Working Group (EWG) on Education and Training
Directive 2010/63/EU

Brussels, 3-4 July 2013

Thought Starter Document

Objectives of EWG on Education and Training

To develop an Education and Training framework within the EU which would assure the competence of staff caring for or using animals in procedures, and facilitating the free movement of personnel within EU.

The outcomes from the EWG will be used to inform the development of EU non-binding guidelines to assist MS progress their obligations to publish minimum requirements on education and training and to promote free movement of personnel throughout the EU. Furthermore, any agreement at EU level on general principles will assist those developing training courses to work towards common, acceptable standards.

Acknowledgements

Following the previous two successful E&T Expert Working Group meetings, we acknowledge the on-going significant contributions being made by the members of the EWG in the lead up to the July meeting. We are grateful for the additional material submitted by Member States and interested organisations to inform our discussions on the remaining issues to be considered by the EWG.

Progress to date

The outcomes of the earlier meetings were presented to, and endorsed by the National Contact Points Meeting on 23-24th January 2013. This document can be found on the EC website at http://ec.europa.eu/environment/chemicals/lab_animals/interpretation_en.htm

Issues for consideration at July Meeting

The items for discussion in July have resulted either from discussions at previous EWG meetings or been raised at NCP meetings.

- Training for functions in Articles 24
- Training for designated veterinarians

  From discussions within the EWG, it was considered, in order to consider training needs, that there would need to be a good understanding of the roles of the persons

listed in Article 24 and the designated veterinarian (A25). The intention therefore is that both the roles and training needs are considered together.

- Training for project evaluators
- Exemptions from the Modular training requirements
- Use of live animals in education and training

In addition, as requested during EWG I a number of examples have been developed by members of the EWG to illustrate the assessment of Learning Outcomes, including examples of how assessment differs between Level I and Level II Modules. Examples of assessment of competence have also been prepared for consideration.

Finally, FELASA/ESLAV/ECLAM/EFAT/FELABA have requested a few minor changes to the Learning Outcomes be considered – these are primarily to ensure consistency and appropriateness of the verbs used in the descriptions for the educational level proposed and to remove duplication.

SESSION 1 - Roles and tasks for functions listed in Article 24(1)(a-c) and Article 25

The majority of responses received from MS and observer organisations agreed that the functions in Article 24 need not be held by different persons, of particular relevance in small establishments, but that the each of the different functions need to be adequately addressed and resourced.

All within the establishment should be aware of how these functions are being delivered and who to contact.

More detailed guidance on the roles would be considered helpful.

24(1)(a) Person responsible for overseeing the welfare and care of animals in the establishment.

The European Federation of Animal Technologists (EFAT) has prepared a paper summarising the role and providing suggestions for training in this role (Appendix 1 – EFAT position paper).

This role will generally be fulfilled by a senior animal technologist, although the designated veterinarian may occasionally assume this role.

The individual should be able to provide independent advice on welfare and care of all animals within the establishment.

The individual is expected to be actively involved on a daily basis in safeguarding the welfare of animals within the establishment, should have managerial authority enabling them to establish and maintain high standards of husbandry and care, at least

meeting the standards set out in Annex III and to champion a culture of care amongst both husbandry and scientific staff.

The individual should be pro-active, working as appropriate with the designated veterinarian, to promote implementation of refinements in animal husbandry, care and use, and contribute actively to the work of the Animal Welfare Body.

24(1)(b) Person responsible for ensuring that the staff dealing with animals have access to information specific to the species housed in the establishment

The person(s) responsible for this role would have to ensure that a range of relevant information was made available, to those who need it, and that the information is kept up-to-date as far as possible.

This would include all manner of information relating to a varied range of subjects such as:

- information relating to the species used in the establishment;
- animal care and husbandry;
- animal welfare and the 3Rs;
- EU and national legislation, guidance and local rules/information;
- external information and publications which deliver relevant guiding principles for good practice in a particular aspect or area of work (FELASA guiding principles documents for example);
- information regarding new initiatives, technical and practical advancements and good practice in a relevant field of research and in relation to the species concerned.

In large establishments it will be difficult for any one person to be aware of all the issues in all areas of science. Ensuring that the most relevant information is available to all will require an appropriate network within the establishment to ensure that all relevant information is collected and disseminated appropriately. The individual(s) responsible may concentrate on specific areas e.g. animal husbandry & care; particular animal models, or one individual may act as a central co-ordinator within the establishment.

