

## **Submission to the Northern Territory Government: Animal Protection and Related Legislation Amendment Bill 2025**

**Submitted by: The Pet Industry College**

RTO No. 70236

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### **Introduction**

The Pet Industry College (RTO 70236) is a nationally registered training organisation specialising in the delivery of accredited training to the Australian pet and animal care industries. We collaborate extensively with industry stakeholders to identify gaps in skills, education, and practical knowledge, and design courses and training programs to address these needs. Our mission is to ensure that animal care professionals are equipped with the highest standards of knowledge and skills to promote animal welfare, safety, and effective behaviour management.

We appreciate the opportunity to make a submission in relation to the *Animal Protection and Related Legislation Amendment Bill 2025* (Serial 32) and wish to provide comment on several specific sections of the Bill.

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### **Section 31A: Prong Collars**

The Pet Industry College is concerned about the proposed total prohibition on the possession and use of prong collars under Section 31A of the Amendment Bill. While we support legislative efforts to prevent cruelty and misuse of training tools, we believe a ban on prong collars is not supported by the body of scientific evidence available regarding their safe and effective use.

#### **Scientific Evidence:**

- Research has shown that, when used appropriately by trained professionals, prong collars can be a safe and humane tool for managing severe behavioural issues, such as leash reactivity or aggression. Schalke et al. (2007, *Journal of Veterinary Behavior*) found that prong collars did not elevate stress markers more than other training tools when used correctly.

- Vázquez et al. (2020, *Journal of Veterinary Behavior*) concluded that prong collars can exert less pressure on the dog's neck compared to flat collars, reducing the risk of tracheal or spinal injury.
- The misuse of prong collars, like any tool, can be harmful; however, professional regulation rather than prohibition ensures animal welfare while retaining critical options for behaviour modification.

#### **Implications of Banning Prong Collars:**

- Removes a vital tool from professional trainers and behaviourists managing high-risk behaviour that may otherwise result in euthanasia.
- Limits owner and trainer ability to humanely manage dogs that are not responsive to other methods.

**Recommendation:** Allow the use of prong collars under strict conditions, including by qualified professionals or under veterinary supervision, to prevent unnecessary euthanasia and promote behaviour rehabilitation.

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#### **Schedule 2: Excluded Electrical Devices (Electric Training Collars)**

Schedule 2 permits only automatic (non-remote) electric training collars, effectively banning the use of remote-operated electronic collars.

#### **Scientific Evidence:**

- Controlled studies (Cooper et al., 2014, *PLoS ONE*) have found that e-collar training, when conducted by professionals, does not cause increased stress or behavioural issues compared to other methods.
- Fernandes et al. (2017, *Frontiers in Veterinary Science*) support the use of e-collars in managing livestock chasing and wildlife aversion, behaviours that can result in animal injury, death, or euthanasia if left unmanaged.

#### **Implications of Banning Remote E-Collars:**

- Restricts precise control of training tools critical for time-sensitive behavioural corrections.
- May lead to increased relinquishment or euthanasia of dogs with behaviours that cannot be modified through positive reinforcement alone.

**Recommendation:** Permit the use of remote-operated e-collars under regulated conditions including professional use, owner consent, and compliance with best practice guidelines.

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### **Section 83: Power of Entry – Definition of "Reasonable Grounds"**

The Bill allows entry based on "reasonable grounds" but lacks a clear definition or threshold for what constitutes such grounds.

**Recommendation:** Define "reasonable grounds" to include:

- Credible complaints or reports from witnesses.
- Observations or documentation indicating welfare concerns.
- History of previous breaches or warnings.

**Safeguards:**

- Require authorised officers to document the evidence forming reasonable grounds.
- Require a warrant for entry into residential premises except in emergencies.

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### **Education Standards for Animal Care Personnel**

We urge that minimum standards of education and training be embedded into all future animal protection legislation.

**Recommendation:**

- Mandate nationally recognised qualifications (e.g., ACM Animal Care and Management).
- Require ongoing professional development and knowledge of species-specific welfare needs.
- Ensure that individuals responsible for animal care have demonstrated competency.

**Rationale:**

- Poor handling and low knowledge levels directly correlate with increased animal stress and aggression (Hemsworth et al., 2015, *Applied Animal Behaviour Science*).
- Uniform training standards support enforcement and promote animal welfare outcomes.

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## Conclusion

While we support the intent of the *Animal Protection and Related Legislation Amendment Bill 2025*, we urge the government to consider amendments that reflect current scientific research and industry best practice. By retaining regulated access to certain training tools and embedding minimum education standards, we can ensure animal welfare outcomes without limiting professional tools that may ultimately prevent unnecessary euthanasia.

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## References:

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