

Promoting responsible dog ownership in Scotland: microchipping and other measures

CONSULTATION QUESTIONNAIRE

Sector

Which of the following best describes you? (Please tick whichever option applies)

- A dog owner
- A dog breeder
- An animal welfare organisation/rescue
- A local authority
- Other British Veterinary Association & British Small Animal Veterinary Association

Comments:

The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and has over 14,500 members. Its primary aim is to protect and promote the interests of the veterinary profession in this country, and it therefore takes a keen interest in all issues affecting the veterinary profession, be they animal health, animal welfare, public health, regulatory issues or employment concerns.

The BVA's Scottish Branch brings together representatives of the BVA's territorial and specialist divisions, government, academic institutions and research organisations in Scotland. The Branch advises BVA on the consensus view of the Scottish members on Scottish and United Kingdom issues.

The British Small Animal Veterinary Association (BSAVA) exists to promote excellence in small animal practice through education and science. It is the largest specialist division of the BVA representing over 9,000 members, including approximately 500 in Scotland, the majority of whom are in general practice and have an interest in the health and welfare of a wide range of small animals.

Current situation in Scotland

1. Are all, some or none of the dogs/puppies in your care already/routinely microchipped? Please explain. (Please tick whichever option applies)

All Some None Don't know N/A

Comments:

Neither the BVA nor the BSAVA have dogs/puppies in our care, however our member veterinary surgeons and veterinary nurses will be responsible for microchipping a significant number of dogs/puppies with the fee set by each veterinary practice independent of the BVA and BSAVA.

Estimates from BSAVA members in Scotland indicate that between 25-50% of their canine patients are microchipped. This is comparable with data from Vetcompass <http://www.rvc.ac.uk/VetCompass/Benchmarking.cfm> and SAVSNET <http://www.savsnet.co.uk/demographics-2/>.

2. Do you offer a microchipping service to the general public? If you do, what geographical range do you cover, how many dogs did you chip in Scotland in 2012 and how much do you charge? Please explain your answers.

Yes No N/A (Please tick whichever option applies)

Number:

Neither the BVA nor the BSAVA have dogs/puppies in our care, however our member veterinary surgeons and veterinary nurses will be responsible for microchipping a significant number of dogs/puppies.

Fee: Consultation with BSAVA members indicate that charges for microchipping vary from £10 - £30

Comments

3. If you run a rescue/rehoming centre, do you ensure that all, some or none of the dogs are microchipped prior to rehoming? How many dogs did you microchip/arrange to be microchipped in 2012? How many dogs came to you in 2012 that were already microchipped? Please explain your answers.

All Some None N/A (Please tick whichever option applies)

Number microchipped in 2012:

Number arriving microchipped in 2012:

Comments:

Potential benefits of compulsory microchipping

4. Do you consider that compulsory microchipping would help to make dog owners more responsible? Please explain and provide any evidence that you may have.

Yes No Don't Know (Please tick whichever option applies)

Comments:

We believe that the primary purpose of microchipping is to enable lost, stolen or stray dogs to be reunited with their owners/registered keepers. Microchipping and registration can also help promote responsible ownership as owners can be readily identified. We support

compulsory microchipping and registration of all dogs as a permanent means of identification.

Microchipping and registration enables:

- Lost, stray and stolen animals to be returned to their owners more rapidly
- Owners to be contacted more quickly in the case of injury to their dog so that veterinary treatment can be agreed and undertaken promptly
- Health test results to be correctly attributed to an individual animal
- Tracing of animals to their breeder helping to reduce the problems associated with unregulated breeders and providing accurate information on inherited diseases
- Population data regarding companion animals to be collected allowing more accurate prevalence data to be calculated
- Tracing and identification of animals in the event of a disease outbreak, such as rabies
- the owner of the animal to be identified which may help to promote responsible pet ownership
- the breeder of each dog to be identified and therefore it may help to promote more responsible breeding practices

Northern Ireland has already introduced compulsory microchipping and England and Wales are about to do so. If Scotland were to fail to introduce compulsory microchipping this would lead to practical difficulties regarding free movement of dogs between the countries and problems of enforcement, particularly for those living / working in the Borders.

