**VETERINARY/PARA-VETERINARY VS NON-VETERINARY PROCEDURES (26 NOVEMBER 2020)**

**Introduction**

The South African Veterinary Council (SAVC) is responsible for registering/authorising persons facilitating veterinary/para-veterinary (hereafter “veterinary”) procedures in animals as well as registering the facilities where said veterinary procedures are facilitated under the Veterinary and Para-Veterinary Professions Act (Act 19 of 1982). Said procedures may be facilitated in veterinary consulting rooms, as ambulatory services, in the field under natural conditions, or when facilitated in animals used for research/scientific purposes. Such procedures include but are not limited to the collection of samples antemortem, surgery, invasive methods of substance administration, the administration or the use of any item (substance or device) controlled by the Medicines and Related Substances Control Act (Act 101 of 1965) or stock remedies that may be restricted for use under the Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act (Act 36 of 1947). The Rules (“Scope of Practice”) relating to the practicing of the various veterinary and para-veterinary professions, under Act 19 of 1982, set out the veterinary / para-veterinary procedures associated with each respective profession.

It has, however, been questioned if all procedures facilitated/undertaken in animals necessarily require registration/authorisation under Act 19 of 1982 or if certain procedures may be safely and professionally facilitated by persons registered under other Professional Acts (i.e., Health Professions or Natural Scientists specifically). The aim of the tables below is to provide guidance to persons, including researchers and registered professional natural scientists, as to when a procedure will be considered a veterinary procedure requiring registration/authorisation of the person and/or the registration of the relevant facility with the SAVC; or when the said procedure may be facilitated without said SAVC registration/authorisation of persons and/or facilities. Since the table could not cover all scenarios, please approach the SAVC if you have any enquiries for procedures or specific applications that may not be listed.

| **Table 1. Biomedical Scientific Purposes 𝛼** | | |
| --- | --- | --- |
| **Category** | **Examples (others may be applicable)** | **Authorisation / Registration required from the SAVC** |
| Using a live animal to study changes in physiology or other phenotypes after administration of substance, or performing of a medical or veterinary technique including the application of external stimuli, and/or when the result has direct impact on human/animal health, understanding of a human/animal disease (or condition) or pathophysiology / treatment / management thereof, and/or involves surgery, including the termination (i.e., euthanasia) of the animals involved | 1. Testing of a new medicine/substance for any effect 2. Implantation of a medical device 3. Surgery or surgical procedure on an animal 4. Invasive embryo transfer or trans-abdominal artificial insemination 5. Memory testing for e.g., Alzheimer’s research 6. Water testing, maze testing and depression testing 7. Gavage or tubing or injection to administer a test substance/chemical or other substance 8. Teaching towards facilitation of a) to g) above 9. Any such research on classical laboratory-bred, or purpose-bred animals, that as a species or strain (breed) are used for these purposes | Person\* and Facility£  Agree |
| Using an animal to assess or demonstrate the safety and/or efficacy of a substance, medicine, chemical, product or medical device, including the termination of the animals involved | 1. Non-clinical toxicity or safety testing 2. Dose-finding studies 3. Placebo-controlled studies 4. Discovery studies 5. Assessing the safety or efficacy of medical devices 6. Studies required to register a substance or product 7. Testing of vaccines or other biological agents | Person\* and Facility£  Agree |
| Using an animal for the production of biological substances, e.g. to antibody production, antigen propagation, blood or serum/plasma harvest, including the termination of the animals involved | 1. Vaccinating an animal to monitor the antibody response. 2. Using an animal to propagate an antigen 3. Collection of serum/plasma for further testing or to facilitate laboratory models | Person\* and Facility£  Agree |
| Using an animal to make a diagnosis in another animal or human, including the termination of the animals involved | 1. As a last resort for testing for overt toxicity such as botulism or rabies | Person\* and Facility£  Agree |
| Implantation/infestation studies, including the termination of the animals involved | 1. Xenograft models 2. Parasite infestations 3. Autotransplant models 4. Implantation of any physiological monitor (excluding microchipping) 5. Fistula for rumen sampling | Person\* and Facility£  Agree |
| Infectious studies, including the termination of the animals involved | 1. To determine the effect of a disease in an animal for the study of the disease directly or for establishing the effect of a therapeutic agent 2. Using an animal as a host to propagate the lifecycle of a micro- or macro-organism. | Person\* and Facility£  Agree |
| Administration of medication (as per Table 3) or sampling of animals (as per Table 4) for biomedical scientific purposes | 1. Administration of medication for biomedical scientific purposes 2. Sampling of animals for biomedical scientific purposes | Person\* and Facility£ |
| Monitoring of animals and basic handling | 1. Routine monitoring of habitus 2. Monitoring for change in behaviour 3. Handling animals outside of its cage or enclosure 4. Weighing animals 5. Cage changing | Registered Facility  Person trained and certified competent by a veterinarian or para-veterinarian who is registered and competent to facilitate said procedures.  Agree |
| **𝛼 Scientific purposes** include using animals that are in captivity or free living for research, teaching, education, testing for regulatory or quality control purposes, to test a hypothesis or demonstrate existing knowledge; and includes all aspects of housing, care and monitoring of animals.  \* For a person involved in the care or use of animals for Biomedical Scientific Purposes:   1. When the person performing a procedure is a medical doctor, dentist or medical specialist who is currently actively registered with the HPCSA (or other international medical specialty board) to undertake the same procedure in humans (in cases where this professional does not need to be supervised by another HPCSA-registered professional when performing the procedure on humans), no SAVC authorization is required as long as the person is working constantly alongside a SAVC-registered veterinarian to perform veterinary procedures such as anaesthesiology, advising on species-specific aspects, monitoring animal wellbeing and ensuring that current good veterinary practice standards are maintained. The veterinarian’s role is that of direct and continuous supervision of the animal’s welfare. 2. When the person performing a procedure is a medical doctor, dentist or medical specialist who is currently actively registered with the HPCSA (or other international medical specialty board) to undertake the same procedure in humans (in cases where this professional does not need to be supervised by another HPCSA-registered professional when performing the procedure on humans), SAVC authorisation is required in all cases where there is not a SAVC-registered veterinarian present throughout the duration of the procedure. However, in all such cases there must still be a registered veterinarian linked to the project and animal, in order to appropriately attend to the animal’s health and welfare and emergencies. 3. All other persons will require authorisation from the SAVC. 4. SACNASP-registered professionals will require SAVC authorisation if they are involved in biomedical scientific purposes in any animal species.   £ For Registration of Facilities, the following shall apply   1. Facilities that are used for any of the purposes contemplated as biomedical will require registration with the SAVC. 2. SAVC-authorised persons and HPCSA-registered persons may only operate in a registered veterinary facility. 3. If the Facility is not registered with the SAVC, the animal needs to be moved to a registered veterinary facility for the facilitation of veterinary procedures. | | |

