

# Visibly better

*The role of the veterinarian in the public interest*



RAAD VOOR DIERENAANGELEGENHEDEN

Council for Animal Affairs 2009/01, May 2009

To: the Minister of Agriculture, Nature and Food Quality

Madam,

I am most pleased to present the first recommendations of the new-style Council for Animal Affairs. Since 1 December 2008 the Council has comprised 40 independent experts. These are the first recommendations that this Council, with its broad base of expertise, has presented.

You asked the Council to consider the position of veterinarians and, more specifically, how they contribute to the public interest in this role.

A veterinarian does not only cure sick animals. He or she undertakes duties and responsibilities relating to animal welfare, food safety and public health. For example:

- A veterinarian dealing with pets<sup>1</sup> should identify hereditary disorders in cats and dogs and not co-operate in breeding animals with a hereditary disorder.
- In the equestrian sector<sup>1</sup> a veterinarian should not administer drugs or other banned veterinary medicines to horses.
- A veterinarian should inform a hobby farmer<sup>1</sup> if he is not caring properly for his animals. In serious cases the veterinarian should report animal neglect or abuse.
- In livestock farming<sup>1</sup> the veterinarian should not always prescribe veterinary medicines if the health problems of the animals can also be treated by other methods, even if these may be more expensive.

These examples show that the public interest is not always in line with the interests of the farmer or animal owner. However, the veterinarian is dependent on the animal owner for his income and in some cases may even have a vested interest. If the veterinarian's vested interest is in conflict with the public interest this can lead to dilemmas and conflicts.

The Council for Animal Affairs has analysed what might cause these dilemmas and conflicts and has recommended a number of solutions.

- Livestock farming and veterinary medicine must be transparent and validated. Keeping animals is not just a matter for the owners and their animals. Society as a whole, and government as its representative, has certain interests, standards and values regarding animals and how they are kept.
- The Council believes that all relevant information regarding animal welfare, animal health, food safety and public health should be collected in one national database. This information should be the basis for effective and differentiated surveillance.
- The Council believes that clearer agreements must be made in addition to prevailing legislation, which lay down how the veterinarian practises his profession. All veterinarians should work within certified systems. Veterinarians and animal owners who refuse to take part in such systems should be classed as high-risk and pay for additional government inspections.
- In conclusion, the Council believes that penalties for veterinarians or animal owners who violate rules should be increased considerably. Where the public interest is under threat, punishing veterinarians or animal owners by suspending their licence or banning them from keeping animals is more suitable than imposing a fine.

The Council's recommendations cannot be implemented overnight. A task force should be set up to implement the recommendations.

The Council will be pleased to provide assistance as and when required.

Prof. Mr H. Vaarkamp,  
Chairman of the Council for Animal Affairs  
May 2009

---

<sup>1</sup> Please note that these examples are not exhaustive and may also apply to other sectors.

## CONTENTS

CONTENTS .....	2
Introduction.....	3
Question from the Minister.....	4
Summary and possible solutions.....	5
Recommendations, overview.....	6
I Basic principles .....	7
<i>The animal</i> .....	7
<i>The veterinarian</i> .....	7
<i>Man</i> .....	7
<i>Society</i> .....	7
<i>Inter-relationships between man, animal, society and the veterinarian</i> .....	7
<i>Veterinary care</i> .....	7
II Tasks and responsibilities of veterinarians in society.....	8
III Tasks and responsibilities of the veterinarian.....	9
<i>Basic principles (actual situation)</i> .....	9
<i>Participants and their interests</i> .....	10
<i>Relationships between participants</i> .....	10
<i>Expectations flowchart</i> .....	11
<i>Economics Flowchart</i> .....	13
<i>Information Flowchart</i> .....	14
IV Conflicts and conclusions .....	15
<i>Conflicts in information flows:</i> .....	15
<i>Conflicts in cash flows:</i> .....	15
<i>Conclusions</i> .....	16
V Solutions and preconditions .....	17
<i>General</i> .....	17
<i>With respect to information</i> .....	17
<i>With respect to interests</i> .....	18
<i>Recommendations</i> .....	20

## Introduction

A veterinarian does more than just cure sick animals.

Veterinarians also play an important role in monitoring animal welfare, food safety and public health. These are tasks in the public interest; it is about safeguarding the securities, standards and values that society deems important.

Over the past five to ten years veterinarians seem to have lost their autonomy vis-à-vis livestock holders, livestock organisations, dealers, transporters and slaughterhouses. Yet autonomy is crucial when undertaking tasks for the public interest.