5. Do you consider that compulsory microchipping for dogs would help to deter dog theft? Please explain and provide any evidence that you may have.

Yes No Don't Know

(Please tick whichever option applies)

Comments:

Dog theft is a relatively uncommon but apparently increasing phenomenon. Recent research has suggested that young dogs of small breeds are most likely to be stolen

<http://www.bbc.co.uk/blogs/5live/posts/Dogs-stolen-from-gardens-homes-cars>

Compulsory microchipping would significantly increase the proportion of dogs that are microchipped which will enable stolen dogs to be identified and ownership to be determined.

Once microchipping becomes the norm it will be significantly more difficult for stolen dogs to be sold on as the seller will need to transfer ownership to the purchaser, failure to do so may alert everyone to the fact that the dog was not legitimately obtained. It should be remembered that microchip identification is permanent and invisible and removing an implanted microchip can be technically demanding, even for a veterinary surgeon.

Therefore once a high proportion of dogs are microchipped this is likely to act as a deterrent to dog theft.

6. Do you consider that compulsory microchipping for dogs would help to tackle the issue of puppy farming? Please explain and provide any evidence that you may have.

Yes No Don't Know

(Please tick whichever option applies)

Comments:

Providing that microchipping and first registration are required to be carried out before first transfer of ownership this would enable the breeder of the dog to be ascertained.

Providing enforcers such as Local Authorities have access to this information from the databases they would be able to trace the source of puppies which were the subject of complaints or welfare concerns.

Data on puppy registrations would also enable enforcers to establish how many puppies were being registered by a breeder and whether this correlated with their licence conditions.

7. Do you consider that compulsory microchipping for dogs would help to address other dog welfare issues, such as abuse/mistreatment? Please explain and provide any evidence that you may have.

Yes No Don't Know

(Please tick whichever option applies)

Comments:

While compulsory microchipping and registration themselves will not prevent animal welfare problems the knowledge that the owner / registered keeper is easily identifiable may act as a deterrent to some and will make enforcement easier.

8. Do you consider that compulsory microchipping for dogs would help to prevent dog attacks on people/animals, including on assistance dogs? Please explain and provide any evidence that you may have.

Yes No Don't Know

(Please tick whichever option applies)

Comments:

Microchipping and registration will not themselves directly prevent dog attacks on people / animals although the knowledge that responsibility for the dog can be traced back to the owner / registered keeper may have an indirect effect by encouraging more responsible ownership.

Reduction in dog attacks will depend on the appropriate education of dog owners regarding the correct way to train and handle their dog, and the appropriate breeding and socialisation of dogs to ensure that they are suitable for living and interacting with people and other animals.

Potential challenges of compulsory microchipping

9. In the long term, the compulsory microchipping of dogs may require all owners to pay to microchip their dogs and to update their details on the commercial database that their dog is registered on. Do you think this would be an unfair burden on any particular sectors? Please explain.

Yes No Don't Know (Please tick whichever option applies)

Rehoming/sanctuary charities

Individuals in receipt of benefits

Other

Comments:

The cost of microchipping is very small in relation to the overall costs of responsible dog ownership and should therefore be met by the owner. For genuine hardship cases, this could be subsidised by large charities. Many charities already offer discounted or free microchipping and veterinary practices may also include microchipping as part of a wider package of healthcare measures. These costs should be balanced against the decreased cost of reunification, which would be easier and quicker if compulsory microchipping was introduced.

As noted above, most vets will charge between £10 and £30 for microchipping.

There will need to be controls so that the fees charged by databases to update details are reasonable and reflect costs.

