



# Review of Veterinary Practice in the ACT

Submission of the  
Australian Veterinary Association Ltd

July 2024

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## The Australian Veterinary Association (AVA)

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, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health, and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

The AVA thanks the ACT Government for the opportunity to provide information to inform the [Review of Veterinary Practice in the ACT](#).

Of note, the [AVA has several policies](#) relating to this review, including:

- [Recommended key principles for veterinary practice acts in Australia](#)
- [Licensing of veterinarians](#)
- [Regulation of animal health service providers](#)
- [Restricted acts of veterinary science](#)
- [The diagnosis and treatment of animals by non-veterinarians](#)
- [Veterinary nursing](#)
- [Equine dentistry](#)
- [Unpaid veterinary services performed for public good](#)



## Concerns with the Consultation Process

The AVA has several concerns regarding the consultation process for the Review of Veterinary Practice in the ACT, which we believe undermines the integrity and effectiveness of this important review.

The consultation period of effectively only four weeks is unreasonably short. This short timeframe does not allow sufficient opportunity for thorough review, thoughtful consideration, or meaningful consultation necessary to produce a robust and comprehensive submission. This abbreviated period suggests a tokenistic approach to consultation by the ACT Government, rather than a genuine effort to engage with and understand the perspectives of those affected by the review, which is disheartening for stakeholders seeking to contribute constructively.

The review encompasses critical aspects of the veterinary profession, including the Veterinary Practice Act, the Veterinary Practice Regulation, and the overall social and economic impacts of veterinary practice. Furthermore, the proposed amendment to permit lay equine dental providers to perform acts of veterinary science is significantly problematic and warrants careful consideration. Given the substantial importance of these matters, a four-week period to provide feedback is both unrealistic and deeply concerning.

We are particularly troubled by the manner and timing of the notification to the veterinary profession about the review. There was a two-week delay in informing veterinarians and the Australian Veterinary Association via email, and an absence of the review on the [ACT Have Your Say Consultation Projects page](#) effectively reduced the consultation period to just four weeks. Additionally, not all registered veterinarians in the ACT were notified via email, nor were NSW-registered veterinarians who work in the ACT. It appears that veterinary nurses, who are also impacted by this review, might not be aware of this ACT review and we would expect the [Veterinary Nurses Council of Australia \(VNCA\)](#) to have been notified and consulted at the very least, but had not.

Furthermore, the AVA should have been invited to participate in the initial development of the review. Early involvement of the AVA could have helped avoid several issues that we now raise in this submission. The AVA's expertise and insights would have been invaluable in shaping a well-rounded and effective review process.

Given the comprehensive nature of the review and its significant impacts on the veterinary profession, it is imperative that adequate time is allowed for consultation and consideration. Rushing this process undermines the potential for meaningful input and could lead to detrimental outcomes for the veterinary profession and the ACT community it serves.

**The AVA urges the ACT Government to undertake a new review that is both inclusive and thorough, providing sufficient time and resources to address the issues at hand appropriately. The issues at hand are too important to be addressed in a rushed and inadequate manner.**

## Concerns with the Discussion Paper and Factsheet Content

The AVA has identified several issues with the [Veterinary Practice in the ACT Discussion Paper](#) regarding its comprehensiveness, accuracy, and the approach to consultation.

The discussion paper attempts to address numerous complex topics, including the regulation of veterinary practitioners, veterinary premises, and broader issues such as mental health, training, and support for veterinary staff. However, it does not provide sufficient depth or detailed proposals for these critical areas. The broad and superficial treatment of these topics makes it difficult for stakeholders to provide meaningful feedback.



The discussion paper lacks robust data and evidence to support the proposed changes or to highlight the current state of veterinary practice in the ACT. For a thorough review, it is essential to present detailed statistical information, case studies, and evidence-based justifications for any proposed amendments to the *Veterinary Practice Act 2018* and related regulations.

While the discussion paper mentions the involvement of veterinary practitioners, it appears that input from other key stakeholders such as veterinary nurses, technicians, and related organisations (e.g., animal welfare groups) has not been adequately sought or incorporated. The absence of a comprehensive stakeholder analysis undermines the inclusivity and representativeness of the consultation process.

The discussion paper does not sufficiently address how the proposed changes will be implemented, nor does it consider the potential social and economic impacts on the veterinary profession and the community. It is crucial to outline clear implementation strategies, timelines, and impact assessments to ensure that stakeholders can evaluate the feasibility and consequences of the proposed changes.

In conclusion, while the *Veterinary Practice in the ACT Discussion Paper* aims to address significant aspects of veterinary practice, it falls short in providing a thorough, evidence-based, and inclusive review. The AVA recommends a more detailed and comprehensive approach, including extensive stakeholder consultation, robust data analysis, and clear implementation strategies to ensure the review's effectiveness and relevance.

The following raises specific issues within the discussion paper and factsheet content:

| Message from the Minister for City Services. Pg 3 Extracts:  |
|--|
| <p>Australia has one of the highest rates of pet ownership in the world. <b>61 percent</b> of Australian homes include pets with dogs making up around 60 percent of all pets, followed by cats at 40 percent, fish at 18 percent and birds at 16 percent. They provide companionship and comfort for many people.</p>   |
| <p>It is disappointing the opening message focuses predominantly on companion animal practice, neglecting the diverse and also vitally important other areas of the veterinary profession, including large animal veterinary practice, Government veterinarians, pathology veterinarians and veterinarians in research.</p>  |
| <p>It is also noted that the <a href="#">2022 Pet Ownership Report from Animal Medicines Australia</a> states pet ownership in Australia to be at 69%, not 61%:<br/><i>“After the pandemic pet boom, Australia's pet population is estimated to be 28.7 million - with 6.9 million households having a pet today. This equates to 69% of all households - significantly higher than the consistent 61% recorded in 2016 and 2019, before the pandemic”.</i></p>  |
| <p>This trend is reflected in Canberra which is the home to 48 veterinary premises and 309 registered veterinary practitioners. Veterinarians are <b>specialised in different aspects of animal care, ranging from surgical procedures and dentistry to pharmacology and animal behaviour</b>. They are responsible for preventing, diagnosing, and treating injuries and illnesses across a range of animal species and provide services that include routine health examinations, vaccinations, surgical procedures, dental care and emergency medical treatment.</p>  |
| <p>The phrase "specialised in" is potentially misleading, as it implies the existence of formally recognised specialists in Dentistry, Pharmacology, or Behaviour within the ACT veterinary profession. However, there are currently no designated specialist qualifications or roles for veterinarians in these specific areas. This could create false expectations among the public and misrepresent the actual scope of specialist expertise available. It is important to accurately convey the qualifications and capabilities of veterinarians to ensure clarity and maintain trust within the community.</p> |



The inclusion of reference to veterinarians who are specialised in these areas is problematic and potentially misleading. Firstly, the majority of veterinarians in the ACT hold general registration rather than specialist registration. While specialist veterinarians in a range of disciplines do visit the ACT, there are currently only two that are based in and registered in the ACT.

