

Question VIII.Aa.

Question text:

Introduction

VIII.a) Current provisions of Directive 86/609/EEC

Article 14 of the current Directive states that persons who carry out experiments or take part in them and persons who take care of animals used for experiments, including duties of a supervisory nature, shall have appropriate education and training.

In particular, persons carrying out or supervising the conduct of experiments shall have received instruction in a scientific discipline relevant to the experimental work being undertaken and be capable of handling and taking care of laboratory animals; they shall also have satisfied the authority that they have attained a level of training sufficient for carrying out their tasks.

VIII.b) Current situation in Member States

All Member States have set (minimum) legal requirements for the competence of personnel working with laboratory animals performing the experiments. Several Member States already specifically refer to their system as being in accordance with the FELASA guidelines for the education and training of persons (Belgium, Slovenia, the Netherlands, Lithuania (B and C category)).

category 1.

Demonstrating/maintaining personnel competence however is required only in approx 35% of the Member States, covering approximately 4 Mio of total animal use in Europe. The other 65% of Member States do not have specific requirements in place for demonstrating/maintaining competence.

VIII.c) Trends and implications

In order to be able to compare the competence of personnel in the different Member States and to work towards mutual recognition, the Directive should include the requirements as set in the “Code of conduct for education and training of persons working with laboratory animals” of the European Convention as adopted by the Multilateral Consultation in 1993.

In the Convention four categories of persons are defined who must have had appropriate education and training.

Category A: Persons taking care of animals

Category B: Persons carrying out procedures

Category C: Persons responsible for directing or designing procedures

Category D: Laboratory animal science specialists

Category 1): Laboratory animal science specialists

EU countries that ratified ETS 123 already have agreed:

- to ensure that these guidelines will be circulated among the persons responsible for education and training of those working with laboratory animals;
- to encourage these persons to follow these guidelines in their courses; and
- to encourage those responsible for education and training to establish programmes to allow the fulfilment of the requirements of the Convention for all persons working with laboratory animals.

An innovative method to ensure minimum standards without generating high costs for Member States is the use of e-learning methods. One best practice example from Switzerland in co-operation with one of the major pharmaceutical companies shows that the development and implementation of an e-learning infrastructure to obtain an officially recognized certificate on the Three Rs would cost 150,000 Euro. This includes automated applications and verification of test results.

VIII.d) Problem dimension

Qualified and well-trained personnel are central for good animal welfare, good science, and the human dimension of animal experiments. People working with animals should have a specific authorisation and should be trained specifically, to reduce suffering of animals during the whole lifetime of the projects. This is currently not ensured since the Directive does not give specific requirements for education and training. Consequently, the level of education and training can differ significantly between Member States.

training can differ significantly between Member States

Competence cannot be guaranteed via education and training. However, the current Directive does not specifically address the necessary competence of the personnel. Lack of competence can seriously undermine animal welfare e.g. when performing a procedure or euthanasia on animal, as well as having a deleterious effect on the scientific outcomes and their reliability.

VIII.e) Potential solutions

The revision could incorporate some key elements that should be included in the training requirements appropriate for the different categories of personnel. In addition, it could set requirements for obtaining, maintaining and demonstrating competence and life-long learning.

Statistics:

193 respondents stated that they support the preliminary analysis.

6 respondents stated that they have no opinion in relation to this question.

8 respondents stated that they do not support the preliminary analysis or components of it. To justify disagreement, they were asked to provide arguments, facts and figures and if possible indicate the source of information. However, a number of respondents opted for the "No" reply only to supply additional arguments in support of the preliminary analysis.

Comments received:

Name of the expert or organisation	Type of organisation	Activity level of the organisation	Representativeness	VIII.Aa

(Name confidential - Respondent 050)	User of animals - public sector	Local; Regional; National; European; Worldwide	yes, we are a major EU HEI for biomedical research	Yes, but the education and training should be an integral part of degree courses in HEIs in all relevant areas: medicine, nursing, biomedical science etc. The present trend to train only those individuals who will be actively participating in animal experiments should be reversed. The best advocates for animal experiments will be those who both provide medical treatments and fully understand that these derive in a large number of cases from animal experimentation.
(Name confidential - Respondent 051)	User of animals - public sector	National	yes	we don't agree with the fact that competence cannot be guaranteed via education and training
GlaxoSmithKline	User of animals - private sector	Worldwide	There are other international pharmaceutical companies. We produce 25% of the worlds vaccines	It already does in many countries, with and without legislation requirements for such education. Harmonisation of training outcomes should ensure free movement of people
DR Achim Klug, Ludwig Maximilians University Munich	Public authority	Worldwide; Not applicable	Deutsche Forschungsgemeinschaft - DFG	Training requirements are already in place and are more than sufficient. No further regulation needed.
(Name confidential - Respondent 122)	Public authority	National	We are the National Competent Authority	See below.
Cris Iles-Wright	Other	Not applicable	Not applicable	This is impractical and theoretical as animals are seen as disposable and with no value or rights. Staff reflect this and do not offer reasonable levels of care.

Stichting EDEV - Een DIER Een VRIEND	Non- governmental organisation	National; European	We cooperate with animal organisations within the ECEAE	Our own findings learn that this is the theory but not the practice in Holland.
(Name confidential - Respondent 173)	Non- governmental organisation	Local; Regional; National; European	One other	This introduction is limited to the use of animals only when alternatives exist wich should be taken into account.

Question VIII.1.1.

Question text:

Appropriate education and training would improve the implementation of all Three Rs and ensure respect of their welfare requirements of animals before, during and after procedures.

Overall assessment: positive

Do you support this overall analysis? Yes/No/No opinion

Statistics:

218 respondents stated that they support the preliminary analysis.

5 respondents stated that they have no opinion in relation to this question.

3 respondents stated that they do not support the preliminary analysis or components of it. To justify disagreement, they were asked to provide arguments, facts and figures and if possible indicate the source of information. However, a number of respondents opted for the "No" reply only to supply additional arguments in support of the preliminary analysis.

Comments received:

Name of the expert or organisation	Type of organisation	Activity level of the organisation	Representativeness	VIII.8.1a.
(Name confidential - Respondent 066)	User of animals - public sector	Worldwide	Yes, representative	I consider this analysis to be flawed in its direction, sicne it assumes that current personnel are not adequately trained. Present directives allow the rejection of applications in cases where this is in doubt.

GlaxoSmithKline	User of animals - private sector	Worldwide	There are other international pharmaceutical companies. We produce 25% of the worlds vaccines	It already does in many countries, with and without legislation requirements for such education. Harmonisation of training outcomes should ensure free movement of people
1. Animal Aid	Other	National	Other organisations do exist	If there was genuine respect for the animals, they would not be used for research and incarcerated in confined spaces.

Question VIII.1.2.

