

Joint BVA, BVNA, BSAVA and SPVS response to the Defra and APHA call for evidence on cat microchipping in England

4 January 2020

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. The British Veterinary Nursing Association (BVNA) The BVNA is the largest membership body of veterinary nurses in the UK with over 6,000 members. It is also the official representative body for veterinary nursing in the UK. In addition to support for its Membership, key activities of the BVNA include an Annual Congress in October and a wide range of accredited CPD courses, including online seminars. The BVNA also publishes the VNJ (Veterinary Nursing Journal).
3. The British Small Animal Veterinary Association (BSAVA) exists to promote excellence in small animal practice through education and science and is the largest specialist division of BVA representing nearly 10,000 members.
4. The Society of Practising Veterinary Surgeons (SPVS) is the division of the BVA with a primary focus on matters concerning vets in practice and the practices where they work. SPVS is a not-for-profit organisation for professionals within the veterinary industry. SPVS promotes responsible leadership by providing tools and resources that enable members to develop and expand their business and leadership skills.
5. We welcome the opportunity to contribute to this call for evidence on cat microchipping. We recognise that the microchipping of cats has the potential to improve animal welfare and promote responsible ownership. We therefore support the microchipping of cats as a safe, effective, and permanent way to identify individual animals, as well as a way to facilitate the quick identification of lost pets if requiring veterinary treatment, and reunite lost pets with their owners.
6. However, we currently have concerns and reservations which we would recommend are addressed before the compulsory microchipping of cats is introduced. We note that the rationale for introducing the compulsory microchipping of dogs - to ensure public safety, to prevent nuisance and to control stray dogs - does not apply to the same extent, or in the same way, to cats as free roaming animals, or their owners.¹ Any proposed legislation to introduce compulsory microchipping for cats must therefore be clear in its aims, what public or animal welfare issue it is trying to address and how it will be enforced.
7. It is also important to recognise the difficulties of implementing compulsory microchipping legislation for feral, or wild living, domestic cats who have no identifiable owner. We therefore question the potential effectiveness of a compulsory microchipping strategy for all cats.
8. Crucially, before considering the introduction of compulsory microchipping for cats, we must address, and learn from, the issues that are currently preventing the effective implementation of the Microchipping of Dogs (England) Regulations 2015. These include:
 - Ensuring the consistent communication of the responsibilities of keepers, new keepers, vets and local authorities to be clearly and consistently communicated to all stakeholders, including encouraging owners to make sure that their contact details are up to date. See

¹ [Cats and the Law: A plain English guide](#),

Annex A for our view on the role of vets in helping to reunite lost, and sometimes stolen, animals with their owner;

- Establishing a central microchipping database, or a single point of entry to query the existing multiple real-time databases that currently exist.

Advantages and disadvantages of the compulsory microchipping of cats

Potential benefits

9. We recognise the advantages of microchipping as a safe, effective, and permanent way to make sure that lost pets can be reunited with their owners. The ability to individually identify owned cats and trace the owner has the potential to improve animal welfare and promote responsible ownership by enabling:
- Lost, stray and stolen cats to be returned to their owners more rapidly;
 - Quicker identification of injured cats meaning that owners are contacted more quickly for veterinary treatment to be agreed and undertaken promptly;
 - Quicker and more accurate identification of dead cats and notification to owners;
 - Health test results to be correctly attributed to an individual animal;
 - Population data regarding cats 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;
 - Reinforcement of responsibilities of the owner under the Animal Welfare Act;
 - Easier detection of cat theft;
 - Easier identification and subsequent arrest of owners culpable of animal cruelty;
 - Reduces potential for fraud at cat shows.

Resolving current issues with the Microchipping of Dogs (England) Regulations 2015

10. Fragmentation of databases

We note under the current compulsory dog microchipping legislation there is currently a total of 14 national databases with which pet owners can choose to register their animals. These databases do not currently share their data with each other, nor is there a central database.

