

ECCVT feedback on public consultation regarding Commission Delegated Directive amending Directive 2005/36/EC as regards the minimum training requirements for the professions of veterinary surgeon.

The European Association of Establishments for Veterinary Education (EAEVE), the European Board of Veterinary Specialisation (EBVS), the International Veterinary Students' Association (IVSA) and the Federation of Veterinarians of Europe (FVE), members of the European Coordinating Committee on Veterinary Training (ECCVT) reviewed the draft Commission Delegated Directive, now for [public consultation](#).

ECCVT welcomes the improvements suggested, especially the new competences in Article 38.3.

However, to align with the latest developments in veterinary medicine and promote the mobility of new graduates to better meet the evolving needs of the society, we are proposing some additional changes.

The proposed changes are in line with the 'ECCVT List of subjects and Day One Competences' ([Annex II of the SOP, page 32](#)), which is endorsed and implemented by all 96 EAEVE member Veterinary Education Establishments in Europe. Furthermore, the proposed changes aim to:

- Ensure new competences in Article 38 are also reflected in Annex V to avoid contradictions
- Remove some subjects in Annex V which are outdated

Specifically, we **propose the following changes**:

Generally:

- Replace the term '*veterinary surgeon*' with '*veterinarian*'. The term 'veterinarian' is the widely accepted standard across the EU, as reflected in numerous EU legislative proposals, including the [Animal Health Law](#).

Improvements suggested to Article 38.3:

- Replace '*competences and skills*' with just 'competences' (as competences include knowledge, skills and attitudes) ([ref](#))
- Under (c) include prevention of pain and necropsy: '*[...], as well as to **prevent**, assess and manage pain [...] and euthanasia and **necropsy**, whether [...],*'
- Under (d) include biosecurity '*adequate knowledge, skills and competences for preventive medicine, including competences relating to inquiries, certification and **biosecurity** [...];*
- Under (h) include adequate to align to the other bullet points: '***adequate** knowledge of the organisation and [...]*'
- Under (h) add reporting '*adequate knowledge of [...] health economics **and reporting**, [...]*'

- Under (i) add information technology and database management *‘adequate knowledge of information and digital technologies and database management, and the competences necessary for their practical application in the veterinary domain.’*

Improvements suggested to the Annex:

- Basic subjects:

- ✓ Change ‘Physics’ to ‘Biomedical Physics’
- ✓ Replace ‘Plant biology’ with ‘Feed plants and toxic plants’
- ✓ Change ‘Biomathematics’ to ‘Biomedical statistics’

- Specific subjects: a. Basic Sciences:

- ✓ Add: ‘Information literacy and data management’,
- ✓ Add: ‘Animal health economics and practice management’,
- ✓ Change ‘Professional ethics’ to ‘Professional ethics and communication’

- Specific subjects: b. Clinical sciences:

- ✓ As ‘Obstetrics’ and ‘Reproduction and reproductive disorders’ belong together, merge them to ‘Obstetrics, reproduction and reproductive disorders’
- ✓ Change: ‘Parasitology’ to ‘Infectious diseases, including zoonosis and their prevention’
- ✓ Change: ‘Clinical lectures on the various domestic animals, poultry and other animal species’ to ‘Clinical practical training in common companion animals and common food producing animals’
- ✓ Change ‘Veterinary legislation and forensic medicine’ to ‘Veterinary legislation including official controls, regulatory veterinary services, forensic veterinary medicine and certification’
- ✓ Delete ‘Veterinary state medicine and public health’ (belongs to d.)
- ✓ Delete ‘Propaedeutics’ (redundant, already covered under other subjects, with no consistent definition across all EU countries)

- Specific subjects: c. Animal Production:

- ✓ Delete ‘Agronomy’
- ✓ Delete ‘Veterinary hygiene’ (covered in point d)
- ✓ Change ‘Animal production’ to ‘Animal production, including breeding, husbandry and economics’

- Specific subjects: d. Food Hygiene:

- ✓ Change the subject title ‘Food Hygiene’ to ‘Veterinary Public Health (including Food Safety and Quality’

ECCVT urges all CVOs, VEEs and national FVE members to provide their input to the Public Consultation on [‘Have your Say’](#) by 21 October 2024.

For any further assistance or clarification, please feel free to contact the [EAEVE](#) , [FVE](#) or [EBVS](#).

Sincerely,

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Heiko Nathues- EBVS President
Siegfried Moder – FVE President
Felix Metzger – IVSA President

