



The Hong Kong Veterinary Association

The main points the HKVA supports in the legislation are:

1. That the ratio of vets to Non-vets be maintained at the current ratio of 2:1

The table below shows the ratio of vets to non-vets in a number of overseas jurisdictions with comparable professional standard and complexity. It is noteworthy that non-vet representation at the HKVSB is already at the leading edge for transparency and accountability.

Country	Jurisdiction	Vets : Non-vets ratio
Australia	NSW	6 : 2
	Victoria	7 : 2
	Western Australia	3 : 2
	Queensland	5 : 1
	South Australia	5 : 2
	Tasmania	4 : 2
	Northern Territory	3 : 2
New Zealand		5 : 2
USA	California	5 : 3
	Oregon	5 : 4
	Nebraska	4 : 1

It is important to note that in none of the countries where University Vet Schools are recognized by the Veterinary Surgeon's Board of Hong Kong is there a ratio of vets to non-vets of 1 : 1

**2. The make-up of Preliminary Investigation Committee be 2 vets and 1 lay person**

There is a real need for practicing vets to be on the VSB and PIC because of:

- a. The complexity of veterinary science. It takes 5 – 6 years to obtain a veterinary degree in most jurisdictions, arguably 8 years in the USA, and it normally requires 5 years of clinical practice to obtain a high level of proficiency – How can a lay person with neither of these be expected to make sound judgments? In fact much time may currently be invested in explaining cases to the lay person in the PIC by the veterinarian
- b. Need for knowledge of local practicing condition. Local knowledge of common diseases and their presentation is vitally important as these vary around the world. Local knowledge of client behavior is also important because this again varies around the world.

The HKVA is very concerned that if the PIC and the Board are structured with less veterinary surgeons (against the time tested international norm), the lack of adequate professional and industry knowledge within the board will result in the falling of standard of decision making to a potentially disastrously low level which will have a negative impact on animal welfare and the standard of veterinary practice in Hong Kong.

**3. Election of 6 practicing veterinarians by the profession.**

Owing to the lack of transparency in the selection of the Board members the HKVA welcomes the changes being sought which would enable the profession to elect 6 members or one third of the Board.

**4. Increasing the size of the Board to 18 members and a Chairman.**

It is hoped that increasing the number of members on the Board will improve efficiency in handling of the complaint cases and the speed in handling registrations of new vets by the VSB.

**Further points which the HKVA feels should be noted.**

1. It is felt in the profession that the VSB is more a consumer advocate group than an impartial professional regulator. There is a feeling amongst the veterinary profession in Hong Kong that members who have a case brought against them are considered guilty until proven innocent.

2. The current administrative procedures regarding the complaint handling are not inline with the fair practices practiced by overseas veterinary surgeons boards as well as comparable local boards such as Hong Kong Medical Council. With fairness, the said boards inform the complaine of the complaint and request explanation. Only in the event that such explanation does not address the complaint sufficiently, collection of evidence and further investigation is initiated. The current practice of the Board is that the complaine (and any other veterinary surgeons who treated the case in question whether they are the subject of complaint or not ) are required to supply all the documents without even identifying the nature of complaint. The complaine is not informed that he or she is being investigated until he or she has supplied all the documents for a microscopic scrutiny. HKVA fully support the disciplinary function of the VSB and believes it is essential in upholding our professional standard. But believe that the disciplinary function should be carried out in line with natural justice and should not put veterinarians at an unfair disadvantage.

To further entrench the practice , the administration is proposing the information gathering activity to be included in the VSR Ordinance. ( Ref . VSR amendment Bill 2014, Part 2 Clause 11, Section 17D).

3. The HKVA does welcome the watch dog role of the VSB and understands the need for it. We are committed to raising the standard of practice in Hong Kong and fully accept the need for a regulator.

4. Transparency for selection of the members of the VSB. Members have always been nominated by Government without any explanation, the proposal to have 6 vets voted in by the profession attempts to address this.

5. Licencing of Veterinary Establishments in order to maintain standards. Currently a non-vet can own a veterinary clinic and is not answerable to the VSB for the practices which occur there. The HKVA is introducing a Clinic Accreditation Scheme as means to partially address this problem.

6. The lack of a Charity Commissioner opens the opportunity for the abuse of charities by business entities.

### **Improving efficiency Performance at the PIC level**

1. Dates need to be set for submission of documents by both parties. We understand that it is often the vet who delays but we believe that this should not be tolerated.

2. Dates need to be set for hearings and adhered to. We understand that it is often the vet who delays but we believe that this should not be tolerated.

3. Fixed time period for a ruling from the PIC. We understand the difficulties involved with obtaining this as there is a legal requirement for all persons to be physically present and members are not remunerated making this difficult to achieve. However we feel that these problems should be overcome as it is unfair to veterinarians to place them under the stress of an investigation for indefinitely prolonged periods of time.

4. One of the biggest problems at present is the lack of an official language for PIC hearings, a veterinarian who does not read or write Chinese is expected to respond to a complaint using his/ her own translation which may be inaccurate. Western vets on the PIC are rendered useless if the whole discussion and written documents are in Chinese.