Developments that have affected this autonomy include progressing commercialisation; general individualisation and consumer and animal owner assertiveness; economies of scale in agriculture that have made veterinarians increasingly dependent (financially) on fewer but larger customers; and increasing (international) competition in agriculture and between veterinarians.

There is also discussion about how standards for the practice of veterinary science are set and observed. Clearly this involves interpreting the government's supervisory role.

Incidentally, these developments extend beyond veterinary medicine, and are witnessed across society. For instance, in the 2008 annual report the President of the Council of State wrote that public interests were losing out to the free market system. According to the President, entrepreneurs were losing focus on the public function of their business. At the same time, government supervision was being eroded.

Yet the importance of the veterinarian in the public interest is growing. For instance, 80% of all emerging diseases are diseases that can pass from animals to humans and vice versa. Veterinarians therefore have an increasingly large role to play in monitoring public health. Globally known as the *One Health* approach, physicians and veterinarians must join efforts in securing public health.

In conclusion, the Council noted that the social status of animals in Dutch society and, therefore, the importance of animal welfare have changed over the past five years. This is reflected in election programmes, the establishment of a political party that focuses solely on animal welfare, and the Memorandum on Animal Welfare published by the Ministry of Agriculture, Nature and Food Quality. In line with these developments, the veterinarian is becoming increasingly important as guardian of animal welfare.

It is also the reason why the Minister of Agriculture, Nature and Food Quality decided to request the opinion of the Council for Animal Affairs on the position of the veterinarian and his role in the public interest.

I trust that the Council's recommendations provide a valuable contribution to solving these issues. Please note, however, that solutions recommended by the Council cannot be implemented overnight. Long-term solutions will be possible only following radical system changes.

Prof. Mr H. (Henk) Vaarkamp  
Chairman of the Council for Animal Affairs

**Question from the Minister**

How can the role of the veterinarian acting in the public interest be enhanced?

To act as an authority in the field, a veterinarian must be independent; how can this independence be guaranteed and by whom?

## Summary and possible solutions

The position of the veterinarian, society's expectations and how to meet these, and tasks in the public interest have been discussed extensively over the past ten years. The government has found that the independence of the veterinarian - and the performance of tasks in the public interest – is coming under pressure.

The Council decided not to restrict itself to the level of implementation, but to study the basic principles of the position of the veterinarian instead. Regarding these underlying principles, the Council came to its conclusions and recommendations. The Council believes that fundamental changes in animal keeping and veterinary care are necessary.

Transparency of the basic principles is essential; please see the relevant paragraph (I) in this report.

Essentially, the Council concludes that whenever there is a conflict of interest between the correct practice of veterinary medicine, the social importance of veterinary supervision and/or the veterinarian's personal interests, this eventually leads to dilemmas.

These conflicts may be solved in a number of ways. We recommend making sure that there is less room for violations, securing the responsibility veterinarians have for the public interest and considerably raising the penalty for violation. In case of conflicting interests, the balance should thus tip towards the common interest.

The Council recommends that *all* animal keeping sectors in the Netherlands should be fully transparent. A central database should be set up to collect data relating to animal welfare, animal health and (animal-related) food safety and healthcare. Risk-based supervision must be developed and implemented based on these data.

The Council also recommends a veterinary certification system, preferably a private one. Effective government policy is essential in promoting participation in this private system and ensuring its self-correcting ability. Risk-based supervision by the government should lower the administrative burden for participants and increase supervision of non-participants. The Council believes that the costs for intensive supervision should be charged directly to the party in question (animal owner, veterinarian, etc). Regarding the (participants of) private systems, the government only needs to control the supervision.

In conclusion, the Council believes that violations should be subject to much higher penalties, with the suspension or revocation of professional licenses a definite option.

## **Recommendations, overview**

- I. Basic principles
- II. The tasks and responsibilities of veterinary sciences in society
- III. The tasks and responsibilities of the veterinarian
- IV. Followed by: the (in)compatibility of these tasks with individuals or positions
- V. Followed by: possible solutions and preconditions

## I Basic principles

### *The animal*

Veterinarians deal with many different types of animals that are kept in different holding systems for different purposes: from production animals (agricultural animals and fish) to non-commercial farm animals (in non-profit, 'backyard' or 'hobby' farming), and from horses (production animals officially, but usually kept for leisure or sports purposes) to pets and exotic animals.

### *The veterinarian*

Due to the wide variety of animals, growing demand from animal owners for specialisation and differentiation, and veterinarians' care and other tasks, the already varied veterinarian profession will differentiate even further. Yet despite its many aspects, veterinary science is often considered a uniform profession. Curing sick animals is usually regarded as the veterinarian's only task, but this is an incomplete and therefore incorrect view of the veterinary profession.