It has been suggested that the Animal Welfare Body may contribute to the task, to assist in the identification of relevant information and co-ordination of dissemination to the correct individuals.

It is essential that the position/network is properly resourced and that the relevant individuals are appropriately trained in information search and retrieval, and have access to the relevant information sources.

Summary of main tasks

- maintaining contacts for information sharing (e.g. with the National Competent Authority, various specialist interest groups including, specialist research groups, professional bodies, FELASA and national LAS associations, 3Rs and animal welfare organisations);
- searching for and disseminating current information (new 3Rs initiatives in a particular scientific field for example);
- maintaining local contact details based on function, type of role (Article 23(2)(a-d), research interests etc. in order to circulate information effectively i.e. directed to those individuals who would benefit (avoiding a copy-to-all approach which would carry the risk of information being ignored);
- distributing information, as appropriate, to individuals and groups of staff/students.

24(1)(c) Person responsible for ensuring that the staff are adequately educated, competent and continuously trained and that they are supervised until they have demonstrated the requisite competence

This role may be a stand-alone defined position within a large establishment, but often the role will be undertaken by different persons. Where more than one person is tasked with this role it is important that they all work to the same principles and standards, and oversight of this role should therefore be maintained at establishment level, rather than at the level of an individual research group or department.

The majority of responses suggested that the person would generally be involved in coordinating training and ensuring that supervision, competence assessment and continued professional development are undertaken and recorded, rather than being directly involved in delivery or assessment of training or competence.

Person will need good communication skills, be properly resourced and supported by senior management to ensure that training requirements are met.

The person responsible for training and competence should be in a position of authority in order to influence others and to be able to make decisions. They could not, in most cases, be directly responsible for the day-to-day training of each individual so certain practical responsibilities would have to be delegated to experienced practitioners who, themselves, should be able to train and/or to supervise the necessary techniques. The trainers must have sufficient relevant knowledge, hands-on experience and expertise (as appropriate) to be able to demonstrate a technique, to deliver or supervise training and/or to assess appropriately (note: where possible assessment should be done by someone other than the person who provided the training). This process should be sufficiently flexible to meet local and individual training needs.

To properly discharge the responsibilities of this role a good, general understanding of the regulatory system and the use of animals for research and testing will be necessary along with an understanding of both the theoretical knowledge and practical skills required. Ready access to individual training histories and any records required for legislative purposes would also be essential along with an up-to-date and comprehensive knowledge of training requirements, training resources, and training opportunities. Guidance as to when individuals should be deemed to be competent, how this should be determined and how existing practitioners are to be assessed are essential.

Tasks:

Depending on their role within the institution the tasks of the person responsible for training and competence are likely to include some or all of the following:

- direct involvement in training;
- identifying appropriate training courses (modules and species);
- ensuring these training courses are accredited (or approved by MS);
- setting required standards for the institution for training, supervision, competence and CPD for each of the functions in Article 23(2)(a–d);
- communicating requirements/expectations to all staff concerned;
- identifying possible trainers for required procedures;
- developing local requirements for training records to be used throughout the establishment;
- ensuring that staff are aware of their individual responsibilities to train/ supervise and/or to be trained and supervised, until competent, as appropriate to their expertise and their function;
- ensuring that mechanisms are in place to identify new training needs;
- similarly to establish mechanisms to identify any refresher training requirements as they arise (which may be triggered in a number of ways);
- checking and verifying training records when individuals transfer from other establishments and identifying any new training which might be required;
- communicating identified training needs, for a particular individual, to the trainer/ supervisor concerned;
- receipt of training records/certificates and consideration of requests for exemptions from training;
- ensuring that all records are complete, accurate and up-to-date;
- working with colleagues locally and further afield to develop a consistent local/ national/EU approach to training/supervision/competence and to the content and detail needed for individual training records (to ensure that these are meaningful across and beyond the institution) to facilitate the transfer of staff.
- considering and taking decisions on requests for training exemptions;
- ensuring that competence is maintained.

