

Consultation Document

Proposals to Amend Schedule 2 to the Veterinary Surgeons Registration Ordinance (Cap. 529) to Facilitate Clinical Training of Veterinary Students

November 2020



食物及衛生局
Food and Health Bureau



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Agriculture, Fisheries and
Conservation Department

CONSULTATION DOCUMENT

**PROPOSALS TO AMEND SCHEDULE 2 TO
THE VETERINARY SURGEONS
REGISTRATION ORDINANCE (CAP. 529)
TO FACILITATE CLINICAL TRAINING OF
VETERINARY STUDENTS**

**Food and Health Bureau
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TABLE OF CONTENT

		Page
CHAPTER 1	INTRODUCTION	3 - 6
CHAPTER 2	THE PROPOSALS	7 - 11
CHAPTER 3	INVITATION FOR COMMENTS	12 - 13
ANNEX 1	PROVISIONS OF SCHEDULE 2 TO VETERINARY SURGEONS REGISTRATION ORDINANCE	14 - 18
ANNEX 2	REGULATION OF VETERINARY STUDENTS TO PERFORM ACTS OF VETERINARY SURGERY IN OTHER JURISDICTIONS	19 - 21

CHAPTER 1 INTRODUCTION

Purpose

- 1.1 The purpose of this consultation document is to facilitate an informed discussion by the veterinary profession, animal welfare groups, animal owners and other stakeholders, as well as members of the public, concerning the Government's proposals to amend Schedule 2 to the Veterinary Surgeons Registration Ordinance (Cap. 529) ("VSRO"). The proposals are made with a view to permitting veterinary students to perform acts of veterinary surgery, in addition to those currently allowed in sections 3A-3C of Schedule 2 to the VSRO, under direct and continuous supervision of a registered veterinary surgeon so as to facilitate the training of veterinary students. We would like to seek your views on the proposals contained in this consultation document. Please let us have your views **on or before 22 January 2021**.

Background

- 1.2 The VSRO was enacted in 1997 to provide for the regulation of the practice of veterinary surgery, the registration of veterinary surgeons, the disciplinary control of the professional activities of registered veterinary surgeons and for matters related to such registration and disciplinary control. The VSRO also provides for the establishment of an independent Veterinary Surgeons Board of Hong Kong ("VSB"), which is responsible for discharging the functions stipulated in the VSRO, including but not limited to establishing and maintaining a register of registered veterinary surgeons, setting and reviewing the qualification standards for registration as a registered veterinary surgeon and related registration matters, as well as advising the Government on registration matters.
- 1.3 The VSB and the Government attach great importance to maintaining the high standard of veterinary services in Hong Kong. Over the years, the veterinary sector is shored by veterinary surgeons graduated from other places. With the establishment of a local veterinary

school at the City University of Hong Kong (“CityU”), it is expected that more practising veterinary surgeons in Hong Kong will be locally trained in the coming years. Since some of the clinical training of veterinary students is not permissible under the VSRO, the Government has conducted a review of the current regulatory regime in Hong Kong and the relevant legislative provisions, with a view to facilitating the required clinical training provided for veterinary students locally.

- 1.4 In order that veterinary students may locally receive veterinary training comparable with international standards, reference has been made to the legislation and practices of other jurisdictions where appropriate, to ensure that changes are made to make the regulatory system on veterinary practice in Hong Kong in line with international standards.

Schedule 2 to the VSRO

- 1.5 Under section 16(1) of the VSRO, no person shall practise veterinary surgery¹ or provide a veterinary service² in Hong Kong unless he or she is a veterinary surgeon registered with the VSB and the holder of a practising certificate which is currently in force. Any person who contravenes this provision commits an offence and is liable on conviction to a fine at level 6 and imprisonment for one year as stipulated under section 25(1)(h) of the VSRO.
- 1.6 Notwithstanding the above, section 29 of the VSRO provides that the persons listed in its Schedule 2 are exempted from the provisions of the VSRO in the circumstances specified in that Schedule. This

¹ “Veterinary surgery” means “the art and science of veterinary surgery and medicine and, without limiting the foregoing, includes –

- (a) the diagnosis of disease in, and injuries to, animals including tests performed for diagnostic purposes;
- (b) the giving of advice based on such diagnosis;
- (c) the medical or surgical treatment of animals including the performance of surgical operations thereon.”