*The ACT Government believes that veterinary practitioners should be supported to deliver quality services to the ACT and that all Canberrans, and their pets, should have access to the best health care possible. This is why **the Government introduced the Veterinary Practice Act 2018 (the Act) in December 2018** to regulate the provision of veterinary services. In accordance with legislative requirements, the ACT Government is now reviewing the first five years of the Act's operation.*

The phrase "the Government introduced the Veterinary Practice Act 2018 (the Act) in December 2018" overlooks the extensive history of veterinary regulation in the ACT. Veterinary practice in the ACT has been governed by various regulations and standards long before the introduction of the 2018 Act. This long-standing regulatory framework has evolved to ensure high standards of veterinary care and professional conduct. The statement fails to acknowledge the foundational work and previous legislation that have shaped the current regulatory environment, thereby diminishing the historical context and continuous efforts to uphold veterinary practice standards.

#### **What is the practice of veterinary science. Pg4 Extract:**

*The practice of veterinary science **does not** include restricted acts of veterinary science set out in the Veterinary Practice Regulation 2018 (the Regulation), such as Laparoscopic surgery on any animal or carrying out an artificial breeding procedure of an animal involving surgery.*

The above statement is incorrect because it implies that these procedures are not considered acts of veterinary science and, therefore, are not regulated by the Act. This misrepresentation could erroneously suggest that laypersons are allowed to perform these complex procedures, which poses significant risks to animal welfare and public safety. Notably, this misleading statement appears in a public document soliciting community feedback, which heightens the potential for misunderstanding and misuse. It is fortunate that this sentence does not appear in the Act itself, but its presence in the discussion paper is still potentially damaging and risky. Accurate information is crucial in maintaining the integrity of veterinary practice regulations and ensuring proper public understanding.

#### **Veterinary Practice Fact Sheet - How does the registration process work? Pg2 Extract:**

*The Act sets out the application requirements for both vet practitioners and premises. Vets applying for registration must be covered by up-to-date insurance.*

The statement in the factsheet that "Vets applying for registration must be covered by up-to-date insurance" is incorrect. According to Section 16 (2) (f) of the Veterinary Practice Act 2018, the application for registration must include complete details of insurance held by the applicant as required by regulation, except for those registering as non-practising veterinary practitioners.



## Response to Discussion Paper Questions

The following are the AVA responses to the questions posed in the *Veterinary Practice in the ACT Discussion Paper*. Our responses aim to address the key issues and provide constructive feedback to ensure the review process is thorough, inclusive, and reflective of the significance of veterinary practice in the ACT. Please note that our feedback is somewhat limited due to the time constraints imposed by the short consultation period.

### Operation of the Act in regulating veterinary practice

#### The regulation of veterinary practitioners

*Are the provisions relating to veterinary practitioners satisfactory? If not, how can they be improved?*

The provisions relating to veterinary practitioners, while foundational, require some updates and refinements to remain effective.

Firstly, the discussion paper and review primarily address the *Veterinary Practitioners Act* and broader community consultation without specifically noting the *Veterinary Practitioners Regulations*. However, attention to the regulations is crucial for a comprehensive review.

In particular, the Regulation, Schedule 1, Part 1.1 Definitions, refers to Australian Standards (AS 5018:2001 and AS 5019:2001) for microchipping. These standards are currently under review and are likely to be replaced in 2024 (AS 5018:2024 and AS 5019:2024). The review process should consider amending to refer to "current Australian Standards" to provide for these forthcoming new standards and to ensure that the ACT regulations remain current and relevant on an ongoing basis when standards are updated.

Ensuring that the regulations reflect the most up-to-date standards is essential for maintaining high professional standards and public confidence in veterinary services. Therefore, it is recommended that the ACT Government monitors these updates closely and incorporates the new standards promptly once they are finalised.

Additionally, to enhance the regulatory framework, it is suggested to align the "Objects of Act" with the [AVA's Recommended key principles for veterinary practice acts in Australia](#). These principles discuss the need to:

- protect the health, safety, and welfare of animals
- protect the public health, safety and welfare of the public
- protect consumers so that they have confidence in accessing veterinary services that are provided by competent persons holding recognised qualifications from approved training institutions
- meet international trade requirements.

Adopting these principles would provide a clearer and more comprehensive regulatory framework that supports both the profession and the community it serves.

While the current provisions lay a solid foundation, updating the references to Australian Standards and aligning the Act's objectives with AVA principles will significantly improve the regulatory framework for veterinary practitioners in the ACT.

#### The regulation of veterinary premises

*Are the provisions relating to the regulation of veterinary premises satisfactory? If not, how can they be improved?*

The provisions relating to the regulation of veterinary premises, while generally satisfactory, could benefit from certain improvements to address current and emerging issues effectively.



With respect to the *Veterinary Practice Regulations 2018*, these include:

- Regulation Part 4, section 9: Clarification is needed on whether the term "meeting" includes online meetings. Given the increasing reliance on digital communication, explicitly defining this could enhance operational clarity and compliance.
- Regulation Schedule 1, Part 1.2, Item 17: This regulation should be retained but refined to allow prophylactic dental care of animals that is restricted to clearly defined and specified procedures that do not compromise animal welfare.