### *Man*

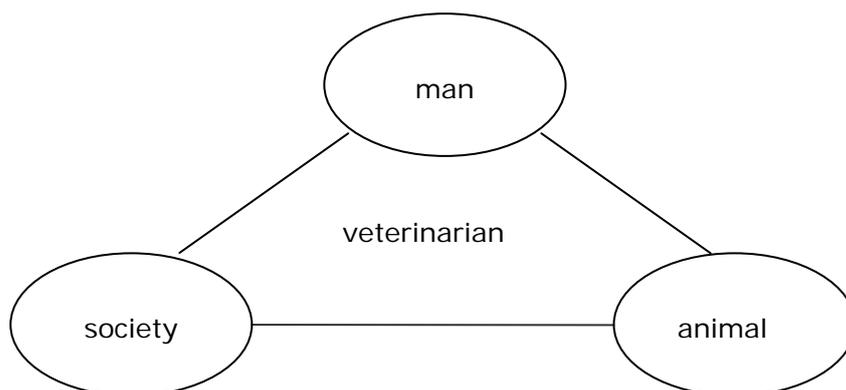
In his work, the veterinarian has to deal with many different people. Firstly, the animal owners. This is a very varied group, due to the huge variation in animal species and keeping systems in veterinary practice. Secondly, in agriculture, the veterinarian also has to deal with current and future consumers, as well as a broad range of clients, administrators, supervisors, and government officials.

### *Society*

In this report, (Dutch) society is defined as the combination of all individual and collective interests, ideals, views and values of civilians, explicitly also as consumers. They are represented by the politicians, in particular the House of Representatives. Like society, politics are continuously changing.

### *Inter-relationships between man, animal, society and the veterinarian*

Veterinarians operate in the inter-relationship between man, animal and society: their work is about taking into account the interests of each of these three players set out in the following diagram:



The dynamics of these inter-relationships requires veterinarians to adapt continuously.

### *Veterinary care*

Veterinary care comprises preventative and curative care for the health and welfare of individual animals, groups of animals and animal keeping systems as a whole.

## II Tasks and responsibilities of veterinarians in society

It is a matter of fact that man owns and domesticates animals. Since domesticating the first animals, man has cared for their health and welfare. This responsibility is greater the more he influences and controls the animals' living circumstances<sup>2</sup>.

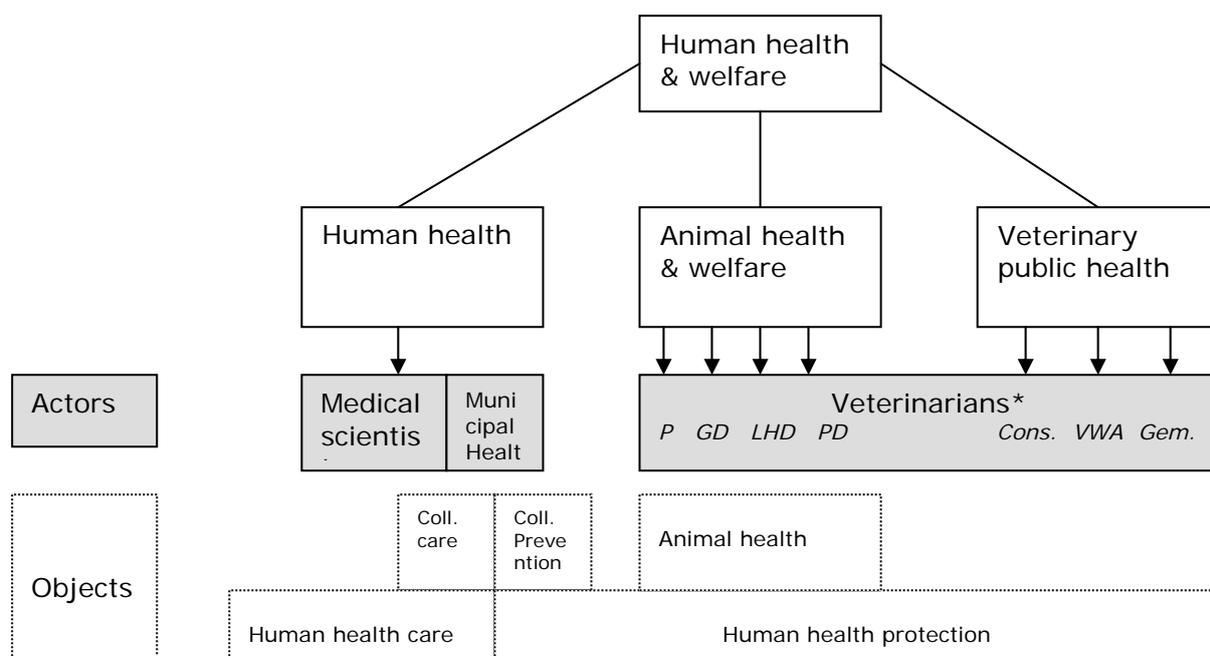
Under modern law, animals are not legal persons. Regulations that relate to animals are about man's rights and duties in dealing with animals, not about the animals' rights themselves. This does not mean that animal owners always share this view - there are plenty of people who regard their pet as a fully-fledged member of their family.