² “Veterinary service” means “doing or performing any act or attending to any matter the doing or performing of which or the attending to which forms part of the generally accepted practice of veterinary surgery”.

means that, in the specified circumstances, the persons listed in Schedule 2 are not subject to the prohibition in section 16(1) when they are performing acts which fall within the meaning of “veterinary surgery” or providing services which fall within the meaning of “veterinary service” under the VSRO.

- 1.7 By virtue of section 29(2) of the VSRO, the Secretary for Food and Health may, by order, amend Schedule 2. Schedule 2 to the VSRO was last amended in 2012 to, amongst other things, permit individuals such as veterinary students undertaking programmes offered by other jurisdictions to perform certain acts of veterinary surgery under the direction and/or supervision of a registered veterinary surgeon for training purposes. The relevant provisions on the exemptions in Schedule 2 are in **Annex 1**.
- 1.8 In formulating the exemption proposals back in 2012, a main consideration then was the need of veterinary students from other jurisdictions (many of whom are Hong Kong residents) to gain work or clinical experience with a view to practising in Hong Kong after graduation. These students may receive training of the more complicated components of their clinical trainings (such as surgical and anaesthetic) at their places of study. Coupled with the fact that there was no local veterinary school or college, there was no need for the provision of an exemption regarding these veterinary surgery acts in Hong Kong at the time.
- 1.9 With the offering of local veterinary programme in recent years, and that its curriculum design requires students to undergo clinical training in senior years of studies, there is now a need to further expand the scope of the exemption for veterinary students in performing veterinary acts (under the direction and/or supervision of a registered veterinary surgeon) for training purposes.
- 1.10 We have therefore conducted a review of the current provisions and have identified several areas where Schedule 2 to the VSRO would need to be amended in order to permit local veterinary students to lawfully undertake the necessary veterinary acts as part of the clinical training of their programme. In devising the amendment proposals,

in addition to taking reference from overseas practices, we have taken into account local conditions and ensure that the proposals are suitable for Hong Kong's circumstances.

- 1.11 The key issues of concern and the proposed way forward are set out in Chapter 2. To facilitate understanding of the subject, a brief background of the issue is provided and followed by a discussion of the issue in greater detail, as well as our proposals. Where appropriate, reference is made to the legislation and practices of other jurisdictions, such as Australia, Canada, New Zealand, the United Kingdom and the United States.

CHAPTER 2 THE PROPOSALS

Background

- 2.1 Currently there are about 1 000 registered veterinary surgeons in Hong Kong, and all of them hold veterinary qualifications of other jurisdictions that are recognised by the VSB for registration purposes. At the moment, the supply of local veterinary surgeons solely relies on graduates of veterinary schools or colleges from other places.
- 2.2 In 2014, the CityU established the then School of Veterinary Medicine (now named Jockey Club College of Veterinary Medicine and Life Sciences) in collaboration with the Cornell University College of Veterinary Medicine, and the first cohort of its six-year Bachelor of Veterinary Medicine (“**BVM**”) programme commenced in the academic year 2017-18 with an annual intake of around 10-20 veterinary students.
- 2.3 Similar to the curricular structure of veterinary programmes in academic institutions of other jurisdictions, veterinary students of the CityU are required to undertake clinical training from their fifth year of study and a year of clinical rotation in their final year at various places like CityU’s veterinary clinic, livestock farms, aquaculture farms and private veterinary clinics, etc. Clinical rotation of a veterinary programme is a transitional and crucial stage where veterinary students shall, under guidance and supervision of tutors who are registered veterinary surgeons, practically apply clinical knowledge and take part in diagnosis, medical treatment, surgical operations and many other veterinary procedures and techniques on animals of real clinical cases. The veterinary school or college, at the same time, will assess whether the students have acquired all necessary competencies to graduate and practise as a veterinarian.

Issues of Concern

- 2.4 While the current exemptions under Schedule 2 to the VSRO permit

the performing of certain veterinary surgery acts by persons other than registered veterinary surgeons under the direction and/or supervision of registered veterinary surgeons, the scope is not wide enough to cover all acts on which local veterinary students need to be trained as part of the BVM programme. If the scope is not expanded, local veterinary students will not be able to receive training on all of the veterinary acts in their curriculum in Hong Kong.

