



Racing QLD

Veterinary Permit System Rule - Qualified Veterinary Surgeon

Submission of the
Australian Veterinary Association Ltd

June 2025

About the Australian Veterinary Association (AVA)

The AVA is the peak professional body representing veterinary professionals and students across Australia. For more than 100 years we have been the united voice of the veterinary profession.

Veterinarians are among Australia's most trusted and respected professionals, dedicated to safeguarding animal health and welfare and supporting the communities they live in.

Our vision and purpose

Vision *A thriving veterinary profession*

Purpose *Building a vibrant future for veterinary professionals.*

At the AVA we champion the veterinary community, advance professional excellence, foster connectivity, and deliver exceptional member experiences to achieve our vision of a thriving profession.

Essential role of the veterinary profession

Veterinary services are essential to Australia's animal health, food security, and economy. They help secure Australia's animal health and livestock supply chain, protecting hundreds of thousands of jobs and easing cost of living pressures through a safe and reliable food supply.

Beyond agriculture, veterinarians support companion animals and their owners, strengthening the human-animal bond and promoting the associated mental and physical health benefits of pet ownership. Animals are not just a part of the Australian way of life; they are deeply embedded in it - socially, culturally, environmentally, and economically, and veterinarians are an essential part of every vibrant Australian community.

Veterinarians play a pivotal role in maintaining the social licence of animal industries, ensuring animal health and welfare meets community expectations. Like human healthcare and education, veterinary services provide both private benefits to individuals and critical public benefits to society, in areas like biosecurity surveillance, wildlife treatment and health and emergency animal disease management.

Recognised among Australia's most ethical and trusted professionals, veterinarians are highly respected and trusted members of their communities. The Governance Institute of Australia's 2023 Ethics Index ranked veterinarians among the nation's top 10 ethical occupations¹.

About Equine Veterinarians Australia (EVA)

Equine Veterinarians Australia (EVA), a special interest group within the Australian Veterinary Association, is committed to supporting equine veterinarians in delivering the highest standards of care and fostering trusted relationships with horse owners and industry stakeholders. EVA actively advocates for the interests of equine practitioners, promoting policies and practices that uphold animal welfare, professional integrity, and sustainable veterinary services across Australia.

¹ Governance Institute 2023 (<https://governanceinstitute.com.au/app/uploads/2023/11/2023-ethics-index-report.pdf>)



Introduction

The Australian Veterinary Association (AVA), together with Equine Veterinarians Australia (EVA), welcomes the opportunity to provide feedback to Racing Queensland (RQ) on the Racing Australia's proposed implementation of a veterinary permit system under Rules AR 2 and AR 104B. As the peak professional body representing veterinarians across Australia, including those working in equine practice and the racing industry, we are deeply committed to upholding the highest standards of animal health, welfare, and professional integrity.

The AVA and EVA strongly support measures that enhance racing integrity and equine welfare. However, we hold significant concerns about the introduction of a parallel veterinary licensing system by a Principal Racing Authority (PRA), which risks duplicating existing statutory regulatory frameworks, creating unnecessary administrative burdens, and undermining the role of established veterinary boards.

Veterinarians practising in Australia are already comprehensively regulated under state and territory legislation and are subject to professional oversight by veterinary registration boards with the legal authority, clinical expertise, and governance frameworks to manage issues of professional conduct and competence. Any additional licensing regime imposed outside of these established processes threatens to fragment regulatory oversight and compromise the fairness and consistency of professional accountability mechanisms.

This submission outlines our key concerns with the proposed changes to AR 2 and insertion of AR 104B, articulates our strong opposition to dual regulation, and provides recommendations to either withdraw the proposal or, if the permit system proceeds, ensure that its design and implementation are informed by meaningful consultation with the veterinary profession and lessons learned from other jurisdictions.

Key Position – Opposition to dual Regulation

Veterinarians across Australia are regulated under robust legislative frameworks administered by state and territory veterinary boards. These statutory authorities are responsible for maintaining professional standards, investigating conduct concerns, and enforcing disciplinary measures where required. In Queensland, this is the role of the Veterinary Surgeons Board of Queensland (VSBQ), which has fulfilled this regulatory function since its establishment in 1936.

The AVA-EVA position is clear: **veterinarians should not be subject to disciplinary proceedings for professional conduct under any additional licensing regime outside of their formal veterinary registration.** The AVA's *Licensing of Veterinarians* policy (2022) states:

“Veterinarians should not be subject to disciplinary proceedings for matters of professional conduct under any other licensing regime... veterinary registration legislation requirements must always take precedence over potentially contradictory requirements of any other accreditation scheme.”



Concerns with the proposed changes

The proposed AR 104B introduces a permit system administered by RQ (or another Principal Racing Authority, PRA) that duplicates regulatory oversight already lawfully undertaken by veterinary registration boards. Specific concerns include:

1. Unnecessary duplication, regulatory burden and cost

The proposed permit requirement would require veterinarians to be “*approved by the relevant PRA... by way of permit, approval or licence.*” This introduces a secondary licensing process which duplicates existing regulation, imposes additional red tape and additional costs, and may result in inconsistent or conflicting regulatory requirements.