| **Table 2. Behavioural and Nutritional Research** | | |
| --- | --- | --- |
| **Category** | **Examples (others may be applicable)** | **Authorisation / Registration required from the SAVC** |
| Monitoring of animal in their natural habitat  (excluding as for Biomedical Scientific Purposes) | * 1. Pure observation studies evaluating animals in the field for behavior, and observation in other zoological research   2. Observation of breeding and other related parameters   3. Census and related activities   4. Metabolic (excluding Biomedical Scientific Purposes) and respirometer related studies   5. Mechanical capture and/or restraint of animals   6. Tagging of animals, excluding invasive tagging   7. Collection of genetic material (hair, faeces, biopsy dart, ear clipping)   8. Non-chemical termination of animals$ | Not Required\*\*  Agree |
| Monitoring animals for stress research  (excluding as for Biomedical Scientific Purposes) | 1. Collection of faecal samples 2. Experiments placing animals (excluding laboratory animals) together to study behavior 3. Alterations in the animals’ natural habitat including introduction of external stimulus (e.g. predator noises) 4. Thermal studies (for the implant of loggers see Biomedical Scientific Purposes) 5. Non-chemical termination of animals$ | Not Required\*\*  Agree |
| Monitoring of animals for reproductive research  (excluding as for Biomedical Scientific Purposes) | 1. Observational studies 2. Tagging and monitoring, excluding invasive tagging 3. Evaluation of changes in reproductive behavior with only post-mortal sampling 4. Non-chemical termination of animals$ | Not Required |
| Monitoring of an animal for nutritional studies  (excluding as for Biomedical Scientific Purposes) | 1. Growth with change in fed diets (for tubing/gavage see Biomedical Scientific Purposes) 2. Evaluation of rumen and faecal samples (for implantation of fistula, see Biomedical Scientific Purposes) 3. Non-chemical termination of animals$ | Not required  Agree |
| The surgical implantation of any device will be considered a veterinary procedure | 1. Surgical implantation of any device | Person and Facility  Agree |
| \*\*Since some studies may induce significant stress and can impact on animal welfare, these studies should have veterinary oversight and this aspect should be included in the ethics application.  $ For non-chemical euthanasia, SACNASP and the SAVC will be required to collaboratively set working guidelines and standards for competence-based training in procedures, which will apply to the veterinary profession as well – for research in predators, termination of the prey species should be according to a species-specific protocol according to best practice guidelines.  If a veterinary procedure is required, a registered veterinarian from a registered veterinary facility may assist in a research project without the facility being SAVC-registered, as long as the facilitated procedure does not become common or routine practice. - Agree | | |

