GOVERNMENT OF MALTA

Government response to the Consultation on **Public Consultation on a new Legal Notice to Regulate, Register and License Professions and Trades Supplementary to the Veterinary Profession.**

Ministry for Agriculture, Fisheries and Animal Rights (MAFA) / Ministeru għall-Agrikoltura, Is-Sajd u d-Drittijiet Tal-Annimali (MAFA)

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Executive Summary

Introduction and overview

1. A brief introduction about the subject.

Through this new Legal Notice, the Ministry for Agriculture, Fisheries and Animal Rights will be regulating, registering and licensing the professions and trades supplementary to the veterinary profession, mainly the following:

- Listed Veterinary Nurse
- Registered Veterinary Nurse
- Veterinary Auxiliary
- Veterinary Technician
- Veterinary Technologist
- Groomer
- Farrier
- Fish Expert
- Animal Trainers

Although most service providers in this area are dedicated individuals who have their profession and trade at heart and who work with diligence for the best interest of animal welfare and with full respect to their clients, some individuals might need a bit more guidance to achieve the high standards that are now expected of these trades and professions. Also, currently, these professions and trades supplementary to the veterinary profession are not regulated in any way. As a result, there is lack of consistency in the standard of service offered. This legislation provides the necessary legal framework to ensure that only qualified individuals are allowed to offer these services, whilst those offering the services will have guidelines and ethical standards set and will be required to follow Continuous Professional Development. Any individual who is licenced to offer these services through this legislation will have to work within the set parameters otherwise they will lose their licence to practice.

The Veterinary Services Act, Chapter 437 of the Laws of Malta, already includes the registration and setting of standards for these professions and trades as part of the duties of the Veterinary Surgeons' Council (VSC) (Article 42 (1)). For this reason, a new subsidiary legislation is being proposed under Chapter 437, to enable the VSC to have a proper basic framework that enables the regulation, registration and licencing of professions and trades supplementary to the veterinary profession.

The electoral manifesto (EM 367) also makes reference to better regulation of certain professions that have a direct impact on Animal Welfare.

This legal notice sets the framework in order for the establishment and enforcement of standards through the registration and licencing of professions and trades supplementary to the veterinary profession.

Individuals who want to obtain a licence to practice any of the professions or trades found in the first schedule must follow all the requirements set for that particular profession or trade and must prove that they possess the required minimum qualifications or years of experience to do so in a professional manner. Among others, this new legal Notice will establish:

a) The official title to be recognised by law for each profession;
b) The role description for each profession;
c) Duties, responsibilities and competencies for each profession;
d) Required training and qualifications for each profession; and
   Licensing requirements.

2. The Public Consultation Date.

On 12 June 2025, the Ministry for Agriculture Fisheries and Animal Rights launched the Public Consultation period on this new Legal Notice to regulate, register and license professions and trades supplementary to the Veterinary Profession. The consultation took a span of five weeks and was published on the government's public consultation portal. An in-person public consultation meeting was also held on the 2nd of July 2025 to discuss the proposed legislation. In addition, other meetings were held with industry stakeholders, including an information session to Veterinary Technical Officers working with MAFA held on 08th July 2025.

3. This whole consultation process was targeted and both concerned stakeholders (Para Veterinary professionals) and the public and sought views on the introduction of this new Legal Notice mentioned above. In particular:

- The need to regulate the sectors better;
- How each para-veterinary profession will be regulated;
- Feedback on the legal text proposed to achieve the intended results; and
- How those who will be regulated, clients making use of the services and other stakeholders will be affected by the introduction of the Legal Notice.

Responses to the consultation and process used to seek stakeholder views.

This document is the Government Response to this consultation and sets out the Government's decisions on these matters.

4. The closing date of the public consultation. Which methods were used to receive the feedback. The total amount of responses. From whom you received the feedback.

The consultation closed on 17th July 2025. The draft legal notice and the reply form were available online on the official consultation portal (consultation.gov.mt). Responses were accepted through the same online platform. However, the VSC also received input via the official email of the Veterinary Surgeons' Council, vsc@gov.mt. Feedback was also received during the public consultation meeting which was organised by the Ministry for Agriculture, Fisheries and Animal Rights on 2nd July 2025, which meeting was open for all industry stakeholders and the public. In total, there were 57 responses. These were received from across the industry including persons who will be regulated. Responses were also received from outside the industry including local authorities, NGOs and individuals. A summary list of respondents can be found in **Annex A**.

