

**SUBMISSION TO THE LEGISLATIVE SCRUTINY COMMITTEE**  
**15th Assembly | Legislative Assembly of the Northern Territory**  
**Regarding Serial 32: Animal Protection and Related Legislation Amendment Bill 2025**

**Submitted by:**  
Kayleigh Royle



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**Position on the Amendment Bill**

While I fully support the aim of the Animal Protection Act to uphold animal welfare and prevent cruelty, I hold serious concerns with certain aspects of **Serial 32 – Animal Protection and Related Legislation Amendment Bill 2025**, which proposes to:

- Prohibit the **use and possession** of prong collars (Section 31A), and
- Regulate e-collars by **excluding remote-controlled devices from permitted use**.

These changes, particularly the **strict liability offences** and **blanket bans**, do not adequately consider the complexity of dog behaviour, nor the **rights and liberties** of individuals who rely on these tools, using them in a responsible and ethical manner.

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**Key Points and Recommendations**

- **I oppose the blanket ban** on the possession and use of prong collars and certain e-collars as proposed in the amendment bill.
  - **I support regulated use of these tools** under the guidance of certified professional trainers.
  - The bill, as currently drafted, may **infringe upon the rights and liberties** of certain individuals, especially the elderly, disabled, and owners of dogs with unique behavioural needs. **Reduce the effectiveness of behaviour modification for complex cases** (e.g. reactivity, aggression, strength-based pulling),
  - I recommend **amending** the bill to allow restricted, professional-supervised use rather than prohibition.
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## Relevant Considerations under Committee Terms of Reference

### Natural Justice and Fair Process

- A strict ban on prong collars **without exceptions or review mechanisms** removes the ability for owners to explain or justify their use.
- Many owners use such tools **under professional guidance** to avoid more aversive methods or unnecessary euthanasia.
- Transferring control from **certified professionals** to administrators who are unfamiliar with individual training contexts, making complex training decisions a matter of legislation, rather than professional judgement.

### Reverse Onus of Proof

- Strict liability offences leave no room for context. An elderly or disabled owner in possession of a tool prescribed by their trainer could be **penalised unfairly**.
- Under the new amendments, the penalty for owning a prong collar will be 10 penalty point resulting in a total fine of \$1890.00. Using the prong collar will be 20 penalty points a fine of \$3780.00. Owning a prong collar and using collar would be a total fine of \$5670.00. **These fine risks criminalising people** acting in the **best interest** of their animals and **their own safety as well as the safety of others**.

### Retrospective Impact on Rights and Liberties

- Owners who are currently using these tools in a lawful and responsible manner would be rendered non-compliant overnight, with no transitional period or licensing framework provided to support legal continuity.
- This abrupt change would not only affect owners but also have serious welfare implications for their pets. Dogs that are currently exercised safely and effectively with the assistance of these tools may be confined to their homes or backyards without alternative means of stimulation or exercise, leading to significant negative impacts on their physical and mental well-being.

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## Expert Input

Scientific evidence suggests banning specific tools without considering the context of use can lead to poorer welfare outcomes (Blackwell et al., 2012; Ziv, 2017). Effective behaviour modification depends more on **how a tool is used**, not merely **what** the tool is.

Renowned professional trainer **Michael Ellis**, founder of the Michael Ellis School for Dog Trainers, advocates for the **responsible and educated use** of tools like prong collars and e-collars in conjunction with **reward-based reinforcement**. In his own words:

**“Tools don’t abuse dogs — people do. The emphasis must be on education and timing, not banning tools that can help people communicate more clearly with their dogs.”**  
— *Michael Ellis*, quoted in *Canine Conversations* podcast, Ep. 12: “*Balanced Training Done Right*”

**“A prong collar, when used correctly, is far less likely to cause injury than a flat collar or a choke chain. The pressure is evenly distributed, and you can give very mild corrections that the dog clearly understands.”**  
— *Michael Ellis*, from Leerburg video: “*The Proper Use of Prong Collars*” (Leerburg Video)

**“The e-collar is not a tool for punishment. It’s a tool for communication — to reinforce known behaviours at a distance. We always pair stimulation with positive reinforcement.**  
— *Michael Ellis*, from the video: “*Michael Ellis Explains E-Collar Training*” ([YouTube, Leerburg](#))

Ivan Balabanov, founder of *Training Without Conflict*® (TWC) and two-time world champion dog trainer, advocates a **balanced, evidence-based training philosophy** that goes beyond purely force-free or positive-only methods:

“In today’s climate, where ‘force-free’ and ‘positive-only’ training dominate, TWC doesn’t shy away from difficult topics, advocating for the thoughtful and judicious use of every tool at a trainer’s disposal.”  
[dogtrainingoftampabay.com+15thebarmybeagle.com+15Reddit+15](#)

His approach is not about banning tools—it’s about using **science, timing, play, clarity, and communication** with each dog’s individual needs at the centre.  
[thebarmybeagle.comHappy Dog Training](#)

In his widely viewed Q&A “*How to Properly Use a Prong Collar*”, Balabanov describes appropriate fitting and strategic use:

**“A thoughtful use of prong collar can keep both dog and owner safe... used in leash walking scenarios.... with large strong dogs.”**  
[RUclips+1dogforums.com](#)

**In an Article by Melanie Benware, Trainer, Glen Allen – “The Benefits of Using the Prong Collar”**

Melanie Benware defends the responsible use of prong collars, countering widespread misconceptions about their function and design. Often misjudged based on appearance, prong collars are incorrectly assumed to be harmful or cruel. When used correctly, they offer a humane and effective training method—particularly for strong-pulling or reactive dogs.