- 2.5 Under the current provisions of the VSRO, the tasks that a veterinary student may legitimately perform under appropriate direction and/or supervision are covered under sections 3A-3C of Schedule 2, and they include giving injection, blood sampling from peripheral vein, administering medication and simple wound management, etc. However, **the veterinary acts stipulated must not include diagnosing, prescribing medication or performing a surgical operation; and only injection or medication other than anaesthetic drugs can be administered.**
- 2.6 The exclusion of performing surgical operation and administering anaesthetic drugs from the exemptions of the VSRO means veterinary students shall not perform surgery or perform sedation or anaesthesia on animals in Hong Kong. While veterinary students from other jurisdictions who try to gain work experience in Hong Kong may complete the surgical and anaesthetic components of their clinical trainings at their places of study, local veterinary students such as veterinary students of the CityU's BVM programme must finish their clinical trainings, including performing surgical operations and anaesthesia on live animals in Hong Kong. Therefore, **with the current provisions, local veterinary students would not have the opportunity to acquire some of the essential training in Hong Kong, thereby affecting the assessment on their competencies.**
- 2.7 Moreover, the veterinary acts permitted under the exemption of the current VSRO are limited and do not cover all diagnostic or therapeutic procedures of veterinary science, and **it prohibits local veterinary students from practising many other common veterinary procedures that are not explicitly exempted under the VSRO**, for instance blood sampling from the jugular vein (a central

vein), cystocentesis (i.e. urine sampling from the bladder), placing urinary catheter, etc. With the rapid advancement of veterinary medicine, there are new diagnostic and therapeutic procedures developed from time to time, and the current defined exemptions under the VSRO applicable to veterinary students will hinder them from learning and practising any new veterinary procedures and techniques during the training of their veterinary programme.

Situation in Other Jurisdictions

- 2.8 In other places where veterinary colleges or schools are recognised by the VSB for registration, veterinary students are generally exempted from restriction of the relevant legislations and allowed to practice veterinary surgery and medicine under the direct supervision of a licenced or registered veterinary surgeon as part of their academic path to obtain the veterinary qualifications. For details of the regulation of veterinary students to perform acts of veterinary surgery in other jurisdictions, please refer to **Annex 2**.

Issues for Consideration

- 2.9 In formulating our proposals, we need to strike a balance between the legitimate needs of local veterinary students to perform veterinary acts for training purposes on one hand, and the welfare of animals, interests of veterinary services users as well as public health and safety concern on the other. We have taken into account the circumstances of local veterinary medicine programme and made reference to relevant legislations from other jurisdictions. It is important that any change made to the VSRO should not undermine the standards of veterinary services in Hong Kong. There are four major considerations when we formulate our proposals and they are further discussed in the following paragraphs.
- 2.10 The first consideration is who would be exempted from performing the veterinary surgery acts in question. The purpose of the proposal to amend the VSRO is to facilitate the clinical training of local

veterinary programme. It is proposed that the exemption applies to persons who are in full time study of a local veterinary programme. This criterion of exemption will make sure that only persons who are currently enrolled in a local veterinary programme will be exempted and bar other persons who do not receive similar training to practise veterinary surgery in Hong Kong. It is also proposed that the same may apply to veterinary students who are in full time study of VSB recognised veterinary programmes in other jurisdictions and choose to receive the same level of clinical training as local veterinary students under the supervision of a registered veterinary surgeon in Hong Kong.

2.11 The second consideration is whether a positive list or negative list for the exempted acts should be adopted. As mentioned in paragraph 2.7, the approach of setting out all the exempted veterinary acts in the legislation is adopted currently. The exempted acts are not exhaustive and do not cover all, including some common, diagnostic and therapeutic procedures of veterinary science. Newly developed techniques in the future would also not be covered. In order not to deprive veterinary students the opportunity to learn, practise and keep abreast of the ever developing veterinary sector, it is proposed that a negative list approach should be adopted to exempt veterinary students to practise acts of veterinary surgery.