With respect to the *Veterinary Practice Act 2018*, they include:

- Section 6 – Objects of Act: While point (a) refers to animal welfare, point (d) could be expanded to require veterinarians to perform within contemporary animal welfare standards, even if not explicitly stated in legislation or guidelines.
- Section 10 (4): The absence of prescribed persons in the regulations is notable. Consideration should be given to including prescribed persons who can be included in a regulatory framework.
- Section 13 (1): Given the current absence of acts of veterinary science requiring specialist registration, this clause may be redundant and could be considered for removal.
- Section 14: This section could serve as a deterrent and warning when a veterinarian is asked to falsify information or perform unethical acts, reinforcing professional integrity.
- Section 16 (2) (f): Clarifies insurance requirements, ensuring that applicants provide complete details of their insurance coverage as stipulated.
- Section 32 (2) (c): This may no longer be relevant since veterinarians can now choose the state or territory for registration. The regulation should reflect this flexibility to avoid outdated stipulations.
- Section 38: The previous comments on Section 32 imply that Section 38 might also be outdated under current registration flexibility practices.
- Investigation of Complaints: The speed of investigating complaints is critical. There are concerns that each request for information requires a one-month waiting period before further action, which could significantly delay resolutions. Streamlining this process would improve efficiency and trust in the regulatory system.
- COVID-19 Lockdowns: The threat to strip veterinary practices of their "hospital" status during COVID-19 lockdowns was counterproductive. Future regulations should ensure that such decisions support rather than hinder veterinary services during crises.
- Strengthening the Act: In order to protect the health, safety, and welfare of animals, the performing of acts of veterinary science must be restricted to registered veterinary practitioners. Veterinary practice Acts within Australia must define and legislate acts of veterinary science consistently across jurisdictions, to protect animals and the community. The AVA recommends that the list of "*restricted acts of veterinary science*", which currently sits at Schedule 1 in the Regulations, should be included in the Act. This is because the list is setting out (in general) which acts of veterinary science can only be performed by a registered veterinarian, and this is of fundamental importance to the overall regulatory regime. The list of "*unrestricted acts of veterinary science*", which are included at Schedule 2 of the Act, require clarification as there is nothing in the Act or Regulations that clearly states the purpose of this list.  
Furthermore, the AVA strongly recommends that the lists of "*restricted*" and "*unrestricted*" acts of veterinary science require further consultation as to their scope, who can perform the listed acts (including the authorisation process), and how non-registered people are regulated when performing these acts.

While the current provisions are functional, these suggested improvements would enhance clarity, efficiency, and relevance in the regulation of veterinary premises, ensuring the standards reflect contemporary practices and challenges.



## Complaints, disciplinary proceedings, and enforcement

*Are the complaints, disciplinary proceedings and enforcement provisions satisfactory? If not, how can they be improved?*

The current provisions for complaints, disciplinary proceedings, and enforcement in the *Veterinary Practice Act* have several areas that require improvement to ensure they are fair, clear, and effective.

These include:

- Section 61 (1) (b) (ii): The financial penalty should be expressed in penalty units to account for inflation and ensure the penalty remains proportionate over time.
- Section 64:
  - Definition of Occupational Discipline: The term "occupational discipline" is not defined, creating ambiguity in its application.
  - Confusing Terminology: Frequent references to "the practitioner's practice" are misleading. The term "veterinary practice" is defined as a business supplying veterinary services, yet in disciplinary contexts, it refers to individual conduct. Most veterinarians do not own practices, so the focus should be on individual or team actions.
- Section 71 (2) (a): Clarification is needed on whether emergency care can be provided in a veterinary consulting room or clinic. The current wording suggests it may not be allowed, which could impede urgent care services.
- Section 89: This section requires the display of a Certificate of Premises Registration. It is important that regulators ensure these certificates are consistently issued and displayed as this is important for compliance and transparency.
- Flaws in the Complaints Process:
  - False Claims: The legislation penalises materially false or misleading complaints with up to 30 penalty units. However, the public is not adequately informed of this penalty when lodging complaints. The Veterinary Practitioners Board (VPB) website and complaint forms should clearly state this to deter false claims and protect veterinarians from unjust accusations.
  - Impact on Young Veterinarians: The fear of complaints deters many young veterinarians, who are often perfectionists, from remaining in the profession. We commend the Board who have been hosting events and providing communications to explain the complaints process. However, the AVA suggests more support should be provided to veterinary practitioners, especially young practitioners. This could include adopting a "meet and greet" approach to reassure veterinarians that complaints will be handled in a restorative manner rather than a punitive one. This proactive engagement is crucial in retaining young talent and fostering a supportive professional environment.

The existing provisions provide a basic framework, they need to be refined to ensure clarity, fairness, and support for veterinarians. Implementing these improvements will enhance the effectiveness and credibility of the complaints and disciplinary process, whilst not needlessly victimising veterinarians during the process.

## The role of the Veterinary Practitioners Board and register

*Are the provisions relating to the Veterinary Practitioners Board and register satisfactory? If not, how can they be improved?*

The provisions relating to the functions of the Veterinary Practitioners Board and register are satisfactory.





We would seek clarification regarding other provisions.

- *Section 98 (3) The board may decide, in writing, the allowances to be paid to board members.* This would appear to be a somewhat unusual arrangement. Can confirmation be provided that 98 (4) is in effect, so that a maximum amount is applicable, and as importantly, that a minimum amount is set that appropriately reflects and compensates the value of the time and contribution that members make when serving on the Board.
- *Section 126 Information in register to be accessible and extractable.* Clarification is sought as to whom/for whom must the information in the register be accessible and extractable?
- *Section 129 Access to register (1) The register must be open for inspection by the public at reasonable times.* What details pertaining to an individual veterinarian or premises contained on the register will be available or accessible by the public?

### Other issues

*How effectively does the Act interact with other relevant legislation? How could this be improved? Is there any other matter that you would like to raise about the operation of the Act?*

Whilst mutual recognition legislation permits the temporary practice of veterinarians registered in other states and territories, it still has prohibitive time restrictions. A national registration scheme for veterinarians would assist to address this issue. Veterinary qualifications are recognised at a national level and overseen at that level through the Australasian Veterinary Board Council (AVBC), be it through undergraduate or post-graduate standards that are set for the ability to be registrable in Australia.

Complexities arise because, although veterinary registration from another jurisdiction may be recognised (temporarily), the Veterinary Practice legislation that a veterinarian is registered with can differ significantly from the legislative and other requirements of the jurisdiction in which they are actually practising. This can lead to confusion and disparity for veterinarians delivering these services in the ACT, and around which jurisdictional body or regulation they are held accountable.

Veterinary teams experience challenges and barriers to provide veterinary care and services to animals that meet animal welfare needs and obligations, while adhering to regulations and requirements of legislation. This encompasses compliance to *ACT Medicines, Poisons and Therapeutic Goods Act 2008 (MPTG-A)* and its associated *Regulation 2008 (MPTG-R)*, the *Veterinary Practitioners Board (ACT-VPB)* administering the *Veterinary Practice Act 2018*, and perhaps the *Animal Welfare Act 1992*, the *Nature Conservation Act 1980* and other ACT legislation, areas which are under Commonwealth jurisdiction, and cross border issues.

