

Please see below my comments as outgoing Chairperson of the IVNA on the following matters as they impact on competition in veterinary services. Please note that these comments do not necessarily represent the views of the newly appointed committee who will begin their terms of office in July/August 2007.

1. Impact of veterinary nurses on competition in the market

Part 8, section 91 (b) outlines the procedures on animals which may be carried out by a veterinary nurse, under the direction of a veterinary practitioner and as such is the focus of potential development for veterinary nursing and the impact this may have in competitive terms to the wider veterinary profession. The procedures are as follows:

- (i) the administration of medication intravenously or subcutaneously, provided that the medication is being administered for the purposes of rehydration or fluid therapy,
- (ii) catheterisation, surgical treatment of abscesses and ulcers, application of external casts and cutaneous suturing,
- (iii) the taking of images by x-ray,
- (iv) the carrying out of minor medical procedures or minor surgery.

While all of the above procedures currently occur within a traditional veterinary practice environment, individual veterinary nurses could run a complementary service for clients once cases have been referred by a veterinary practitioner. Interestingly, the first veterinary nurse clinic in the UK opened its doors to the public on March 17th in London after many months of consultation with the Royal College of Veterinary Surgeons (RCVS). The veterinary nurse set up the clinic to provide cost effective preventative health care consultations and while she operates out of her own business premises she has established a formal link with a local veterinary practice who refer cases where necessary. Further information can be found in VN Times Volume 7 (4) April 2007.

2. Demand for veterinary nurse training places and provision of courses

Demand for veterinary nurse training in Ireland is high and with limited study places available there is competition for college places and employment in veterinary practices which allow ongoing training. Both University College Dublin and Athlone Institute of Technology offer veterinary nurse training, the former having recently been accepted by the Veterinary Nursing Validation Committee which will allow graduating Veterinary Nurses from UCD to be entered on to the Council's Register of Veterinary Nurses due to be established in January 2008. Both limit student numbers to approximately 35 per year, so as not to flood the market with new graduands, however in general there is a shortage of veterinary nursing staff willing to work in traditional roles within veterinary practice, possibly due to poor rates of pay and varied working conditions.

UCD is also one of seven European schools of veterinary nursing that have been accredited by ACOVENE (the European Accreditation Committee for Veterinary Nurse Education) following a successful pilot project to develop a system for quality assuring

veterinary nurse education in Europe. Further information can be found at <http://www.vetnnet.com/News.php>

In the UK the RCVS are responsible for the development of the veterinary nursing curriculum and all the education providers use the same curriculum but in different formats e.g. Certificate, BSc (Hons), full time, block release etc. Both UCD and AIT currently use independent curriculum devised from a Eurosyllabus in the case of UCD and independent scientific background in the case of AIT. It may be beneficial if education providers in Ireland were to follow a similar curriculum template and offer independent top up modules to already qualified VNs.

3. Establishment of Register of Veterinary Nurses and Veterinary Nurses Board

The establishment of Register of Veterinary Nurses and Veterinary Nurses Board as provided for in Part 8, section 93 (1) and 98 (1) are intrinsic to the development of the veterinary nursing profession. The register provides a list of recognised professionals and section 97 (1) outlines offences in relation to practice of veterinary nursing or use of title. This will in time eliminate individuals who are currently working as VNs in practice without recognised qualifications. Furthermore, making VNs accountable for their own actions allows the profession to advance by taking the professional responsibility away from veterinary practitioners who currently are reluctant to direct or supervise veterinary procedures that can be carried out by veterinary nurses.

Once the Veterinary Nurses Board is established a review of the functions of the Irish Veterinary Nursing Association must take place to determine a continued need for such an Association.

4. Supplemental information

Unfortunately the IVNA has undergone a period of transition and there has not been an active committee since September 2006. This has had a negative effect on active membership numbers which currently stand at just 50, while there are 115 inactive members. However, I am confident that the new committee will work hard to regain the confidence of the veterinary nursing profession.

On behalf of the IVNA may I take this opportunity to thank The Competition Authority for the opportunity to provide comment for this study.

Regards,

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Chairperson 2002 - 2006
On behalf of the IVNA Committee