In relation to animal welfare/re-homing centres we believe that the measures should reduce costs in terms of being able to re-unite strays more easily, but could lead to an increase in abandoned dogs when legislation is introduced. Charities that provide subsidised microchipping could be subject to increased costs in the short term, but these should decrease in the long term, with fewer dogs needing microchipping. Rehoming organisations in the UK currently spend an estimated £16.4 million caring for and kennelling stray dogs after the statutory 7 days and some charities spend an estimated £176,660 on putting stray dogs to sleep¹.

10. When a microchipped animal changes ownership, the registration details on the database must be updated for microchipping to be effective. If microchipping was to be made compulsory, with whom should this responsibility lie: The seller, the buyer,

¹Microchip Alliance Compulsory Microchipping Briefing
http://www.bva.co.uk/public/documents/compulsory_microchipping_briefing.pdf

or both? Please explain why and how you consider that the requirement could be enforced?

Seller Buyer Both Don't Know (Please tick whichever option applies)

Comments:

We believe that responsibility should lie with the seller/previous owner, as they will be the only party authorised to change the details on the database. Although there will need to be procedures in place for strays etc, so that they can have their details reallocated. The seller/previous owner should register that their dog has been sold (with as much detail as they can provide) and it may be appropriate for the buyer to contact the database to provide their full contact details, and ideally their local vet's details. We have previously suggested something along the lines of a Car Registration Certificate, where both buyer and seller have parts to complete. The buyer's parts could then include all relevant contact details.

It should be noted that not every transfer of ownership will involve a buyer and seller and this should be considered when drafting new legislation.

As any database is only as good as the information it contains, there should be a penalty for not updating details within a reasonable time frame. This penalty should be enforced and compliance monitored.

11. Are you aware of any difficulties due to different microchip companies using different technical specifications regarding scanners etc.? Please explain.

Yes No Don't Know (Please tick whichever option applies)

Comments:

Yes, we are aware of animals that have been imported which have microchips that are not compliant with the scanners commonly used in the UK. The Microchip Advisory Group developed a Code of Practice for microchips which stated that all microchips intended for companion animal and equine markets should meet ISO standards 11784 and 11785, FDX-B type. It is important that microchips comply with these standards and must operate at 134.2KHz.

The readers used for companion animals in the UK read FDX-B microchips as described in the standards

However it will be necessary for the authorities to consider what action will be taken if an animal is presented with a non-FDX-B chip.

It should also be noted that around the world various sites are used for implanting a microchip. An international standard is being developed to cover this which is at the DIS stage DIS15639-1.2. This standard lists two sites for use in the dog - 1) left side of neck and 2) between the scapulae. It is important that any UK legislation refers to this standard and specifies site 2). Much of the rest of Europe uses site 1) and it will be important to ensure that vets trained in Europe and working in Scotland know that the site is different in the UK.

12. Do you think that any regulation being introduced on microchipping should set

minimum standards for commercial databases? Why, and if so what should they be?

Yes No Don't Know

(Please tick whichever option applies)

Comments:

We agree that any regulation introduced on microchipping should set minimum standards for commercial databases to ensure harmonisation and maintain confidence in the system. We currently recommend that manufacturers of identification microchips, suppliers and database operators should comply with the Codes of Practice drawn up by the Microchip Advisory Group (MAG) and now adopted by the Microchip Trade Association (MTA).

We feel that a single point of entry to the database system is essential and that this should form a requirement to be included in any minimum standard for commercial databases. If there is not a single database/point of contact, at the very least databases should be able to provide contact details for the appropriate database. Access to the data in the database must be available 24 / 7 by phone and internet

With the increased number of animals travelling in Europe, it would also be sensible for them to be required to register/share data with the Europetnet database.

Finally, it is vital that all microchip implanters are adequately trained.

13. Presently, the dog owner, the microchip implanter, and some animal welfare organisations are able to access current database records, but only enforcement authorities are able to see previous records. Do you think this should remain the same? Please explain.

