The Kennel Club is the UK’s largest organisation dedicated to the health and welfare of dogs. It has the broadest remit to protect and promote the general wellbeing of dogs. At its heart are programmes and investments in education and health initiatives to help dog owners across the UK to keep healthy, happy dogs living long lives with responsible owners.

Q1. Do you think that all dogs in Wales should have to be microchipped? Why?

The Kennel Club believes that all dogs in Wales should have to be microchipped as this form of permanent identification is deemed to be the most efficient in identifying and returning stray dogs to their owners and as a result, the most beneficial in relation to welfare and cost savings.

The most important reason for microchipping is to enable a straying or lost pet to be returned quickly to its owner. Microchipping has also a number of advantages over other forms of identification. With regards to the collar and tag, it may fail to reunify pet and owner as the collar and tag could fall off or the writing on the tag can fade making it illegible. Additionally, if a dog was stolen, the collar and tag
could be removed easily. Permanent identification via microchipping would be effective at all times and difficult to remove or alter.

All dogs should be microchipped in Wales in order to reap the wide range of welfare benefits that microchipping provides. As stated above, the main welfare benefit is for dogs to be promptly identified and returned to their owners. In addition, microchipping and registration to a database allows quick and simple detection, acts as a deterrent to dog theft, provides easier identification of owners who persistently allow their dogs to stray, cause nuisance or are culpable of animal cruelty, helps puppies be traceable to their breeder and as a consequence helps to tackle puppy farming problems.

Lastly, as microchipped dogs can be returned to owners faster, there are significant economic benefits that can be accrued from saving local authority and rescue centres kennelling costs. This is expanded further in question 2.

Q2. If compulsory microchipping was introduced in Wales, should the legislation require:

1. only puppies born after the legislation is made be microchipped?
2. all dogs be microchipped within 1 year of the legislation being made?
3. microchipping only be required for new puppies and upon change of ownership?
4. 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?
5. there be a phased approach, by microchipping puppies at time of sale?

Please comment.

The Kennel Club supports Option 2, which requires all dogs be microchipped within 1 year of the legislation, as the best option out of the 5 proposed as it has both the highest welfare and economic benefits combined.

Option 1 which would require microchipping puppies born after the legislation has been enacted would eventually lead the outcome of compulsory identification of all dogs. However, this option alone would not be immediately effective in securing both the welfare and economic benefits associated with microchipping all dogs without efforts to ensure existing adult dogs are also included.

Option 3 may cover a larger proportion of the dog population as it includes both the microchipping of new puppies and a requirement to microchip upon change of ownership, however it would also not be immediately effective in securing the
benefits as it would take years in order for the entire dog population to be microchipped and registered to a database. Furthermore, the Kennel Club’s concern regarding the change of ownership element is that dogs which are kept in the ownership of the breeder (for example working dogs) would not need to be microchipped as they have not changed ownership. Problems could arise when an un-chipped animal strays, gets lost or is involved in a dog bite incident. The ability to identify owners to reunite them with their dog and possibly hold them responsible for an incident would be a longer and more complicated process. Additionally, there is a higher chance of finding legal loopholes which would allow owners to legally avoid microchipping their dogs.

With regards to Option 5 which involves a phased in approach by microchipping puppies at the time of sale, the concern is once again that both welfare and economic benefits would not be delivered fast enough as well as the segment of dogs that might be excluded because they are never transferred to a new owner. This option would offer extremely slow progress for both animal welfare and financial gains for both local authorities and rescue centres.

Option 4 which requires new puppies to be microchipped and all dogs on change of ownership as well as the remainder microchipped within an agreed timescale would be the second best option as it would cover a greater proportion of the dog population which would ensure faster delivery of benefits. However, instead of having three different requirements placed on the public, Option 2 which requires all dogs to be microchipped within one year of the legislation would be an easier and more digestible requirement for the public to understand and comply with.

Based on a cost impact analysis undertaken by the Microchipping Alliance, the Kennel Club considers Option 2 to be by far the most beneficial in terms of cost savings. The cost analysis looked at implementation costs, enforcement costs, cost savings in Wales and the total estimated cost. The calculated annual cost savings relating solely to dog welfare amount to between £2.39-£2.61 million in the first year of introducing such legislation. These savings could enable local authorities to offer further assistance in other canine related matters as well as potentially providing extra income.