Involvement in training/supervision/assessment:

This will depend on the nature of the person's role within the establishment and may vary. If this role is solely a management/administrative role then direct involvement in training/supervision/assessment will be less likely. However, where the tasks associated with the role are delegated (i.e. where the personnel involved have other active duties as project designer/manager, member of the animal care staff or designated veterinarian) then direct contribution to training/supervision/assessment is likely. In each case this will be subject to the background, expertise and competence of the individual/s concerned and their day-to-day work. Whilst the person responsible for training and competence may or may not be directly involved in the provision of training they should oversee the process of training, supervision, competence and CPD within the establishment which would include making sure that training is taking place, that standards are acceptable and that a consistent approach is being adopted and delivered by and for all staff.

Article 25 – Designated Veterinarian

Role of designated veterinarian

ESLAV (the European Society of Laboratory Animal Veterinarians), ECLAM (the European College of Laboratory Animal Medicine) and LAVA (UK Laboratory Animal Veterinary Association) have prepared a position paper on the role, training and education with regards to the designated veterinarian under Directive 2010/63/EU.

This is a comprehensive paper which develops the role of the veterinarian within the terms of the Directive and identifies the areas where veterinarians can actively contribute to improved welfare and use of animals in scientific procedures. The paper is attached as Appendix 2. Further information on the views of these organisations is included in Appendix 2a.

The role of the designated veterinarian should extend beyond advice on disease or health issues, and be integral to the development of continued improvement of scientific practices, in particular with respect to refinements in model design and clinical monitoring.

Although not a Directive requirement, active contributions by the designated veterinarian in the Animal Welfare Body and to project applications are highly desirable, and will benefit both science and animal welfare.

Some concerns were expressed over the availability of Laboratory Animal Science trained veterinarians, the availability of LAS training courses for veterinarians and the need to ensure that any training was appropriate and proportionate to the needs of the establishment.

Workshop 1

Define the roles of the person (s)

- responsible for overseeing the welfare and care of the animals in the establishment (see EFAT position paper – Appendix 1)
- responsible for ensuring that the staff dealing with animals have access to information specific to the species housed in the establishment
- responsible for ensuring that the staff are adequately educated, competent and continuously trained and that they are supervised until they have demonstrated the requisite competence
- named as designated veterinarian (see ESLAV/ECLAM/LAVA position papers – Appendix 2/2bis)

SESSION 2 - Training for persons in functions listed in Article 24(1)(a-c) and Article 25

Although there are no specific requirements for the training of persons identified in Articles 24 and 25 of the Directive, the submissions provided strong support for the need for training in the roles of the person responsible for overseeing welfare and care and of the designated veterinarian.

Although the skills required for the "information" and "training" persons were identified, because the roles could be fulfilled by very different approaches and individuals of widely varying backgrounds, no common approach has emerged from the received feedback, however, some useful principles could be developed. The use of certain of the Training Modules developed for the functions in Article 23 and FELASA courses have been suggested, and in some cases, adapted to fulfil these training needs – but neither approach would seem to be fully tailored to training for these functions.

2.1 Training for person responsible for overseeing the welfare and care of animals in the establishment.

There is general agreement that all persons responsible for overseeing the welfare and care of animals should have received appropriate training. Where a combination of the developed training modules are used, the modules for project designers should be included as these modules require a deeper appreciation of the 3Rs, experimental design and good scientific practice.

EFAT has provided some detailed recommendations on suitable training, presented as Learning Outcomes.

Training to FELASA Category C and/or D has also been suggested as suitable training.

Specific issues to be covered include

- Knowledge of relevant husbandry and care practices – ensuring compliance with Directive, in particular Annex III.
- Understanding of 3Rs relevant to work in establishment.
- Animal health and welfare standards.
- Development and maintenance of appropriate record keeping systems.

2.2. Training for person responsible for ensuring that the staff dealing with animals have access to information specific to the species housed in the establishment

This function is sometimes linked to that of the person responsible for overseeing welfare, but person does not need to be expert in all areas of science – rather have good networking ability.

Training should include searches for information and strategies for dissemination.

2.3. Training for person responsible for ensuring that the staff are adequately educated, competent and continuously trained and that they are supervised until they have demonstrated the requisite competence

Training will vary significantly depending on whether person is actively involved in delivery of training, supervision or competence assessment.

For those involved in the coordination, confirmation and recording of training an understanding of the legislative requirements is necessary.

2.4. Training for designated veterinarian

The ESLAV/ECLAM/LAVA document outlines a tiered approach to training for designated veterinarians.

Although the majority of responses acknowledged that some form of Laboratory Animal veterinary science training should be required before assuming the role as designated veterinarian.

