	49	3	7	45
Local government	2	29	2	29	1	14	1	14	1	14	1	14	-	0	-	0	1	14	2	29	7
Member of the public	33	45	31	42	31	42	25	34	33	45	28	38	30	41	28	38	26	35	3	4	74
Pet owner	269	41	219	33	223	34	197	30	262	40	218	33	219	33	188	28	224	34	57	9	661
Pet supplies	4	44	4	44	3	33	3	33	4	44	4	44	3	33	3	33	2	22	-	0	9
Veterinary professional	15	58	10	38	12	46	12	46	13	50	9	35	11	42	10	38	14	54	1	4	26
Owner of working dogs	3	13	2	8	1	4	1	4	3	13	1	4	1	4	1	4	1	4	3	13	24
TOTAL	428	41	361	35	357	35	322	31	415	40	352	34	350	34	310	30	361	35	81	8	1032

Respondents selecting 'regulate' at Question 7 having not already selected 'ban' at Question 6

Respondent category	Remote training collars								Anti-bark collars								Boundary Fence Systems		Group size N
	Static pulse		Spray		Sonic		Vibrate		Static pulse		Spray		Sonic		Vibrate		Static pulse		
	N	%	N	%	N	%	N	%	N	%	N	%	N	%	N	%	N	%	
Animal behaviourist	3	7	5	12	5	12	9	21	2	5	5	12	6	14	6	14	3	7	43
Animal care	-	0	-	0	-	0	1	17	-	0	-	0	-	0	1	17	1	17	6
Animal trainer	9	7	8	6	6	4	19	14	8	6	7	5	6	4	11	8	9	7	137
Animal welfare	2	4	5	11	5	11	9	20	-	0	6	13	4	9	7	16	5	11	45
Local government	1	14	2	29	1	14	1	14	1	14	1	14	-	0	-	0	1	14	7
Member of the public	3	4	9	12	7	9	5	7	3	4	6	8	6	8	7	9	7	9	74
Pet owner	54	8	46	7	48	7	60	9	50	8	50	8	52	8	52	8	68	10	661
Pet supplies	2	22	2	22	2	22	2	22	2	22	2	22	2	22	2	22	1	11	9
Veterinary professional	4	15	5	19	6	23	8	31	3	12	5	19	6	23	6	23	4	15	26
Owner of working dogs	1	4	2	8	1	4	1	4	1	4	1	4	1	4	1	4	1	4	24
TOTAL	79	8	84	8	81	8	115	11	70	7	83	8	83	8	93	9	100	10	1032

Question 10: Have you ever bought an electronic training device?

Respondent category	Yes		No		Not answered		Total	
	N	%	N	%	N	%	N	%
Animal behaviourist	18	42	25	58	-	0	43	100
Animal care	-	0	6	100	-	0	6	100
Animal trainer	84	61	49	36	4	3	137	100
Animal welfare	13	29	27	60	5	11	45	100
Local government	1	14	3	43	3	43	7	100
Member of the public	24	32	48	65	2	3	74	100
Pet owner	348	53	296	45	17	3	661	100
Pet supplies	7	78	1	11	1	11	9	100
Veterinary professional	6	23	19	73	1	4	26	100
Owner of working dogs	19	79	3	13	2	8	24	100
TOTAL	520	50	477	46	35	3	1032	100