2.12 The third consideration is that there must be an appropriate level of oversight from a registered veterinary surgeon in relation to the proposed exemption for veterinary students, similar to the current requirement under exemptions provided in sections 3A-3C of Schedule 2. Should a veterinary student needs to perform any veterinary act that is not covered by the current provisions of Schedule 2, for instance the performance of surgical operations aseptically, sedation or anaesthesia, the nature of such veterinary act is most likely to be more invasive than the currently permitted ones. Therefore, it is proposed that the highest level of oversight should be required and that the registered veterinary surgeon shall be responsible for the veterinary acts performed by the persons under his or her direct and

continuous supervision³.

2.13 The final consideration is the necessity of veterinary students to perform the required veterinary acts. While it is crucial for veterinary students to practise veterinary procedures so as to gain hands-on experience and for the veterinary institution to assess their competencies, it is proposed that the exemption should permit them to only perform veterinary acts or procedures that are necessary as part of the learning and assessment of their veterinary programme, taking into account the level of knowledge and skills of veterinary students.

The Proposals

2.14 Bearing in mind the considerations set out in paragraphs 2.9-2.13 above, it is proposed 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.**

2.15 To provide adequate protection, we propose that **it should be stipulated by the VSB in the Code of Practice for the Guidance of Registered Veterinary Surgeons** 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.

³ As stipulated in Schedule 2 to the VSRO, direct and continuous supervision means specific instruction given by a person on how a certain act is to be performed, with the person being present on the premises on which the act is performed to monitor the whole process and to provide assistance when appropriate.

CHAPTER 3 INVITATION FOR COMMENTS

3.1 We would like to have your views on the proposals as set out in paragraphs 2.14 and 2.15 in Chapter 2.

3.2 Please send us your comments by post, facsimile or email **on or before 22 January 2021**:

Address: Technical Services Division
 Inspection and Quarantine Branch
 Agriculture, Fisheries and Conservation
 Department
 5/F, Cheung Sha Wan Government Offices
 303 Cheung Sha Wan Road
 Kowloon, Hong Kong

Fax number: (852) 2156 0215

Email address: tsdiq@afcd.gov.hk

3.3 It is voluntary for any member of the public to supply his / her personal data upon providing views on the consultation document. Any personal data provided with a submission will only be used for purpose of this consultation exercise.

3.4 The submissions and personal data collected may be transferred to the relevant Government bureaux, departments or agencies for purposes directly related to this consultation exercise. The relevant parties receiving the data are bound by such purposes in their subsequent use of such data.

3.5 The names and views of individuals and organisations which put forth submissions in response to the consultation document (“**senders**”) may be published for public viewing after conclusion of the consultation exercise. The Agriculture, Fisheries and Conservation Department (“**AFCD**”) may, either in discussion with others or in any subsequent report, whether privately or publicly, attribute comments

submitted in response to the consultation document. We will respect the wish of senders to remain anonymous and / or keep the views confidential in relation to all or part of a submission; but **if no such wish is indicated, it will be assumed that the sender can be named and his / her views be published for public information.**

- 3.6 Any sender providing personal data to AFCD in the submission will have the right of access and correction with respect to such personal data. Any request for data access or correction of personal data should be made in writing to the contact specified in paragraph 3.2 above.

PROVISIONS OF SCHEDULE 2 TO VETERINARY SURGEONS REGISTRATION ORDINANCE

Veterinary Surgeons Registration Ordinance

Schedule 2

S2-2

Cap. 529

Schedule 2

[s. 29]

Exemptions from Ordinance

In this Schedule—

direct and continuous supervision (直接持續監督) means specific instruction given by a person on how a certain act is to be performed, with the person being present on the premises on which the act is performed to monitor the whole process and to provide assistance when appropriate;

direction (指示) means instruction given by a person to perform a certain act (which may include instruction on how the act is to be performed) without it being necessary for the person to be present on the premises on which the act is performed;

supervision (監督) means specific instruction given by a person on how a certain act is to be performed, with the person being present on the premises on which the act is performed to provide assistance when appropriate.

(Added L.N. 40 of 2012)

1. A medical practitioner or a dentist carrying out any treatment, test or surgery on an animal provided it is done at the request of a registered veterinary surgeon.
2. A medical practitioner who performs surgery on an animal for the purpose of removing an organ or tissue for use in the treatment of human beings.