Question text:

Animal welfare:

Requirement for competence combined with minimum elements for education and training would highly improve the welfare of animals through deeper knowledge, understanding and better skills.

Do you support the preliminary findings? Yes/No/ No opinion

Statistics:

213 respondents stated that they support the preliminary analysis.

6 respondents stated that they have no opinion in relation to this question.

6 respondents stated that they do not support the preliminary analysis or components of it. To justify disagreement, they were asked to provide arguments, facts and figures and if possible indicate the source of information. However, a number of respondents opted for the "No" reply only to supply additional arguments in support of the preliminary analysis.

Comments received:

Name of the expert or organisation	Type of organisation	Activity level of the organisation	Representativeness	VIII.8.2a.

GlaxoSmithKline	User of animals - private sector	Worldwide	There are other international pharmaceutical companies. We produce 25% of the world's vaccines	It already does in many countries, with and without legislation requirements for such education. Harmonisation of training outcomes should ensure free movement of people
(Name confidential - Respondent 122)	Public authority	National	We are the National Competent Authority	No evidence is presented of welfare problems attributable to this. The UK system requires competence attested to by experience, qualification and training. We believe training and competence are essential, but believe adequate provision is already made in many member states. Other measures may be required to promote the free movement of labour.
(Name confidential - Respondent 136)	Public authority	Regional	this organisation is representative for the field at the respective activity level	this is already established in Austria
1. Animal Aid	Other	National	Other organisations do exist	Based on the UK experience, a deeper knowledge through education and training would not necessarily lead to improved animal welfare.
Cris Iles-Wright	Other	Not applicable	Not applicable	Animals are seen as disposable and with no value or rights. Staff reflect this and do not offer reasonable levels of care.
Stichting EDEV - Een DIER Een VRIEND	Non-governmental organisation	National; European	We cooperate with animal organisations within the ECEAE	The trainings are aimed at using animals when ordered to do so.

Question VIII.1.3.

Question text:

Quality of science:

Requirement for competence combined with minimum elements for education and training would also enhance the quality of science and research and reduce existing obstacles to horizontal mobility.

Do you support the preliminary findings? Yes/No/ No opinion

Statistics:

213 respondents stated that they support the preliminary analysis.

21 respondents stated that they have no opinion in relation to this question.

3 respondents stated that they do not support the preliminary analysis or components of it. To justify disagreement, they were asked to provide arguments, facts and figures and if possible indicate the source of information. However, a number of respondents opted for the "No" reply only to supply additional arguments in support of the preliminary analysis.

Comments received:

Name of the expert or organisation	Type of organisation	Activity level of the organisation	Representativeness	VIII.8.3a.
(Name confidential - Respondent 117)	Public authority	National; European; Worldwide	yes	Science cannot be taught in this way. Some elements can be taught but most (and application of elements learnt) must be acquired during on the job training.

(Name confidential - Respondent 122)	Public authority	National	We are the National Competent Authority	No evidence is presented of current problems attributable to this. The UK system requires competence attested to by experience, qualification and training. We believe training and competence are essential, but believe adequate provision is already made in many member states. What we may currently lack in this context is a framework that allows the free movements of skilled labour across the EU - this may be best addressed by mutual recognition rather than harmonisation of processes.
Cris Iles-Wright	Other	Not applicable	Not applicable	This assumes that experimental design is good and the role of animal use is valid. Whilst this assumption is false, the above moves will not impact.

Question VIII.1.4.

Question text:

Free movement of people/workers:

Requirement for competence combined with minimum elements for education and training would assist in reducing existing obstacles to horizontal mobility.

Do you support the preliminary findings? Yes/No/ No opinion

Statistics:

201 respondents stated that they support the preliminary analysis.

24 respondents stated that they have no opinion in relation to this question.

1 respondents stated that they do not support the preliminary analysis or components of it. To justify disagreement, they were asked to provide arguments, facts and figures and if possible indicate the source of information. However, a number of respondents opted for the "No" reply only to supply additional arguments in support of the preliminary analysis.

Comments received:

Name of the expert or organisation	Type of organisation	Activity level of the organisation	Representativeness	VIII.8.4a.
(Name confidential - Respondent 122)	Public authority	National	We are the National Competent Authority	No evidence is presented of current problems attributable to this.

Question VIII.1.5.

Question text:

Job satisfaction of personnel:

Ensuring competence and knowledge on how to optimise animal welfare and implementation of Three Rs in the daily work would lead to a high job satisfaction of those having direct contact with animals on daily basis.

Do you support the preliminary findings? Yes/No/ No opinion

Statistics:

196 respondents stated that they support the preliminary analysis.

26 respondents stated that they have no opinion in relation to this question.

6 respondents stated that they do not support the preliminary analysis or components of it. To justify disagreement, they were asked to provide arguments, facts and figures and if possible indicate the source of information. However, a number of respondents opted for the "No" reply only to supply additional arguments in support of the preliminary analysis.

Comments received:

Name of the expert or organisation	Type of organisation	Activity level of the organisation	Representativeness	VIII.8.5.
(Name confidential - Respondent 117)	Public authority	National; European; Worldwide	yes	For animal technicians, yes, for scientists, not necessarily.

(Name confidential - Respondent 119)	Public authority	Local; Regional	no	People working with animals generally have the feeling that their knowledge is sufficient, no matter whether it is really true or not.
(Name confidential - Respondent 122)	Public authority	National	We are the National Competent Authority	No evidence is presented of current problems attributable to this.
(Name confidential - Respondent 136)	Public authority	Regional	this organisation is representative for the field at the respective activity level	this is already established in Austria
Cris Iles-Wright	Other	Not applicable	Not applicable	Animals are seen as disposable and with no value or rights. Staff attitudes reflect this and do not offer reasonable levels of care.
Stichting EDEV - Een DIER Een VRIEND	Non-governmental organisation	National; European	We cooperate with animal organisations within the ECEAE	If they would really care they would not work in a laboratory. Anybody who knows the natural needs of animals cannot agree with their housing and what they have to go through.

Question VIII.1.6.

Question text:

Additional costs to national authorities:

Requirements for competence combined with minimum elements for education and training would result only in low additional costs for national authorities, as all Member States already do have systems of education and training in place.

Do you support the preliminary findings? Yes/No/ No opinion

Statistics:

137 respondents stated that they support the preliminary analysis.

74 respondents stated that they have no opinion in relation to this question.

15 respondents stated that they do not support the preliminary analysis or components of it. To justify disagreement, they were asked to provide arguments, facts and figures and if possible indicate the source of information. However, a number of respondents opted for the "No" reply only to supply additional arguments in support of the preliminary analysis.

Comments received:

Name of the expert or organisation	Type of organisation	Activity level of the organisation	Representativeness	VIII.8.6a.