Question 10: Please specify which devices

Respondent category	Remote training collars								Anti-bark collars								Boundary Fence Systems		Group size*
	Static pulse		Spray		Sonic		Vibrate		Static pulse		Spray		Sonic		Vibrate		Static pulse		
	N	%	N	%	N	%	N	%	N	%	N	%	N	%	N	%	N	%	
Animal behaviourist	16	37	8	19	5	12	8	19	8	19	4	9	6	14	4	9	4	9	43
Animal care	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6
Animal trainer	72	53	10	7	14	10	38	28	31	23	13	9	6	4	13	9	12	9	137
Animal welfare	7	16	3	7	2	4	3	7	1	2	3	7	-	-	-	-	1	2	45
Local government	1	14	1	14	1	14	1	14	-	-	1	14	-	-	-	-	-	-	7
Member of the public	13	18	1	1	2	3	8	11	4	5	1	1	-	-	1	-	10	14	74
Pet owner	226	34	26	39	70	11	128	19	21	3	35	5	15	2	25	4	98	15	661
Pet supplies	5	56	3	33	2	22	3	33	3	33	3	33	2	22	2	22	4	44	9
Veterinary professional	3	12	-	-	1	4	2	8	-	-	-	-	-	-	-	-	2	8	26
Owner of working dogs	19	79	-	-	6	25	7	29	2	8	1	4	2	8	2	8	1	4	24
TOTAL	362	35	52	5	103	10	198	19	70	7	61	6	31	3	47	5	132	13	1032

*Purchase of at least one type of training aid reported, irrespective of answer to Yes/No question 10. Several individuals reported purchase of more than one device.

Question 11: From where did you purchase your device?

Respondent category	Direct from a manufacturer	Online e.g. Amazon/eBay	Pet store	Animal trainer or behaviourist	Distributor (for a manufacturer)	Online specialist retailer	Other retailer (e.g. countryside sports shop)	Veterinary practice	Other (not known)
	N	N	N	N	N	N	N	N	N
Animal behaviourist	10	7	3	2	1	-	1	-	-
Animal care	-	-	-	-	-	-	-	-	-
Animal trainer	57	18	7	4	1	2	1	-	-
Animal welfare	6	6	1	1	-	-	-	-	-
Local government	-	1	-	-	-	-	-	-	-
Member of the public	13	5	2	1	3	-	-	-	1
Pet owner	205	73	19	44	11	2	4	1	11
Pet supplies	6	-	1	-	-	-	-	-	-
Veterinary professional	3	-	-	-	1	-	1	1	-
Owner of working dogs	17	2	-	-	-	-	-	-	1
TOTAL	317	112	33	52	17	4	7	2	13
% of respondents who reported one or more purchase route (n=536)	59%	21%	6%	10%	3%	1%	1%	0%	2%

Question 12: How much did your device cost? Please use the price ranges below.

Respondent category	Under £50	£50-£100	£100-£150	Over £150	Don't know/can't remember	Not answered	Total
	N	N	N	N	N	N	N
Animal behaviourist	1	3	5	6	2	26	43
Animal care	-	-	-	-	-	6	6
Animal trainer	10	10	19	36	11	51	137
Animal welfare	2	3	5	3	1	31	45
Local government	1	-	-	-	-	6	7
Member of the public	4	5	2	8	4	51	74
Pet owner	26	73	84	139	37	302	661
Pet supplies	1	-	-	6	-	2	9
Veterinary professional	-	1	-	5	-	20	26
Owner of working dogs	1	2	8	6	2	5	24
TOTAL	46	97	123	209	57	500	1032
As % of those answering question	9%	19%	23%	39%	11%	-	-

Question 13: Would your business/company be affected by any ban or stricter regulations put on the use in Scotland of any of the electronic training aids listed?

Respondent category	Remote training collars															
	Static pulse				Spray				Sonic				Vibrate			
	Yes	No	Don't know	Total	Yes	No	Don't know	Total	Yes	No	Don't know	Total	Yes	No	Don't know	Total
Animal behaviourist	7	28	3	38	3	31	2	36	2	32	2	36	5	28	4	37
Animal care	-	6	-	6	-	6	-	6	-	6	-	6	-	6	-	6
Animal trainer	44	59	7	110	13	67	10	90	20	64	8	92	35	58	7	100
Pet supplies	4	3	1	8	-	6	1	7	-	6	1	7	3	4	1	8
Veterinary professional	2	16	1	19	1	16	1	18	1	16	1	18	1	16	2	19
Owner of working dogs	2	4	3	9	-	4	2	6	1	4	2	7	1	4	2	7
TOTAL	59	116	15	190	17	130	16	163	24	128	14	166	45	116	16	177
%	31%	61%	8%	100%	10%	80%	10%	100%	14%	77%	8%	100%	25%	66%	9%	100%

NB: Percentages do not sum to 100% due to rounding

Question 13: Would your business/company be affected by any ban or stricter regulations put on the use in Scotland of any of the electronic training aids listed?