11. Our 2017 Voice of the Veterinary Profession survey revealed that where attempts by vets to reunite stray dogs with their owner failed it was either because there was no identifying microchip or collar/tag (50%) or the information held on the microchip database had not been kept up to date (44%).
12. This is a growing issue, which threatens one of the key aims of compulsory microchipping – to help reunite lost dogs with their owners. Although [Check-a-Chip](#) helps to identify which database holds the registration for a particular microchip number, it is not a central database.
13. For veterinary practices, cross-checking with such a large number of databases is an administrative burden which challenges already stretched vets and vet nurses, whose limited contact time with their clients and patients is better spent providing preventative healthcare advice.
14. Individual pets can be registered on more than one database leading to heart-breaking ownership disputes. We are therefore concerned that this situation would be replicated with the compulsory microchipping of cats. We would like to see one central UK microchip database. However, we recognise that this is increasingly unlikely given the proliferation of commercial databases in recent years. Before the introduction of compulsory microchipping of cats is considered, these issues must be addressed. We are calling for:

- All existing and future commercial microchip databases to register with [EuroPetNet](#). Petlog is currently the only UK database to be registered².
- Improved enforcement in relation to those databases which do not meet government standards.
- Exploration of the potential for setting up a single point of entry to query existing multiple real-time databases. The facility to enter a microchip number into a single web-based portal that could check all microchip databases would minimise the need for a manual search, increasing efficiency and protecting commercial interests.

15. Lack of clarity regarding responsibilities

In order for the compulsory microchipping of cats to be effective in its aims, roles and responsibilities under any legislation it would need to be clearly and consistently communicated. However, we note that in regard to the Microchipping of Dogs (England) Regulations 2015, there is still a lack of clarity as to roles and responsibilities. Under the Microchipping of Dogs (England) Regulations 2015:

- It is the keeper's responsibility to ensure their dog is microchipped and registered on one of the authorised commercial databases.
- It is also the keeper's responsibility to keep their contact details up-to-date on the databases.
- Where a dog is transferred to a new keeper, the new keeper must, unless the previous keeper has already done so, record their details and any change in the dog's name with the database on which the dog's details are recorded. Transfer of ownership will require relevant documentation to be completed and, in some cases, the presentation of a transfer code depending on the requirements of the database.
- Veterinary surgeons are obliged to scan a dog for a microchip before rabies vaccination and the issue of a pet passport, or before completing other official documentation that requires identification of the animal (eg official health screening tests).
- Veterinary surgeons should report an adverse reaction to microchipping, or the migration or failure of a microchip to the Veterinary Medicines Directorate (VMD) via their [online form](#)³.

See Annex A for more detail on the role of vets in reuniting lost and stolen animals with their owners

16. As part of this lack of clarity, there has been some criticism of the veterinary profession from campaigners for compulsory scanning. Unfortunately, such campaigns misunderstand the powers of vets and the potential welfare harms of compulsory scanning to both animals and humans (eg those fleeing with their pets from domestic abuse). In addition, there are practicalities and resource implications that require careful consideration (see para. 12 above and recommendations for vets outlined in Annex A.)
17. There remains work to be done to consistently and clearly communicate the responsibilities of keepers, new keepers, vets and local authorities under the Microchipping of Dogs (England) Regulations 2015 to all stakeholders. We would welcome opportunities to work with the government, competent authorities, and other stakeholders to achieve this, potentially by means of supporting a government-led awareness campaign.

Enforcement costs

18. Local authorities currently enforce the Microchipping of Dogs (England) Regulations 2015, and we would welcome further clarity as to who would enforce compulsory microchipping for cats, how this would be funded, as well as which personnel would carry out these enforcement duties and what

² <https://www.europetnet.com/member-organisations.html>

³ <https://www.rcvs.org.uk/setting-standards/advice-and-guidance/code-of-professional-conduct-for-veterinary-surgeons/supporting-guidance/29-microchips-microchipping-and-animals-without-microchips/>

these enforcement duties would look like (eg. would dog wardens be expected to carry out enforcement duties, and what training in cat health and welfare would be required?).