Dept. Laboratory Animal Science, Utrecht University, The Netherlands	User of animals - public sector	Worldwide	chair of lab. animal sci. recognized by national authorities/resp onsable for national coordination education and training in lab. animal sci./ leading role in international laboratory animal science	This is not necessarily the case as not every member state has a national system for laboratory animal science training and education; where this is in place, it may not be mandatory and the programmes in use may vary considerably.
(Name confidential - Respondent 007)	User of animals - public sector	National	yes	-
(Name confidential - Respondent 014)	User of animals - public sector	Local; Regional; National; European; Worldwide	Yes	see 8.8
(Name confidential - Respondent 048)	User of animals - public sector	Local	Not applicable, I am not an organisation	The costs to provide the education is significant at a local level

(Name confidential - Respondent 051)	User of animals - public sector	National	yes	there will be extra cost in order to verify the competence after initial education and training
(Name confidential - Respondent 052)	User of animals - public sector	Local	Yes	In my country there is no official education and training system for laboratory animal workers. Education and training is dependent on veterinarians and other laboratory animal experts at institution level. Consequently the costs for implementing such an official country-wide program would highly increase, at least in a short-term way.
(Name confidential - Respondent 059)	User of animals - public sector	Not applicable	No	See my previous answers to these. In Portugal most of the animal houses are managed by non-qualified personnel and courses are non-existent. The implementation of such will be costly, however, I agree, necessary.
MA 60-Veterinäramt, Wien/Vienna	Public authority	Local; Regional	yes	More than minimum elements would be needed, like Belgium, Slovenia, the Netherlands, Lithuania (B and C FELASA category) who have a specific education.
MA 60-Veterinäramt, Wien/Vienna	Public authority	Local; Regional	yes	More than minimum elements would be needed, like Belgium, Slovenia, the Netherlands, Lithuania (B and C FELASA category) who have a specific education.
Universidad de Zaragoza	Public authority	European	yes	I can not show any figure but I do not agree with this "low" . Training cost in some of these categories are high.
(Name confidential - Respondent 122)	Public authority	National	We are the National Competent Authority	That implies nothing needs to be changed. It may be the case the mutual recognition is all that is required - but to change systems to harmonise processes would be expensive, and would disadvantage those who are already trained and competent.
(Name confidential - Respondent 161)	Other	National	There are other similar organisations	The costs are certainly higher. Especially in hands on practice which is most important, it is necessary to have enough teachers. Furthermore, even there are systems for education and training, there might not be competent teachers within teaching personnel. However, despite of the costs, it is necessary to create good enough courses to all FELASA levels

FELASA (Federation of European Laboratory Animal Science Associations)	Non-governmental organisation	European	FELASA represents 13 European lab animal sci associations and therefore some 3-4000 members of those associations (scientists, veterinary surgeons, technicians etc.). See www.felasa.org	This is not necessarily the case as not every member state has a national system for laboratory animal science training and education; where this is in place, it may not be mandatory and the programmes in use may vary considerably.
(Name confidential - Respondent 167)	Non-governmental organisation	National	YES	It is not true that all Member States have sufficient systems of education and training for all categories.
(Name confidential - Respondent 190)		Regional; Worldwide	also others	see 8.8.

Question VIII.1.7.

Question text:

Additional costs to establishments: -

Additional costs for education and training measures would not lead to a significant increase of project costs. The average cost of a training course on Three Rs for instance is not higher than 200 Euro per day (plus loss of labour for the duration of the course)

Do you support the preliminary findings? Yes/No/ No opinion

Statistics:

130 respondents stated that they support the preliminary analysis.

66 respondents stated that they have no opinion in relation to this question.

31 respondents stated that they do not support the preliminary analysis or components of it. To justify disagreement, they were asked to provide arguments, facts and figures and if possible indicate the source of information. However, a number of respondents opted for the "No" reply only to supply additional arguments in support of the preliminary analysis.

Comments received:

Name of the expert or organisation	Type of organisation	Activity level of the organisation	Representativeness	VIII.8.7a.

Dept. Laboratory Animal Science, Utrecht University, The Netherlands	User of animals - public sector	Worldwide	chair of lab. animal sci. recognized by national authorities/resp onsable for national coordination education and training in lab. animal sci./ leading role in international laboratory animal science	The “hidden” costs associated with loss of labour should also be computed. However, these costs do not outweigh the overriding need for minimum standards of education and training across Europe.
Timo Nevalainen	User of animals - public sector	Local	Yes	The topic of this chapter is competence training of all categories (A-D), two of the careers with long curricula (A & D) and two others course of one (B) and two (C) weeks. The three Rs are built-in features of the training there. The sentence containing €’s simplifies the approach too far.
(Name confidential - Respondent 001)	User of animals - public sector	National; European; Worldwide	yes	The FELASA recommendations on education should be introduced and made obligatory in all member states after an adequate transitional period. Personnel in animal facilities need different knowledge and skills. Therefore the costs for continuing education and advanced training on large central institutions have to be multiplied by the number of different qualifications like animal keeper, veterinarian, biologist, chemist, engineer, technician, nurse etc.
(Name confidential - Respondent 006)	User of animals - public sector	National	representative	The increase of projects costs will be significant

(Name confidential - Respondent 007)	User of animals - public sector	National	jes	-
(Name confidential - Respondent 014)	User of animals - public sector	Local; Regional; National; European; Worldwide	Yes	see 8.8
(Name confidential - Respondent 017)	User of animals - public sector	National; European; Worldwide	Yes	More than 3R's training is required
(Name confidential - Respondent 032)	User of animals - public sector	Local	yes	Especially practical courses with supervision of experts are necessary for appropriate training of Cat. A and Cat. B. Those courses are expensive.
(Name confidential - Respondent 033)	User of animals - public sector	Local; Regional; National	Representative	Training is costly and specific budgets should be available to allow training in all aspects of welfare to occur including animal husbandry, 3R's and general welfare.
(Name confidential - Respondent 035)	User of animals - public sector	Local	yes	Especially practical courses with supervision of experts are necessary. Those courses are expensive
(Name confidential - Respondent 046)	User of animals - public sector	National	yes	3Rs rules are implemented in the education of animal our caretaker and technicians. It is not possible to evaluate the cost of formation without the knowledge of the length of the formation (200 € per day is realistic).