Veterinary Surgeons Registration Ordinance

Schedule 2

S2-4

Cap. 529

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3. A person who treats an animal by physiotherapy provided the treatment is carried out under the direction of a registered veterinary surgeon.
- 3A. A person who performs any of the following on an animal under the direction, and on the premises of the practice, of a registered veterinary surgeon—
- (a) applying medication or treatment (other than anaesthetic drugs) topically or administering medication or treatment (other than anaesthetic drugs) orally, per-rectally or by inhalation;
 - (b) positioning for, or the taking of, medical images;
 - (c) giving subcutaneous or intramuscular injections (other than anaesthetic drugs);
 - (d) non-invasive parameter monitoring, including taking vital signs of an animal;
 - (e) administering fluids intravenously through a preplaced catheter,
- but it must not include diagnosing, prescribing medication or performing a surgical operation.
- (Added L.N. 40 of 2012)*
- 3B. A person who performs any of the following on an animal under the supervision, and on the premises of the practice, of a registered veterinary surgeon—
- (a) blood sampling from peripheral veins;
 - (b) applying simple dressings and bandages and simple wound management;
 - (c) placing intravenous catheters into the cephalic, saphenous or ear veins;

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Last updated date
2.8.2012

Veterinary Surgeons Registration Ordinance

Schedule 2

S2-6
Cap. 529

- (d) administering medication (other than anaesthetic drugs) intravenously through a preplaced catheter,

but it must not include diagnosing, prescribing medication or performing a surgical operation.

(Added L.N. 40 of 2012)

3C. A person who performs any of the following on an animal under the direct and continuous supervision, and on the premises of the practice, of a registered veterinary surgeon—

- (a) teeth scaling or polishing, but not associated processes or other dental procedures;
- (b) endotracheal intubation or extubation;
- (c) giving intravenous injections (other than anaesthetic drugs);
- (d) monitoring and maintaining anaesthesia;
- (e) aiding the registered veterinary surgeon who is performing and is in charge of a medical or surgical procedure, but not making any decision on the procedure;
- (f) applying complex dressings and bandages and complex wound management,

but it must not include diagnosing, prescribing medication or performing a surgical operation.

(Added L.N. 40 of 2012)

4. An owner of an animal (or the owner's employee or a member of the owner's household) when performing any of the following on the animal for remedy or prevention of injury or illness—

- (a) applying medication topically or administering medication orally;

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2.8.2012

Veterinary Surgeons Registration Ordinance

Schedule 2

S2-8

Cap. 529

- (b) administering medication specific to the animal per-rectally, parenterally or by inhalation under the direction of a registered veterinary surgeon;
- (c) any other non-invasive act of veterinary surgery or veterinary service under the direction of a registered veterinary surgeon,

but it must not include making a surgical incision into any part of the animal.

(Replaced L.N. 40 of 2012)

4A. An owner of a fish (or the owner's employee or a member of the owner's household) when performing on the fish any of the following—

- (a) taking samples for diagnosing or treating infection;
- (b) administering vaccine or medication.

(Added L.N. 40 of 2012)

4B. A licensee under the Public Health (Animals and Birds) (Keeping of Cattle, Sheep and Goats) Regulations (Cap. 139 sub. leg. C), the Dairies Regulations (Cap. 139 sub. leg. D) or the Public Health (Animals and Birds) (Licensing of Livestock Keeping) Regulation (Cap. 139 sub. leg. L) (or the licensee's employee or a member of the licensee's household) when performing on an animal kept by the licensee in that capacity any of the following—

- (a) castrating a pig (other than a cryptorchid pig) at 14 days of age or less;
- (b) docking the tail of a pig at 7 days of age or less;
- (c) clipping the teeth of a pig at 7 days of age or less;
- (d) trimming the beak of poultry at 10 days of age or less;
- (e) administering vaccine or medication.

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Last updated date
2.8.2012

Veterinary Surgeons Registration Ordinance

Schedule 2

S2-10
Cap. 529

(Added L.N. 40 of 2012)

5. A licensee under the Animals (Control of Experiments) Ordinance (Cap. 340) when performing an experiment in accordance with the provisions of that Ordinance.
6. A person who is employed or retained by the Government for performing one or more of the following on an animal, when acting in that capacity—
 - (a) examining the animal;
 - (b) collecting samples;
 - (c) administering vaccine or medication;
 - (d) implanting identification devices;
 - (e) any other procedure as instructed by a veterinary officer.