Alignment and agreed understanding across all stakeholders of the interpretation and enforcement of the relevant legislation and other requirements is essential to ensure the public and their animals are protected, and the veterinary profession can function effectively.

In some instances, especially related to the MPTGA legislation, it is considered not to be fit for purpose in its application to contemporary veterinary practice. The AVA are currently in dialogue with the ACT Health Directorate regarding some aspects of this issue.

### Broader issues around veterinary practice in the ACT

#### Regulation of the broader veterinary profession, including veterinary nurses

*Should the ACT consider expanding the procedures that the broader veterinary profession can undertake that are currently restricted to veterinary practitioners? Are there other ways the broader veterinary profession can be better supported?*

It is in the interests of all veterinarians and the community that that the provision of veterinary services is regulated. The integrity and quality of the veterinary profession is maintained through standards of university education, professional conduct, and professional behaviour, determined by



state and territory veterinary boards, and overseen by the Australasian Veterinary Boards Council. This is imperative to remain internationally competitive and collaborative. Regulation ensures that the public can have confidence when they visit registered veterinarians with their animals.

Regulation of the veterinary sector is a partnership between government and the veterinary profession. Veterinary practitioner boards across the country are made up of a mix of expertise and are predominantly peers within the veterinary profession. The profession itself has a strong interest in ensuring that appropriate standards of care are maintained, and that poor performance is corrected where possible and persistent poor performance addressed. This is crucial for continued high standards and integrity and for the maintenance of public confidence in the profession. Veterinarians are consistently ranked amongst the most trusted occupations.

There are many areas within animal industries that are unregulated, and the regulated veterinary profession provides protection to the community. This extends to the companion animal area where availability and access to regulated veterinarians give consumers confidence in a “buyer beware” system of animal ownership.

However, regulation is a balancing act. If regulation is too dated or too restrictive, it will impede innovation and restrict the ability of the profession to adapt to modern environments. Regular review and development of the legislation is needed to support modern veterinary practice, such as the growth in telemedicine and the shift from veterinarians working in isolation to the veterinarian led team. Similarly, too little attention to regulation will lead to poor animal health and welfare outcomes. Veterinarians’ expertise and judgment underpin the community obligation to the health and welfare of animals. Their involvement also provides a safety net where regulation may not be precise enough.

#### *Regulation currently only extends to veterinarians*

The existing regulatory framework in the ACT only regulates veterinarians, rather than other members of the veterinary team. This is limiting the capacity of the workforce and efficacy of the veterinary team. We would like to see a regulated **veterinarian led team**. Registration of veterinary nurses and para-veterinary staff by the Veterinary Practitioners Board, legislated through the VPA would allow the setting of professional standards for this group. At present, many procedures carried out by these individuals require unnecessary direct supervision by the veterinarian, where direction or a lower level of supervision is more appropriate. This places an increased workload and responsibility and cost on the veterinarian. In countries such as the UK where registration occurs, the work and responsibility within the veterinary practice is more spread across the veterinary practice personnel than what currently occurs in the ACT.

In Australia, the Western Australian VPA and Vet Board are leading the way in the recognition, registration and regulation of veterinary nurses and technicians.

#### *Veterinary Nursing*

We refer to the AVA Policies

#### [Regulation of animal health service providers;](#)

*All animal health service providers, including veterinarians, paraprofessionals and non-veterinary animal health providers should be appropriately regulated to ensure adequate animal welfare and consumer protection.*

The policy outlines a three-tiered approach to regulating animal health service providers:

#### 1. Paraprofessionals (Vet Nurses/Technicians):

- Require registration under veterinary practice acts.
- Define clear obligations and responsibilities for both paraprofessionals and supervising veterinarians.
- Ensure qualifications and training meet standards set by veterinary boards.



## 2. Licensed Non-Veterinary Providers:

- Evaluate services to determine if higher-risk or higher-quality tasks warrant licensing.
- Establish a government-issued license with veterinary input for complaint investigations.
- Prohibit them from performing restricted veterinary procedures.

## 3. Unregistered Non-Veterinary Providers:

- Introduce legislation with a code of conduct for all unregistered providers.
- Establish a complaints process similar to human healthcare systems.

The policy also recommends creating a Code of Conduct for Unregistered Providers:

- This code sets minimum standards for practice and ethics. It ensures:
  - Safe and ethical animal care.
  - Providers stay within their qualifications and experience.
  - Clients are not misled about provider capabilities.
  - Clients are referred to veterinarians for complex cases.
  - Open communication and cooperation with veterinarians and other providers.
  - Professional conduct, including proper insurance and recordkeeping.
  - Appropriate first-aid and emergency veterinary access during procedures.
  - Abstinence from drugs/alcohol while working.

Enforcement:

A designated agency can investigate complaints and issue:

- Temporary bans on providing services.
- Restrictions on service provision.
- Public warnings about specific providers.

### Veterinary Nursing:

*All persons using the title 'Veterinary Nurse' must possess veterinary nurse qualifications and conform to standards appropriate to professional veterinary practice.*

*The standards should be subject to regular review by a national professional body.*

*The Veterinary Nurses Council of Australia (VNCA) and their Australian Veterinary Nurses and Technicians (AVNAT) Registration Scheme are recognised and supported by the Australian Veterinary Association.*

Veterinary nurses are an integral part of modern veterinary practice. The registration, quality training, and continuing professional development of veterinary nurses are essential components of practice.

Veterinary nurses, under the direction, supervision, and responsibility of veterinarians, provide nursing care to sick animals, and communicate with, and educate owners on the health care of their animals. The veterinary nurse also provides support to the veterinarian with technical work, surgical and peri-operative procedures, medical procedures, diagnostic testing, and critical care. The veterinary profession benefits greatly when working as a team with appropriately educated and trained veterinary nurses.

The national qualification for veterinary nurses is presently the vocational Certificate IV in Veterinary Nursing. The AVA policy advocates for a high-quality outcome for all students of veterinary nursing in Australia, irrespective of where they live, where they are trained, or where they are employed. This outcome should be of an international standard and take into consideration the specific work, health, and safety aspects of the veterinary workplace. All students commencing the vocational Certificate IV in Veterinary Nursing should have guaranteed access to a veterinary workplace and ideally should be employed. The AVA, representing the employers of veterinary nurses and technicians, has had, and continues to advocate for, continued input into the development of training packages relevant to veterinary nursing, and university curricula for veterinary technicians.



The terms, 'Veterinary Nurse' and 'Veterinary Technician', are presently becoming internationally interchangeable. Under current Australian legislation there is no consistent definition of 'veterinary nurse'.