Man's health and welfare are inextricably linked. This also applies to animals' health and welfare.

Modern society recognises that animals have an intrinsic value and are sentient beings. This intrinsic value is taken into account when considering the interests that underlie how we deal with animals. The balance of these interests may change, depending on time and circumstance<sup>3</sup>.

The care for the health and welfare of animals serves to promote the health and welfare of man and, in view of the animals' intrinsic value, of the animal itself.

In balancing these interests, caring for the health and welfare of animals is part of and secondary to caring for the health and welfare of man, as set out below:



\*: Veterinarians working in the following sectors: *P* = Horse, *GD* = Pets, *LHD* = Farm animals, *PD* = Laboratory animals; or as *Cons.* = Consultant, *Gem.* = Municipality, *VWA* = the Food and Consumer Product Safety Authority

In practice, veterinarians may focus solely on animal's curative care and welfare, usually of more individually kept animals like pets, horses and non-commercial farm animals.

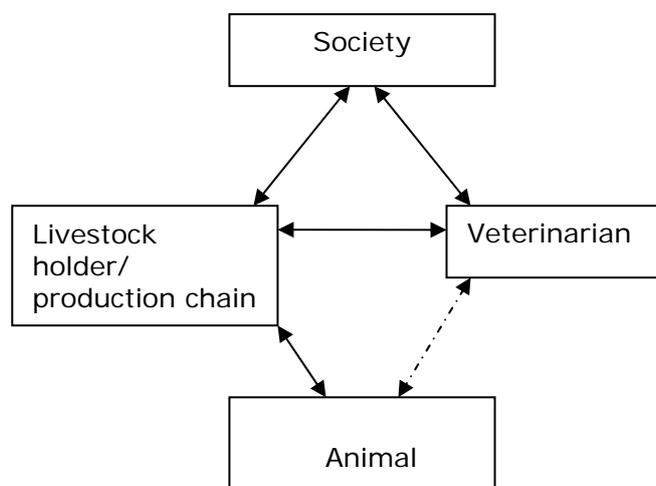
<sup>2</sup> From: Animal Welfare Memorandum (par. 3.2: Our responsibility for animals), 2008

<sup>3</sup> The Council will discuss this in its paper on *Roles and responsibilities for animal welfare and animal health*, expected end 2009.

### III Tasks and responsibilities of the veterinarian

#### **Basic principles (actual situation)**

In his work, the veterinarian deals with animals, livestock holders and society.



The diagram above differs from the 'inter-relationship triangle' set out in Chapter I (Definitions), in that:

- It is the owner who keeps animals, not society, nor the veterinarian.
- However, society does have widely-varying views on how livestock holders should keep animals.
- The animal in this diagram is a subject rather than a full participant.
- The animal – veterinarian 'relationship' always runs via the livestock holder.
- In exceptional cases society (the government) can/must take over the tasks of the livestock holder.
- The veterinarian provides a service to the livestock holder.
- The veterinarian has a supervisory and safeguarding service to society.
- The veterinarian is a breadwinner for himself/his practice.
- Although the veterinarian has no direct legal responsibilities towards the animal, he certainly has moral responsibilities: these are (derivative) tasks which society and/or the livestock holder assign to the veterinarian<sup>4</sup>.
- Note: *tasks* may be delegated, *responsibilities* may not.
- Production chains (in this diagram) are a cooperation effort by livestock holders, and an extension of livestock farming.
- This expressly concerns *all* forms of animal keeping: owning livestock for agricultural production and non-commercial farming, owning horses and owning pets (both for profit and non-profit purposes).

<sup>4</sup> This corresponds with the animal's legal status: while society recognises that animals are *sentient beings*, legally animals still have the status of object (property). This means that animals do not have any rights and that veterinarians cannot have direct responsibilities towards the animals.