(Name confidential - Respondent 048)	User of animals - public sector	Local	Not applicable, I am not an organisation	Animal training courses recently attended would be in reagon of 1000 euro
(Name confidential - Respondent 051)	User of animals - public sector	National	yes	the cost of 200€/day is very expensive for the establishments
GlaxoSmithKline	User of animals - private sector	Worldwide	Thre are other international pharamceutical companies. We produce 25% of the worlds vaccines	Costs can be higher, these do not include travel
Coordination group for laboratory animal activities	Public authority	National	Yes	The topic of this chapter is competence training of all categories (A-D), two of the careers with long curricula (A & D) and two others course of one (B) and two (C) weeks. The three Rs are built-in features of the training there. The sentence containing €'s simplifies the approach too far.
Federal Public Service - Public Health (div. animal welfare & CITES)	Public authority	National	Yes, representative.	Cost of training of personnel is substantial.
Francois Lachapelle INSERM	Public authority	National	BEA du CNRS, de l'INRA, du CEA	sorry, but considering that at least 15 days are necessary for a minimum training this mean 3000€ + loss of labour

(Name confidential - Respondent 117)	Public authority	National; European; Worldwide	yes	Travel costs and times are not included. Increased duration of courses if FELASA type courses were put in place would result in significant resource implications. Small remote places will be significantly affected.
(Name confidential - Respondent 122)	Public authority	National	We are the National Competent Authority	The true financial and resource costs are much higher.
(Name confidential - Respondent 126)	Public authority	National	Regulatory authority in UK	Likely to be an underestimate of costs
COST Action B24 "Laboratory Animal Science Welfare" - http://biomedicum.ut.ee/costb24	Other	European	No	Especially practical courses with supervision of experts are necessary for appropriate training of Cat. A and Cat. B. Those courses are expensive
Medical University of Vienna	Other	Local; Regional; National; European; Worldwide	Research in Medicine	The FELASA recommendations on education should be introduced and made obligatory in all member states after an adequate transitional period. Personnel in animal facilities need different knowledge and skills. Therefore the costs for continuing education and advanced training on large central institutions have to be multiplied by the number of different qualifications like animal keeper, veterinarian, biologist, chemist, engineer, technician, nurse etc.
(Name confidential - Respondent 141)	Other	Not applicable	other	The FELASA recommendations on education should be introduced and made obligatory in all member states after an adequate transitional period. Personnel in animal facilities need different knowledge and skills. Therefore the costs for continuing education and advanced training would be significant.

(Name confidential - Respondent 161)	Other	National	There are other similar organisations	The costs are certainly higher. Especially in hands on practice which is most important, it is necessary to have enough teachers. Furthermore, even there are systems for education and training, there might not be competent teachers within teaching personnel. However, despite of the costs, it is necessary to create good enough courses to all FELASA levels
FELASA (Federation of European Laboratory Animal Science Associations)	Non-governmental organisation	European	FELASA represents 13 European lab animal sci associations and therefore some 3-4000 members of those associations (scientists, veterinary surgeons, technicians etc.). See www.felasa.org	The “hidden” costs associated with loss of labour should also be computed. However, these costs do not outweigh the overriding need for minimum standards of education and training across Europe.
Gesellschaft für Versuchstierkunde - Society for Laboratory Animal Science (GV-SOLAS)	Non-governmental organisation	National; European	Yes	Especially practical courses with supervision of experts are necessary for appropriate training of Cat. A and Cat. B. Those courses are expensive.

The National Anti-Vivisection Society	Non-governmental organisation	National; European; Worldwide	The NAVS is the leading and oldest anti-vivisection organisation in the world. There are a number of other relevant anti-vivisection organisations around the world with expertise in this field.	By ensuring that staff receive proper education and training, and comply to animal welfare regulations, establishments should cut costs, since we have repeatedly witnessed the waste of money caused by failing experiments following lack of compliance. A report published by ADI in 2005 concerning a leading contract research organisation, included: Miscalculations in dosing resulting in severe suffering, death and premature termination of studies; animal test continuing whilst human trials were already underway; researchers running out of the test substance, half way through a study; chemicals accidentally pumped into dogs lungs instead of their stomachs. These problems go to issues of competence amongst staff and of the authorisation process and need to be addressed by a combination of. Ref: Animal experiments at Inveresk (2005) ADI report
(Name confidential - Respondent 164)	Non-governmental organisation	National	yes	The FELASA recommendations on education should be introduced and made obligatory in all member states after an adequate transitional period. Personnel in animal facilities need different knowledge and skills. Therefore the costs for continuing education and advanced training on large central institutions have to be multiplied by the number of different qualifications like animal keeper, veterinarian, biologist, chemist, engineer, technician, nurse etc
(Name confidential - Respondent 166)	Non-governmental organisation	National	NO OTHER RELEVANT ORGANISATION	Is 200 Euro for a one day training on 3 R little money? Category B and C are very expensive!
(Name confidential - Respondent 167)	Non-governmental organisation	National	YES	The mentioned quotation of 200€ might not be realistic, and could vary remarkably between Member States.

Question VIII.1.8.

Question text:

Justification (open text box)

Statistics:

(no numbers registered as this was not a closed question)

Comments received:

Name of the expert or organisation	Type of organisation	Activity level of the organisation	Representativeness	VIII.1.8. Justification
(Name confidential - Respondent 002)	User of animals - public sector	Local; Regional; National; European; Worldwide	XXX	The current major disparity between member states should be reduced by common standards. E learning has advantages but does not address issues of the competence of research staff in handling animals, improvements in which could significantly improve animal welfare. Some degree of practical training and assessment is therefore desirable, to a common standard and possibly by a European-based organisation.
(Name confidential - Respondent 008)	User of animals - public sector	Local; National; European; Worldwide	representative of a research university	Education is also important to encourage the right attitude towards animals by staff at all levels; it is not just about technical skills and their direct benefits. The syllabus is important as well, and this needs to be revised occasionally to keep it up-to-date and maybe to achieve different aims e.g. incorporating ethical values other than simply the Three Rs (which is how ethics tends to be interpreted at the moment) as happens in many businesses today.

(Name confidential - Respondent 010)	User of animals - public sector	Worldwide	One of several global pharmaceutical companies	This is one of the most important points, since education and training have a high impact on the quality of research and thus enhance the usability of results from animal experiments. Training of animal holding and research personnel would not only be for animal welfare, but also contribute to more competitiveness of the Eu.
(Name confidential - Respondent 011)	User of animals - public sector	National; European; Worldwide	Other organisations in Austria: Karl-Franzens-University; Medical University Vienna; Medical University Innsbruck	Although e-learning would provide a very useful adjunct, animal handling must form an integral part of the training and this must include a 'hands on' element, for which there can be no substitute
(Name confidential - Respondent 014)	User of animals - public sector	Local; Regional; National; European; Worldwide	Yes	In contrast what this document says, the costs of educating animal care takers are not negligible. There is only a limited (or non-existing) supply of qualified personnel in some member states, and the education guidelines differ considerably between member states. Although e-learning would provide a very useful adjunct, animal handling must form an integral part of the training and this must include a 'hands on' element, for which there can be no substitute
(Name confidential - Respondent 016)	User of animals - public sector	European	Yes	Implementation of requirements for training and competency testing across all member states would be beneficial (already implemented in the UK)