Yes No Don't Know

(Please tick whichever option applies)

Comments:

In general, although it may be appropriate to allow others e.g. approved researchers, access to the data for research reasons, for example research on demographic data or breed related problems.

The same level of access as to car registration details might be appropriate if a similar system is adopted.

14. Do you believe that compulsory microchipping would be easy or difficult to enforce effectively? Why? Can you suggest what approach to enforcement would be most appropriate?

Easy Difficult Don't Know

(Please tick whichever option applies)

Comments:

As it is not possible to determine whether a dog is microchipped without scanning, enforcement is likely to be confined to dogs which come to the attention of the authorities for other reasons – straying / requiring a Dog Control Notice or animal welfare concerns.

We would suggest that a similar approach to enforcement is adopted as the one Defra has proposed:

1. Primary responsibility for enforcement to rest with local Authorities but police and secretary of state would have powers too in case of need.
2. To be light touch with the emphasis on achieving compliance, concentrating on irresponsible owners.
3. Notices to be served in first instance requiring compliance (e.g. to microchip and register, update records, stop implanting until (re)trained, stop supplying microchips until ISO tested etc.

Readers must be widely available to dog wardens, dog associated charities and police. They must all be trained in how to use them and must have easy access to the database 24/7. Enforcement must be adequately resourced in terms of finance and personnel.

15. Do you have any concerns that microchipping could cause health problems in dogs? Please explain.

Yes No Don't Know

(Please tick whichever option applies)

Comments:

While there have been concerns about microchips causing health problems current evidence suggests that the risks are very low and are significantly outweighed by the benefits.

As noted above is important that any microchip implanter is properly trained.

The Microchip Advisory Group has collected data on adverse reactions involving microchips since 1996 and during that time has received reports of 24 cases of infection, 2 cases of mis-implantation and 3 tumours, believed to be as a result of microchip implantation.

There are also a small number of reports of tumours at the site of microchip implantation in dogs and cats in the peer reviewed literature including liposarcoma (Vascellari, Mutinelli et al. 2004) and fibrosarcoma (Vascellari, Melchiotti et al. 2006; Daly, Saba et al. 2008; Carminato, Vascellari et al. 2011).

Vascellari and colleagues have been involved in the investigation of several possible microchip associated tumours in dogs and cats but despite being quoted in evidence by many of the anti-microchipping campaigns state in their most recent paper that *“Despite the huge number of microchips implanted annually in pets, the number of reported adverse reactions is limited; therefore, the use of microchips for pet identification should not be discouraged. However, veterinarians should be aware that tumours can develop at microchip sites, and owners should be educated to monitor these sites for long periods of time, in order to promote early detection as well as better definition of the incidence of tumours.”* (Carminato, Vascellari et al. 2011)

The WSAVA Microchip Committee concluded that the benefits of microchip implantation far outweighed the potential health risks.

It is expected that the Veterinary Medicines Directorate will be taking on responsibility for recording adverse reactions related to microchips.

Business impact

16. Do you believe that compulsory microchipping would have a positive or negative financial or other impact on owners, enforcement agencies, animal welfare organisations/rehoming charities, dog breeders, pet shops, microchip database companies? Please Explain.

Positive Negative Don't Know

Comments:

We have already commented on the impact that microchipping would have on individual owners and animal welfare/re-homing centres above in response to question 9.

In relation to the impact on dog breeders, we envisage that the costs of microchipping will be passed on to purchasers. Depending on the breed, most puppies fetch between £200 and £500, with some pedigree dog breeds fetching upwards of £1,000 per puppy. The PDSA Wellbeing Report 2011 gave an average cost of purchase as £215, with the lifetime cost of owning a dog between £16,000 and £31,000. The added cost of microchipping is unlikely to make much of a difference, considering these figures.

Microchip database companies may have to invest initially to ensure that they are able to deal with the increased number of registrations and able to update ownership details. However, having guaranteed income should make this possible.