Cost to owners and breeders

19. The cost of microchipping may be considered a disincentive for some cat owners, although the cost is relatively small, with microchipping prices range approximately between £10 to £30. The cost includes the price of the microchip, implantation and registration on a relevant database. Further costs may be incurred if there is a need to amend the owner's details for which there is a small fee charged by the database. On some databases, owners can pay a fee for unlimited amendments to the database record for the lifetime of the animal.
20. The cost of microchipping implantation and registration is an extremely small share of the total cost of cat ownership, which ranges between £12,000 and £24,000 according to PDSA estimates. However, it could be perceived as a deterrent for potential new owners from low income brackets who would otherwise explore offering a good home to a cat or kitten. Pet ownership brings many benefits to society and consideration needs to be given to supporting all sectors of society whether by government or in partnership with charities. There are many support schemes which could provide a template for implementation.
21. Cat breeders and sellers may also have to meet the cost of microchipping before the point of sale or transfer. However, this could be incorporated into the cost of the cat/kitten.
22. Specific consideration would also need to be given to existing pet owners who do not have their cat microchipped at the point of introducing any new legislation requiring compulsory microchipping and how government can encourage compliance.

Implantation reactions

23. These can occur relatively soon after implantation and are commonly linked to the implantation procedure eg haematomas (bleeding under the skin) or infection (an abscess near the site or an infection spreading systemically, making the animal ill). On rare occasions, an animal may react to an implanted microchip, as with any foreign material introduced into the body, with an inflammatory response. These along with any evidence of infection or other pathology should be reported as adverse events. There are a very small number of reports of paralysis resulting from implantation into the spinal cord. Although these relate to problems with implantation technique rather than a problem with the microchip, these should also be reported. There have also been a very small number of cancers reported around the site of microchip implantation. Although these may or may not be related to the implantation of the microchip (c.f. feline injection site sarcomas, the prevalence of which is estimated between 1 in 1000 and 1 in 10 000 in the United Kingdom⁴ and microchipping will make up a small proportion of these injection sites) these should still be reported so that the VMD is able to collect accurate data on the incidence of these types of reaction.
24. It would be useful to request up-to-date data from the VMD on reported adverse events in cats.

Chip sizes and age of implantation

25. We would welcome further clarity as to whether if compulsory microchipping were to be introduced, there would be small chip sizes available for smaller kittens. We are aware that even with mini chips, the size of the needle for implantation can still damage soft tissue of smaller kittens. We would therefore welcome further clarity as to what the proposed age for microchipping kittens would be in any legislation. Anecdotal evidence from our members suggests that kittens are usually

⁴ Kliczkowska K, et al. Epidemiological and morphological analysis of feline injection site sarcomas. Pol J Vet Sci. 2015.

Available at: <https://www.ncbi.nlm.nih.gov/m/pubmed/26172181/#>

microchipped at second vaccination (12 weeks, when they are bigger and easier to handle), or at the time of neutering at 14-18 weeks.

One of the aims of compulsory dog microchipping is to reduce the public nuisance caused by stray dogs, and to ensure public safety. Defra is interested in evidence to understand how far and in what ways this issue also applies to cats.

26. As outlined in [Cats and the Law: A plain English guide](#), the law accepts that cats will follow their free roaming instincts, therefore owners are unlikely to be held responsible for any damage that their cat causes where it can be argued that it results from a cat's natural behaviour. Consequently, it is unlikely that compulsory microchipping would reduce potential nuisances caused by roaming stray cats.
27. It is also generally accepted that free roaming cats will cause less damage, and pose less of a threat to public safety, than stray dogs.
28. The rationale for introducing the compulsory microchipping of dogs - to ensure public safety, prevent nuisance, and control stray dogs - therefore does not apply to the same extent, or in the same way, to cats as free roaming animals.

How would microchipping apply to feral or wild cats who have no identifiable owner, or where ownership is not clear cut?

29. We recognise the difficulties of implementing compulsory microchipping legislation for feral, or wild living, domestic cats who have no identifiable owner. We therefore question the potential effectiveness of a compulsory microchipping strategy for all cats. To mitigate this, any compulsory microchipping strategy for all cats would need to be employed in conjunction with the promotion of overall responsible cat ownership, including promoting the health and welfare benefits of microchipping, neutering and vaccination to owners.
30. Further consideration could also be given to the use of [Trap-Neuter- Return](#) approach to manage feral cat colonies and reduce numbers in a humane manner over time.

