



# Joint standing committee on migration inquiry into the role of permanent migration in nation building

Submission of the  
Australian Veterinary Association Ltd

16<sup>th</sup> February 2023

## The Australian Veterinary Association

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock, and wildlife. Government veterinarians work with our animal health, public health, and quarantine systems while other members work in industry, research, and teaching. Veterinary students are also members of the Association.

## Executive Summary - Joint standing committee on migration inquiry into the role of permanent migration in nation building

The AVA thanks the joint standing committee on migration for the opportunity to comment on this issue. We have provided background to the skills shortage within the veterinary profession, the role of migration in addressing this the skills shortage as well as putting forward suggestions for consideration.

The veterinary workforce is currently entering its seventh year of a workforce shortage. Predominantly this shortage has been with veterinarians<sup>1</sup>, however, for the first-time veterinary nurses have also been included on the national skills commission's skills priority list.<sup>2</sup> Migration has a role in helping address the shortage with immediate effect, allowing longer term solutions time to mature.

The AVA would like to see modification to the prerequisite requirements of several visas that suitably qualified veterinarians commonly use to work in Australia to help immediately address the veterinary profession skills shortage. These are the;

- Temporary Skill Shortage Visa (Subclass 482)
- Working Holiday Visa (Subclass 417)
- Work and Holiday Visa (Subclass 462)

We would also like to see an improved pathway for veterinary nurses to achieve permanent residency (PR) and consideration given to increase the age restriction for veterinarians to secure PR.

The AVA will welcome the opportunity to speak to this submission if the committee feels this would be valuable.

## Background

The veterinary profession is suffering a chronic skills shortage. The outcome of this shortage is a reduction in current veterinary skills available to the Australian community and the cumulative reduction of experienced veterinarians with advanced skills. This compromises animal health, leads to poorer animal welfare outcomes, poorer agriculture outcomes and increased biosecurity risk to the Australian community. A tangible example the impact of the veterinary work force shortage at a community level is illustrated in this [media article](#). We are seeing an increase in frequency of closure of veterinary businesses due to difficulty attracting veterinary professionals, this has profound implications in rural settings where towns may only have one veterinary practice as was recently seen in [Parkes NSW](#).

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<sup>1</sup> Source: 2007 – 2019 data from DESSFB; 2021 – 2022 data from NSC

<sup>2</sup> <https://www.nationalskillscommission.gov.au/topics/skills-priority-list>

Predominantly this shortage has been with veterinarians<sup>1</sup>, however, for the first time veterinary nurses have also been included on the national skills commission’s skills priority list<sup>2</sup>. The veterinary workforce shortage existed prior to the COVID-19 pandemic and has been exacerbated by it. It is also clear that this shortage is significantly more acute in rural and regional areas.

The AVA conducts regular surveys of the veterinary workforce.

- The AVA 2021 Workforce Survey Report noted that 30.64% of veterinary job vacancies took more than 12 months to fill or were still not filled at the time of the survey.
- Looking more broadly at vacancies taking over 6 months to fill, this accounted for 43.12% of vacancies. This is up from 34% vacancies in the 2018 survey<sup>3,4</sup>.

Investigating the 2021 data further shows that the situation is more dire in mixed practices. Mixed practices are those which service both small animals and production animals. They are generally located in rural and regional areas.

**Table 1 - Percentage of Vacancies Remaining Unfilled by Practice Type**

	Small animal	Equine only	Mixed practice & Production	Other
less than 3 months	20.96%	37.50%	19.14%	18.36%
3-6 months	18.84%	22.50%	21.72%	14.84%
6-9 months	8.65%	3.75%	6.45%	6.64%
9-12 months	4.65%	1.25%	5.59%	5.08%
More than 12 months or still not filled	29.77%	25.00%	34.41%	29.69%
I'm not sure	17.13%	10.00%	12.69%	25.39%
<b>Total</b>	100.00%	100.00%	100.00%	100.00%
<b>Total sample size</b>	1226	80	465	256

The causes of the skill shortage in the veterinary profession are complex and the profession is working towards addressing the underlying causes. The long-term solutions can be broadly categorised into mechanisms that drive greater investment into the profession to recoup the substantial costs borne by the profession for the provision of public goods to protect animal health and welfare and public health. As well as profession-led education and resources so veterinary professionals have satisfying and sustainable careers.

While these longer-term solutions are being progressed solutions with more immediate effect are essential, as the current level of stress on the profession due to shortages further exacerbates the problem and contributes to attrition.

<sup>3</sup> AVA (2021) Veterinary Workforce Survey 2021 - Analysis Report (<https://www.ava.com.au/news/workforce-survey-2021/>)

<sup>4</sup> AVA (2019) Australian Veterinary Workforce Survey 2018 (<https://www.vetvoice.com.au/SysSiteAssets/veterinary-careers/ava-workforce-survey-2018.pdf>)

Solutions with immediate effect include reducing barriers of migration of overseas suitably qualified veterinarians and veterinary nurses. The AVA would like to see modification to the prerequisite requirements to several visas that suitably qualified veterinarians commonly use to work in Australia to help immediately address the veterinary profession skills shortage. These are the;

- Temporary Skill Shortage Visa (Subclass 482)
- Working Holiday Visa (Subclass 417)
- Work and Holiday Visa (Subclass 462)

We would also like to see an improved pathway for veterinary nurses to achieve permanent residency, and consideration given to increase the age restriction for veterinarians to secure PR.

