



Regulation on Animal Health

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Briefing from the Veterinary Profession

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FVE welcomes the Commission's initiative to bring the EU animal health legislation into one single framework. The potential benefits of enhanced animal health and welfare are great for animals, their owners, public health and the wider society. FVE particularly welcomes the preventive approach, the recognition of "One Health" and the inclusion of companion and wild animals in the proposed legislation. FVE also welcomes MEP Mrs M. Paulsen's draft report. Many of amendments she proposes are in line with earlier comments made by FVE on the proposal.

In the framework of the debates that are taking place in the European Parliament (AGRI and ENVI committees) and in the Council of the European Union, FVE would like to draw your attention to the following:

1. The Regulation should **focus on the prevention and the control** of diseases that can be transmitted to other animals and to people. Although animal health, welfare and public health are closely related, issues like animal transport, cloning, etc. should be addressed in more specific pieces of legislations.
2. An important part of the detailed rules will actually be decided through secondary legislation. It is crucial that the **drafting of this secondary legislation** is done transparently, with proper consultation of all stakeholders including the veterinary profession (FVE).
3. The health of animals and the veterinary public health are assured through the Veterinary Services and the veterinary profession. There is a need to better pin down the different roles veterinarians play. FVE therefore recommends introducing definitions of a **Veterinarian** and an **Official Veterinarian** (see Annex I).
4. FVE is concerned about extending the range of people that are allowed to prescribe medicines (antibiotics!) by **undefined and non-regulated "Aquatic Animal Health Professionals"**. Veterinarians are properly trained, regulated and accountable to the regulatory authority in their country to perform these tasks (see Annex I).
5. A key point of the draft Regulation is the recognition of the importance of **regular animal health visits** to assure animal health, welfare and public health. This visitation system is indeed a cornerstone of the "prevention is better than cure" strategy. FVE calls for the involvement of all relevant stakeholders, including veterinarians, in the drafting of the secondary legislation related to this system.
6. In the perspective of the implementation and enforcement of the Regulation, a practical, well-funded **communication plan** should be developed in order to ensure actual commitment of all stakeholders, who will be the key to the success of this legislation.

President

Christophe Buhot

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Hans Joachim Götz
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More detailed propositions are presented hereafter, in Annex 1.

Annex 1 – Proposition for suggested amendments

AMENDMENTS RELATED TO POINT 3 and 4 ABOVE	
<p>(42) Veterinarians and aquatic animal health professionals play a crucial role in all aspects of animal health management, and general rules concerning their roles and responsibilities should be laid down in this Regulation.</p> <p>(43) Veterinarians have the education and the professional qualifications which ensure that they have acquired the knowledge, skills and competencies necessary, inter alia, to diagnose diseases and treat animals. In addition, in some Member States for historical reasons, or due to the lack of veterinarians dealing with aquatic diseases, there exists a specialised profession called "aquatic animal health professionals". These professionals are traditionally not veterinarians but they practice aquatic animal medicine. This Regulation should therefore respect the decision of those Member States who recognise that profession. In those cases, aquatic animal health professionals should have the same responsibilities and obligations as veterinarians</p>	<p>(42) Veterinarians and aquatic animal health professionals play a crucial role in all aspects of animal health management, and general rules concerning their roles and responsibilities should be laid down in this Regulation.</p> <p>(43) Veterinarians have the education and the professional qualifications, which ensure that they have acquired the knowledge, skills and competencies necessary, inter alia, to diagnose diseases and treat animals. In addition, in some Member States for historical reasons, or due to the lack of veterinarians dealing with aquatic diseases, there exists a specialised profession called "aquatic medicine biologists". These professionals are traditionally not veterinarians but they practice certain designated tasks in a territory in the field of aquatic animal medicine and under the supervision of a veterinarian. These professionals should have received appropriate qualifications and training to perform these tasks. This Regulation should therefore respect the decision of those Member States who recognise that profession. In those cases, aquatic animal health professionals should have the same responsibilities and obligations as veterinarians</p>
<p><u>Justification:</u> Every expansion of groups with the right to prescribe medicines will heighten the risk of increasing the use of medicines in general, and antibiotics in particular. Therefore it is not wise to expand the prescription write to aquatic animal health professionals. There is a need to better define 'Aquatic Animal Health Professionals' in the Regulations, as only veterinarians are a regulated profession which can diagnose, treat and prescribe.</p> <p>The veterinarian is licensed by the legal authority to carry out his tasks, something that shall be done in an independent, ethical and personally responsible capacity. The veterinarian is accountable to the licensing authority. In addition, in order to get a degree in veterinary medicines, a broad training is needed covering in addition to animal health, welfare and public health training also training in epidemiology, toxicology and pharmacology. 'Aquatic Animal Health Professionals' in most countries do not have this broad training, neither are they a regulated profession in other words subject to disciplinary actions.</p>	
<p style="text-align: center;">Article 4 <i>Text proposed by the Commission</i></p>	<p style="text-align: center;">Article 4 <i>Amendment</i></p> <p>(52) 'Aquatic medicine biologist means a person who is authorised by the Competent Authority to carry out certain designated tasks in a territory and has the appropriate qualifications and training to perform the designated tasks under the veterinary supervision.</p> <p>(53) 'Veterinarian' means a professional with a comprehensive scientific education, licensed by</p>