Respondent category	Anti-bark collars															
	Static pulse				Spray				Sonic				Vibrate			
	Yes	No	Don't know	Total	Yes	No	Don't know	Total	Yes	No	Don't know	Total	Yes	No	Don't know	Total
Animal behaviourist	6	29	3	38	1	32	2	35	1	32	2	35	3	30	2	35
Animal care	-	6	-	6	-	6	-	6	-	6	-	6	-	6	-	6
Animal trainer	28	67	7	102	12	67	9	88	12	68	9	89	21	65	7	93
Pet supplies	2	5	1	8	-	6	1	7	-	6	1	7	2	5	1	8
Veterinary professional	1	17	1	19	2	16	1	19	1	17	1	19	1	16	1	18
Owner of working dogs	-	5	1	6	-	4	1	5	-	4	1	5	-	4	1	5
TOTAL	37	129	13	179	15	131	14	160	14	133	14	161	27	126	12	165
% of those answering the question	21%	72%	7%	100%	9%	82%	9%	100%	9%	83%	9%	100%	16%	76%	7%	100%

NB: Percentages do not sum to 100% due to rounding

Question 13: Would your business/company be affected by any ban or stricter regulations put on the use in Scotland of any of the electronic training aids listed?

Respondent category	Boundary Fence Systems			
	Static pulse			Total
	Yes	No	Don't know	
Animal behaviourist	3	30	3	36
Animal care	-	6	-	6
Animal trainer	19	70	7	96
Pet supplies	4	3	1	8
Veterinary professional	2	17	-	19
Owner of working dogs	-	5	1	6
TOTAL	28	131	12	171
% of those answering the question	16%	77%	7%	100%

Question 16: Would a ban or restriction in Scotland on the use of any of the electronic training aids listed have an effect on your business or organisation?

Respondent category	Remote training collars															
	Static pulse				Spray				Sonic				Vibrate			
	Yes	No	Don't know	Total	Yes	No	Don't know	Total	Yes	No	Don't know	Total	Yes	No	Don't know	Total
Animal behaviourist	8	29	1	38	3	30	2	35	3	31	2	36	5	29	2	36
Animal care	-	6	-	6	-	6	-	6	-	6	-	6	-	6	-	6
Animal trainer	40	65	8	113	13	72	8	93	20	70	6	96	29	68	6	103
Pet supplies	2	3	2	7	1	4	2	7	1	4	2	7	2	3	2	7
Veterinary professional	1	17	-	18	1	17	-	18	1	17	-	18	1	17	-	18
Owner of working dogs	3	2	2	7	2	2	2	6	2	2	2	6	2	2	2	6
TOTAL	54	122	13	189	20	131	14	165	27	130	12	169	39	125	12	176
% of those answering the question	29%	65%	7%	100%	12%	79%	8%	100%	16%	77%	7%	100%	22%	71%	7%	100%

NB: Percentages do not sum to 100% due to rounding

Question 16: Would a ban or restriction in Scotland on the use of any of the electronic training aids listed have an effect on your business or organisation?