### ***Participants and their interests***

#### **Society's** interests:

- Ability to keep livestock
- Sufficient, safe food of socially accepted quality
- Minimising the risk of zoonotic diseases

#### Interests of the **livestock holder**:

- Ability to keep animals safely and satisfyingly
- Making a living from keeping animals
- Ability to work safely and satisfyingly (personal health and job satisfaction)

#### Interests of the **production chain**:

- Free trade (economy)

#### Interests of the **veterinarian**:

- Making a living
- Ability to work safely and satisfyingly (personal health and job satisfaction)

#### Interests of the **animal**<sup>5</sup>:

- Health and welfare<sup>6</sup>

### ***Relationships between participants***

The *relationship model* can be interpreted as a *flowchart* to identify the relationships on the basis of the following factors:

- I. Expectations
- II. Economics
- III. Information

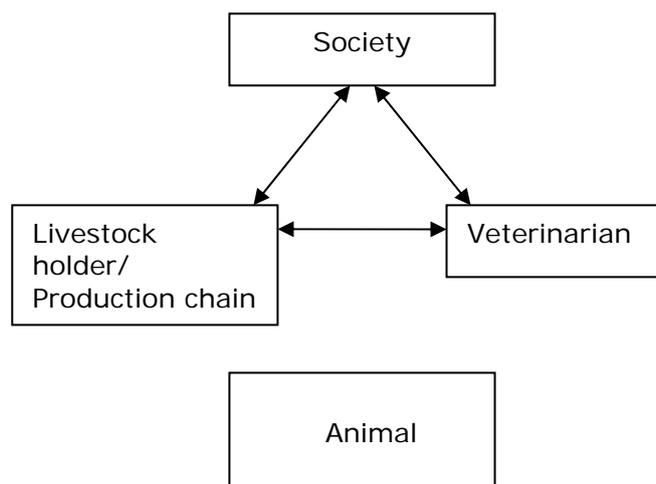
By comparing these flowcharts taking into account the interests of the various participants, inconsistencies and dilemmas can be identified, and solutions can be sought.

---

<sup>5</sup> This is what we consider important for the animal, based on our responsibility for the animal.

<sup>6</sup> As defined by – for example – the Welfare Quality criteria, the Five Freedoms and Intrinsic Value.

## Expectations flowchart

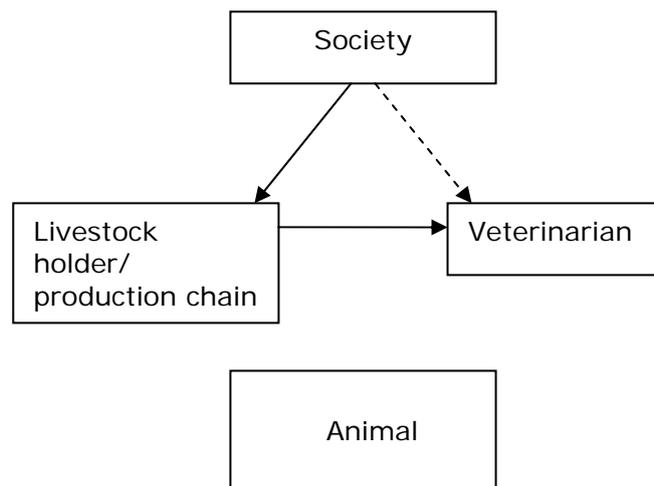


- The public (society) expects the following from the livestock holder and production chain:
  - o proper care for the health and welfare<sup>7</sup> of the animal
  - o timely and adequate intervention: veterinary or otherwise
  - o reporting of animal diseases: notifiable (EU-list) diseases and zoonoses
  - o management of residues and resistance risks, for instance through sensible use of animal medicines (food safety, public health)
  - o the production of sufficient and safe food by methods that are acceptable to the public.
  
- The public (society) expects the following of the veterinarian:
  - o care for the health and the welfare of all animals
  - o management of residues and resistance risks, through sensible prescription of animal medicines (food safety, public health)
  - o reporting of animal diseases: notifiable (EU-list) diseases and zoonoses (trade, animal health, public health)
  - o actions relating to animal health certification (for example in relation to trade interests)
  - o monitoring and notification of animal suffering and animal abuse (relating to food acceptance, societal values)
  - o monitoring and safeguarding food security during the production of food products of animal origin (food safety)
  
- the livestock holder and the agricultural production chain expect the following from the veterinarian:
  - o veterinary medical care (see also *basic principles*, page 8)
  - o supplying veterinary medicines
  - o transfer of knowledge about animal keeping in general and animal welfare and animal health in particular
  - o health certification at individual animal level and herd level
  - o in the chain: the management of residues and resistance risks, including proper prescription of animal medicines (food safety, public health).