Option 2 would allow all dog owners sufficient time to get their dogs microchipped which would ensure that should any dog get lost or stray, the chances of their reunification with the owner are higher and kennelling time lower. In addition, legislation centred on Option 2 could also include measures to avoid possible welfare implications of microchipping older dogs who may find the microchipping process distressing.

For these reasons, the Kennel Club considers Option 2 to be the most efficient, beneficial and best ‘catch all’ option that has the highest welfare benefits as well as lowest costs to both local and national government.
Q3. 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?

The Kennel Club believes that the responsibility to ensure that the correct and most up to date details are registered on the database should lie with both the seller and buyer. The reason for the shared responsibility is to ensure that all correct paperwork has been undertaken and processed correctly. The previous owner would need to sign over the paperwork to the new owner, who will have the responsibility of updating the database with the new details and continuously update when necessary. This would follow a similar process to that currently undertaken when changing ownership of a vehicle.

Q4. We propose to require microchip registration details to be stored on approved commercial databases – do you agree?

Ensuring microchip registration details are stored on approved databases will assist in creating uniformity and ensuring robust standards across the databases.

The Kennel Club, as a member of the Microchip Alliance, has produced a draft Standard Operating Procedure document for databases, distributors and manufacturers, and recommended standard practice documents for transfer of ownership, data collection and dealing with incorrect ownership data. Furthermore, the Kennel Club strongly believes that all databases should operate to relevant ISO standards.

The Kennel Club believes that these standards would form a robust and workable standard for all involved parties to adhere to and therefore strongly recommends that they be considered by the Welsh government. These documents have also been put forward by all members of the Microchip Alliance as recommendations in the recent Defra consultation on a package of measures to promote more responsible dog ownership and reduce dog attacks.

Q5. The compulsory microchipping of dogs would require owners to pay to microchip their pet. What are your thoughts on this issue?

The Kennel Club does not foresee the requirement on owners to pay for their pet to be microchipped as having a negative financial impact on the average pet owner.

The average cost to microchip a dog is a one off payment of £20-£30 which is considered to be a small cost compared to the overall cost of owning a dog responsibly. A microchipped dog registered to a database means an owner has a greater chance of being reunited with their pet should they ever become
separated. To date Petlog, the UK’s largest pet re-unification database managed by the Kennel Club, has recorded data in respect of more than 6.2million pets, including 4million dogs which have been microchipped voluntarily, indicating that many people believe a small initial cost is worth the added peace of mind that this brings.

Figures from Petlog estimate that almost 60% of dog owners have microchipped their pets. In addition a recent Dogs Trust survey demonstrated that 83% of the public were supportive of compulsory microchipping. Furthermore, compulsory microchipping is not considered to impact on lower income households as a range of current schemes offer either free or significantly reduced cost microchipping across the UK. To guarantee further safeguards for the vulnerable in society, any new legislation could allow cost exemptions or reductions for those who fulfil a certain set of criteria (financial, medical, etc). The Kennel Club also believes that compulsory microchipping should be introduced in a phased approach supported by a public education campaign to give the public time to take on board the legislation and allow sufficient time to get their pet microchipped.

Ultimately, by ensuring that the implantation of microchips is not restricted to any one organisation, it will help maintain competitiveness thereby providing cost effective options and ensuring that it is easy for dog owners to get their pets microchipped which will have a positive impact on public compliance.

Furthermore, recent advances in technology will also benefit owners in helping reunify pets. Petlog has recently released a ‘My Dog UK’ smartphone application which allows owners of lost pets to input microchip details to immediately notify the database. The free App Petlog Premium subscribed owners are also able to alert authorised users including veterinary surgeries, local authorities and dog warden services within a 30 mile radius. Services such as this will make it even easier for pet owners to comply with the legislation and utilise its benefits for reunification.

However, the Kennel Club would stress that costs relating to compulsory microchipping should be kept to a minimum and this should not be used as an opportunity to reintroduce an annual registration fee. This would be seen as a retrograde step penalising the responsible dog owner and encouraging others to seek to avoid the key act of identifying their dog.

Q6. We have set out what we think are the benefits to microchipping your animal. We would like to know your views on compulsory microchipping.

The Kennel Club supports the principle of compulsory microchipping as one of the simplest ways of permanently identifying animals. We agree with the Welsh
government’s list of microchipping benefits which is reflected in our own list of benefits in Question 1 and below.