	<p>the legal authority, to carry out, in an independent, ethical and personally responsible capacity, all aspects of veterinary medicine, in the interest of the animals, the client and society;</p> <p>(54) 'official veterinarian' means a veterinarian appointed by the competent authorities and appropriately qualified to perform the official controls and other official activities in accordance with the provisions laid down in the proposal for a Regulation on official controls.</p>
<p><u>Justification:</u> It is obvious that, such when it comes to disease outbreak, the role and responsibilities of official veterinarians are different from the role and responsibilities of veterinary practitioners. The text does not take these realities into account. Most of the time, the draft refers to "veterinarians" in general. As such, it is important to define veterinarians and official veterinarian in the definitions.</p>	
<p>Article 11</p> <p><i>Responsibilities of veterinarians and aquatic animal health professionals</i></p> <p>1. Veterinarians shall in the course of their activities which fall within the scope of this Regulation:</p> <p>(a) take all appropriate measures to prevent the introduction, development and spread of diseases;</p> <p>(b) ensure the early detection of diseases by carrying out proper diagnosis and differential diagnosis to rule out or confirm a disease before symptomatic treatment is commenced;</p> <p>(c) play an active role in:</p> <p>(i) raising animal health awareness;</p> <p>(ii) disease prevention;</p> <p>(iii) the early detection and rapid response to diseases.</p> <p>(d) cooperate with the competent authority, operators, animal professionals and pet keepers in the application of the disease prevention and control measures provided for in this Regulation.</p> <p>2. Aquatic animal health professionals may undertake activities attributed to veterinarians under this Regulation in relation to aquatic animals provided that they are authorised to do so under national legislation. In that event, paragraph 1 shall apply to those aquatic animal health professionals.</p> <p>3. The Commission shall be empowered to adopt delegated acts in accordance with Article</p>	<p>Article 11</p> <p><i>Responsibilities of veterinarians and aquatic medicine biologists</i></p> <p>1. Veterinarians shall in the course of their activities which fall within the scope of this Regulation:</p> <p>(a) advise on all appropriate measures to prevent the introduction, development and spread of diseases;</p> <p>(b extra) advise operators about measures to minimise the risk of zoonotic diseases, food borne pathogens, residues, contaminants in order to ensure safe food</p> <p>(b) ensure the early detection of diseases by carrying out proper diagnosis and differential diagnosis to rule out or confirm a disease before symptomatic treatment is commenced;</p> <p>(c) play an active role in:</p> <p>(i) raising animal health and welfare awareness;</p> <p>(ii) disease prevention;</p> <p>(iii) the early detection and rapid response to diseases.</p> <p>(iv) raising awareness on antimicrobial resistance and implications that might follow</p> <p>(extra d) ensure the integrity of veterinary certification</p> <p>(extra d) ensure the integrity of the food chain information</p> <p>(d) cooperate with the competent authority, operators, animal professionals and pet keepers in the application of the disease prevention and control measures provided for in this Regulation.</p>

<p>253 concerning the qualifications of veterinarians and aquatic animal health professionals undertaking activities which fall within the scope of this Regulation.</p>	<p>2. Aquatic medicine biologists may undertake activities attributed to veterinarians under this Regulation certain designated tasks in a territory in the field of aquatic animals under the supervision of a veterinarian, provided that they are authorised to do so under national legislation. In that event, some aspects of paragraph 1 can apply to those aquatic animal health professionals. Aquatic medicine biologists should have the same responsibilities and obligations as veterinarians. Member States need to notify other countries if they will authorise aquatic medicine biologists on their territory and should provide evidence that these will have the necessary training and skills and will meet the same responsibilities and obligations as veterinarians.</p> <p>3. The Commission shall be empowered to adopt delegated acts in accordance with Article 253 concerning the training of veterinarians and the training and qualifications of aquatic medicine biologists undertaking activities which fall within the scope of this Regulation.</p>
<p><u>Justification:</u> See above</p>	

The [Federation of Veterinarians of Europe \(FVE\)](http://www.fve.org) is an umbrella organisation of 44 veterinary organisations from 38 European countries, representing a total of around 200 000 veterinarians

For further information, consult the FVE website <http://www.fve.org> or contact the FVE Secretariat on Tel +32 2 533 70 20 or by e-mail to info@fve.org