Respondent category	Anti-bark collars															
	Static pulse				Spray				Sonic				Vibrate			
	Yes	No	Don't know	Total	Yes	No	Don't know	Total	Yes	No	Don't know	Total	Yes	No	Don't know	Total
Animal behaviourist	6	30	1	37	2	32	1	35	3	31	1	35	3	29	1	33
Animal care	-	6	-	6	-	6	-	6	-	6	-	6	-	6	-	6
Animal trainer	23	70	8	101	12	71	9	92	13	71	8	92	18	70	9	97
Pet supplies	2	4	1	7	1	4	2	7	1	4	2	7	2	3	2	7
Veterinary professional	1	17	-	18	2	16	-	18	1	17	-	18	1	16	-	17
Owner of working dogs	2	3	2	7	2	2	2	6	2	1	2	5	2	1	2	5
TOTAL	34	130	12	176	19	131	14	164	20	130	13	163	26	125	14	165
% of those answering the question	19%	74%	7%	100%	12%	80%	9%	100%	12%	80%	8%	100%	16%	76%	8%	100%

NB: Percentages do not sum to 100% due to rounding

Question 16: Would a ban or restriction in Scotland on the use of any of the electronic training aids listed have an effect on your business or organisation?

Respondent category	Boundary Fence Systems			
	Static pulse			Total
	Yes	No	Don't know	
Animal behaviourist	4	30	3	37
Animal care	-	6	-	6
Animal trainer	16	74	7	97
Pet supplies	4	3	1	8
Veterinary professional	1	17	-	18
Owner of working dogs	1	2	2	5
TOTAL	26	132	13	171
% of those answering the question	15%	77%	8%	100%

Questions on the consultation process

Question 21: Do you consider that the consultation explained the key issues sufficiently to properly consider your responses?

Respondent category	Yes		No		Total answering question	
	N	%	N	%	N	%
Animal behaviourist	36	88%	5	12%	41	100%
Animal care	5	100%		0%	5	100%
Animal trainer	101	86%	17	14%	118	100%
Animal welfare	32	84%	6	16%	38	100%
Local government	5	100%		0%	5	100%
Member of the public	54	83%	11	17%	65	100%
Pet owner	473	82%	103	18%	576	100%
Pet supplies	6	75%	2	25%	8	100%
Veterinary professional	20	91%	2	9%	22	100%
Owner of working dogs	15	79%	4	21%	19	100%
TOTAL	747	83%	150	17%	897	100%

The majority of respondents (83% of those answering the question) considered that the consultation explained the key issues sufficiently to allow them to properly consider their response.

Question 22: Do you consider that you had sufficient time to respond to the consultation?

Respondent category	Yes		No		Total answering question	
	N	%	N	%	N	%
Animal behaviourist	39	95%	2	5%	41	100%
Animal care	5	100%		0%	5	100%
Animal trainer	118	97%	4	3%	122	100%
Animal welfare	36	95%	2	5%	38	100%
Local government	5	100%		0%	5	100%
Member of the public	65	97%	2	3%	67	100%
Pet owner	555	96%	21	4%	576	100%
Pet supplies	7	88%	1	13%	8	100%
Veterinary professional	20	91%	2	9%	22	100%
Owner of working dogs	18	86%	3	14%	21	100%
TOTAL	868	96%	37	4%	905	100%

A very substantial majority (96% of those answering the question) thought they had enough time to respond to the consultation.

How would you rate your satisfaction with using Citizen Space to respond to consultations?

Respondent category	Very satisfied		Slightly satisfied		Neither satisfied nor dissatisfied		Slightly dissatisfied		Very dissatisfied	
	N	%	N	%	N	%	N	%	N	%
Animal behaviourist	23	55%	7	17%	9	21%	2	5%	1	2%
Animal care	3	50%	1	17%	2	33%		0%		0%
Animal trainer	42	38%	29	26%	32	29%	5	4%	4	4%
Animal welfare	15	39%	6	16%	12	32%	2	5%	3	8%
Local government	3	75%		0%	1	25%	-	0%		0%
Member of the public	23	40%	15	26%	13	22%	5	9%	2	3%
Pet owner	183	34%	129	24%	186	34%	23	4%	21	4%
Pet supplies	2	33%	1	17%	2	33%	1	17%	-	0%
Veterinary professional	13	59%	7	32%	1	5%	-	0%	1	5%
Owner of working dogs	1	9%	5	45%	4	36%	-	0%	1	9%
TOTAL	308	37%	200	24%	262	31%	38	5%	33	4%

A majority (61% of those answering the question) were either very or slightly satisfied with using Citizen Space (the Scottish Government's online consultation hub) to respond to the consultation.