However, views were expressed that the standard veterinary undergraduate course should be sufficient training, although there was acknowledgement that knowledge of the Directive and veterinary responsibilities would be necessary.

<u>Workshop 2</u>

Define the training needs, if any, for the roles of the person (s)

- responsible for overseeing the welfare and care of the animals in the establishment (see Appendix 1)

- responsible for ensuring that the staff dealing with animals have access to information specific to the species housed in the establishment
- responsible for ensuring that the staff are adequately educated, competent and continuously trained and that they are supervised until they have demonstrated the requisite competence
- named as designated veterinarian (see Appendix 2)

SESSION 3 – Training for Project Evaluators (Article 38)

At the recent EWG meeting on Project Evaluation and Retrospective Assessment, there was general agreement that those involved in Project Evaluation should undergo some specific training in the process, in particular in how the objectives of the project, the application of the Three Rs and the assessment of severity classification should be evaluated, and how the harm-benefit analysis should be undertaken. It was suggested that this item be referred to the EWG on Education and Training for consideration of whether or not a specific training module could be developed for those carrying out project evaluation (PE), and what elements such a module should cover.

The responses received to date have generally agreed that there should be training for those involved in PE, in particular with respect to conducting a harm-benefit assessment. Although there are different structures in place for meeting the requirements of Article 38, some training for all those involved would be considered beneficial to promote transparency and consistency in the evaluation process.

The main focus should be on the harm-benefit analysis.

A number of respondents indicated that training is already under development based on existing courses (e.g. FELASA) and elements of the modular system developed by the E&T EWG.

Principles for consideration in training for Project Evaluators

It is important that those carrying out the PE have a good understanding of the expected harms to the animals and the proposed benefits of the research, as the harm-benefit assessment is an integral piece of the authorisation process. In terms of assessing harms, it follows that an ability to perform a well-informed and consistent assessment of severity is an essential element of the process. Training should include information on the various systems available to assist the process, and how these can be applied in practice.

PE also requires careful consideration of the effectiveness of the application of the Three Rs within the project.

Training for Project Evaluators should include:

Legislative Framework (Module 1)

All those undertaking PE should have a clear understanding of EU and National Legislation and in particular the obligations of or for PE

Ethics, Animal Welfare and the Three Rs (Level 2)(Module 12)
All those undertaking PE, should understand the ethical and welfare issues relating to the use of animals in scientific procedures, and appreciate the importance of the implementation of the Three Rs in all scientific research.

Conducting a harm-benefit assessment
Recital 39 of the Directive states that *"The likely harm to the animal should be balanced against the expected benefits of the project. Therefore, an impartial project evaluation independent of those involved in the study should be carried out as part of the authorisation process of projects involving the use of live animals."*

Training should include how to assess harms in the animals, how to assess the potential benefits of the project, and how to determine the likelihood of success. Other elements are important to the evaluation process, but this knowledge would not necessarily be required of all individuals involved in the process – for example statistician may provide confirmation of appropriateness of design.

Although Article 38 provides an outline for the evaluation of projects, training should include greater emphasis on whether others are conducting similar work elsewhere, especially without the use of animals; whether human data is available; whether a non-animal alternative is available; whether there are other sources of the information required. Project licence evaluators should be taught to assess:

- Assessment of benefits
    - Consideration of the relevance of the proposed work in relation to current knowledge and the subject to be addressed.

- Assessment of harms
    - Concept of direct and contingent suffering
    - Cumulative effects
    - Re-use
    - Methods to prevent or ameliorate suffering
    - Determination of severity classification
    - Confirmation that the Three Rs have been fully addressed
        - That the knowledge to be acquired by the animal studies is not already available or may be concluded from previous results.
        - That the non-sentient methods currently available could not produce similar results.
        - The quality of experimental design, including statistical aspects.
        - Appropriate choice of model

        - All refinement opportunities have been considered and adopted or rejected (and justified on scientific grounds)
    - Effects on animals
    - Fate of animals at end of procedure e.g. humane killing; release ; re-home

- Likelihood of benefit
    - How the scientific quality of the proposal is assessed (for example, by periodical independent peer review).
    - The adequacy and security of funding in relation to time-scale of proposed work (prevent preliminary results not being taken further due to lack of funding).
    - The validity of working hypotheses and suitability of procedures in relation to the general purpose of the work.
    - That the research team has all the necessary experience and competence, to maximise scientific quality and animal welfare
    - Suitable facilities available

- How to "weigh" harms and benefits
- How to ensure a consistent outcome

It has been suggested that the use of genetically modified animals poses particular difficulties for the harm-benefit analysis, and that these should be given due consideration in PE training.