| **Table 3. Administration of Medication** | | |
| --- | --- | --- |
| **Category** | **Examples (others may be applicable)** | **Authorisation / Registration required from the SAVC** |
| Anaesthesia and Tranquilisation | 1. To allow for animal handling and restraint 2. To allow for tagging of animals 3. To allow for fitting of tracking devices 4. To perform a procedure including surgery 5. To perform implantation of monitoring devices 6. To allow for collection of genetic material 7. Overdose of an anaesthetic or chemical agent for resultant euthanasia for any purpose$ | Person and Facility#  Agree |
| Chemical wildlife immobilization | 1. Darting of wildlife to facilitate a procedure 2. Translocation of animals 3. Sampling of animals | Person and Facility  Agree |
| Scheduled parenteral medication 𝛽 | 1. Intravenous medication 2. Infusions 3. Extravascular administrations (excluding oral without assistance) 4. Gavage, or tubing 5. Injections | Person and Facility  Agree |
| Prescribed medication from Schedule 3 to 8, after consultation with a veterinarian  (only for topical or oral administration)  (excluding medication that is required to be administered by a veterinarian according to the Veterinary Rules)  (excluding as for Biomedical Scientific Purposes) | 1. Prescribed for use by a veterinarian | Not required  Agree |
| Over-the-counter medication  (excluding as for Biomedical Scientific Purposes) | 1. Use of a registered stock remedy | Not required  Agree |
| Over-the-counter vaccination  (excluding as for Biomedical Scientific Purposes) | 1. Use of a registered stock remedy | Not required  Agree |
| Chemicals not registered as medicines and used solely for monitoring purposes  (excluding as for Biomedical Scientific Purposes) | 1. Labelled water 2. Isotope administration 3. Non-controlled chemical substances as marker substances (excludes therapeutic substances as per biomedical) | Not Required  Agree |
| 𝛽The administration of medication by the parenteral route in general will require authorisation or registration with the SAVC.  $ For non-chemical euthanasia, SACNASP and the SAVC will be required to collaboratively set working guidelines and standards for competence-based training in procedures, which will apply to the veterinary profession as well.  # For registration of the facility, will depend on the extent of the work being undertaken. A veterinarian may work in a non-registered facility on condition they are associated with a registered veterinary facility for their routine practice. | | |

| **Table 4. Sampling of animals** | | |
| --- | --- | --- |
| **Category** | **Examples (others may be applicable)** | **Authorisation / Registration required from the SAVC** |
| Sampling post-mortem after euthanasia | 1. As listed for behavioural and nutritional research | Not required |
| Blood sampling  (peripheral vein or needle stick sampling only)  (excluding as for Biomedical Scientific Purposes) | 1. Sampling from a peripheral vein 2. Needle stick sampling | Not required ǂ  Agree |
| Blood sampling  (other methods) | 1. Cardiac puncture 2. Large venous puncture 3. Arterial puncture 4. Peri-orbital bleeding 5. Vascular catherisation | Person and Facility  Agree |
| Invasive sampling | 1. CSF (cerebrospinal fluid) sampling 2. Stereotactic sampling 3. Bone marrow sampling 4. Biopsies (excluding biopsy darts) | Person and Facility  Agree |
| ǂ Standards for competence-based training in procedures and working guidelines to be set up by SACNASP in agreement with the SAVC. | | |

**General footnotes to all tables**:

In all cases, confirmation of competence in practically performing the said procedures on live animals, must be ascertained by SACNASP (for non-veterinary procedures) and/or SAVC (for veterinary or non-veterinary procedures).

In all cases, mention of a registered facility does not imply that all procedures necessarily need to be done in the facility (e.g., field work is of necessity done in the field); but the SAVC-authorised/registered person must be associated with a SAVC-registered facility.