Question 23: Do you have any other comments on the way this consultation has been conducted?

A total of 299 respondents made one or more comments about the consultation process.

In their further comments, some respondents welcomed the Scottish Government's decision to consult on this issue, although the importance of then taking the views expressed into account was also noted. Other positive comments included that:

- Being able to respond online is easy and convenient. However, it was also noted that not everyone may have this option and that it is important to allow people to respond in other ways.
- The questions were clear or unambiguous and there were plenty of opportunities to make further comments.
- The Scottish Government's support team had provided a very good service.

Issues or concerns raised included:

- There has been insufficient publicity concerning the consultation. There was a suggestion that others may have made a response had they known the Scottish Government was consulting on this issue.
- This is not an issue on which it was necessary or helpful to consult the general public – any decisions should be based on the evidence concerning animal welfare and/or public safety rather than public opinion.
- The consultation and/or the questions appear biased in favour of banning electronic training aids.
- The consultation and/or the questions appear biased in favour of not banning electronic training aids.
- The questions focus too much on the financial implications of any changes as opposed to animal welfare issues.
- There are some misleading statements within the consultation paper. For example, the description of boundary fences states that they are 'sometimes preceded by a warning sound'. This suggests that pet containment systems do not usually have this feature when most, if not all, do.
- The consultation should have clarified which electronic training devices might cause an animal distress or pain and which do not. There should have been options concerning electronic training aids other than collars, such as remote-controlled treat dispensers.
- The question format and the guidance notes were not user friendly and this may have discouraged people (and in particular pet owners) from participating. In particular, the syntax and structure is difficult to follow.
- The consultation asks too many questions, including many questions that are not of relevance to a pet owner and/or a member of the general public. An

associated point was that respondents should be routed past questions which are not of relevance to them.

- Online consultations and/or consultations structured around specific questions limit the respondents' opportunity to provide the information they consider important and in a structure they consider most appropriate or useful.
- A number of the questions represent a "false positive" response. For example, asking if guidelines or statutory welfare act would be sufficient when additional options are then presented in the next question.
- At Question 5, the option of 'A complete ban on all devices' should have been included rather than 'A complete ban on certain devices'.
- At questions that asked about which types of devices should be banned or regulated, there should have been an option to indicate 'No ban or regulation'.

The following suggestions or areas of possible improvement were suggested:

- Information on the consultation and/or paper copies should have been made available at places that those interested in this issue might frequent, such as veterinary surgeries.
- There should be an option to submit an anonymous response, including being anonymous to the Scottish Government.
- Covering information, including the invitation to participate letter sent, should state clearly the date on which the consultation closes.
- The relevant legislation currently in place should be listed.
- It would be helpful for a respondent to be able to save and download an electronic record of the submission they have made.
- A 'mobile-friendly' way to submit a response would be welcome.
- The comment boxes needed to be larger at some questions.



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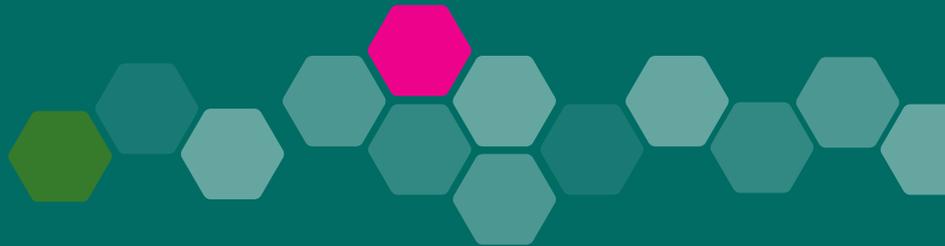
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