Many of the microchipping databases that operate under the Microchipping of Dogs (England) Regulations 2015 already store information on cats and other pets. Evidence is requested on whether any scheme should continue to rely on the legal requirements placed on database operators under the 2015 Regulations, in addition to the controls on who can implant microchips and the adverse reaction reporting procedure.

31. We consider the current adverse reaction reporting procedure [and VMD Microchip Adverse Event Reporting Form](#) to be fairly straightforward. On our respective websites we signpost our members to the Veterinary Medicines Directorate (VMD)'s Microchip Adverse Event Reporting Scheme and in our guidance note [Compulsory microchipping of dogs: Additional guidance for vets](#) we provide further explanation as to what constitutes an adverse event/.

We would be interested to hear about your experiences with the current compliant microchip databases. What do they do well, and what could be looked at to improve the service?

32. See paragraphs 11-15. We would like to see one central UK microchip database. However, we recognise that this is increasingly unlikely given the proliferation of commercial databases in recent years. Before the introduction of compulsory microchipping of cats is considered, these issues must be addressed. We are calling for:

- All existing and future commercial microchip databases to register with [EuroPetNet](#). Petlog is currently the only UK database to be registered⁵.
- Improved enforcement in relation to those databases which do not meet government standards.
- Exploration of the potential for setting up a single point of entry to query existing multiple real-time databases. The facility to enter a microchip number into a single web-based portal that could check all microchip databases would minimise the need for a manual search, increasing efficiency and protecting commercial interests.

The PDSA estimate that 71% cats are microchipped. We would be interested to hear whether any individuals or organisations have other figures on the number of cats already microchipped.

1. In our most recent Voice of the Veterinary Profession Survey (October 2019) we asked companion animal and mixed practice vets "What percentage of the cats you see in practice would you estimate are microchipped?". 565 respondents indicated that on average 51.4% of cats they saw in practice were microchipped.
2. [VetCompass](#) demographic data indicated that 23% of cats are microchipped and [SAVSNET estimates that](#) around 40% of cats are microchipped. However, these figures are likely to be underestimates as they only reflect the number of cats on a veterinary practice database and will also not reflect unowned cats.

We would be interested to hear how the enforcement of any law making cat microchipping compulsory should be funded.?

3. We would welcome further clarity as to how enforcement of compulsory cat microchipping legislation would be funded and resourced. As part of this, it is important to reiterate that as with the Microchipping of Dogs (England) Regulations 2015, vets must not be expected to enforce compulsory cat microchipping legislation.
4. As outlined at **Annex A**, on admission to membership of the RCVS, and in exchange for the right to practise veterinary surgery in the UK, every veterinary surgeon makes a declaration:

"I PROMISE AND SOLEMNLY DECLARE that I will pursue the work of my profession with integrity and accept my responsibilities to the public, my clients, the profession and the Royal College of Veterinary Surgeons, and that, ABOVE ALL, my constant endeavour will be to ensure the health and welfare of animals committed to my care."⁶

5. With the declaration in mind, vets play a key role in helping to reunite lost, and sometimes stolen, animals with their owner. However, if the veterinary profession were required to play a role in enforcing owners' compliance with microchipping legislation this may cause negative unintended consequences for animal welfare by compromising the vet-owner relationship. This crucial relationship is based on trust and confidentiality and if compromised could act as a disincentive to accessing veterinary advice and care, ultimately impeding the profession's primary responsibility to protect animal health and welfare
6. In addition, the circumstances surrounding the individual cases which present themselves in veterinary practices are sometimes not clear cut and there will be a need for the vet to exercise their professional judgement, based on the information available to them. Vets must also operate within their powers, so cannot seize or hold a dog suspected as stolen, nor can they share confidential

⁵ <https://www.europetnet.com/member-organisations.html>

⁶ <https://www.rcvs.org.uk/setting-standards/advice-and-guidance/code-of-professional-conduct-for-veterinary-surgeons/>

ownership information as this would breach data protection laws and, in some circumstances, could put the animal, its owner, or its finder, at risk.