Workshop 3

- Develop the key components of training for Project Evaluators. Focus on the elements common to all those involved, rather than the specialist knowledge which may be brought by individuals (e.g. veterinary expertise on anaesthetic practices)
- Develop the respective LOs
- Is further guidance needed on the skill set required to conduct a Project Evaluation (i.e. a composite knowledge)?

SESSION 4 - Exemptions from Modular Training for functions 23(2)(a-d)

In the responses received there was general agreement that although exemptions from training should be permissible, the principles on which such exemptions are given should be transparent.

Approval of training exemptions should either be made by the CA, or where clearly defined criteria have been published by CA, this may be approved at the local establishment level (by

person responsible for training (Article 24(1)(c)), with any such exemptions recorded and available for inspection by the CA.

It can be difficult to interpret the standards of training courses in other MS and from other countries outside EU. It would be helpful to have some form of mutual recognition at least within EU of "approved" training courses – this issue will be picked up in the discussions on the EU E&T Platform.

As a matter of good practice, irrespective of the training history, any new arrival at an establishment should have training and competence reviewed before the individual is permitted to work unsupervised.

Principles for Exemption

"Grandfathering in" should be accepted for training in Functions a-d – that is, if individuals are already trained and experienced in their areas of work, there is no requirement for additional training (except of course where the individual wishes to develop in new areas e.g. new species and what is required for the maintenance of competence and CPD.

For individuals who have not been working with animals in scientific procedures for a period of time (5 years was suggested), these individuals, should be required to satisfactorily complete training before re-commencing to work.

There should be no exemption to the requirement for training in MS legislation.

Applications for exemption should contain all relevant training and previous experience, such that these may be mapped/matched to MS training requirements.

MS should identify and publicise information on any standard exemption criteria. In some MS there are already prescribed exemptions for certain individuals e.g. veterinarian is exempt from modular training except for legislation; licensed slaughterman is exempted from relevant "killing" modules on relevant farmed species.

Workshop 4

- Consider and develop further any principles for exemptions.
- Identify list of examples of "standard" exemptions, and "level" of exemption (i.e. which Modules are not required).

SESSION 5 – Principles for the use of live animals in Education and Training

It may be useful to separate and define what is meant by Education versus Training, since they may entail different concerns over animal use: Education could be interpreted principally to refer to the imparting of general principles (e.g. in anaesthesia) whereas Training could refer mainly to the teaching of practical skills.

The use of live animals for Education and Training purposes which may cause the animals pain, suffering, distress or lasting harm (as defined in Article 3(1)) will require project authorisation. Note – training in handling skills is not considered as a procedure, but training will be conducted under supervision until competence is attained.

The extent to which animal use is permitted varies considerably among MS, and quite diverse views were also expressed by responding observer organisations.

On the one hand, views were expressed that no animals should be required in education and training –

"Hundreds of humane teaching methods have now been developed and approximately "90% of published educational evaluations have demonstrated that students using humane alternatives achieve superior or equivalent learning outcomes, such as the acquisition of clinical or surgical skills or theoretical knowledge" [(1)].

Techniques include models, mannequins and surgical simulators which allow clinical skills training for students, including laboratory technicians. "These may include venipuncture (blood sampling, using fake blood solutions), endotracheal intubation, thoracocentesis, bandaging, splinting, resuscitation, arterial pulse palpitation, and auscultation of heart and breath sounds via stethoscope" [(1)].

Almost a decade ago, one paper reported, "There are sufficient alternatives available at relatively low-cost and with proven educational value to allow the vast majority of students who study biomedical science courses to qualify without using animal experiments" [(2)].