<sup>7</sup> The public and livestock holder may not necessarily have the same idea of *animal welfare*.

- The veterinarian expects the following from the public (society):
  - o recognition of the veterinarian's role in the public interest
  - o compensation for performing social tasks
  
- the veterinarian expects the following from the livestock holder:
  - o payment for the services, recommendations and goods provided
  - o that livestock holders take responsibility for the health and welfare of their animals, food safety and public health
  - o transparency and provision of information

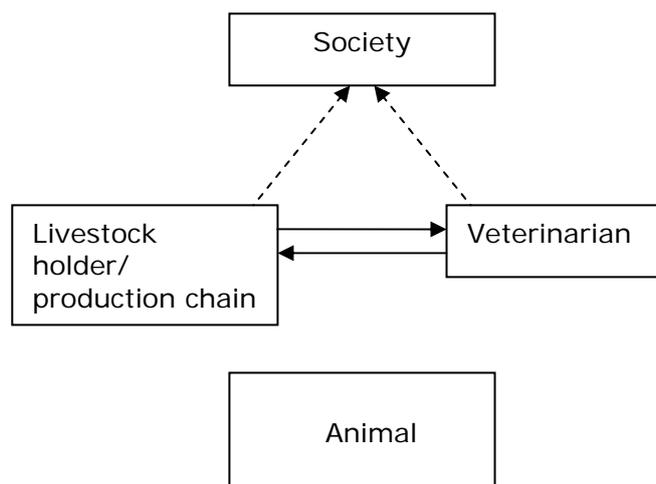
## Economics Flowchart



----: the government pays Food and Consumer Product Safety Authority veterinarians only, not for privately practicing veterinarians

- from the public (society) to the livestock holder and the agricultural production chain:
  - o the consumer purchases food products of animal origin
  - o the government contributes to the costs for the prevention and control of notifiable animal diseases and zoonoses
- from the public (society) to the veterinarian:
  - o the government pays the salary of official government veterinarians and practitioners in the service of the government to supervise and safeguard animal welfare and food security during the production of food products of animal origin
  - o the government pays a fee to practitioners for certain activities relating to animal health certification
- from the livestock holder to the veterinarian:
  - a fee (invoice) for:
    - o veterinary medical care
    - o supplying animal medicines
    - o provision of information/transfer of knowledge regarding animal welfare and animal health
    - o health certification at individual animal level and herd level

## Information Flowchart



- the livestock holder and agricultural production chain inform the public (society), in this case the government, about:
  - o the animal diseases reported: notifiable diseases (EU list) and some zoonoses
  - o the use of animal medicines
  - o the health and welfare of the animal
  - o the production method of food products of animal origin
  
- the livestock holder and the agricultural production chain inform the public (society), in this case the consumer, about:
  - o the production method for food products of animal origin
  
- the veterinarian informs the public (society), in this case the government, about:
  - o the animal diseases reported: notifiable diseases (EU list) and some zoonoses
  - o violations of animal welfare and animal health<sup>8</sup>
  
- the veterinarian informs the livestock holder about:
  - o the health and welfare status of the animal
  - o possible preventative care for the animal
  - o the veterinary medicines available and their correct use
  - o general information about animal welfare, animal health, animal keeping and livestock management
  
- the livestock holder and the agricultural production chain inform the veterinarian about:
  - o the health status of the animal
  - o the preventative measures taken
  - o the veterinary medicines/treatments already used
  - o general information about animal welfare and animal health

<sup>8</sup> Notification of abuses may conflict with the interests of the livestock holder. A good relationship with the livestock holder is of commercial interest for the veterinarian. As a result, not all abuses are reported.

#### **IV Conflicts and conclusions**

Based on the flowcharts on expectations, information and Economics (Chapter III) and taking into consideration the interests of the various participants (also Chapter III) the Council has reported the following **conflicts**

##### ***Conflicts in information flows:***

- The exchange of information between livestock holders and the public is incomplete and fragmented: the livestock holder introduces only part of the information in the chain<sup>9</sup>, of which only part reaches the government, and only part of that reaches the public.
- Consumer information about production methods often only applies to positive aspects, such as the *Biologische- en de Beter Leven*<sup>10</sup> (Organic and Better Living) labelling.
- The exchange of information between veterinarians and the public is incomplete and is limited to official notifications to the government (primarily relating to suspicions of notifiable animal diseases). Only part of this information is relayed to members of the public.

