1. The British Veterinary Association (BVA), the British Small Animal Veterinary Association (BSAVA) and BVA Welsh Branch welcome the opportunity to comment on these proposals.

2. The BVA is the national representative body for the veterinary profession in the United Kingdom and has over 13,000 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.

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

4. The BSAVA is the largest specialist division of the BVA and of the veterinary profession. It represents approximately 7,500 members, the majority of whom are in general practice and have an interest in the health and welfare of small animals, namely dogs and cats.

5. The BVA and BSAVA are both members of the Microchipping Alliance.

1. Do you think that all dogs in Wales should have to be microchipped?

Why?

6. We have long called for the microchipping of all dogs to be made compulsory. Compulsory microchipping is beneficial for animal welfare and responsible pet ownership for the reasons given below:
   a. Microchipping is a permanent form of identification;
   b. It enables pets and owners to be reunited in cases of straying, accident or theft;
   c. It could help reduce the numbers of stray dogs;
   d. As the owner/breeder of the animal can be identified, it can promote responsible pet ownership and responsible breeding practices;
   e. It allows for the identification of individual animals for certification, test results and medical history;
   f. It enables veterinary surgeons to contact owners more easily in case of an emergency – e.g. with an animal brought in after a road traffic accident.

7. It is important to stress, however, 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.
2. If compulsory microchipping was introduced in Wales, should the legislation require:

- only puppies born after the legislation is made be microchipped?
- all dogs be microchipped within 1 year of the legislation being made?
- microchipping only be required for new puppies and upon change of ownership?
- microchipping be required for new puppies and all dogs on change of ownership and the remainder microchipped within an agreed timescale, for example five years?
- there be a phased approach, by microchipping puppies at time of sale?

Please comment.

8. We support the microchipping of all dogs after a certain period (e.g. a year from the introduction of the legislation) as this is likely to make enforcement easier. We therefore support the second consultation option. 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 a pup’s origin.

9. We believe that requiring all dogs to be microchipping within a year of the legislation will be the most effective option as:
   a. Only microchipping puppies will mean that it will be 10-12 years before the legislation is fully effective meaning that the full welfare benefits will not be realised until this time. It will also 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.
   b. Requiring microchipping on change of ownership will be difficult to enforce as it will be difficult to ascertain whether or not an animal had a previous owner.

10. It will of course be vital to ensure that all microchip implanters are adequately trained.

3. When a microchipped animal changes ownership, the registration details on the database would need to be updated. With whom should this responsibility lie: the seller, the buyer, or both?

11. We believe that responsibility should lie with the seller, 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 re-allocated. The seller 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 suggest something along the lines of a Car Registration Certificate, where both buyer and seller have parts to complete. The buyer’s part could then include all relevant contact details.

12. 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.

13. 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.
4. We propose to require microchip registration details to be stored on approved commercial databases – do you agree?

14. We agree that registration should be stored on approved databases and, as mentioned above, a central reunification mechanism put in place to facilitate access through a single point of entry. Databases should be required to sign up to a code of practice. 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 Europenet database¹.

5. The compulsory microchipping of dogs would require owners to pay to microchip their pet. What are your thoughts on this issue?

15. The cost of microchipping is very small, especially compared with the other costs associated with dog ownership. The cost of microchipping should therefore be met by the owner. For genuine hardship cases, many charities offer discounted or free microchipping and veterinary practices may also include microchipping as part of a wider package of healthcare measures. Most vets will charge between £10 and £30 for microchipping, which is the equivalent to about 3 weeks worth of dog food (based on 80 pence per day).

6. We have set out what we think are the benefits to microchipping your animal. We would like to know your views on compulsory microchipping.

16. Please see our answer to question 1.

7. At present, the owner of the animal, the microchip implanter and some animal welfare organisations are able to access current records, but only enforcement authorities are able to see previous records. Do you think this should remain the same? If not, please explain.

17. In general yes, although it may be appropriate to allow others e.g. approved researchers, access to the data for research reasons.

8. Should there be any exemptions from compulsory microchipping?

18. 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. Exemptions should be certified by a veterinary surgeon.

9. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

19. We have no comment.

¹ www.europetnet.com