The prong collar works by applying **even, self-limiting pressure** around a dog's neck, unlike choke chains (which tighten indefinitely) or flat collars (which exert constant pressure). This design reduces the risk of injury. Benware emphasizes that the collar is not about punishment, but about **clear, gentle communication** between handler and dog.

<https://holidaybarn.com/blog/the-benefits-of-using-the-prong-collar-melanie-benware>

Justin Rigney, a nationally recognized law enforcement K9 handler and professional trainer, offers informed, humane perspectives on the use of training tools such as prong and electronic collars. His approach emphasizes **clarity, communication, and canine engagement**, rather than force or punishment.

In a video published via K9 Services Unlimited, Rigney demonstrates the use of the **prong collar through “indirect pressure”**, stating:

**“Light prong taps happen at the end of the leash creating indirect pressure. The sweet spot is marked via clicker, followed by payment.”**

*(K9 Services Unlimited, TikTok)*

This reflects a **positive reinforcement-based methodology**, using the prong collar not for correction, but as a subtle tactile cue paired with reward-based learning.

Rigney also speaks extensively on **e-collar use** in the *Gun Dog It Yourself* podcast, underscoring that these tools—when properly introduced—serve as precise communication aids, not punitive devices. He emphasizes:

**“The e-collar is not just for brakes and corrections.”**

**“Dogs learn via tactile pressure and our intentions do not matter.”**

*(Gun Dog It Yourself Podcast, Ep. 283)*

These insights illustrate a professional standard of e-collar use rooted in **learning theory, consistency, and tactile communication**, not coercion.

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## Real-World Impacts on Owners and Dogs

- Many elderly and disabled people rely on remote-controlled e-collars and prong collars for mobility assistance or to manage strong dogs.
- Removing access to these tools may **prevent the elderly or disabled from exercising or enriching their dogs**, or worse, force them to rehome or euthanise animals they can no longer control safely.
- Many people use Global Position System (GPS) collars which is a training collar controlled by remote, to **track and locate** their dogs giving them **freedom to explore** on their properties or out walking off leash, **enabling** the dogs to have the freedom to move at their own pace rather than have the pace restricted by on leash walking.

- The GPS collar also gives the owner the **ability to recall the dog** using the remote control if the **owner sees a danger** the dog may be heading towards such as a buffalo or crocodile infested water.
  - Dogs with hearing impairment tactile feedback provided using a prong or e-collar.
  - Prong collars are often **less forceful** than flat collars when used for leash reactivity.
  - Removing access to these tools may **prevent certain dog from being exercised or enriched**, reducing their overall welfare and may cause them to be rehomed or euthanised as they can no longer be controlled safely.
  - I am a qualified Search and Rescue K9 handler the ban effects my dog and I training. I use both a prong collar and a training collar controlled by remote for training and deployment when searching for missing people.
  - If I cannot locate my dog on operation and he has found the missing person and is 100m from my location and I can not hear my dog due to external noise I may not be able to locate that person.
  - The prong collar has assisted my training for assessments on our capability to locate missing people.
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### **The Ban affects me personally in my dog's Search and Rescue training and deployment.**

I am a qualified Search and Rescue K9 handler the ban effects my dog and I by banning the tools we use to train to locate missing people. I use both a prong collar and a training collar controlled by remote for training and deployment purposes.

- If I **cannot locate my dog on operation** and he has found a missing person and is 100m from my location in high dense vegetation and I cannot hear my dog alert due to external noise e.g. helicopter, search buggy etc. **I may not be able to locate my dog and more importantly the missing person.**
  - The prong collar has assisted my training for assessments on our capability to locate missing people. This is a yearly process to ensure that we are deployable.
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## Recommendations

1. **Amend Section 31A** to allow the use and possession of prong collars by:
    - Certified professional dog trainers.
    - Dog owners using them under written guidance from a certified trainer.
  2. **Allow conditional use of remote-controlled e-collars** for:
    - Certified professional dog trainers.
    - Dog owners using them under written guidance from a certified trainer.
  3. **Consult widely with industry professionals** local and international as well as the community that would be impacted by these changes before legislating.
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## Conclusion

I respectfully urge the Committee to reconsider the **blanket prohibition** of training tools that are often misrepresented in public discourse. The focus should be on **education and regulation**, not outright bans that limit the rights of responsible owners and trainers, and risk worsening dog welfare in vulnerable cases.

A more balanced legislative approach would **better uphold the principles of animal welfare, individual liberties, and natural justice** as outlined in the Committee's terms of reference.

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### Kayleigh Royle

NT SAR K9 handler

- Foundation Skills Assessment in K9 Search and Rescue
- Cert 3 in Companion Animals Services
- Dog Psychology and Training Certificate
- Canine Nutrition and Health Certificate
- Rescue Dog Cognition and Rehabilitation Diploma
- Dogs for Motion Academy K9 Conditioning course

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