



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

20th November 2013

*William Powell AM  
Chair of the Petitions Committee  
National Assembly for Wales  
Cardiff Bay  
Cardiff  
CF99 1NA*

Dear William Powell AM,

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

I write in relation to P-04-445, entitled '*Save our Welsh cats & dogs from death on the roads*', which is currently being considered by the National Assembly for Wales' Petitions Committee.

RSPCA policy states that no technical device should be used (or offered for sale) where an animal can be subjected to a painful stimulus at the direct instigation of a human or where a painful stimulus is delivered as a result of an animal's action from which it cannot retreat.

The RSPCA also has a very strong position against the use of training aids which are based on the principles of applying an unpleasant stimulus to inhibit unwanted behaviour.

We are, therefore, deeply concerned by any proposals to remove the ban on electric collars linked with invisible boundary fencing or hidden fencing, as proposed by P-04-445. We also believe that such discussions are untimely.

The report from the Companion Animal Welfare Council, referred to during the Committee's deliberations, argues that there is no scientific evidence that these boundary fence systems necessarily cause any welfare problems, nor is there a compelling argument to believe that this should be the case. However, the report also states there is a lack of conclusive scientific research concerning the welfare implications of the use of Electronic Pulse Training Aids. Such conclusions about boundary fence systems, therefore, appear premature.

We would suggest that the lack of evidence in relation to welfare problems relate primarily to a shortage of research. Committee members will be aware that the University of Lincoln is presently undertaking research in this field, and we hope

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**Chris O'Brien, Public Affairs Manager**

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**RSPCA Cymru**

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Patron HM The Queen

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their deliberations will encourage further, informed debate on this important issue.

Certainly, existing evidence has highlighted many of the negative consequences concerning the use of boundary fence systems. The Association of Pet Behaviour Counsellors (APBC), for example, found additional behavioural problems in animals subject to such systems. Suitable alternatives which pet owners can use have been highlighted by the APBC.

Invisible boundary fencing systems support a form of aversive training which inhibits unwanted dog or cat behaviours by applying an unpleasant stimulus. We are concerned that legalising such systems in Wales could encourage poor practices in animal training and ownership, which could have negative consequences for an animal's welfare and which may cause pain and fear, as well as other behavioural problems, including aggression.

RSPCA Cymru hugely welcomed the decision to introduce the Animal Welfare (Electronic Collars) (Wales) Regulations 2010, which included the ban on devices which administer an electric shock to pets to stop them getting too close to a defined boundary. We are concerned that a reversal of any such ban, particularly given the lack of conclusive evidence, could be a backwards step for animal welfare and, more broadly, lead to irresponsible pet ownership and a prevalence of ineffective, aversive approaches to animal training. We, therefore, presently support the view which the Welsh Government communicated to the Committee in February 2013 that no significant proposals have been brought forward to suggest changes to the legislation are warranted.

As ever, RSPCA Cymru would be very pleased to meet with you to discuss this or provide any further information which may be required.

Yours Sincerely,



**Chris O'Brien**  
**Public Affairs Manager, RSPCA Cymru**