5. Include (if any) meetings with stakeholders and list who the stakeholders were.

A number of sectoral consultation meetings / discussions with a representative sample of most of the trades and professions being regulated were also held before since 2021 onwards, with the aim of presenting a draft legal notice that keeps the regulated individuals in mind.

- Nurses working at the veterinary clinics licenced at that time were invited and consulted to a meeting to discuss the proposed text regulating listed veterinary nurses and registered veterinary nurses.

- The Maltese representative on the European Federation of Farriers Associations was invited and consulted to discuss the proposed text regulating Farriers.

- Several persons with expertise in the fisheries and aquaculture sector were invited and consulted to discuss the proposed text regulating Fish Experts.

- All the groomers found in the Yellow Pages were invited and consulted to discuss the proposed text regulating Groomers.

- The Committee of representatives of Government-employed Veterinary technical support staff was invited and consulted to discuss the proposed text with regulating Veterinary Auxiliary, Veterinary Technician and Veterinary Technologist.

- The Committee members of the Malta Veterinary Association were invited and consulted to discuss the text of the whole proposed legislation as veterinary surgeons are potential employers or collaborators with each of the trades or professions that are proposed to be regulated.

- An in-person consultation session explaining the details of each of the particular professions and trades was held on 02nd July 2025. Any person from the public in general could attend this meeting. Meeting attendance was from a variety of sectors both from those being regulated and also service receivers. Responses were provided as indicated in section 3 of this report.

- Another in-person meeting was held on 08th July 2025, for the individuals working with the Ministry for Agriculture Fisheries and Animal Rights (mainly within the Animal Health and Welfare Department), whose roles are affected by the proposed legislation (all Veterinary Technical Officers). A large number of individuals who may be affected by this regulation were in attendance.
- An online meeting was held on 10th July 2025 with the Malta Chamber of SMEs who were representing groomers who are members with them, and a number of these groomers were also present.
- An in-person meeting was also held on 11th September 2025 with the Malta Business Registry.

Summary of responses and decisions

The following is a summary of the consultation responses received. We would like to thank all those who took the time to respond to the consultation and participate in stakeholder meetings around the consultation exercise.

6. Statistics

- Total feedback received: 57
- Total feedback received by individuals: 50
- Total feedback received by organisations: 7
- Total feedback received through email: 8
- Total feedback received through online form: 39 *(including 15 anonymous)*
- Total feedback received by post: 0
- Total feedback received during the in-person session: 10

7. Summary of feedback received.

Most respondents (mostly from the industry sector) did not oppose to the notion of being regulated. About half of the respondents provided proposals for minor changes, whilst around 70% of respondents had

concerns of how it will affect them or their current duties. Some of the requested changes cannot be entertained as they would alter the scope of the legislation or would be considered disproportionate. Most respondents were satisfied with the explanations to their queries. All feedback received, including those received anonymously have been considered relevant. In summary by topic:

A) Request for the regulation of trades or professions not listed in the current proposed annexes: Feedback was received from individuals through email to the VSC, through the consultation portal and during the in-person session asking about the regulation of trades or professions that are not currently in the proposed text; or asking for a different licence schedule for varying categories of trades or professions that are in the proposed text. Two of the requests made are for trades or professions that are completely new and not covered in any way by the proposed text. The persons providing feedback were informed that the way the proposed legislation is drafted allows for further annexes to be considered in the future once the legislation is enacted.

B) Pathways for access to a proposed regulated trade or profession for individuals with limited formal training but practical experience: Feedback was received from individuals through email to the VSC, through the consultation portal and during the in-person session asking about the possibility of individuals who have on-the-job experience but limited or no formal training. Individuals were informed that there was a provision in the legal text (The proviso of Regulation 4 states that *"Provided that persons already involved in such roles on publication of the relevant Schedule who do not hold such qualifications may apply to the Council on the basis of their experience. The Council may use on the job training and evaluation or aptitude tests or a combination of them as equivalent to the required qualification for such cases."*) that caters for their request and how this is intended to work was explained to them.