### Temporary Skill Shortage Visa (Subclass 482)

The requirement of this visa for at least two years of relevant work experience in the occupation/field prevents suitably qualified new graduate and early career veterinarians from entering Australia, at a time when they are most likely to consider overseas opportunities. Although Australia is producing around 750 new graduates per year, one veterinary employment agency in Australia (personal communication) has seen a doubling of new graduate full time jobs from ~20% in 2016 to ~40% in 2022. One of the contributing factors to this could be the common occurrence for new graduate veterinarians to leave Australia very soon after completion of the degree to work in countries that don't have a two-year experience requirement such as UK, NZ, and the USA.

There is a large contingent of suitably qualified new graduate veterinarians, whose degrees are recognised by Australia regulatory bodies who wish to work in Australia, however due the current visa requirements they choose alternate destinations without this requirement. A proportion of newly qualified graduate veterinarians that undertake overseas experience remain in the overseas location and progress to permanent residency. The existing two-year experience requirement of this visa is likely to impact this pathway. Its removal would likely **strengthen skilled migrant pathways to permanent residency** in the veterinary profession. Furthermore, the costs associated with this visa (visa costs, skilling Australia levy and labour market testing requirements) are significant for veterinary employers, a profession that is suffering from underinvestment.

We note that the Australian and New Zealand Standard Classification of Occupations (ANZSCO) does not explicitly require demonstration of experience post-graduation to meet the occupation of veterinarian. The skills assessing authority for veterinarians, the Australasian Veterinary Boards Council (AVBC), also does not require applicants to have relevant work experience to be issued with a skills assessment for migration purposes. A recognised bachelor's degree qualification is sufficient to meet the AVBC's requirements. In addition, as a generality the veterinary profession in Australia has support structures in place to assist new graduates as they enter chosen occupation.

### Recommendations

- The AVA recommends the veterinary profession being exempted from the two-year experience requirement for the Temporary Skill Shortage Visa (Subclass 482) as skill level at time of graduation is deemed sufficient by regulatory bodies to be able to safely perform this occupation. We are of the opinion that this could be a **useful attraction and retention strategy for working migrants to Australia**. The majority of veterinarians support this as evidenced by 77% of respondents responding "yes" to a recent survey "Would you welcome the removal of



the 2-year experience requirement on skills visa (482) for the veterinarians, which would mean new graduates from places such as the United Kingdom could work in Australia”

- The AVA recommends the costs associated with the Temporary Skills Shortage Visa are reviewed.

### **Working Holiday Visa (Subclass 417) and Work and Holiday Visa (Subclass 462)**

Unfortunately, the existing conditions of the subclass 417 visa and the subclass 462 visa are not fit for purpose for the majority of the veterinary profession. Recruiting and inducting veterinarians who can only stay at a practice for six months can be time consuming and expensive. The current temporary waiver on this requirement acknowledges the challenge with this time frame. Furthermore, the requirements of working in the agriculture sector for a period is not an appropriate use of the skill set of veterinary professionals with qualifications recognised in Australia.

#### *Recommendation*

The AVA recommends the adoption of a more flexible working holiday visa, such as the UK Youth Mobility Scheme Visa where the equivalent visa is for two years with no requirement to change employers after six months, or requirements to work rurally.

### **Permanent migration of veterinary professionals**

Currently the pathway to permanent residency for veterinary nurses is to transition from a Skilled Employer Sponsored Regional (Provisional) Visa (Subclass 494) to a Permanent Residence (Skilled Regional) Visa (Subclass 191). A vet nurse wanting to transition from a 494 visa to a 191 visa must stay at one practice for at least three years before applying (if they leave the practice for any reason, there is no rollover, i.e. the three years start again). The eligibility requirements for grant of a subclass 494 visa are onerous. The veterinary nurse applicant must have at least three years of relevant work experience and a positive skills assessment issued by VET assess, which comes at additional cost. This pathway is considered prohibitive for many veterinary nurses, and it is our understanding that very few overseas veterinary nurses pursue permanent residency.

Currently the age limit restriction for PR visas is capped at 45 years of age to secure PR. This is a significant barrier for South African and UK veterinarians, particularly those who have undertaken advanced training to become specialists. The length of these training programs is similar to those in the human medical sector. It is our understanding the human doctors have an age limit of 65 for PR

#### *Recommendations*

- The AVA recommends long term modification of **policy settings around to strengthen skilled migrant pathways to permanent residency** for veterinary nurses, such as was employed during COVID where veterinary nurses were eligible for the Temporary Skill Shortage Visa (Subclass 482) and could then transition to Employer Nomination Scheme Visa (Subclass 186) if they were pursuing PR.
- The AVA recommends increasing the age restriction for veterinarians to secure PR to that of human doctors as the educational pathways to specialisation are similar. We are of the opinion that this could be a **useful attraction and retention strategy for working migrants to Australia.**

Thank you for your consideration of this submission. The recommendations made in this submission are supported by employer groups who make up ~15% of the veterinary services market as well as the Australasian Veterinary Boards Council. Statements of support are included in this submission (Appendix A and B) and separately submitted. Please contact Dr Cristy Secombe if you require further information.

**Contact:**

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