



Wednesday, March 30 2005



Canadian Federation of
Humane Societies

La Fédération des sociétés
canadiennes d'assistance
aux animaux

AVID Canada
The Microchip Company
Ms. Cathy Hutcheson
Sales & Marketing Director
#14, 6143 – 4 Street SE
Calgary, Alberta
T2H 2H9

Dear Ms. Hutcheson,

Thank you for your March 9th letter. As usual, I circulated your letter to all member associations of the NCAC.



CANADIAN KENNEL CLUB
CLUB CANIN CANADIEN

The NCAC represents the key national organizations involved in the companion animal industry in this country. Since 1995 this group has undertaken and successfully completed numerous projects of common interests that have brought tangible benefits to Canadian pet owners and their pets. Our group has worked with other interested parties on issues ranging from electronic identification, dog bite prevention, animal control and breed specific legislation. We do not know of other user groups or associations in Canada working collectively on issues of common interest, especially in the area of electronic identification for companion animals.



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Each of the NCAC member associations operate on mandates given to them by their respective memberships. Actions taken by these associations are supported by their respective Boards. More importantly, the members of the NCAC have consulted closely with and informed their respective memberships throughout the process of establishing and, more recently, revising the Canadian standard for electronic identification in companion animals.

We will address your other enquiries and concerns in the order in which you raised them in your letter:

Question 1.



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The NCAC has always been upfront about its intention to move towards ISO. In fact, as early as 1995, the NCAC communicated the fact that the adoption of a Canadian standard (FECAVA) was intended as an interim measure to avoid incompatibility between products and create market stability in Canada until such time as the issue of technology incompatibility was deliberated and resolved by the International Standards Organization. Considering the fact that the ISO standard has been in place for more than eight years, and that countries around the world have made or are

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making the transition to ISO, making ISO chips a mandatory component of their pet import requirements, the NCAC felt it was time to proceed. This being said, no transition is instantaneous and the NCAC has been communicating with its respective members on this issue for a decade. Your reference to Regulation (EC) No. 998/2003 of the European Parliament and of the Council in which an 8 year transitional period is established therefore appears to be in line with the 10 year transition period of the NCAC.

Question 2.

In order to be able to use the qualification ISO chip, such chips must have an ICAR certificate of conformance. To allow for a smooth transition from the different transponders in use to those complying with ISO, universal readers have been designated as an interim measure to allow the identification of both existing and ISO-standard technology during a 2-year transition period. ISO11785 – Annex A, to which you refer, specifies how a certain transponder is activated and how the stored information is transferred to a transceiver. However, it does not recognize FECAVA, Datamars or Trovan as ISO-compliant technologies but simply incorporates these technologies in a transceiver in accordance with ISO.

Question 3.

Canadian breeders and other RFID users are aware that there is no mechanism to ensure that every country moves at the same speed. Breeders are advised, when exporting animals to other countries, to request from the purchaser, what type of chips they prefer to have implanted. Buyers in those other countries of course, also have the option of re-implanting with whatever other microchips they deem to be more appropriate at a future date.

Concerning the situation in the United States, if I recall correctly, similar concerns over compatibility were expressed when we first decided to go ahead with the original Canadian standard in 1995. Back then we had to contend with different technologies, encrypted chips, etc. With time, the FECAVA based standard became established in the United States. It is our strong belief that this pattern will repeat itself with the ISO standard. The US market is simply 10 years behind Canada and, as long as market share protection continues with the production and distribution of incompatible technologies, user confidence and successful pet recovery in that country is jeopardized.

Question 4.

Estimates run as high as 65% of users having dual capability scanners already in place. The NCAC has been working hard for more than two years to help ensure

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there are enough appropriate readers to support the transition. We will continue our efforts to ensure that there are sufficient readers out there able to read both ISO and FECAVA chips. With the ever increasing number of ISO chips entering the Canadian market, the need for dual read capability scanners has long been identified, as evidenced by your companies' initial decision to provide Canadian users with dual read compatibility scanners.

Question 5.

I guess the same question could have been asked for animals coming in with encrypted chips a few years back. I will just answer by saying that misreads or the inability to read chipped animals is something we will work hard at eliminating, with the help of all our partner stakeholders.



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On the questions arising from our email reminder on the upcoming review, I refer you to the answer provided to you under question 2. As for the rest of the review process, I will refer you to the initial NCAC package sent to you in December of 2004. I trust this document explains in detail all the necessary requirements for the readers, chips and databases. To guide you through some of the examples you provide: 1) NCAC will recognize transponders that have a certificate of conformance according to ISO 11784 and 11785; 2) The Canadian standard requirement for scanners is to read both forward (ISO 11784 and 11785) and backward (125kHz non-encrypted) chips. If a reader performs the above plus can read any other frequency, the NCAC will review the scanner to ensure it meet the Canadian standard requirements; 3) scan capability for the next fifteen years.



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Once again we appreciate your interest in the NCAC and our revised Canadian standard for electronic identification of companion animals. As an important player in the Canadian market, your company can play an important role in ensuring a smooth transition to ISO technology for all Canadian pets. We look forward to working with you.

Sincerely,

Louis McCann
Chairperson
NCAC



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