



FAWC, Area 8B, 9 Millbank, c/o Nobel House  
17 Smith Square, London, SW1P 3JR  
Tel: 020 7238 5016

Tim Brooks  
Veterinary Professional Services Unit  
Area 5D  
Nobel House  
London  
SW1P 3JR

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Dear Mr Brooks

## **CONSULTATION ON PROPOSED AMENDMENTS TO THE VETERINARY SURGEONS ACT EXEMPTION ORDER REGIME**

Thank you for the opportunity to comment on proposed amendments to the Veterinary Surgeons Act exemption order regime to enable EU trained technicians to carry out artificial insemination in cattle and mares, epidural anaesthesia and rectal ultrasound scanning of bovines. I will try to follow the order of the consultation paper in this response.

1.5 – In the longer term FAWC would prefer to see a full review of the Veterinary Surgeons Act that brings veterinary paramedics within its control.

2.4 – How many of the nine countries contacted did not allow technicians to carry out some of these procedures and could the FVO not provide details about the others? Can the UK learn anything from the 'more robust mechanisms' in other Member States and, if they improve animal welfare, implement these?

2.4 – It is not clear that training will include any consistent assessment of competence. The key issue is that persons are competent in what they do and know when to ask for help if they come across an abnormality or other problem, e.g. restlessness and the need for sedation. Knowing the point at which to do this is essential, as is knowing how to contact support, e.g. the veterinarian, if necessary.

3.1 - Technicians allowed to carry out these procedures should be demonstrably at a similar level of competence to each other and to an absolute minimum standard. The Council has expressed concern that training of technicians in all Member States may not be to a consistent standard.

3.2 - Is any refresher scheme or re-training for technicians contemplated, e.g. every 5 years? Is there a mechanism to report problems encountered by the technicians?

3.3/3.4 – The technician should be able to provide evidence of carrying out procedures safely and effectively, i.e. with some indication of the technician's competence, e.g. from a veterinarian that directed or supervised.

3.3/3.4 - Competence should be measured, with HACCPs and benchmarks applied. How will these points be documented for audit purposes?

Q1 – Q4 - Yes

3.5 – Needs to be stronger in terms of demonstrating competence.

3.7 – Ensuring the safety of their animals should include protecting their welfare.

Q5 – Yes

Q6 – Guidance for employers and animal owners should include the need for technicians to demonstrate:

- competence with HACCP and benchmarking;
- whether they have had a requirement for re-certification;
- whether they have undertaken any Continuous Professional Development; and
- whether they have reported any problems, including anatomical abnormalities or animal distress requiring more than the restraint of normal handling, e.g. twitches.

Q7 – With suitable levels of competence and the right attitude to the animals, no.

With kind regards,

Yours sincerely

Professor Richard Bennett  
Chairman, EEER Standing Committee on behalf of FAWC