Compulsory microchipping in Scotland

17. Do you believe that all dogs in Scotland should be microchipped? Why?

Yes No Don't Know (Please tick whichever option applies)

Comments:

We have long called for the microchipping and registration of all dogs to be made compulsory. Compulsory microchipping and registration is beneficial for animal welfare and responsible pet ownership for the reasons given above.

It is important to stress, that compulsory microchipping will be ineffective without a robust registration system that needs to be well regulated in any legislation along with a requirement for the owner/registered keeper to be responsible for keeping the details up to date. A central reunification mechanism for databases will need to be established to facilitate access through a single point of entry.

Compulsory microchipping should be introduced in Scotland to bring it into line with other countries in the United Kingdom.

18. Do you consider that any sectors of dog ownership (for example rehoming/sanctuary charities, police, armed services, security services, guide/helper dogs, vermin control, sheep dogs, or other sectors) merit exemption from any requirement to microchip? Why?

Yes No Don't know

(Please tick whichever option applies)

Comments:

Individual identification and registration of the details of the owner/registered keeper are useful for all dogs.

The costs of microchipping are very small in relation to the overall costs of dog ownership, and if there are sectors where costs are truly an issue it is more appropriate to look at ways of alleviating costs rather than providing an exemption from the requirements.

The only exemption from compulsory microchipping should be for animals where microchipping would present a risk to their health, although such cases would be extremely rare and we are unable to identify any examples where this might be the case. Exemptions should be certified by a veterinary surgeon.

Where any exemptions exist they provide a potential loophole for someone to claim that their dog is exempt which would involve the enforcement authorities in extensive checking.

19. Which of the suggested options for introducing any requirement for compulsory microchipping do you believe would work best? Do you have an alternative option to suggest? Please explain.

(Please tick whichever option applies)

- 1. Status Quo
- 2. All puppies born after a specific date should be microchipped
- 3. All dogs microchipped on transfer of ownership
- 4. Two-phase approach over 2 years
- 5. Microchipping of all dogs within one year of legislation coming into effect.
- 6. Other

Comments:

We support the microchipping of all dogs after a certain period (e.g. a year from the introduction of the legislation) or option 5 in the consultation. This is likely to make enforcement easier. We further advise that puppies should be microchipped and registered before the first change of ownership such that the breeder is the first registered owner. This will provide transparency regarding the puppy's origin.

Microchipping dogs on transfer of ownership only would be difficult to enforce as it will be difficult to ascertain whether or not an animal had a previous owner.

Microchipping all puppies born after a specific date would be problematic as it would mean that it would be 10-12 years before the legislation is fully effective (i.e. all dogs are microchipped) meaning that the full welfare benefits will not be realised until this time. It will be difficult to enforce as it is hard to accurately estimate the age of an adult dog and therefore whether or not it should have been microchipped.

Other possible measures to promote responsible dog ownership

20. Do you think a system of dog licensing could help encourage responsible dog ownership and help make our communities safer from dangerous and out of control dogs? Do you have views on how such a dog licensing scheme might operate?

Comments:

BVA agrees that a compulsory microchipping scheme is currently the preferred alternative to a dog licensing scheme, which would potentially create unnecessary bureaucracy and expense for local authorities and could act as a barrier to dog ownership for vulnerable groups. BVA remains to be convinced that funds from a licensing scheme could be adequately ring-fenced to provide for dog welfare initiatives.

Compulsory microchipping, backed up by an enforced registration process is much more effective than licensing.

21. Do you think muzzling of dogs while in public should be introduced?

Comments:

Whilst muzzling is an option to be used in the short term in individual circumstances if a dog has been exhibiting aggression towards humans, keeping a dog muzzled or on a lead all the time in public is likely to reduce its ability to show a normal range of behaviours. We therefore do not think that muzzling all dogs in public is an appropriate intervention for a number of reasons.