7. Options for funding could include ring-fencing any income generated by the proceeds of any financial penalties that might be included in any new legislation.

[Annex A: Extract from the BVA, BSAVA and SPVS policy position on microchip scanning \(dogs\) and microchip databases](#)

The role of vets

On admission to membership of the RCVS, and in exchange for the right to practise veterinary surgery in the UK, every veterinary surgeon makes a declaration:

" I PROMISE AND SOLEMNLY DECLARE that I will pursue the work of my profession with integrity and accept my responsibilities to the public, my clients, the profession and the Royal College of Veterinary Surgeons, and that, ABOVE ALL, my constant endeavour will be to ensure the health and welfare of animals committed to my care."⁷

With the declaration in mind, vets play a key role in helping to reunite lost, and sometimes stolen, animals with their owner.

Our Voice of the Veterinary Profession survey showed that in 2017 vets were seeing on average 4.1 strays each month, with 97% of practices attempting to reunite lost pets with their owners. Compared with reunification data gathered two years previously, one year before the introduction of compulsory microchipping, vets were seeing improved rates of reunification (68% managing it more than half the time, compared to 51% in 2015).

Where reunification attempts failed, most vets said it was either because there was no identifying microchip or collar/tag (50%) or the information held on the microchip database had not been kept up to date (44%).

However, the circumstances surrounding the individual cases which present themselves in veterinary practices are sometimes not clear cut and there will be a need for the vet to exercise their professional judgement, based on the information available to them. Vets must also operate within their powers, so cannot seize or hold a dog suspected as stolen, nor can they share confidential ownership information as this would breach data protection laws and, in some circumstances, could put the animal, its owner, or its finder, at risk.

There has been some criticism of the profession from campaigners for compulsory scanning. Unfortunately, such campaigns misunderstand the powers of vets and the potential welfare harms of compulsory scanning to both animals and humans (eg those fleeing with their pets from domestic abuse).

Where there is an ownership dispute or an animal is suspected stolen vets should follow the [RCVS 'Client confidentiality and microchipped animals flowchart'](#)

Note: If a member of the public finds a stray dog and cannot contact the owner, [they should report it to their local council](#).

Scanning for microchips

We recommend that veterinary practices should scan for a microchip under the following circumstances:

- **Prior to microchip implantation** – this helps to ensure that there is no other microchip present.

⁷ <https://www.rcvs.org.uk/setting-standards/advice-and-guidance/code-of-professional-conduct-for-veterinary-surgeons/>

- **On presentation of a lost, stray or apparently unowned animal** – this facilitates reunification with the owner when checked against the national databases, providing the owner has kept their details up-to-date.
- **On first presentation at the practice** – this ensures that the animal is correctly identified when checked against the national databases and serves as a useful reminder to the new client to ensure that they keep their details up-to-date. The microchip details should be recorded on the practice database – often lost pets are local to the practice and a check against the practice's own database can provide a quick solution.
- **Before travelling abroad** – this is to ensure that the microchip is still working and has not migrated significantly and would not normally include a check against the national database(s).
- **Before rabies vaccination or official certification** – vets are obliged to scan for a microchip before administering a rabies vaccination and issuing a pet passport, or before completing other official documentation that requires identification of the animal (eg official health screening tests)
- **Annually as routine** (eg at the time of the annual check-up and/or booster vaccination) – this is also to ensure that the microchip is still working and has not migrated significantly. Although it would not normally include a check against the national databases it should include a check against practice records and provides an opportunity to remind the owner to keep their details up-to-date.
- **On admission for treatment or hospitalisation where appropriate** – this is part of good clinical practice to ensure that the patient is matched to clinical records. This would not normally include a check against the national database(s).
- **Prior to euthanasia if considered appropriate** – this is part of good clinical practice to ensure that the patient is matched to clinical records. This would not normally include a check against the national database(s) and in many cases may not be appropriate.
- **On presentation of wildlife** – this is to identify any wild animals part of a local or national, wildlife rehabilitation or research programme.

NOTE: practices and owners should be aware that occasionally, as a result of chip or scanner failure or incompatibility, efforts to scan may not be successful.