(Name confidential - Respondent 023)	User of animals - public sector	Local; National	There are several central laboratory animal facilities at Austrian universities	The FELASA recommendations on education should be obligatory in member states.
(Name confidential - Respondent 028)	User of animals - public sector	National	yes. There are other academic medical centres	Education and training should be considered as important instruments. This should include both theoretical and practical courses. E-learning by itself will therefore not be sufficient and should always be accompanied by hands-on-training. FELASA has published guidelines for education at different levels and has an accreditation scheme in place. Both the guidelines and the scheme should be promoted and considered as important tools towards standardisation and harmonisation.
(Name confidential - Respondent 031)	User of animals - public sector	National; European; Worldwide	Yes	Cost of training and time investment is never low.
(Name confidential - Respondent 032)	User of animals - public sector	Local	yes	Depending on the work with laboratory animals personnel need different knowledge and skills. This can be attained theoretically (courses, seminars, workshops, e-learning methods etc.) but some skills really need practical training (practical courses, on-the-job training, hands-on training under supervision of experts).
(Name confidential - Respondent 034)	User of animals - public sector	Not applicable	representative for Cancer Research	FELASA has already defined the 4 people categories. Nevertheless, even if each country refers its official training as one of these FELASA categories, no equivalency exists !!
(Name confidential - Respondent 044)	User of animals - public sector	National; Worldwide	yes, major UK research organisation for aquatic organisms and environment	Already applies in UK

(Name confidential - Respondent 045)	User of animals - public sector	National; European; Worldwide	Our organisation is representative within the field of cancer research but we have many collaborations with other like organisations.	Training is very important, but competency is even more important. We believe that these skills are essential for working within this important field.
(Name confidential - Respondent 059)	User of animals - public sector	Not applicable	No	200 EUR/ day for a country in which project funding is in average 50 000 EUR/year is huge!!! Check www.fct.mctes.pt for funding amounts.
(Name confidential - Respondent 062)	User of animals - public sector	National; European; Worldwide	yes	Meaningfull experiments require that competent trained personell are used throughout the process.
Bayer HealthCare	User of animals - private sector	Worldwide	organisation is representative for the field	Depending on the nature of their work with laboratory animals the personnel must attain and keep up sufficient competencies within the fields of the 3 R's, housing conditions, access to suitable diets and water, proper care, an environment that meets at least some behavioural needs, health monitoring, experimental design including statistics etc. This is in particular important for persons with advisory functions. The competencies can be attained by on-the-job training, theoretical and practical courses, symposia, seminars, workshops etc. The needed competencies for a particular job function should be continuously updated to meet current standards within the field of laboratory animal science as the amount of scientific knowledge is ever increasing. Notification to the authorities of the competencies of the persons working with laboratory animals (CV's, job training records or similar documentation) will formalize the authorisation process.

GlaxoSmithKline	User of animals - private sector	Worldwide	There are other international pharmaceutical companies. We produce 25% of the world's vaccines	Any legislative requirement should focus on flexible outputs that can be updated as knowledge develops. It is not useful or appropriate for a Directive to mandate a detailed syllabus or delivery method.
Protherics Medicines Development Ltd.	User of animals - private sector	Worldwide	No - ABPI and EFPIA represent the pharmaceutical industry in UK/EU	Depending on the nature of their work with laboratory animals the personnel must attain and keep up sufficient competencies within the fields of the 3 R's, housing conditions, access to suitable diets and water, proper care, an environment that meets at least some behavioural needs, health monitoring, experimental design including statistics etc. This is particularly important for persons with advisory functions. In regulatory testing, some aspects of the proposals are covered through the need to perform work in accordance with Good Laboratory Practice (GLP) regulations. GLP requires laboratories to demonstrate that adequate training/instruction of staff takes place, and that they are assessed as competent in a procedure, before they are allowed to perform the procedure unsupervised on a GLP laboratory study. Thus, there could be some overlap between the proposed revisions to the Directive and requirements of GLP regulations.
(Name confidential - Respondent 073)	User of animals - private sector	National; European; Worldwide	Sanofi aventis is the largest pharmaceutical company in Europe and ranks third worldwide	Staff competence is key to high standards of animal care & welfare. What is often lacking is adequate attention to continuing education and documentation that this has been done. Referring to Inspection - AAALAC accreditation includes and evaluation of staff competence as a part of the accreditation process.
(Name confidential - Respondent 074)	User of animals - private sector	Worldwide	Yes	The cost for a training course will vary but it is very important that the bureaucracy does not increase.

(Name confidential - Respondent 075)	User of animals - private sector	Worldwide	Research and development	no comment
(Name confidential - Respondent 079)	User of animals - private sector	National; Worldwide	yes	Education and training are a critical component of the 3R implementation. It is a must to make sure that any personnel having to deal with live animals as the required expertise, whatever his position, job description or role. This expertise should be adapted to the species, the type of research activities, the techniques, address animal care and husbandry as well as scientific and experimental techniques. Some critical item such as detection of pain and distress are essential. It should include "hand on" experience acquired under senior supervision as well as theoretical knowledge, and develop the required level of awareness about animal respect and the 3 R rule. Programs should be specific to each type of responsibility. In addition to this specific training, issuing a personal license to direct an experiment or a project should also require minimum a Master degree in biology.
(Name confidential - Respondent 083)	User of animals - private sector	National; European; Worldwide	representative for MD&D	Depending on the nature of their work with laboratory animals the personnel must attain and keep up sufficient competencies within the fields of the 3 R's, housing conditions, access to suitable diets and water, proper care, an environment that meets at least some behavioural needs, health monitoring, experimental design including statistics etc. This is in particular important for persons with advisory functions. The competencies can be obtained by on-the-job training, theoretical and practical courses, symposia, seminars, workshops etc. The needed competencies for a particular job function should be listed in a EU catalogue and continuously updated to meet current standards within the field of laboratory animal science as the amount of scientific knowledge is always increasing.
(Name confidential - Respondent 085)	User of animals - private sector	Not applicable	Also other biotech companies have similar animal facilities	- We agree that the cost for training is not that high, but we are not sure of a cost of 200 Euro per day - Include also documented on-site training by experienced personnel next to theoretical courses