(Replaced L.N. 40 of 2012)
7. A person who administers first aid to an animal for the purpose of saving its life or relieving pain, provided such treatment does not include making a surgical incision into the abdominal or thoracic cavity.

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Last updated date
2.8.2012

Please visit <https://www.elegislation.gov.hk/hk/cap529> for complete provisions of the Ordinance.

REGULATION OF VETERINARY STUDENTS TO PERFORM ACTS OF VETERINARY SURGERY IN OTHER JURISDICTIONS

Australia

1. In Queensland, under Part 4B of the **Veterinary Surgeons Act 1936**, subsection (1) of section 25M stated that “*A person who is not a veterinary surgeon must not practise veterinary science.*”; and subsection (2)(b) further stated that “*However, a person does not commit an offence against subsection (1) if the person is undertaking a course of study, or a qualifying examination, in veterinary science approved by the board; and practises veterinary science under the supervision of a veterinary surgeon.*”

Canada

2. In Ontario, section 11(1) of the **Veterinarian Acts** stated that “*No person shall engage in the practice of veterinary medicine or hold himself, herself or itself out as engaging in the practice of veterinary medicine unless the person is the holder of a licence.*”; section 11(3) further stated that “*Subsection (1) does not apply to a student of veterinary medicine to the extent that the student is engaging in the undergraduate curriculum of studies at the Ontario Veterinary College of the University of Guelph.*”

New Zealand

3. Section 15 of the **Animal Welfare Act 1999** stipulated that “*Except as provided in section 18(1), no person may perform any significant surgical procedure on an animal unless that person is (a) a veterinarian; or (b) a person who is acting under the direct supervision of a veterinarian and who is a student undergoing his or her training to become a veterinarian.*”

South Africa

4. Under Section 23(1) of the **Veterinary and Para-veterinary Professions Act** stated that “(a) *No person shall in any manner whatsoever practise a veterinary profession or a para-veterinary profession unless he or she is registered or deemed to be registered in terms of this Act to practise the profession concerned.* (b) *A student who is registered in terms of this Act and undergoes practical training may render a particular service deemed in terms of the rules to pertain specially to a veterinary profession or a para-veterinary profession, if it is so rendered under the supervision and by direction of a person who is registered or deemed to be registered in terms of this Act to practise the profession concerned.*”

United Kingdom

5. Under section 19 of the **Veterinary Surgeons Act 1966**, subsection (1) stipulated that “*Subject to the following provisions of this section, no individual shall practise, or hold himself out as practising or as being prepared to practise, veterinary surgery unless he is registered in the register of veterinary surgeons or the supplementary veterinary register...*”; subsection (3) further stated that “*The Council may make regulations exempting from subsection (1) of this section the carrying out or performance of any veterinary treatment, test or operation prescribed by the regulations, subject to compliance with prescribed conditions, by students of veterinary surgery of any prescribed class.*”
6. Under section 2(1) of Schedule of **The Veterinary Surgeons (Practice By Students) (Amendment) Regulations Order of Council 1995**, “*The classes of students of veterinary surgery prescribed for the purpose of these regulations shall comprise: (a) students who have attained the age of 18 years, are attending full-time courses at a university or a veterinary school in the United Kingdom or elsewhere, leading to a veterinary qualification, and*”

have entered upon that part of the curriculum which deals with clinical studies;”

7. Section 4 of **The Veterinary Surgeons (Practice By Students) Regulations Order of Council 1981** stated that “A student who falls within the class prescribed by Regulation 3 of these Regulation may (a) examine animals; (b) carry out tests upon animals under the direction of a registered veterinary surgeon; (c) administer treatment (other than by way of surgical operations) to animals under the supervision of a registered veterinary surgeons; and (d) perform surgical operations upon animals in accordance with the directions and under the direct and continuous personal supervision of a registered veterinary surgeon.”

United States

8. In Texas, under sec. 801.251 of the **Veterinary Licensing Act**, “Except as provided by Section 801.004, a person may not practice, or offer or attempt to practice, veterinary medicine unless the person holds a license to practice veterinary medicine issued under this chapter.”; section 801.004 further stated that “This chapter does not apply to: ...(5) the performance of an act by a person who is a full-time student of an accredited college of veterinary medicine if the act is performed under the direct supervision of a veterinarian.”