

**Report on Result of the Public Consultation on**  
**Proposals to Amend Schedule 2 to the Veterinary Surgeons**  
**Registration Ordinance (Cap. 529) to**  
**Facilitate Clinical Training of Veterinary Students**

## BACKGROUND

The current exemptions provided in Schedule 2 to the Veterinary Surgeons Registration Ordinance (Cap. 529) (“VSRO”) only permit the performing of specified veterinary surgery acts by persons other than registered veterinary surgeons. With the establishment of a veterinary school at the City University of Hong Kong, the current scope of exemption needs to be expanded to allow veterinary students to perform veterinary surgery acts under suitable supervision. Otherwise, local veterinary students will not be able to receive training on all of the veterinary surgery acts required by their curriculum.

2. From 23 November 2020 to 22 January 2021, the Food and Health Bureau (FHB) and the Agriculture, Fisheries and Conservation Department (AFCD) conducted a public consultation on proposals to amend Schedule 2 to VSRO.
3. The proposals are extracted as the following:
  - a) **to add to Schedule 2 to the VSRO a new provision to permit any person who is in full time study of a veterinary programme at a local or Veterinary Surgeons Board of Hong Kong (VSB) recognised veterinary school, college or institution, to practise acts of veterinary surgery under the direct and continuous supervision of a registered veterinary surgeon as part of the training requirement under that veterinary programme.**
  - b) to be stipulated by the VSB in the Code of Practice for the Guidance of Registered Veterinary Surgeons (“COP”) the following – (a) **owner’s consent must be sought before a veterinary student may perform any exempted veterinary acts on an animal;** and (b) **the registered veterinary surgeon shall be fully responsible for the veterinary acts performed by the persons under his or her direct and continuous supervision.**

Please refer to the full [consultation document](#) for more details.

## **CONSULTATION ACTIVITIES**

4. The consultation began on 23 November 2020 with a press release issued on the main portals of the websites of [www.gov.hk](http://www.gov.hk), FHB and AFCD to introduce the proposals and explain the consultation to the public.

5. Letters and emails inviting comments were sent to over 1,200 stakeholders including all registered veterinary surgeons in Hong Kong, animal welfare organisations (AWOs) and animal related associations, veterinary associations, livestock and farmers' associations, Universities running animal related courses, Consumer Council as well as relevant boards and committees under AFCD, including the Dogs and Cats Classification Board, Appeal Board Panel under the Rabies Ordinance, Advisory Committee on Agriculture and Fisheries, Animal Welfare Advisory Group and the Veterinary Surgeons Board.

6. Responders were invited to fill in the comment form (Annex) for views. Nevertheless, responses in other formats were also accepted. The proposals, comment form and the relevant documentation had also been made available for downloading from the websites of AFCD and FHB.

## **RESULT OF THE PUBLIC CONSULTATION**

7. A total of 66 written responses were received. Of the responses, about half were from VSB and registered veterinary surgeons in Hong Kong, and the other half were from universities, AWOs, political party, other associations and individuals. Major views received related to the proposals are set out in the ensuing paragraphs.

### ***Proposed amendments to Schedule 2 to VSRO***

8. All respondents agreed that the proposed amendments were necessary to enable local veterinary students to receive clinical training on acts of veterinary surgery that is necessary for them to fulfil the requirement of their veterinary programmes, and expressed general support for them. Some respondents remarked the importance of practical hands-on clinical training for veterinary students before they graduate, the need to align with international standards and attain accreditation, as well as the importance of the proposals to the overall development of veterinary profession in Hong Kong.

9. Apart from the legitimate needs of veterinary students to perform veterinary surgery acts for training purposes, our policy intent to protect the welfare of animal welfare, interests of veterinary service users as well as public health on the other hand by requiring such acts to be performed under direct and continuous supervision of registered veterinary surgeons was well recognised and supported.

10. We propose in the consultation paper not to confine the scope of acts for veterinary students to perform under suitable supervision to a specific list, as there would be newly developed techniques from time to time and specifying which acts are permitted might deprive veterinary students the opportunity to learn, practise and keep abreast of the ever developing veterinary sector. Most respondents are supportive of this approach, while a couple of them suggested that relevance of the exempted veterinary acts to the course content should be ensured. There was also a suggestion that only certain veterinary students, e.g. those in their final years should be allowed to receive clinical training. We consider that these concerns are adequately addressed in our proposal, which requires the acts to be performed by veterinary students to be part of the training requirement under their veterinary programmes, hence ensuring that the exempted veterinary acts will be relevant to the course content.