- The majority of dogs are not aggressive towards people or other animals
- Muzzling may have welfare implications for the dog
- Muzzling may induce a false sense of security and avoid addressing the underlying problem of socialisation or dog control.

Muzzling is most likely to be used where a dog is showing aggression and there are public safety concerns. Requiring muzzling in certain places and at certain times may reduce the risk of biting, but it does not address the underlying motivation for the aggressive behaviour. As aggression is almost invariably in response to something the dog finds threatening, understanding the motivation and implementing a specific treatment plan to resolve the behaviour problem is important both for long term safety and the dog's welfare. Aggressive behaviour can also be a response to an underlying medical problem and so it is important that the owner consults with a vet first to rule this out.

Muzzling should only be used in dogs where the risk of undesired behaviour remains during or despite rehabilitation training.

22. The Dog Fouling (Scotland) Act 2003, gives local authorities the powers to deal with dog mess

Are you aware that local authorities have these powers?

Yes No Don't know (Please tick whichever option applies)

Do you think they are being used effectively in your area?

Yes No Don't know (Please tick whichever option applies)

Is there more you think can be done to address this issue effectively?

Yes No Don't know (Please tick whichever option applies)

Comments:

Although most of BSAVA's members responded that they were aware that the local authorities had powers under the Dog Fouling (Scotland) Act 2003 they did not feel that they were being used effectively and thought that more could be done.

Any other comments

23. Do you have any other comments on the possible introduction of compulsory microchipping for dogs in Scotland?

Microchipping itself does not address issues of responsible ownership, but allows owners/registered keepers to be traced provided registration is correct and database details are kept updated. Therefore, it is important to ensure that all references to microchipping refer to microchipping and registration.

With the introduction of compulsory microchipping and registration in England and Wales (as well as Northern Ireland where it is already compulsory) the failure of Scotland to introduce compulsory microchipping would produce difficulties, especially for enforcement agencies close to the Border.

24. Do you have any other comments on the promotion of responsible dog ownership in Scotland to help improve the safety our communities from dangerous and out of control dogs?

Responsible dog ownership requires education of the public and potential dog owners which should include the following

- The responsibilities of dog ownership and the need to provide for the animal's welfare needs
- Understanding the costs of dog ownership – in terms of regular (food, grooming, preventive healthcare) and variable (kennelling, veterinary fees) costs

- Selecting an appropriate dog
- Choosing an appropriate source for the dog(reputable breeding or rehoming centre)
- The questions to ask to ensure that the dog is healthy and well socialised
- Socialisation and training of the dog

This education should ideally start in schools and be available to all through websites and other media.

There is already a wide variety of resources available, e.g.

<http://www.peteducationtrust.com/>

<http://www.dogadvisorycouncil.com/puppy/index2.html>

<http://www.pdsa.org.uk/pet-health-advice/your-right-pet>

<http://www.thekennelclub.org.uk/getting-a-dog-or-puppy/>

<http://www.scottishspca.org/education>

<http://www.rspca.org.uk/allaboutanimals/pets/dogs>

<http://www.dogstrust.org.uk/rehoming/searchcentres/default.aspx>

The BVA and BSAVA support Dog Control Notices as a method of enforcement to encourage responsible dog ownership, however we are concerned about the low numbers issued in relation to the number of investigations carried out and would suggest that some research into the reasons for this are carried out. Appropriate owner education should also be required when Dog Control Orders are issued.

25. Do you consider that the consultation paper explained the key issues sufficiently for you to properly consider your responses?

In general yes although there are a few points raised in the consultation paper that are not addresses in the response proforma e.g. page 9 refers to a suitably trained person implanting the microchip but no information is given on what level of training is considered suitable.

26. Do you consider that you had sufficient time to respond to the consultation?

Yes 12 weeks was sufficient to respond although bringing out a consultation between Christmas and New Year decreased the time available for the consultation.

27. Do you have any other comments on the way this consultation has been conducted?

