

Welsh Government Consultation: Compulsory Microchipping of Dogs

1. The following response is made on behalf of the Royal College of Veterinary Surgeons (RCVS). The RCVS is the regulatory body for veterinary surgeons in the UK. The role of the RCVS is to safeguard the health and welfare of animals committed to veterinary care through the regulation of the educational, ethical and clinical standards of veterinary surgeons and nurses, thereby protecting the interests of those dependent on animals, and assuring public health. It also acts as an impartial source of informed opinion on relevant veterinary matters.
2. As a regulatory body, the RCVS will limit its comments to those areas where there are clear indications of relevance to the College's role and where the new policy may require the Welsh Government, the veterinary profession or the public to seek assistance from the College.
3. The RCVS strongly supports the compulsory microchipping of all dogs and commends the Welsh Government for making proposals to legislate for its introduction in Wales.
4. The RCVS considers that the introduction of compulsory microchipping would have a positive impact on animal health and welfare, and has a role to play in the control of potentially dangerous dogs, on the grounds that the accurate identification of an animal and its owner is crucial to the enforcement of legislation and to achieving successful prosecutions. Furthermore, microchipping puppies prior to sale or change of ownership could assist in identifying where dogs were bred and help to reduce the poor breeding practices that can lead to inherited defects and diseases. Indeed, the 'indelible identification' of all puppies by 'microchip or other such equivalent system as may be developed' was one of the recommendations of the Independent Inquiry into Dog Breeding (2010) led by Professor Sir Patrick Bateson.
5. The microchipping of a dog is not an onerous requirement and a significant number of dogs in Wales are already likely to have been microchipped. Furthermore, microchipping provides benefits to the owner and animal alike. The RCVS, therefore, supports policy Option 4 (Microchipping new puppies and upon transfer of ownership as a first step, moving to microchipping all dogs within one year of the legislation coming into force) as this option would ensure that the maximum number of dogs are microchipped, that the breeders of the puppies can be identified and that the benefits of the legislation are fully realised, in the shortest possible time.
6. In order to be effective, any legislation requiring the compulsory microchipping of dogs would need to be both enforceable and enforced. The RCVS welcomes the Welsh Government's proposals that the enforcement of legislation on compulsory microchipping should be the responsibility of Local Authorities. The College notes, however, that the role of veterinary surgeons in the enforcement or 'policing' of any such policy of compulsory microchipping needs further discussion as this could have a negative effect on animal health and welfare. If, for example, it were widely known that veterinary surgeons routinely scan all dogs coming into their practices to check for the presence of a microchip, it might deter those with dogs that, for whatever reason, had incorrect details on the microchip database, from taking their animals to a veterinary surgeon.

7. There is currently no legislation as to who can implant microchips in the UK. RCVS guidance states that microchipping should only be undertaken by a veterinary surgeon when it is via a method other than the subcutaneous route, ear tags or bolus. As dogs are microchipped subcutaneously, there is currently no requirement for a veterinary surgeon to perform the procedure. Poorly implanted chips, however, can lead to severe injuries during implantation, increased risks of microchip migration and may have adverse effects on diagnostic techniques such as Magnetic Resonance Imaging (MRI). Should the Welsh Government decide to make microchipping compulsory, then appropriate guidance and training on the implantation of microchips should be provided. As the act of implanting a microchip subcutaneously in a dog is not restricted to veterinary surgeons, there must be due consideration given as to the authority and provenance of any certification that accompanies non-veterinary implantation.
8. The RCVS considers that any legislation on the introduction of compulsory microchipping should require the relevant commercial databases to be operated to minimum agreed standards. Moreover, it is imperative that there is a central point of contact, available 24 hours a day, seven days a week, from which the information held on all of the databases can be accessed.
9. The Microchipping Alliance, of which the RCVS is a member, has undertaken considerable work to develop guidelines on codes of practice for database operators, together with those involved in supplying and implanting chips. The RCVS lends its support to the introduction of codes based upon these guidelines.
10. If clarification on the above comments is required, please do not hesitate to contact the College. Representatives from the RCVS would be happy to meet with officials to discuss and expand upon this evidence.

RCVS
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