### ***Proposed revisions to the Code of Practice for the Guidance of Registered Veterinary Surgeons***

11. On the requirement for owner's consent, while most respondents were supportive, a couple of respondents held a different view, commenting it might hinder students from gaining training opportunities or give rise to unnecessary litigations. In overseas jurisdictions, it is a common practice for the supervising veterinary surgeon to inform the animal owner that veterinary student would be involved in the treatment of his/her animal and seek his/her consent.

12. On the level of supervision, most respondents consider it appropriate to subject the veterinary surgery acts proposed to be performed by students to the highest level of supervision by veterinary surgeons for the purpose of ensuring the standard of procedures performed, as well as protecting the welfare of animals and clients, because the nature of these acts (such as sedation or anaesthesia) is likely to be invasive.

13. In view of the above, we shall invite VSB to proceed to revise the COP accordingly.

### *Other views related to the proposals*

14. Several respondents expressed that certain qualifications or criteria such as years of experience, higher or additional qualifications etc. should be met by veterinary surgeons who supervise the veterinary students. On the other hand, some respondents consider that there is no need to set any further requirements on supervising surgeons' qualifications because all registered veterinary surgeons already possess professional qualifications recognised by VSB, and that additional criteria may exclude good tutors. A couple of respondents proposed that the training clinics or facilities should meet certain requirements in terms of equipment and practicing standards.

15. There are different views on whether qualifications or criteria should be set for supervising veterinary surgeons' qualifications. On this, we understand that the relevant veterinary schools will adopt appropriate selection criteria in choosing supervisors as well as clinics for their students, as the quality of clinical training for their students would affect the reputation and professional accreditation of their veterinary programmes.

16. Several respondents suggested that the VSB could provide guidance to veterinary surgeons to help them ascertain that the students are in full time education at an appropriate veterinary school approved by the VSB. Under our proposal, only students in full time studies of veterinary programmes at local veterinary schools or VSB recognised veterinary schools, colleges or institutions would be exempted. Such programmes would need to be professionally accredited and should thus ensure students have attained an appropriate standard before conducting clinical training. As to whether more detailed guidance is needed, we would relay the suggestion to VSB for consideration.

### **OTHER VIEWS RECEIVED**

17. Apart from the proposals put forward in the consultation document, several respondents requested a review of other sections of Schedule 2 in relation to exemption of veterinary acts by certain groups of persons. Suggestions and comments included extension of exemption under Schedule 2 to cover inspectors of the Society for the Prevention for Cruelty to Animals, university researchers who may need to euthanize research animals and veterinary surgeons who may not be eligible for VSB licensure. There also have suggestions to review exempted procedures for animal owners on their pets and farmers on farm animals; and refinement or amendment of some wordings in Schedule 2. Owing to the fact that the above exemptions, which were reviewed and amended in recent years, are currently well implemented, and these suggestions and comments are

out of scope of current proposals, we shall review other areas of exemption in the future when necessary.

**Food and Health Bureau  
Agriculture, Fisheries and Conservation Department  
March 2021**

**Part B – Personal Information of the Sender**

Name or Name of Organisation:	_____
Name and title of contact person of the organisation:	_____
Are you a registered veterinary surgeon in Hong Kong?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Phone number:	_____
Email address:	_____

If you do not wish to disclose your name or name of your organisation to the public, please tick the box here:

- I do not wish to make my name or name of my organisation public in relation to this public consultation.

Note: the provided email address and phone number will not be made public even if the above box is not ticked.

If you do not wish to disclose your views or views of your organisation to the public, please tick the box here:

- I do not wish to make the views or comments provided in Part C of this comment form public.

### **Part C – Views or Comments on the Proposals**

Please provide your views or comments on the proposals after reading the Consultation Document. Please use separate sheet if the space provided in the form is insufficient.

1. Do you generally support the proposed amendment that is stated in paragraph 2.14 and 2.15 of the Consultation Document?

Yes

No

2. Reasons of your view indicated in question 1, or any other views or comments on the proposed amendment:

- End -