Outside of Western Australia, there is no regulation or statutory code of conduct, and no requirement to maintain currency and fitness to practice within veterinary nursing. The AVA supports the VNCA's stated position that unqualified and unregulated veterinary support staff potentially expose the public and animal patients to harm and increase liability for veterinary practices. Mandatory professional registration for veterinary nurses would bring rights and responsibilities, as well as increasing professionalism—to the benefit of the veterinary profession and the public it serves.

The Australian Veterinary Nurses and Technicians (AVNAT) Voluntary Registration Scheme was set up by the VNCA. By creating the AVNAT Registration Scheme, the VNCA has established a self-regulation program, which will set standards for the professional practice of veterinary nurses across Australia. This will complement the Accredited Veterinary Nurse Scheme (AVN) which was set up with the support of the National Industry Advisory Group for Veterinary Nursing and the AVA, to recognise excellence in Veterinary Nursing.

The ongoing advances in veterinary nursing knowledge and skills, including the work, health, and safety requirements of the role, necessitate, in the public interest, that the title 'Veterinary Nurse' must be restricted to those who are suitably qualified and accepted into the AVNAT Voluntary Registration Scheme. These qualifications are also required to be eligible for membership of the VNCA.

#### *Acts of veterinary sciences*

Currently, the Act includes a set of 'unrestricted acts of veterinary science'. This details those procedures that non veterinarians or non-regulated persons are able to perform.

There is a need to define in the Act the procedures that can only be performed by registered veterinarians (or regulated paraprofessionals) which are underpinned by a need to maintain animal health and welfare, and to maintain public health through the restricted use of controlled substances. Certain procedures simply cannot be safely performed by someone who is not a registered veterinarian – for a lay person to perform them will lead to unnecessary harm to the animal and potentially death. Further, there are a set of procedures that can be performed by a suitably trained non-veterinarian, but risks associated with the procedure mean that a veterinarian needs to oversee it and be available to quickly deal with negative issues that may arise. There are also procedures that inherently involve the use of certain dangerous drugs, whose use needs to be controlled. As such, veterinary involvement is crucial.

With these situations there are links with both Animal Welfare and Poisons and Therapeutic Goods legislation. While the Veterinary Practitioners Board (VPB) may be the most appropriate body to enforce breaches in many cases, there are situations in which it may be more effective for enforcement to occur through other agencies. Currently the mechanisms to enforce consequences for breaches of restricted acts of veterinary science by non-regulated providers are limited and ineffective. In particular, where a non-veterinarian is undertaking a restricted act of veterinary science, animal welfare enforcement agencies may be better placed to secure a successful prosecution. In the current environment, due to resourcing and historically light sentencing, welfare agencies have only been able to prosecute the most egregious offences under the act, leaving many animals unprotected.

Consideration needs to be given to how this would be enabled, however, one step would be to have 'restricted acts of veterinary science' performed by an unauthorised person to be included in the definition of cruelty under the Animal Welfare legislation.



### *Unfunded obligations*

There are legislative, professional, and ethical factors that place public good obligations on to the veterinary profession with no method for the profession to recoup the costs. Where it is not appropriate for private funding, and not publicly funded, the regulatory and financial burden is shifted to registered veterinarians. Examples include care of wildlife and stray animals.

### **Mental health and wellbeing of veterinary staff**

*What can the profession, the ACT Government and community do to better support the mental health and wellbeing of veterinary staff?*

The burn-out and mental health challenges facing the veterinary profession are the result of a profession where the labour component has been chronically underfunded. Burn-out has been well recognised in the profession for some time and the cost to the profession is estimated to be 2.01% of its value due to poor retention and reduced working hours.

In 2019 the AVA undertook research in this area to better understand the size of the issue and to inform the development of a wellness strategy. It found over half (66.7%) of veterinarians said they had experienced a mental health condition at some stage, compared to 61.8% in the general population. Financial concerns, poor interactions with the community, and damaging social media have a significant role to play. Other factors include long working hours with a high case load, which has only worsened as the veterinary workforce shortage has continued.

The worst-case scenario for those with mental health challenges is death by suicide. The evidence suggests risk of death by suicide is increased in the veterinary profession compared to the general population. The profession as a whole is working hard in this area. The sole focus of awareness and intervention has now moved to also encapsulate prevention of risk factors and promotion of good workplace practises to improve these issues.

**The AVA is providing support** to the veterinary profession through its [THRIVE wellness initiative](#) and also its extensive advocacy work.

THRIVE is an industry-led veterinary wellness initiative that aims to support veterinarians and veterinary staff to lead satisfying, prosperous, and healthy careers.

All programs within THRIVE are guided by our policy *Safeguarding and improving the mental health of the veterinary team*. This outlines the importance of taking action to moderate work demands linked to occupational stress, while implementing interventions and resources to improve wellbeing targeted at the level of individuals, groups, leadership and organisations.

Our goal is to formulate the overarching industry frameworks and guidelines that will protect the wellbeing of all veterinary practitioners.

The AVA's advocacy program monitors and responds to issues that may impact the profession. This involves meeting with key industry and government stakeholders, and members of parliament, to represent member views on a range of issues.

We make a large number of written submissions to government agencies on proposed changes to policy and legislation. This has proven to be our most powerful method for effecting change on topics that matter to our members, such as veterinary legislation, prescribing rights, biosecurity, public health, companion animal management, and pet food regulation to name a few.

The AVA's Veterinary Policy and Advocacy team works to educate and advocate on behalf of the veterinary profession. This work benefits all the veterinary profession, not just our members. Our



members play a vital role in influencing the direction of this work and helping to bring about positive change. Read more about AVA Veterinary Policy and Advocacy [here](#) and the latest AVA Advocacy Plan can be found [here](#).

As outlined in the [AVA 2024 ACT Government Pre-Budget submission](#), the ACT Government can support the veterinary profession through:

- Committing funding to AVA's wellness initiative, [THRIVE](#), to support veterinarians and veterinary staff to lead satisfying, prosperous and healthy careers.
- Funding around support for veterinary students to undertake practical work placements in the ACT and provide educational fee relief to encourage early career veterinarians to work in the ACT.
- Exploring solutions that support the veterinary sector in its role with stray animals and wildlife, addressing the key issues outlined and promoting overall animal health, welfare, and public health. Through supporting the public good that private veterinarians provide would go a long way toward achieving a more sustainable model for the profession and improved mental health of its workforce. This would be best achieved through a private-public-partnership model akin to human education/health sector models.

