



IRISH CATTLE AND SHEEP FARMERS' ASSOCIATION



ICSA Submission on the  
Proposed Dog Microchipping Programme

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## Introduction

The Irish Cattle and Sheep Farmers' Association has welcomed the publication of the Animal Health and Welfare Bill and the fact that regulations arising from the Bill will facilitate the microchipping of all dogs in the country.

ICSA have been calling for the compulsory microchipping of dogs for several years, and have been particularly vocal recently, in light of a number of extremely distressing dog attacks on sheep in several parts of the country. There have been a worrying number of incidents of dogs killing and seriously injuring sheep, including pregnant ewes. Apart from the pain and stress inflicted on the animals, each one of these attacks represents serious distress and financial loss to the farmer involved and it is now beyond doubt that action is needed to address the problem of out-of-control dogs.

The introduction of compulsory microchipping would bring Irish law into line with the law in Northern Ireland, where all dogs must be microchipped. Microchipping is already used by most responsible dog owners for traceability purposes.

Out-of-control dogs can be highly dangerous in a number of ways. Apart from the sheep attacks, ICSA is aware of several incidents of dogs attacking children in recent years. Every year thousands of dogs are put down in pounds across Ireland because their owners cannot be traced. Microchipping helps local councils and wardens to deal with dangerous dogs which pose a danger to everyone, as well as providing a reliable traceability system.

ICSA sees compulsory microchipping as the best solution to this highly emotive and distressing problem. ICSA is confident that those who truly value their pets and working dogs will see this as a progressive initiative, designed to safeguard dogs and prevent distress, injury and death.

## Recommendations

In the context of the points noted above, ICSA wishes to make the following recommendations as part of the Minister's consultation call of May 24<sup>th</sup> 2013:

- ICSA advocate that all dogs, regardless of role (domestic pet, companion animal, sporting dog, working dog, racing dog etc) be dealt with in the same manner as part of the microchipping roll-out. In essence, the chipping of all types of dogs should incur the same nominal fee, and no sector should be inequitably targeted by higher rates.
- ICSA recommend that the remit for the physical microchipping of dogs should be limited to registered vets, dog wardens and staff of approved dog shelters. This ensures a degree of standardised professional practice, and eliminates concerns relating to location of chips, double-tagging or incorrect recording of data. ICSA further propose that these approved practitioners should be encouraged to apply batch discounts for groups of dogs in the care of a single owner, in cases where all dogs are chipped during a single session. Many vets currently follow best practice in recommending to all dog owners that their dog should be microchipped; ICSA advocate encouraging all vets to implement a 'duty of care' approach when dogs are brought in for routine checkups, vaccinations or other procedures, by reminding owners of the forthcoming legal requirement for microchipping that will arise from the regulations.
- ICSA does not believe that a widely subsidised scheme for the *free* microchipping of dogs is feasible or sustainable in the context of the current fiscal situation; there may however be a role for some subsidised microchipping via dog rescue centres and other animal welfare organisations. The Government should instead ensure that costs of microchipping a dog

should be kept to an absolute minimum by encouraging or requiring the permitted parties to carry out the procedure at or very close to cost price. ICSA propose that costs for veterinary practitioners during the phased roll-out can be minimised through linking the chipping of puppies with their initial vaccination regime.

- ICSA, like many other stakeholders are concerned about the lack of compliance with dog licensing requirements. Using an estimate of a total Irish dog population of 650,000, only approximately 190,000 are licensed; this is below 30% overall compliance. Dog licensing provides critical funds for the running of numerous dog shelters and helps to fund dog warden services that assist the public with concerns relating to dogs; the observe low-level of compliance is therefore detrimental to the provision of these valuable services, which are frequently required in cases of livestock worrying. ICSA therefore proposes that increased compliance in dog licensing can be delivered through the microchipping roll-out: Owners who ensure that their dog is appropriately microchipped should be incentivised to ensure that their dog license is licensed and that the license is fully up to date. It is proposed that this can be achieved by offering a reduction in the cost of the annual, general and lifetime licenses. While the reduction value may be debated, ICSA propose that this could be as much as 50% for the initial years of the roll-out of microchipping. However, ICSA also note that such an approach must be carefully handled by the Department of Agriculture, Food and the Marine so as to avoid any risk of further public backlash over concerns of ‘stealth taxation’.
- ICSA have noted in discussions with other key stakeholders that the compulsory microchipping of dogs is meaningless without the compulsory recording of microchip details on an approved database. ICSA therefore advocate that the new regulations should ensure that this is implemented. Furthermore, it is critical that the public at large are appropriately educated in matters relating to the technical aspects of microchipping, not least in the fact that microchips only store a unique 15-digit number and feature no further information. While ICSA accept that private companies may be engaged to provide much of the data administration, ICSA recommend that the integrated microchip-database system would also need to be backed up by the relevant State department. ICSA also recommend that private agencies involved in the management of databases should be appropriately regulated so as to prevent undue costs being passed on to dog owners.
- ICSA also wish to highlight member concerns relating to change of ownership of dogs, and the responsibility of updating a dog’s details on the respective database. The regulations need to make it clear where the responsibility should fall for ensuring the dog’s details are up-to-date. ICSA advocate that the responsibility should fall to the previous owner, breeder, dog shelter etc., but that a recommendation should also be made that it is good practice for the recipient of a dog to ensure that this has been carried out. Further clarification is also required in relation to the management or deletion of a dog’s microchip record on a database after its death.

## Conclusion

ICSA reiterates its welcome for the compulsory microchipping of dogs as a solution to many of the current problems relating to Ireland’s dog population such as straying, rehoming, theft, livestock worrying, animal cruelty and dangerous dogs. Again, ICSA is confident that those who truly value their pets and working dogs will see this as a progressive initiative, designed to safeguard dogs and prevent distress, injury and death. ICSA is open to further engagement with the Department of Agriculture, Food and the Marine as part of further consultation on this issue, and as part of any publicity and education campaign that may form part of the microchipping rollout.