2. Search and seizure abilities

The AVA is concerned about the potential overreach in the proposed powers relating to search and seizure under AR 104B. Specifically, the ability for stewards or PRA representatives to search vehicles and seize property—including veterinary equipment, records, or medications—raises significant legal and ethical issues. These actions may be undertaken without due process, clear limitations, or independent oversight, and in circumstances where the individuals conducting the searches may not have the necessary legal authority or professional understanding to interpret or manage veterinary materials appropriately. The AVA urges that any such powers be clearly defined, limited in scope, exercised only by appropriately authorised persons, and subject to procedural safeguards that respect the legal rights and professional responsibilities of veterinarians.

3. Lack of veterinary oversight in permit decisions

The permit system proposed under AR 104B allows a PRA to determine eligibility, impose conditions, and revoke permits without reference to veterinary regulatory bodies or professional expertise. These risks decisions being made without the input of qualified veterinary professionals or proper procedural fairness.

4. Professional conduct should remain within Veterinary Board’s jurisdiction

Under AR 104B(10), permit holders can be penalised or have their permit revoked based on conditions or requirements set solely by the PRA. Matters of professional misconduct or negligence, however, must be handled by the VSBQ, which has the statutory power, processes, and expertise to investigate and discipline veterinarians. Anything less creates risk for inconsistent treatment or erosion of procedural rights.

5. Willingness of mixed practice veterinarians to engage with the Racing Industry

A key consideration unique to Queensland is the significant reliance on mixed animal veterinary practitioners who service the racing industry. Unlike jurisdictions such as NSW and Victoria, where there is a larger pool of equine-only veterinarians, many Queensland practitioners support racing as part of a broader mixed practice workload. Introducing an additional layer of regulation through a licensing or permit system may deter these veterinarians from continuing to provide services to the racing sector—both on raceday and in the ongoing care of racehorses. This could result in a reduced pool of veterinarians willing to undertake racing-related work.



Recommendations

The AVA urges Racing Australia to reconsider and withdraw the proposed veterinary permit system under AR 104B. We encourage Racing Queensland to exert its influence over Racing Australia to that end. Instead, we recommend:

- **Continued recognition of veterinary registration boards as the sole regulatory and disciplinary authority for veterinarians;**
- **Instead of introducing a licencing or permit system, there should be collaborative development of a Code of Conduct for veterinarians in racing, led by AVA-EVA in partnership with Racing Queensland, as discussed in prior ministerial forums²;**
- **Ongoing consultation with the AVA on veterinary-related policy and regulatory matters affecting the racing industry.**

Additional considerations if a veterinary licensing system is introduced

If Racing Queensland proceeds with introducing a veterinary licensing system despite the objections of the AVA and EVA, it is imperative that the development, implementation, and oversight of such a system be conducted in full and ongoing consultation with the AVA-EVA and veterinarians working within the equine racing industry. A co-designed approach is essential to ensure the system is practical, fair, and does not inadvertently compromise the standard of care or deter veterinary participation. The following recommendations are representative only and are not intended as exhaustive for developing of a proposed permit system.

Recommendations:

- **Mandatory consultation with AVA-EVA:** AVA-EVA must be centrally involved in developing the licensing system to ensure it reflects veterinary expertise, maintains professional standards, and supports both horse welfare and racing integrity.
- **Licensing fee:** Given veterinarians are already required to pay state-based veterinary registration fees, there must be no additional fees or charges levied by RA or a PRA, should an additional licensing requirement be implemented.
- **Learnings from NSW and Victoria:** Experiences in other jurisdictions show that additional licensing has created administrative inefficiencies without delivering clear benefits. The system must avoid excessive reporting requirements, unclear rules around medications, and logistical burdens that negatively affect both veterinarians and trainers.

² AVA held a meeting with Ministers for DAFF and Racing and Biosecurity Queensland and Racing Qld. 4 November 2013



- **Appeals and peer review mechanisms:** The determination of veterinary competence, permit eligibility, and breaches of permit conditions must involve qualified veterinary professionals. An independent appeals body led by veterinarians should be established, and decisions around permits must not rest solely with stewards, who may lack the clinical understanding required to make fair and accurate assessments.
- **Addressing culture and professional respect:** Feedback from veterinarians in NSW and Victoria suggests a concerning culture of steward bias, professional disrespect, and inadequate understanding of veterinary practices and equipment. Any new system must embed training for stewards on veterinary practice and require respectful, peer-informed interactions with veterinary professionals.
- **Streamlined administrative infrastructure:** Practical issues such as raceday and stable access, guest passes, automated permit renewals with opt-out functions, and a digitally optimised reporting platform (with paper alternatives) must be addressed to reduce operational friction and support service continuity.
- **Support for veterinary fee recovery:** Any licensing system should incorporate mechanisms to assist veterinarians in recovering unpaid service fees from owners, recognising this is a common issue within the industry.

Conclusion

The AVA remains committed to supporting animal welfare and integrity within the racing industry. However, these objectives are best served through clear, consistent, and singular veterinary regulation under existing statutory boards. Introducing a secondary licensing system risk undermining these outcomes and creates unnecessary regulatory complexity.

If a licensing system is to be introduced, it must be founded on genuine partnership with the veterinary profession, structured to reduce red tape, and designed with respect for veterinary expertise. Without these safeguards, the system risks harming both veterinary engagement and equine welfare.

We welcome the opportunity to continue engaging with Racing Queensland and other stakeholders to achieve a practical and professionally sound approach to veterinary practice in the racing sector.

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