The use of the human placenta as a medium for training in microsurgery techniques has made the use of animals in this area obsolete[(3)]*. One paper reviewing the technique concluded that "the dissection of human placenta is a very good microsurgical training"* [(4)]*."*

1. *Knight, A (2011) "The Potential of Human Teaching Methods within Veterinary and Other Biomedical Education" ALTEX Proceedings, vol.1, no. 1 pp: 365 – 275*
2. *Gruber, F.P. & Dewhurst, D.G. (2004) "Alternatives to Animal Experimentation in Biomedical Education", ALTEX, vol.21, suppl. pp.33-48.*
3. *http://www.ldf.org.uk/research/49/51/287/ - accessed 31/05/12*
4. *Romero, F. R et al (2008) "Microsurgical techniques using human placenta" Arquivos de Neuro-Psiquiatria, Vol. 66, No. 4, pp: 876 - 878.*

On the other hand, views were expressed that, at least some, live animal use is necessary:

"the use of live animals for techniques is essential. Such skills cannot be acquired by mere theoretical education. Training on live animals is also necessary to maintain or improve manual skills and to acquire new up-to date techniques. The training on live animals not only increases animal welfare in procedures but also guarantees good scientific quality of projects and thus contributes to the implementation of the three Rs."
"It is not possible to achieve the proper results of training without using live laboratory animals. ..... In the second part of the training, when the trainee gains some practical

knowledge, it will be possible to move to the next stage where using live animals for training will be permitted."

Two submissions are attached which have identified the main issues and concerns over the use of live animals in Education and Training - *Discussion papers on the use of living animals for training under Directive 2010/63 - UK views (Appendix 3) and German views (Appendix 4) from trainers and other interested Stakeholders.*

All are agreed that there should be a considered and structured approach towards the use of animals in Education and Training. The use of alternative strategies should be fully explored and specific objectives and defined benefits be presented in any request for the use of live animals.

Where the use of live animals can be justified and project authorisation secured, often other limitations are used to minimise numbers or suffering, for example limiting severity to mild; re-use of animals under non-recovery anaesthesia.

The differing views on the use of animals in training has resulted in occasions when scientists from one MS which limits animal use in E&T have attended courses in other Member States specifically to attend courses which use animals to develop manual skills. One example cited was to develop embryo transfer skills as part of a GA programme.

Ideally, within the EU, there should be a common understanding on the circumstances under which live animals are required for Education and Training, and similar outcomes to requests for such animal use.

It is important to note in this context that with the adoption of the Directive it was considered acceptable to allow the use of animals for the purposes of higher education, and training for the acquisition, maintenance or improvement of vocational skills in the EU. Therefore, the present discussion should focus not on whether but on circumstances under which animal use is justified.

Workshop 5

- Develop the principles for a tiered approach towards the justification for the use of animals in higher education.
- Develop the principles for a tiered approach towards the justification for the use of animals in training.
- Explore the different views on the need for animal use, and consider whether or not a common approach to the justification for animal use can be developed for a) higher education; b) training.
- Should there be limitations on the severity permitted in E&T projects, perhaps limiting to non-recovery and/or mild severity procedures?
- At what stage in the 'training through to competence' process should the trainee first carry out a procedure on a living animal i.e. should this be separate from or during an actual scientific study?

SESSION 6 - Follow-up of any pending items from EWG II

6.1. Examples of Assessment Criteria for Learning Outcomes

Members of the EWG have continued to work on illustrative examples of assessment criteria as requested at EWG II and noted at the NCP meeting. These examples are included in Appendix 5.

6.2. Examples of Competence Assessment

During work on the assessment criteria, a few examples of competence assessment were developed. These are included in Appendix 6.

6.3. Requested modifications to LOs (FELASA/ESLAV/ECLAM/EFAT/FELABA)

Some minor changes (as described in Appendix 7) were requested by the above organisations to LOs within the Modules agreed at the EWG II. These suggestions are not substantive, and are intended to clarify the level of training within the modules (by changing the wording), reduce duplication, and some redistribution of LOs within the Core Modules to ensure coherent approach, and which may facilitate exemption requests. One additional LO is suggested. The Commission is content that these changes can be supported.

Appendices

1. EFAT submission - Person- a) Responsible for overseeing the welfare and care of animals in the establishment
2. ESLAV ECLAM LAVA Position Paper on the role, training and education with regards to the designated veterinarian under Directive 2010/63/EU
3. Discussion paper on the use of living animals for training under Directive 2010/63 - UK views from trainers and other interested Stakeholders.
4. Discussion paper on the use of living animals for training under Directive 2010/63 - German views from trainers and other interested Stakeholders.
5. Principles for defining assessment criteria in relation to learning outcomes in the training modules
6. Examples of Competence Assessment
7. Suggested modifications to LOs to improve clarity