C) Clarification of the proposed legal text to make some articles clearer and linguistic corrections: Feedback was received by email to the VSC requesting clarification on certain sections of the text to enhance clarity, as well as highlighting minor linguistic corrections. The VSC informed the concerned stakeholders that the suggested clarifications and linguistic amendments have been taken on board and will be reflected in the version to be presented to Cabinet for approval.

D) Feedback relating to academic courses or related subject: Feedback was received by email to the VSC and through the consultation portal asking about availability or validity of courses as well as on the licensing of premises used for the teaching of radiography. Academic courses will be accepted by the VSC on a case-by-case basis initially, once the permanent subcommittees are in place, the subcommittee would be able to reply to any queries regarding the validity of courses. The query regarding the licensing of premises used for the teaching of radiography does not fall under the remit of the Veterinary Surgeons' Council or of the Ministry for Agriculture, Fisheries and Animal Rights. The person providing feedback was informed that it is the responsibility of any educational institution to follow the rules of their respective country where the course is delivered with regards to radiography equipment and its uses.

E) Feedback received from officers working with the Government: Feedback was received from individuals through email to the VSC, through the consultation portal and during the in-person session asking for changes to the legal text to be aligned with the current nomenclature or duties of officers carrying out work with government departments or entities, as well as for clarification if government officials would still require to be registered and licenced if they carry out only duties related to their government role. Individuals sending feedback to ask if they would still be required to be registered and licenced if they carry out only duties related to their government role were informed that they would require to be registered and licenced under any of the respective schedules if the task that they perform is listed in the schedule as a competence attributed to such a regulated trade or profession. They were also informed that they may apply and be granted a registration and licence for more than one schedule if the tasks carried out so require. The request to change the roles in the schedules to reflect the government structure could not be entertained as the regulation is not intended to regulate, register and licence only persons working within the government framework, but also other individuals that work in the private sector. The segregation of roles between the schedules was planned to reflect the roles that are to be assigned in reflection to competences gained.

8. Your assessment and the Government's decision (list the Government's decisions).

The feedback received was considered encouraging where the majority of the received submissions were positive. MAFA will be evaluating all the feedback received and will be updating and clarifying the legal text where possible. Where recommended legal text changes are not possible, an explanation was sent to the feedback providers. MAFA remains open to find workable solutions that will still allow the objectives of this legislation to be achieved.

Indeed, MAFA's main feedback focused on clarifying the scope and implementation of the proposed regulations. In summary, MAFA emphasized that the current legal text covers only the first set of para-veterinary professions to be regulated, with future additions planned. MAFA also highlighted the need for clear accountability of para-veterinary professionals, ensuring they are responsible for their own actions except where veterinarians give incorrect instructions. MAFA acknowledged suggestions to include animal welfare, surveillance, and continuous education clauses, and committed to correcting language and spelling issues.

MAFA also agreed to consider references to environmental legislation in professional codes of conduct and clarified that CPD requirements and licensing details will be developed by subcommittees for each profession. MAFA also addressed concerns about the division of licenses (e.g., for farriers), the creation of independent oversight structures, and the practicalities of eligibility, training, and recognition of qualifications, indicating that many operational details will be refined through future guidelines issued by the sub-committees for each profession that will be regulated.

Implementation

9. When you intend to implement the decisions

The Legal Notice is scheduled to be submitted for Cabinet approval and publication towards Q2 of 2026.

Contact Details

If you have any questions regarding this response, please contact the Veterinary Surgeons' Council on vsc@gov.mt

Annex A: List of respondents.

Feedback received through the portal (39)
Malta College of Arts, Science and Technology (MCAST)
Environment and Resources Authority (ERA)
Federation of Maltese Aquaculture Producers
Vuċi għall-Annimali
Directorate for Disability Issues (DDI)
Private Individuals (34)
Feedback received through the VSC E-Mail (8)
Office of the Chief Veterinary Officer
Malta Veterinary Association
Private Individuals (6)
Feedback received during the in-person session (10)
Private Individuals (10)