The ACT Community can support the veterinary profession by being considerate and respectful of the daily challenges faced by a workforce under extreme pressure and through an understanding of the value and role of veterinarians and their teams as essential health workers.

The AVA acknowledge and appreciate the ACT Government's recent efforts in the veterinary campaign 'Respect in the Workplace' to address violence in veterinary practices. The AVA recommends this campaign is expanded to address the rising rates of verbal and physical assault of veterinary teams and to educate the community on the impact of their actions. For example, similar to the [NSW Ambulance 'It's Never Okay'](#) campaign.

### **Training, mentoring and support for veterinary staff**

*What statutory or non-statutory initiatives can the profession and ACT Government undertake to better support veterinary staff?*

Veterinarians have a high risk of mental ill health and little to no access to industry specific programs and assistance. The burn out and mental health challenges facing the veterinary profession are the result of a profession where the labour component has been chronically underfunded at a time of immense generational and societal change. Many of the issues that the veterinary profession face are common to a large number of the essential service professions, however, as there is minimal public funding, these issues are accentuated within the veterinary profession.

For a number of years, the AVA has been running several of these programs (counselling, mentoring) and instigated pilot programs (Cultivating Safe Teams) for members. However, as stated in the [AVA ACT Pre-Budget Submission for 2024-25](#), we proposed that the ACT Government support the extension of a suite of AVA veterinary specific mental health support programs.

#### **Submission Extract:**

To assist in addressing this, we propose that the ACT Government support the extension of a suite of AVA veterinary specific mental health support programs, including:

- Cultivating Safe Teams – Psychological health and safety awareness training sessions for all individuals working in the veterinary profession.
- Mental health first aid for veterinary teams

**Recommendation 1.1** Funding for the AVA wellness initiative (THRIVE) The ACT Government commit to funding (\$150,000 over 4 years) to the AVA's wellness initiative, THRIVE to support veterinarians and veterinary staff to lead satisfying, prosperous and healthy careers. This includes the expansion



of a range of existing programs being undertaken by the AVA for the veterinary profession and implementing new programs under the areas of prevent, promote and protect. These bespoke programs provide psychological health and safety awareness training, mental health first aid, suicide prevention and counselling for veterinarians.

### Training

Training provided by the AVA through the THRIVE initiative include;

- [Cultivating Safe Teams program](#) - This initiative aims to deliver psychological health and safety awareness training sessions for all individuals working in the veterinary profession. This is a tailored, one-hour in-workplace training that is fit for purpose for the veterinary profession.
- [Mental Health First Aid Training](#) - Mental health first aid is the help provided to a person who is developing a mental health problem or who is experiencing a mental health crisis. Like physical first aid, mental health first aid is given until the person receives professional help or until the crisis resolves.

### Mentoring

The AVA provides extensive support for veterinary graduates through its [Graduate Mentoring Program](#). The purpose of our program is to facilitate mentoring relationships so that experienced mentors can share advice, knowledge and individual experiences with a new graduate or mentee. Through our mentoring scheme, we aim to establish a mutually beneficial professional relationship that creates a positive transition to the veterinary profession and highlights the collegiality that is so profound in this industry.

### Support

As previously outlined, the AVA's THRIVE initiative provides several support programs. The AVA also offers free mental health counselling services to members, their family and team. There is also access to the AVA Benevolent Fund, not only for our members but also to the wider veterinary profession.

The ACT Government could establish that part of veterinary registration fees are used for supporting the programs and initiatives of the AVA to be more sustainable and expanded.

Addressing the various issues we have raised in this submission (including registration of veterinary nurses and support for public good that veterinarians provide) would assist in achieving a more sustainable model for the veterinary profession

### **Improving respite care for animals**

*How can the ACT Government better support respite care for animals in the ACT?*

### **Social support models for subsidised sustenance, boarding and veterinary care**

*How can the ACT Government better support vulnerable Canberrans to meet the costs associated with keeping animals?*

### **Pet-crisis support for access to urgent health care**

*How can the ACT Government better support pet-crisis support for access to urgent health care?*

Given that the above three questions are closely aligned, we will provide a grouped response that addresses all relevant aspects collectively rather than answering each question separately. This approach ensures a comprehensive and cohesive commentary on the issues raised.

To enhance overall human and animal welfare in the community, the ACT Government can better support ACT residents experiencing vulnerabilities, requiring respite care or urgent health care for their animals, in the following ways:

- **Financial Assistance:** Provide grants or subsidies to animal shelters and rescue organisations to expand respite care programs. This would allow vulnerable pet owners temporary relief from pet care costs during emergencies or hardship.



- **Emergency Veterinary Fund:** Creating a government-funded emergency veterinary fund that can be accessed by veterinarians to cover the costs of urgent care for animals in crisis situations, especially those without known ownership.
- **Animal-friendly facilities:** Provide facilities that are suitable and allow ACT residents experiencing vulnerability, such as fleeing Domestic and Family Violence situations, to take their pets with them. This lack of facilities is a well-recognised contributor to why DFV victims remain in dangerous situations.
- **Subsidised Veterinary Services:** Offering subsidies or vouchers for veterinary care to low-income individuals and families. This can help offset the costs of essential veterinary services and ensure that financial constraints do not compromise animal and human welfare.
- **Community Veterinary Clinics:** Supporting veterinary clinics who provide community, charity, and public good services by subsidising the services they offer to pet owners experiencing vulnerabilities.
- **Educational Campaigns:** Running educational campaigns to inform vulnerable populations about the resources available to them for pet care, including financial assistance programs and pet food banks.
- **Collaboration with Social Services:** Partnering with social services to integrate animal and human care support into existing programs for vulnerable populations (eg pet care resources at shelters, food banks, and other social service facilities) and as part of the provision of veterinary services (eg Veterinary Social Workers and aligned human social services support).
- **24/7 Veterinary Hotline:** Provide financial support for pet owners to access established 24/7 veterinary hotline services for advice and assistance in emergency situations. This service could help triage cases and direct owners to the nearest available emergency care.
- **Public Awareness Campaigns:** Running public awareness campaigns to inform the community about the importance of timely veterinary care and the resources available (both human and animal) for emergency situations. This can help ensure that pet owners know where to turn in a crisis.
- **Public Good compensation:** The ACT Government assumes responsibility for and financially supports the costs incurred by veterinary practices when treating or caring for Crown-owned wildlife and unowned animals, such as strays. Currently, these costs are almost entirely borne by private veterinary businesses, which significantly impacts the health, welfare, and sustainability of veterinary teams and the profession. This financial burden restricts the private veterinary sector's ability to contribute effectively to the care and support of these animals, and by extension the support for ACT residents experiencing vulnerabilities is constrained.

