

**For discussion  
on 9 March 2021**

**LegCo Panel on Food Safety and Environmental Hygiene**

**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**

**Purpose**

This paper sets out the outcome of the public consultation on “Proposals to amend Schedule 2 to the Veterinary Surgeons Registration Ordinance (Cap. 529) (“VSRO”) to Facilitate Clinical Training of Veterinary Students” (the public consultation) and the proposed way forward.

**Background**

2. The current exemptions provided in Schedule 2 to the VSRO only permit the performing of certain 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 a wider variety of veterinary surgery acts under suitable supervision. Otherwise, local veterinary students will not be able to receive training on all veterinary surgery acts required by their curriculum.

3. The Food and Health Bureau and the Agriculture, Fisheries and Conservation Department conducted the public consultation from 23 November 2020 to 22 January 2021. Apart from inviting comments from members of the public, letters and emails were sent to stakeholders, including all registered veterinary surgeons in Hong Kong, the Veterinary Surgeons Board (VSB), animal welfare organisations and animal-related associations, veterinary associations, livestock and farmers’ associations, universities running animal-related courses, the Consumer Council as well as relevant boards and committees. We also consulted this Panel (LC Paper No. CB(2)599/20-21(02)) on 25 January 2021.

## **Result of the Public Consultation**

### *Views on the proposals*

4. In the public consultation paper, the following proposals were recommended –

- (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 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 stipulate by the VSB in the Code of Practice for the Guidance of Registered Veterinary Surgeons (“COP”) the following –
  - (i) owner’s consent must be sought before a veterinary student may perform any exempted veterinary acts on an animal; and
  - (ii) the registered veterinary surgeon shall be fully responsible for the veterinary acts performed by the persons under his or her direct and continuous supervision.

5. A total of 66 written responses were received during the public consultation period<sup>1</sup>. 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.

6. Recognising our policy intent to protect the welfare of animals, interests of veterinary service users as well as public health, the majority of

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<sup>1</sup> Of the responses, about half were from VSB and registered veterinary surgeons in Hong Kong, and the other half were from universities, animal welfare organisations, political party, other associations and individuals.

the respondents support our proposals to (i) require veterinary surgery acts by veterinary students to be performed under direct and continuous supervision of registered veterinary surgeons, (ii) stipulate in the COP that owner's consent must be sought before a veterinary student may perform any exempted veterinary acts on an animal, and (iii) stipulate in the COP that the registered veterinary surgeon shall be fully responsible for the veterinary acts performed by the persons under his or her direct and continuous supervision.

7. 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.

8. 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. We understand that VSB is also supportive of the requirement.

9. 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.

#### Other views

10. 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.

11. 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.

12. 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.

### **Way Forward**

13. Considering that the views received are predominantly supportive of our proposals, we will proceed to prepare the legislative amendments to Schedule 2 to the VSRO. We target to introduce the Amendment Order into the Legislative Council for negative vetting in the coming months for commencement before the 2021/22 academic year.

### **Advice Sought**

14. Members are invited to note the outcome of the public consultation and comment on the proposed way forward.

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