(Name confidential - Respondent 091)	User of animals - private sector	Worldwide	YES (Safety Assessment)	It is important for people working with lab animals to have and to maintain competencies appropriate to their job taking into account any new requirements of the job eg due to new technologies. The competencies can be attained and maintained by on-the-job training, theoretical and practical courses, symposia, seminars, workshops etc. Notification to the authorities of the competencies of the persons working with laboratory animals (CV's, job training records or similar documentation) will formalize the authorisation process.
(Name confidential - Respondent 092)	User of animals - private sector	Worldwide	Global pharmaceutical research and development	Depending on the nature of their work with laboratory animals the personnel must attain and keep up sufficient competencies within the fields of the 3 R's, housing conditions, access to suitable diets and water, proper care, an environment that meets at least some behavioural needs, health monitoring, experimental design including statistics etc. This is in particular important for persons with advisory functions. The competencies can be attained by on-the-job training, theoretical and practical courses, symposia, seminars, workshops etc. The needed competencies for a particular job function should be continuously updated to meet current standards within the field of laboratory animal science as the amount of scientific knowledge is ever increasing. Notification to the authorities of the competencies of the persons working with laboratory animals (CV's, job training records or similar documentation) will formalize the authorisation process.
(Name confidential - Respondent 093)	User of animals - private sector	Worldwide	yes	Personnel must be competent (3 R's, housing conditions, access to suitable diets & water, proper care, environment that meets at least some behavioural needs, health monitoring, experimental design including statistics). Particularly important for persons with advisory functions. Competencies can be attained by on-the-job training, theoretical & practical courses, symposia, seminars, workshops etc. Competencies should be continuously updated to meet current standards In fact, requirements of appropriate training: not new; many countries know already mandatory training programs (e.g. CH, Germany). Germany: personnel executing animal experiments have to be trained either by their professional training or by participation in a course according to FELASA Cat. B.

(Name confidential - Respondent 096)	User of animals - private sector	National; European; Worldwide	there are multiple independent Contract Research Organisations in UK and EU	No comments
(Name confidential - Respondent 097)	User of animals - private sector	National	Yes	The personnel must attain and keep up sufficient competencies within the fields of the 3 R's, housing conditions etc. The competencies can be attained by on-the-job training, theoretical and practical courses, symposia, seminars, workshops etc. The required competencies should be continuously updated to meet current standards as the amount of scientific knowledge is continuously increasing. Notification to the authorities (CV's, job training records or similar documentation) will formalize the authorisation process.
(Name confidential - Respondent 099)	User of animals - private sector	Worldwide	yes	It is important for people working with lab animals to have and to maintain competencies appropriate to their job taking into account any new requirements of the job eg due to new technologies. The competencies can be attained and maintained by on-the-job training, theoretical and practical courses, symposia, seminars, workshops etc. Notification to the authorities of the competencies of the persons working with laboratory animals (CV's, job training records or similar documentation) will formalize the authorisation process.
(Name confidential - Respondent 101)	User of animals - private sector	Worldwide	yes	Depending on the nature of their work with laboratory animals the personnel must attain and keep up sufficient competencies within the fields of the 3 R's, housing conditions, access to suitable diets and water, proper care, an environment that meets at least some behavioural needs, health monitoring, experimental design including statistics etc. This is in particular important for persons with advisory functions. The competencies can be attained by on-the-job training, theoretical and practical courses, symposia, seminars, workshops etc. The needed competencies for a particular job function should be continuously updated to meet current standards within the field of laboratory animal science as the amount of scientific knowledge is ever increasing. Notification to the authorities of the competencies of the persons working with laboratory animals (CV's, job training records or similar documentation) will formalize the authorisation process.

(Name confidential - Respondent 103)	User of animals - private sector	Worldwide	The questionnaire will be completed for the German sites. Other site head in other countries will reply individually	We regard education and training as extremely important and helpful and fully support these options. However, we are convinced that internally we already organize and perform more training and educational events than would ever be prescribed by law.
(Name confidential - Respondent 104)	User of animals - private sector	Worldwide	Many organisations	Depending on the nature of their work with laboratory animals the personnel must attain and keep up sufficient competencies within the fields of the 3 R's, housing conditions, access to suitable diets and water, proper care, an environment that meets at least some behavioural needs, health monitoring, experimental design including statistics etc. This is in particular important for persons with advisory functions. The competencies can be attained by on-the-job training, theoretical and practical courses, symposia, seminars, workshops etc. The needed competencies for a particular job function should be continuously updated to meet current standards within the field of laboratory animal science as the amount of scientific knowledge is ever increasing. Notification to the authorities of the competencies of the persons working with laboratory animals (CV's, job training records or similar documentation) will formalize the authorisation process.

(Name confidential - Respondent 110)	User of animals - private sector	National	representative	Depending on the nature of their work with laboratory animals the personnel must attain and keep up sufficient competencies within the fields of the 3 R's, housing conditions, access to suitable diets and water, proper care, an environment that meets at least some behavioural needs, health monitoring, experimental design including statistics etc. This is in particular important for persons with advisory functions. The competencies can be attained by on-the-job training, theoretical and practical courses, symposia, seminars, workshops etc. The needed competencies for a particular job function should be continuously updated to meet current standards within the field of laboratory animal science as the amount of scientific knowledge is ever increasing. Notification to the authorities of the competencies of the persons working with laboratory animals (CV's, job training records or similar documentation) will formalize the authorisation process.
(Name confidential - Respondent 198)	User of animals - private sector	Worldwide	Don't understand this question	It is important that any system is effective and not overly bureaucratic.

Animal Procedures Committee (APC)	Public authority	National	The APC provide independent advice to UK Government on the use of animals in scientific procedures. The APC consider science, industry and animal welfare. Members are from a variety of backgrounds.	With regard to 1.7, the financial cost of appropriate education and training courses should not be under-estimated and will be variable depending on type of institution, numbers attending and other factors. However, this must be balanced against the need for education and training in order to help ensure individuals are capable of applying principles of good science and welfare. The UK Animal Procedures Committee has published a report by its Education and Training Sub-Committee (ETSC) with detailed recommendations on the required elements of a modular training course for UK licensees carrying out research involving the use of animals (http://www.apc.gov.uk/reference/apc-education-modular-training.pdf). The ETSC is currently preparing recommendations on modular training for those responsible for the conduct of projects, i.e. project licensees.
(Name confidential - Respondent 114)	Public authority	National	XXX is central competent authority for approval for the experiments and inspections animal protection	The education and training of personal safeguards the employer in the Slovak Republic at the tim.