## Additional Consultation - Equine Dentistry

*Additionally, the ACT Government are consulting on a proposed amendment to the Veterinary Practice Regulation 2018 (the Regulation) seeking feedback on a proposal to amend the restricted acts of veterinary science to allow non-veterinary professionals, who hold a Diploma of Equine Allied Health, to undertake equine dentistry with the use of power tools. The act itself will remain as a restricted act of veterinary science.*

**The AVA strongly opposes the proposed amendment to the Veterinary Practice Regulation 2018 that would allow non-veterinary professionals, including those holding a Diploma of Equine Allied Health, to undertake equine dentistry using power tools.** The act itself remains a restricted act of veterinary science, and this amendment undermines the integrity and safety of equine dental care.

**The AVA strongly urges the ACT Government to reject the proposed amendment.** Equine dentistry, particularly the use of power tools, requires the advanced knowledge and skills possessed only by veterinarians. The welfare of horses, legal implications of sedative use, and the professional integrity of veterinary practice must be upheld. The proposed amendment jeopardises these principles and





introduces unacceptable risks to human and animal health and safety. Furthermore, the proposed amendment is not based on demonstrated scientific nor commercial need.

The legislation (in its Regulations) includes a set of 'restricted acts of veterinary science'. This details those procedures that only veterinarians (or regulated veterinary paraprofessionals) are able to perform. This listing is underpinned by a need to maintain animal health and welfare, and to maintain public health through the restricted use of controlled substances. Certain procedures (including equine dentistry with power tools) simply cannot be safely performed by someone who is not a registered veterinarian – for a lay-person to perform them will lead to unnecessary harm to the animal and potentially death. Further, there are a set of procedures that can be performed by a suitably trained non-veterinarian, but risks associated with the procedure mean that a veterinarian needs to oversee it and be available to deal quickly with negative issues that may arise. There are also procedures that inherently involve the use of certain dangerous drugs, whose use needs to be controlled. As such, veterinary involvement is crucial, and this proposed amendment erodes animal welfare standards and undermines the restricted acts of veterinary science.

Below is the [AVA Policy on Equine Dentistry](#). Please note, AVA Policies are developed through extensive member consultation and wherever possible are underpinned by evidence from the scientific literature. The policies represent the consensus view of AVA members on a range of issues of importance to the profession. All AVA Policies, including the policy on equine dentistry, are approved by the AVA Board before becoming official policies or positions of the association.

#### Policy

All dental procedures on horses and related species should be performed only by registered veterinarians and be supported by evidenced-based medicine.

#### Background

The Australian Veterinary Association (AVA) recognises that to provide optimal health and quality of life, good oral care is necessary. Diseases of the oral cavity, if left untreated, are not just painful, but may also contribute to ill thrift and other local or systemic diseases.

The primary aim of equine dentistry is to maintain good oral health and maximise the comfort and function of the horse while eating and when bitten.

Advances in the understanding of oral pathology and function, drug modalities, technology, skills, and skill learning opportunities have allowed this area of veterinary science to leap forward to a position where only qualified and skilled veterinarians can practice it.

Unless these issues are fully understood, the practice of equine dentistry becomes unreasonable for animal welfare and consumer protection aside from horse health and legislative grounds.

Incorrect dental procedures can result in any or all of the following: smooth dental tables, exposed pulps, inappropriate orthodontic movement, loss of teeth, bone fractures, osteomyelitis and abscess, death from complication or for humane reasons.

Horse owners are entitled to expect that the persons practising dentistry are properly trained, accredited, and regulated.

The following are the AVA's concerns with the proposed amendment. **Please note that our feedback is somewhat limited due to the time constraints imposed by the short consultation period. It is important to emphasise that such a significant and detrimental proposed amendment requires robust consideration.**

#### Training and Expertise

- Insufficient Training for Lay-Equine Dentists: The training provided by courses like the Diploma of Equine Allied Health is insufficient compared to the rigorous and comprehensive 5+ years university education undertaken by veterinary students. Veterinary programs are regularly audited to meet international standards, ensuring high-quality education and training.



The Diploma specifically referred to, is undertaken by lay people without prior knowledge of anatomy, physiology, dentistry, pharmacology and clinical conditions of animals, which veterinary students study for multiple years to university standards, and are assessed on.

- **Veterinary Training and Education:** Veterinarians are trained over five or more years as part of attaining their degree in Veterinary Science. During their undergraduate course, veterinarians are required to undertake learning in physiology, anatomy (including dental anatomy), pharmacology, toxicology, chemistry, biochemistry, anaesthesia, medicine, surgery, pathology, bacteriology, animal husbandry, nutrition, along with other subjects, and the clinical application of all these skills across a wide variety of species including horses.

Veterinary dentistry has become an integral part of the undergraduate curriculum in all universities across Australia and New Zealand. This extensive training ensures that veterinarians have the comprehensive knowledge and skills required to perform complex dental procedures safely and effectively. Upon qualification, veterinarians can pursue further training in equine dentistry through various advanced courses. Since 1996, over 1000 veterinarians have completed post-graduate training in equine dentistry, with the number increasing annually. This positions veterinarians strongly to deliver essential dental services to the equine population in Australia. Rather than the ACT Government reducing animal welfare protections through the proposed amendment, we suggest a more sensible approach would be to support further equine dentistry training for qualified veterinarians.

#### Animal Welfare Concerns, including using Power Tools and Sedation

##### Animal welfare

- We must ensure that the welfare of horses, in particular their dental care, is maintained to the highest level. This requires advanced knowledge in anatomy, physiology, pharmacology, surgery, and medicine to achieve the best outcome for horses. Therefore, such acts should only be performed by veterinarians.
- Proper dental care is crucial for maintaining the overall health and well-being of horses. Diseases of the oral cavity, if left untreated, can cause severe pain and lead to systemic health issues. Veterinarians, with their in-depth knowledge and skills, are best positioned to provide the necessary care to prevent and treat these conditions.
- Incorrect dental procedures by unqualified individuals can result in a range of severe complications, including smooth dental tables, exposed pulps, inappropriate orthodontic movements, loss of teeth, bone fractures, osteomyelitis, abscesses, and even death. Such risks highlight the importance of having only trained veterinarians perform these procedures.