**The deficient exchange of information to the public (government and consumer) is not in keeping with the expectations that the public has of the livestock holder, the production chain and the veterinarian.**

**In the case of insufficient transparency it is not possible to determine when public interests such as 'responsible livestock practices', 'public health', 'food safety' and 'food quality' have to make way for the interests of the veterinarian, livestock holder and production chain such as 'privacy', 'free trade' and 'income generation'.**

##### ***Conflicts in cash flows:***

- Practicing veterinarians (not official veterinarians), are primarily paid by the livestock holder, for veterinary medical care, veterinary medicines, veterinary advice and animal and farm health declarations.
- The public – in this case the consumer – pays the production livestock holder for safe<sup>11</sup> and acceptably produced food. The increased demands of the public in the area of food acceptance<sup>12</sup> do not yet translate into higher retail prices. Consumers pay producers indirectly through retail and processing parties in the chain.

**Both the livestock holder/production chain and the public have expectations regarding the tasks of the practicing veterinarians. However, practicing veterinarians are paid by livestock holders.**

**When public interests conflict with the economic interests of the veterinarian, livestock holder and/or production chain, it is likely – certainly when veterinarian, farmer and/or production chain are under economic pressure – that these economic interests will preside over the public interests and the interests of animal welfare.**

---

<sup>9</sup> All livestock chains: agricultural production, horses, non-commercial animals and pets

<sup>10</sup> A quality mark of the Dutch Society for the Protection of Animals

<sup>11</sup> Food safety is a prerequisite, as is food security

<sup>12</sup> Sustainability, animal welfare, etc.

## ***Conclusions***

On the basis of veterinary medicine and the veterinarian the Council has come to the following conclusions:

- I. As a large part of animal keeping and veterinary medicine occur outside the public eye, members of the public have an incomplete picture of veterinary medicine and what the veterinarian does.
- II. As a large part of animal keeping and veterinary medicine occur outside the public eye, the government and members of the public have an incomplete picture of the social tasks carried out by the veterinarian.
- III. Dilemmas arise when the personal interests of the veterinarian conflict with the public interests that must be safeguarded by veterinary science.

## **V Solutions and preconditions**

On the basis of the problem areas and conclusions formulated in chapter IV, the Council for Animal Affairs has arrived at a number of possible solutions. The Council recommends a combination of both changes in the information infrastructure and changes in the collaborative and remuneration structure. The solutions suggested generally cannot be implemented overnight, as they primarily concern system changes. The Council firmly believes that the conflicts regarding the position of veterinarians and the role they perform for the public interest are structural and that solutions require structural changes.

### ***General***

In every (animal keeping) sector there will always be a small group of people who do not observe agreements, and who break laws or display hazardous behaviour for personal gain.

Situations in which personal gain is put first primarily arise because the veterinarian (and/or the customer) who does not comply with the agreements can obtain a cost advantage or a competitive advantage compared to veterinarians or livestock holders who do comply.

Solutions have been sought in which these costs or competitive advantages could be removed, in which people who fail to observe agreements made would be penalised, and/or in which those who do comply could obtain a competitive advantage. A combination of these three aspects would be ideal.

### ***With respect to information***

Full transparency is a *licence to produce* and a *licence to keep* for animal keeping: transparency ensures that matters that are unacceptable to the public (even when they fall within the boundaries of the law) come to light. It also makes detection and enforcement of abuses easier.

This means that all parties that are related to or which supply the animal keeping chains (including agricultural, horse, non-commercial and pet keeping) should strive to achieve full transparency in their activities.

Many of the data that are registered by the veterinarian, such as data on the use of veterinary medicine (including use of antibiotics) and animal diseases (including zoonoses and emerging diseases), are of great importance for human preventive healthcare. Providing this information to the government should therefore become a *licence to practice* for the veterinarian. The government should ensure that these data are monitored and used. Violations regarding animal welfare and animal health should, of course, be reported.

Transparency can be achieved through registering, gathering and linking all the information<sup>13</sup> that is currently available on a fragmented basis. A national database should be set up for this purpose in which these data are stored and from which certain information can – compulsorily – be provided to the government. This information must form the basis for effective and differentiated supervision by the government.

If the database is set up by the government then the obligation to provide the information should be regulated by public law. If the database is established privately, then the implementation of sufficient and effective accompanying government policy is essential in making it a success.

---

<sup>13</sup> Regarding animal health, animal welfare, public health and food safety.