(Name confidential - Respondent 122)	Public authority	National	We are the National Competent Authority	There should be two objectives. To ensure technical competences: appropriate training at the right time, and provision for continued professional development are necessary and already feature in some national frameworks. To promote the free movement of labour in the EU, and to foster competitiveness against other economic regions, a common EU standard and recognised qualification is required. Proper training and demonstration of competence promote good science and good welfare, but the focus has to be on the outcome not the process. Formal training, with recognised qualifications is expensive, and this may be of concern to SMEs and academia.
(Name confidential - Respondent 126)	Public authority	National	Regulatory authority in UK	Overall opinion is that the current directive provides sufficient broad requirements for training (article 14) and that detailed policy in this area would reduce flexibility. Main issue is trying to ensure that a minimum standard is met throughout Europe to facilitate movement of scientists from country to country with mutual recognition of relevant training. Overall training requirement is recognised but the detail of its provision should not be mandated. A common approach with certification showing completion of a basic course backed by evidence of on the job training should be adequate. The questions are unclear and do not separate out the three areas of education, training and competence. Judgement of and maintenance of competence is a difficult area and requires a flexible local approach as it would be very difficult to set standards. There also seems to be an underestimate of the costs of training.
1.Animal Aid	Other	National	Other organisations do exist	Some of the strongest scientific arguments against using non-human primates in medical research have been voiced by individual scientists who themselves performed animal experiments in the past. A recent example can be found in a powerful editorial written by Michael Balls (M Balls. Editorial in ATLA 2003; 31, 545-547.)
Biosciences Federation	Other	National; European	There are other relevant organisations	The current major disparity between member states should be reduced by common standards. E learning has advantages but does not address issues of the competence of research staff in handling animals, improvements in which could significantly improve animal welfare. Some degree of practical training and assessment is therefore desirable, to a common standard.

COST Action B24 “Laboratory Animal Science Welfare” - http://biomedicum.ut.ee/costb24	Other	European	No	Depending on the work with laboratory animals personnel need different knowledge and skills. This can be attained theoretically (courses, seminars, workshops, e-learning methods etc.) but some skills really need practical training (practical courses, on-the-job training, hands-on training under supervision of experts).
INRA center of Jouy-en-Josas Working group in animal experimentation ethics	Other	Local	it is representative at the local level	Education and training would increase competence, especially if the law provides some guidelines or conducts of experiments. Therefore, less questions of ethic would be asked. Trained persons could be invited to see an ethical evaluation.
Royal Netherlands Akademie of Arts and Sciences	Other	National	Yes, representative of the scientific community	Comment to 8.4: Yes. Under the conditions that education and training courses are accepted throughout the EU
The Association for the Study of Animal Behaviour	Other	Worldwide	yes	Clearly, better education can only be good. How good, however, depends on its nature and how well it reflects current scientific understanding and not just a pre-determined set of precepts deemed necessary for an easily assessable uniform approach. Labouring the three Rs in itself will achieve little if there is poor instruction in their judicious application across the wide field of animal science

(Name confidential - Respondent 138)	Other	National	I am the chair of the Hungarian Scientific Ethical Committee on Animal Experimentation	8.2. This is far the most important factor which has a direct impact on animal welfare. 8.7. It should not be considered as a cost rather as an investment (as any kind of education)
(Name confidential - Respondent 147)	Other	Not applicable	not applicable	Laboratory animal staff must attain and keep up sufficient competencies within the fields of the 3 R's, housing conditions, access to suitable diets and water, proper care, an environment that meets some behavioural needs, health monitoring, experimental design including statistics etc. This is in particular important for persons with advisory functions. The competencies can be attained by on-the-job training, theoretical and practical courses, symposia, seminars, workshops etc. The needed competencies for a particular job function should be continuously updated to meet current standards within the field of laboratory animal science as the amount of scientific knowledge is ever increasing. Notification to the authorities of the competencies of the persons working with laboratory animals (CV's, job training records or similar documentation) will facilitate the authorisation process.
(Name confidential - Respondent 149)	Other	Worldwide	The Institute of Animal Technology is the professional body representing animal technologists	While the Institute of Animal Technology supports the training and qualification of those involved in the care and welfare of laboratory animals, especially animal technologists, we feel that the FELASA guidelines now ten years old quoted above, are no longer appropriate and do not reflect the current role and skills of animal technologists. By artificially separating four defining groups of personnel, this does not reflect the wide range of skills, expertise and knowledge of modern animal technologists. In our opinion a far better training programme which enables suitable persons to fulfil their roles not based on artificial categories would better serve the interests of the science and animal welfare, see http://iat.org.uk/srb.htm

(Name confidential - Respondent 154)	Other	National	representative	Properly constructed and appropriately delivered education and training has the potential to improve animal welfare and science. However such training programmes have to be properly constructed and minimum standards defined in order to minimise inconsistency. The cost of attending training courses is cited as a problem particularly in the academic sector.
Austrian Society of Toxicology (ASTOX)	Non-governmental organisation	National	Yes	Depending on the work with laboratory animals personnel need different knowledge and skills. This can be attained theoretically (courses, seminars, workshops, e-learning methods etc.) but some skills really need practical training (practical courses, on-the-job training).
Eurogroup for Animal Welfare/EWLA	Non-governmental organisation	European	Eurogroup/EWLA is made up of animal welfare Member Organisations and Observers in all Member States	Viiiic: e-learning does not replace 'hands-on' learning and so needs to be part of an overall training framework which needs to include basic computer literacy skills. Re 1.6 & 1.7 Education and training costs will depend on: what is already done, what the training is, how it is provided and assessed, how training courses are accredited, how training is monitored, the resources (time, personnel, money) required to implement it and to develop appropriate training materials (e.g. videos, presentations). Education and training in any field is universally agreed as important and given the benefits stated in the text, it is hard to believe that justification for additional expenditure is required. The requirement for competence should not depend on costs. Incompetent staff will produce untrustworthy results, which is a waste of EU resources including animals' lives. Improved training will produce a more skilled work force delivering good science that will be more economic in the long term.
European Coalition to End Animal Experiments (ECEAE)	Non-governmental organisation	Worldwide	Representative (the only EU coalition focusing on animal experiments)	Lack of competence in personnel working with animals used in experiments can seriously undermine animal welfare. Such people must be properly authorised and highly trained to reduce the suffering of animals during the whole lifetime of the projects. Consequently, we believe that the revision must set high minimum training requirements for the different categories of personnel, in addition to requirements for obtaining, maintaining and demonstrating competence and life-long learning. This must, however, be meaningful rather than an exercise in going through the motions.

FELASA (Federation of European Laboratory Animal Science Associations)	Non-governmental organisation	European	FELASA represents 13 European lab animal sci associations and therefore some 3-4000 members of those associations (scientists, veterinary surgeons, technicians etc.). See www.felasa.org	FELASA strongly endorses the importance of education and training and has published detailed guidelines (see www.felasa.org) for Categories A-D. A FELASA working group is currently looking at a revision of the Category A guidelines; a further working group on continuing education has also recently begun work. FELASA also offers an accreditation system for educational courses that could be used as a quality system at European level.
Gesellschaft für Versuchstierkunde - Society for Laboratory Animal Science (GV-SOLAS)	Non-governmental organisation	National; European	Yes	Depending on the work with laboratory animals personnel need different knowledge and skills. This can be attained theoretically (courses, seminars, workshops, e-learning methods etc.) but some skills really need practical training (practical courses, on-the-job training, hands-on training under supervision of experts).
Nuffield Council on Bioethics	Non-governmental organisation	National; Worldwide	There any other relevant organisations	Appropriate education and training would enable those involved with animal research to effectively carry out cost-benefit assessments of their work and to implement the Three Rs, particularly Refinement, wherever possible. See paras 15.54, 15.55 and 12.28 for further discussion, in Nuffield Council on Bioethics (2005) The ethics of research involving animals (London: Nuffield Council on Bioethics) Available at: http://www.nuffieldbioethics.org/go/ourwork/animalresearch/publication_178.html