##### Power Tools

- Veterinarians advise that power tools should only be used on horses if they are sedated and the mouth has been thoroughly examined with a mirror and dental pick. This procedure is highly stressful for the horse and dangerous for both the horse and handlers due to the noise and strange sensations, which can cause violent reactions. Incorrect use can result in significant damage to teeth, gums, and mucous membranes. Therefore, veterinarians use power tools only in controlled circumstances, ensuring the horse is sedated, the mouth is clean and illuminated, and all structures are carefully viewed during any odontoplasty.
- If power tools are used incorrectly and by persons not trained in the anatomy and physiology of dental structures, they can cause:
  - thermal injury (overheating) of dental structures when power tools are used for odontoplasty, and
  - injury to sensitive pulp tissue due to overaggressive odontoplasty where too much tooth is removed and the nerve tissue (pulp horn/root canal) of the tooth is exposed.

Proper dental procedures training can only be achieved at higher level veterinary education or post-graduate veterinary teaching.

The use of both manual and motorised teeth grinding equipment in horses is difficult and carries increased levels of risk to the horse. Such procedures should not be undertaken by laypersons under any circumstances.



### Sedation

- As stated above, power tools in equine dentistry should never be undertaken without sedation. The *Medicines, Poisons and Therapeutic Goods Act 2008* prohibits possession, supply, and use of restricted drugs (schedule 4 and schedule 8) by unauthorised persons. Therefore, sedation can only be prescribed and administered by a veterinarian.
- Furthermore, veterinary practitioners are not permitted to prescribe or dispense these types of drugs to their clients except in tightly controlled circumstances. These laws are consistent in all Australian States and Territories.
- The illegal possession and use of schedule 4 and schedule 8 drugs by unlicensed individuals present severe legal and safety concerns. Veterinarians are tightly regulated to handle these medications, ensuring their judicious use in animal care. The proposed amendment could exacerbate the illegal use of sedatives, increasing the risk of misuse in crimes and recreational activities.
- It should be noted that horses all react differently to sedation and sometimes veterinarians need to reverse it. Horses can become heavily sedated or highly aggressive and more reactive/kick. An appropriate clinical examination to detect underlying disease, (e.g. cardiac or respiratory issues, presence of a fever) needs to be performed and a thorough history taken prior to sedative administration.
- As such, no such dental procedure using power tools can be safely and effectively performed without the presence of a registered veterinarian to administer, monitor, and comply with the required act with regards to use of the necessary concurrent schedule 4 and schedule 8 medications.

### Consumer Protection Issues:

- The use of power tools by laypersons presents significant consumer protection issues. When complications arise, there is no established regulatory framework to hold these laypersons accountable, unlike veterinarians who operate under a strict regulatory regime.
- The ability of veterinarians to use sedatives makes some procedures safer and easier to carry out. Often the cost of additional veterinary care to treat the aftermath of inappropriate treatments by laypersons makes treatment by the layperson considerably more expensive for horse owners.

### Application of the proposed amendment

- The proposed amendment raises significant concerns regarding its practical implementation. The AVA request detailed clarification on how the amendment would allow individuals without a registerable veterinary degree to perform acts of veterinary science, given that such acts will still be classified as restricted under the legislation. Key questions include:
  - Who will be responsible for the oversight and regulation of these laypersons?
  - Will the Act be amended to include specific regulatory powers governing non-veterinary practitioners?
  - In cases where the actions of these individuals lead to serious animal harm, what actions will be taken by the Veterinary Practitioners Board?

The lack of clarity on these points undermines the feasibility and safety of the proposed amendment, potentially jeopardising animal welfare and professional standards within the veterinary field.

### Financial Viability of Veterinary Practices

- Allowing laypersons to perform equine dentistry threatens the financial viability of veterinary practices by removing routine procedures essential for sustaining business operations. This shift could leave veterinarians dealing predominantly with emergency cases, leading to increased financial strain and mental health challenges. Equine dentistry is appealing to many veterinarians for several reasons, including:
  - It is schedulable (non-emergency), allowing for better planning and time management.



- It enables veterinary practices to employ more vets, sharing the onerous burden of after-hours emergencies—a service currently under extreme threat due to many vets leaving the profession.
  - It can be performed on specific days, allowing for more flexible work rosters for veterinarians, particularly those with young children.
  - It is conducted in low-emotion environments, making it less stressful than higher-risk, high-debt-incurring after-hours emergencies.
  - It provides an ideal opportunity for horse owners to meet and gain confidence in newer veterinarians within the practice, establishing a relationship that can be beneficial during emergencies.
  - It is relatively easy and efficient for veterinarians to build and develop skills in equine dentistry in addition to their already established veterinary skills.
- Furthermore, veterinarians already have investment in equipment including radiography, anaesthesia and surgical equipment that would allow appropriate dental procedures to take place in horses safely and correctly.

The AVA asserts that there are sufficient large animal and equine veterinarians in the greater ACT region (the ACT itself and surrounding towns) to meet the region's equine dental needs. These veterinarians have the expertise and experience to ensure comprehensive dental care and maintain high standards of animal welfare. The current workforce can effectively serve the equine community without requiring regulatory changes.

**For the reasons outlined above, the AVA stands firmly against this proposed amendment and advocates for maintaining the current regulations that restrict equine dental procedures to qualified veterinary practitioners.**

## Additional Veterinary Matters for Consideration

Had a more realistic timeframe been available, the AVA would have provided more comprehensive commentary on several key issues affecting the veterinary profession.

These include:

- Veterinary Workforce Shortages: The veterinary profession is facing critical workforce shortages due to various factors. For an in-depth discussion, please refer to the [AVA's submission to the Inquiry into veterinary workforce shortages in NSW](#).
- Funding Arrangements for Emergency Veterinary Care to Disaster-Impacted Animals: Ensuring adequate funding and support for veterinary care in disaster situations is crucial. The AVA's advocacy on Australia's disaster resilience and related funding arrangements can be viewed [here](#).
- HECS debt burden: The burden of Higher Education Contribution Scheme (HECS) debt on veterinarians is a significant concern. Detailed information and advocacy efforts can be found in the [AVA media release on this matter](#).
- National Microchipping Registration: There are ongoing cross-border issues with other jurisdictions' Pet Registry systems, highlighting the need for better collaboration between systems or a unified national microchipping registration system to improve animal tracking and welfare.

These issues are important to the veterinary profession and warrant thorough discussion and consideration. The limited timeframe of the current consultation period has unfortunately constrained our ability to provide detailed input on these matters.



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