*Medical insurance companies, which increasingly cater for pets, horses and non-commercial farm animal husbandry, could be an important source of information for monitoring emerging diseases and zoonoses, safeguarding food safety with respect to non-commercial animals and horses, and preventing antimicrobial resistance problems (such as MRSI) in the companion animal sector. These sources of information should be expanded and utilised. Furthermore, medical insurance provides a form of (publically desired) basic care which safeguards an animal's health and welfare.*

### ***With respect to interests***

As entrepreneurs veterinarians will always be required to strike a balance between public and their own interests.

The independent position of the veterinarian with respect to public interests can be strengthened by:

1. Imposing greater sanctions for malpractice.

*Risk = chance of detection x penalty. In the case of sufficiently high penalties the risk no longer outweighs the benefits to be obtained, even with a low probability of detection. Thus, the exclusion from practice (prolonged or permanent suspension from the professional register, with adequate enforcement) of one or two veterinarians each year can be very effective as a deterrent. The present (lenient) penalty system in the form of fines is not sufficient.*

2. Providing the veterinarian with direct remuneration for performing social tasks.

*Introducing a remuneration structure for social tasks that is comparable with the legal due system will take these out of the commercial balancing of public and private interests.*

3. Ensuring all veterinarians work within a certified quality system.

*In the recent past there have been several attempts to guarantee social values in the agricultural production chain through a closed chain approach. These attempts have to date not yielded the desired result because preconditions –set by the government and the livestock husbandry sectors – were not sufficiently clear at that time.*

*The recent covenants on the use of antibiotics are a step in the right direction, but in this system the balance between private interests (livestock holder/veterinarian) and public interests has not yet been sufficiently safeguarded.*

*Certified quality systems should establish the veterinarian's own responsibility, a permanent education system and rules for professional behaviour. These quality systems can be instituted by both practicing veterinarians and chain organisations in the livestock husbandry sectors. They can also be used to ensure easier compliance with international regulations.*

*The Council would once again like to emphasise that the implementation of social tasks in private systems can only succeed if the government provides sufficient and effective accompanying policy.*

4. avoiding conflicting interests through one or both of the following solutions:

4.1. Separate the provision of services by veterinarians to the livestock holder from the veterinarian's supervisory (social) tasks.

*Practitioners employed by livestock holders would not be authorised to perform any public tasks in this system.*

*Public tasks are carried out by practitioners in the service of certified production chain organisations or employed by a public or private institute.*

*Apart from the current supervisory, guarantee and certification tasks, these veterinarians should also carry out social tasks relating to animal welfare – such as the euthanasia of downer animals. The costs for these activities are borne directly or indirectly by the production chain and the public. This should form a part of the contract that the livestock holder has with such organisations.*

*Assigning public tasks to private institutes can lead to improvements in efficiency and lower costs due to market forces. Public interests should be properly guaranteed and success also depends on sufficient, effective accompanying policy. Government supervision of non-participants should be stepped up (risk-based enforcement) and the related costs should be charged directly to the livestock holder and/or veterinarian. Regarding the private system, the government only applies itself to Inspection Supervision.*

4.2. Separate the income from the sale of animal medicines from the prescription of animal medicines.

*This sounds easier than it is: good preconditions are essential to ensure that such an initiative would have the desired effect, without unacceptable financial and business losses for the livestock holder and the veterinarian. Aspects relating to competition law should also be properly researched. It is the Council's opinion that these preconditions should in any case cover full transparency (in the form of a national database) and a differentiated supervisory policy by the government.*

## ***Recommendations***

The Council believes a combination of transparency, certification and influence to be the best solution.

Full transparency must be the standard for all livestock holders and veterinarians: social interests relating to animal welfare, animal health, public health and food safety prevail over any possible infringement of the privacy of the individual livestock holder and veterinarian: when people in Dutch society decide they want to keep an animal, there are not only obligations towards the animal, but also obligations towards society.

As regards the agricultural production sector, the Council prefers a system in which the public and other social tasks of the veterinarian are carried out by validated and certified private parties. The responsibility for supervising these private parties rests with the Government (Inspection Supervision). The livestock holders and the veterinarians that are not connected to said private parties are to be supervised by the government on the basis of risk-based enforcement. The costs that are incurred are invoiced directly to the party in question. The penalties for violations must be raised considerably.

This should also apply to the holders of non-commercial farm animals and horses: by law these animals are still production animals.

Safeguarding social interests in the pet sectors can, for now, be achieved with maximum transparency, provided central registration details from veterinary practices, organisations in the chain and animal health insurers are actually monitored. As social interests are the issue, the Government should initiate this.

Finally, the Council believes that the penalty for violations should be raised considerably: suspension of professional licenses (temporarily or permanently) is an appropriate measure that suits the public interests of the correct practice of veterinary medicine.