The Kennel Club believes that microchipping has both vital welfare and economic benefits. The clear welfare benefit for dogs is the ability to rapidly identify and return dogs to their owners. Rapid return also reduces the time dogs are held by local authorities thereby lowering costs as well as allowing local authority officers to highlight to owners that straying is not acceptable and it is hoped that through educating owners in this way, it will decrease the likelihood of a dog straying again.

The Kennel Club also believes that additional welfare benefits of microchipping a pet include the reinforcement of responsibilities of an owner under the Animal Welfare Act, easier identification of owner which is hoped will encourage responsible ownership as well as assistance in resolving ownership disputes, traceability between puppy and breeder which would help with tackling puppy farming issues, a microchip and its information could act as a deterrent to dog theft and assisting vets in contacting dog owners in emergencies.

As mentioned also in Question 2, there are significant economic benefits relating to microchipping dogs. The Microchipping Alliance briefing on Wales stated that £2.39 to £2.61 million approximately could be saved by local authorities should compulsory microchipping be implemented for all dogs.

It is important to recognise that the implantation and database registration are separate but equally important for reunification to be successful. Furthermore, the cost of microchipping in comparison to other forms of identification is significantly lower. For a nominal cost which includes both implantation and the registration fee to a database, an owner can receive a ‘lifetime service’ guarantee allowing them to update details whenever necessary without incurring any further charges.

Compulsory microchipping has an array of socio-economic benefits such as the ones mentioned above which would benefit Wales as it has done in the majority of European Union (EU) member states that have introduced compulsory microchipping as well as a number of overseas countries, including Australia, Canada and Japan.
Q7. 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.

The Kennel Club bases this response on its experiences in managing Petlog, the UK’s largest independent microchip database which works with 11 microchip suppliers.

In accordance with the objectives of Petlog, which is to facilitate the reunification of pets, the database currently allows authorised users access to the most recent owner information corresponding to the microchip number in order to reunify pets and current owners. Whilst previous records are maintained on the database, currently Petlog, the database operator, is the only party that has access to this information. Any cases involving a dispute of ownership or registered missing pets, are dealt with directly through Petlog in accordance with data protection.

In any future case of using the data for purposes other than reunification, then it would be important for pet owners to be made aware of this and to allow selected authorised users to retrospectively review owner/pet details.

Q8. Should there be any exemptions from compulsory microchipping?

The Kennel Club maintains that certain measures could be included in the legislation that might help to avoid possible welfare implications of microchipping older dogs who may find the microchipping process distressing.

Q9. 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:

In order to ensure the smoothest transition to compulsory microchipping of dogs for the rest of the UK, the Kennel Club will add some of the lessons that could be learned from how microchipping of dogs has been implemented in Northern Ireland and would therefore like to highlight the following two points:

- The introduction of compulsory microchipping as a condition of the dog licence is largely ineffective as the Northern Irish Government accepts that less than 50% of dog owners in the country comply with the requirement for a dog licence. For this reason, the Kennel Club believes as indicated in our response to Question 5 that microchipping should not be linked to an animal ‘licence fee.’
• Information submitted to the database providers by implanters and/or owners was insufficient with many failing to provide important contact details such as telephone numbers and email addresses. It is essential for such information to be included so that for example enforcers can make contact with owners should a dog come to their attention.

As a consequence, this illustrates the need for a code of conduct for implanters as well as a need for both old and new owners to take responsibility for notifying the database of any new changes. As stated in response to Q4, key Standard Operating Procedure documents for databases, distributors and manufacturers, and recommended standard practice documents for transfer of ownership, data collection and dealing with incorrect ownership data have been submitted with the Kennel Club’s response.

Petlog has ensured that systems are in place for the transmission of data electronically to provide instant online registration. This initiative would improve efficiency whilst dealing with larger volumes of registration and ensuring all key data required is mandatory for the registration to be processed.

In respect of microchipping, the Kennel Club views its management of and link to Petlog as a significant strength and of great benefit to the aims and objectives of both the government in terms of promoting responsible dog ownership and the wider public. Petlog is the only database which can also communicate the level of information and expertise associated with the Kennel Club to those whose data it manages. Not only can it offer the lifetime management of the dog and owner’s information but also best practice through the Good Citizen Dog Scheme – the UK’s largest dog training scheme, the Safe and Sound Scheme - the Kennel Club’s education initiative to teach children how to be safe and interact around dogs, its extensive information guides covering everything from travelling with your pet to dog law, up to date access information for dog walkers and responsible dog ownership messages from a trusted source. The Kennel Club is committed to continuing this work now and in the future for the benefit of dogs and their owners alike.