



International Association of Canine
Professionals (IACP)
201 Riverview Drive
Lampasas, TX 76550

November 8, 2022

VIA E-MAIL

San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 224
San Francisco, CA 94102-4689

**RE: Proposed Ordinance Banning the Use and Sale of Dog Training Shock
Collars in San Francisco**

Dear Supervisors,

We are writing to you on behalf of the International Association of Canine Professionals (IACP) regarding the proposed ordinance banning the use and sale of electronic collars in San Francisco. The IACP is a professional organization dedicated to the education, development, and support of dog training professionals worldwide and represents over 2,500 members on six continents, in 40 countries and all 50 US states, with dozens of active members in San Francisco. Our members consist primarily of dog trainers and canine behavior professionals, as well as veterinarians, professional breeders, kennel owners, groomers, avid canine competitors, etc.

We have worked with legislators domestically as well as internationally over the last 20 years and would be honored to work with you to help create realistic legislation that both protects the animals, creates an environment where business owners can succeed and increases the professionalism of the industry based on an understanding of canines.

On behalf of our organization and our membership, as well as the welfare of the animals, we respectfully urge the swift rejection of this proposed ordinance. As a professional association, we understand both the concerns of our members, your constituents, and the concerns of the city of San Francisco. We are well suited to assist in the development of professional standards to ensure the welfare of the animals in our care. Due to the complex nature of the field, we feel very strongly that the city would benefit by seeking the outside counsel of a diverse set of industry representatives before acting on this ordinance. Therefore, we would be grateful for the opportunity to have a representative from our organization be a part of any discussions in determining

the standards and requirements impacting dog care and training so that it may serve the intentions of the ordinance without placing unnecessary restrictions on professionals and thus, potentially limit their ability to serve their communities.

We understand that this proposed ordinance's intention is to enhance dogs' safety, however, you should be advised that this will have the opposite effect. The ban takes away a whole range of tools that have proven to be extremely safe and effective in training dogs, and will result in more incidents, more injuries to both dogs and humans, more pointless work for city staff, and more dogs being abandoned and/or euthanized.

We must begin by respectfully correcting the term "shock collar" that is being used. The language is misleading and is commonly used intentionally as a means of capturing the attention and securing the support of an audience by appealing to emotions above logical reasoning. The technology behind remote training collars is very similar to that of medical devices used by many qualified physical therapists to help reduce pain and muscle spasms caused by a wide range of conditions such as arthritis, endometriosis, sports injuries and is even used to alleviate labor pain. Transcutaneous Electrical Nerve Stimulation, (TENS), is a modality that uses electric current to activate nerves for therapeutic reasons. Much like the electronic collar, the TENS unit is highly adjustable, allowing the user to control pulse width, intensity, and frequency. Also, much like the electronic collar, the concept of the TENS throughout history has been the topic of debate within medical and scientific circles in regard to efficacy, however, because the benefits of this modality of pain management have been proven clinically, the machine continues to be utilized.

Physical injuries to the dog can only occur when the tool is misused, which is true of any tool. For example, a flat collar is the most common piece of equipment misused by dog owners and can cause a dog to choke or cause injury to the dog's trachea. The stimulation of an electronic collar cannot damage the dog's skin due to the high technology these collars now possess, the only injuries you see are typically caused by allergies to the metal and/or pressure sores from prolonged use and misuse of the tool itself. A scalpel in the hands of someone intending to do harm is a deadly weapon, but in the hands of a surgeon, it is a life-saving tool.

Electronic collars are used by tens of thousands of professional dog trainers and handlers all over the world. They are not cruel or inhumane and they are not about controlling dogs through fear and pain. They are simply part of a broad spectrum of tools, approaches, and philosophies informing dog training. Dogs are as unique and individual as people and there is not a one-size-fits all method of training dogs. Therefore, a canine professional must have the proper tools at his/her disposal to properly do their job for the benefit of both dog and owners.

Many countries like Scotland, Western Australia and Victoria have opposed an outright electronic collar ban. They believe that education and regulations are sufficient to ensure e-collars are used ethically and responsibly. New Zealand has no plans to ban

electronic collars since there already exists welfare laws prohibiting inflicting unreasonable or unnecessary pain or distress upon animals. Likewise, California Penal Code 597 is the statute that defines animal abuse and makes it a crime to neglect, harm, kill, or even overwork an animal making the proposed ordinance redundant and unnecessary.

(a) Anyone who intentionally maims, tortures, wounds, or kills an animal is guilty of a crime punishable by imprisonment in a California state prison, a fine \$20,000, or both, or up to one year in a county jail.

Electronic collars are not used solely for training pet dogs. There is a wide variety of dog training specialties that require the reliability electronic collars offer. Some examples include, but are not limited to, law enforcement K9 training, service dog training and snake aversion training.

Furthermore, there exists a large population of elderly and physically compromised individuals who benefit greatly from having a dog that has been trained using an electronic collar. Were it not for the ability to use an electronic collar, those individuals would otherwise have to relinquish their dog due to their physical limitations. The remote collar allows these dogs and owners to live a full life. A person in a wheelchair can exercise their dog in an open field knowing their dog will have the ability to have impeccable recall.

Research studies are cited selectively by opponents of electronic collars to support their claims often with insufficient appreciation of the quality of experimental design or with a biased evaluation of evidence, such as the multiple possible interpretations of isolated behavioral indicators of welfare. The reality is that there is very little independent robust, repeatable research and a body of real-world prosecutions to corroborate claims that electronic collars pose a proven, realized threat to canine welfare.

If this ban passes, it will no doubt financially impact many small business owners in the community. This is of particular significance in the post-COVID environment, where people are trying to get back to work and thrive. This ordinance would create a barrier to people with a passion and aptitude for entering the canine professional industry.

As dog lovers, we all want the same thing: safe, humane, and effective training methods, ensuring our dogs are happy, healthy, and well-behaved both at home and in public. Electronic collars are humane and a proven option in this regard when used by a trained professional. We believe humane training of dogs begins with appropriate academic preparations for professionals. Education among dog trainers and the community will ensure the safety of families and mostly the welfare of dogs. We would appreciate your personal commitment to seeing that this matter is revisited so that together we create a better standard for dog training that applies to real life scenarios.

In closing, the IACP does not support inhumane or unethical training. As an industry leader, we recognize the need to protect animals, after all our motto is "In Safe Hands". We urge when these matters are considered that you reject the proposed ordinance as currently written for the sake of the dogs, and the ability of professional dog trainers to train dogs properly and effectively. Please allow for consultation with industry professionals and the community before moving forward.

Thank you, in advance, for your consideration in this matter.

Respectfully,



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cc: San Francisco Commission of Animal Control & Welfare