PETA Europe Ltd.	Non-governmental organisation	Worldwide	both	All personnel involved with the use of animals must be adequately trained in the principles of animal care and ethical issues, especially application of the 3Rs. Through revision of the directive, overall costs of training could be reduced as improvements are made, and best practice shared. MSs and individual facilities will be supported through introduction of EU based systems and standards, and public confidence would be enhanced. Examples of inappropriate behavior by personnel responsible for animals in research facilities have been obtained by investigators working for animal protection organisations; see: http://www.buav.org/undercover/covance.html which includes film footage of inappropriate, violent handling of animals. Such blatant disregard for animal welfare is less likely to occur if training standards are compulsory, animal facilities are subject to unannounced inspections, and breaches in the law are reported to the public.
PROFESSOR RD COMBES - FRAME	Non-governmental organisation	Worldwide	THERE ARE OTHERS	Refresher training should be formalised and harmonised throughout the EU, and should be linked with continuous learning? All licensees, whatever their experience, should receive regular training, to enable them to benefit from new thinking and new approaches to experimentation, alternatives and ethical views. The minimum educational background (per category of personnel should be considered in the context of competency - the closer someone is to handling animals, the more important their competency in this area becomes. The director of a project should have sufficient knowledge and understanding of the relevant science to ensure that the project proceeds properly according to its authorisation. Criteria for assessing competency for all personnel need to be harmonised across the EU.

The National Anti-Vivisection Society	Non-governmental organisation	National; European; Worldwide	The NAVS is the leading and oldest anti-vivisection organisation in the world. There are a number of other relevant anti-vivisection organisations around the world with expertise in this field.	Although we recognise that further education and training should have a positive effect on animal welfare, we feel the issue of competence requires further attention. Throughout our undercover investigations, we have consistently observed problems with staff deviating from the rules, showing a lack of diligence while carrying out procedures and generally cutting corners. Our concern is that this problem would not necessarily be solved with further training alone. Competence along with education and training should be subject to regular revision and assessment. Even when a sufficient level of competence can be demonstrated, supervision should always be present to ensure standards are maintained throughout every procedure. Consequences should be severe for members of staff who fail to adhere to rules. Any standards set for education and training should be compulsory regardless of previous experience or skills and knowledge already possessed by the individual applicant.
The Physiological Society	Non-governmental organisation	Worldwide	Many other Learned Societies are also representative	The current major disparity between member states should be reduced by common standards. E learning has advantages but does not address issues of the competence of research staff in handling animals, improvements in which could significantly improve animal welfare. Some degree of practical training and assessment is therefore desirable, to a common standard.

The Royal Society	Non-governmental organisation	National	Yes. The Royal Society is the independent scientific academy of the UK dedicated to promoting excellence in science. The Society plays an influential role in national and international science policy	The Society agrees that common standards of education and training are needed to reduce the current disparity between Member States which limits free movement of scientists.
UK Laboratory Animal Science Association (LASA)	Non-governmental organisation	National	LASA represents animal user community in academic, government & industry sectors.	In addition to the education and training requirements as set out in this section it is important that all those involved in animal work have the opportunity for continuing education (CPD). To this end, FELASA has initiated a working group which is assessing the feasibility of introducing a European wide accredited system of continuing education. http://www.felasa.org/Working_groups/contedu.htm
(Name confidential - Respondent 163)	Non-governmental organisation	National; European; Worldwide	both	Looking at the impact of laboratory routines on the stress level of animals (see Balcombe et al Laboratory routines cause animal stress. Contemporary Topics in Laboratory Animal Science Nov. 2004;43(6):42-51, it shows that it is of utmost importance that all personnel involved is properly trained in animal care and ethical issues and 3Rs.

(Name confidential - Respondent 169)	Non-governmental organisation	National	Represents all Finnish pharmacologists	Animal workers would probably benefit from some kind of certified continual training programme. The programme for researchers could well be some web-based material with an electronic examination.
(Name confidential - Respondent 170)	Non-governmental organisation	National	The Danish Society of Pharmacology and Toxicology represents Danish pharmacologists and toxicologists.	No further comments.
(Name confidential - Respondent 174)	Non-governmental organisation	Worldwide	-	-
(Name confidential - Respondent 177)	Non-governmental organisation	Worldwide	Representative	Although e-learning would provide a very useful adjunct, animal handling must form an integral part of the training and this must include a 'hands on' element, for which there can be no substitute.
(Name confidential - Respondent 178)	Non-governmental organisation	Worldwide	yes	An EU comparable education and training for persons working with laboratory animals would be very important and helpful. At the moment we as company try to adapt the FELASA education demand which is not so easy due to the fact, that less training courses for advanced training exists. So we have to fix our own training programs. By EU wide comparable Education more Training courses would be offered and an intellectual exchange would be easier possible

(Name confidential - Respondent 183)	Breeder of animals	Worldwide	We are representative for the field and constitute about 50 percent of the activity	No justification required.
(Name confidential - Respondent 189)		National; European	There are other organisations	Contrary to the assertion in VIIIId, appropriate education and training is vital to ensure competence. E-learning should not be relied on its own, as practical training in handling is important. We suggest that the Council of Europe's Resolution on education and training of persons working with laboratory animals be adopted within the directive.
(Name confidential - Respondent 190)		Regional; Worldwide	also others	The best competence can still be obtained by doing the experiments under appropriate guidance. A formalized training will not be able to cover all possible techniques. E-learning is not the appropriate method to teach practical skills. Regarding animal caretakers, in contrast to what this document says, the costs of their education are not negligible. There is only a limited (or non-existing) supply of qualified personnel in some member states, and the education guidelines differ considerably between member states.
(Name confidential - Respondent 192)		National; European; Worldwide	Yes	Requirement for competence with minimum elements for education and training are good standards and an EU-wide standardisation of such requirements would greatly improve mobility between member countries. Nevertheless, to allow mobility from and to third countries, it is important that a certain flexibility in rules is maintained, at least for researchers. For example, while 1 day of "minimal education" for an experienced American post doc is feasible, it seems unnecessary that third country researchers with relevant experience have to follow two-week courses before allowed to work with animals, especially since most of the relevant skill are obtained through experience on the job.
(Name confidential - Respondent 196)		European	all universities are relevant	The value of training depends on who is doing it. At present there are many self-appointed experts. There is a need to consider who 'trains the trainers'