



APVMA draft Strategic Plan 2025–30

Submission of the
Australian Veterinary Association Ltd

April 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.

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



Executive Summary

The Australian Veterinary Association (AVA) supports the APVMA Strategic Plan 2025–30 direction and its alignment with principles of transparency, regulatory agility, and future preparedness. Our submission highlights opportunities to enhance stakeholder engagement, improve regulatory responsiveness, and strengthen Australia’s animal health system.

Key recommendations include expanding APVMA’s remit to include oversight of compounded veterinary medications, prioritising resources to meet timeframes for minor use and permit applications and establishing proactive mechanisms to manage supply disruptions for critical veterinary therapeutics. The AVA also encourages clearer alignment with the TGA, improved terminology that reflects the therapeutic use of veterinary products, and greater national harmonisation of medicines and poisons regulation.

To support long-term success, the AVA recommends investment in regulatory workforce capability, including targeted recruitment of veterinarians and collaboration on career pathway development. We look forward to continued collaboration with the APVMA to ensure a fit-for-purpose regulatory system that safeguards animal welfare and supports the veterinary profession.

Introduction

The AVA welcomes the opportunity to provide feedback on the draft APVMA Strategic Plan 2025–30. As the national peak body representing the veterinary profession, the AVA supports regulatory systems that are science-based, risk-proportionate, transparent, and responsive to the evolving needs of the veterinary profession, animal industries, and the broader community.

We commend the APVMA on the clarity of its draft Strategic Plan and on its commitment to long-term strategic thinking and performance measurement. The five proposed pillars align well with the AVA’s own strategic goals of leadership, sustainability, innovation, and One Health advocacy. Our feedback focuses on areas of alignment, and where further refinement or emphasis may enhance outcomes for animal health, public health, and regulatory effectiveness.

Strategic Pillar 1: Being a Trusted, Transparent and Fair Regulator

The AVA supports the APVMA’s emphasis on transparency, fairness, and evidence-based decision-making. These principles are vital for maintaining the trust of veterinarians, the animal-owning public, and industry.

Recommendation:

- That the APVMA establish clear protocols for early and meaningful engagement with professional stakeholders, including the AVA, in the development or review of key regulatory policies and technical frameworks.

Terminology issue:

The AVA suggests that the APVMA consider reviewing public-facing terminology to reflect the distinction between agricultural and veterinary products. The term “*veterinary medicines*” is more



appropriate and accessible than “*veterinary chemicals*”, and aligns with global usage. Clear and consistent language will support public understanding and professional confidence in the regulator.

Strategic Pillar 2: Support a Contemporary Regulatory System

The AVA encourages the APVMA to explore the potential for assuming regulatory oversight of compounded veterinary medications, which currently exist in a space of regulatory ambiguity. While compounded preparations play a critical role in veterinary practice—especially in cases where no registered alternatives are available—the absence of a dedicated regulatory framework creates variability in quality, safety, and consistency. Establishing formal oversight under the APVMA would provide greater assurance for veterinarians and animal owners, reduce risks to animal welfare, and ensure that compounded medicines are used appropriately and responsibly. Inclusion within the APVMA’s regulatory framework could be developed in collaboration with the veterinary profession and compounding sector to ensure it is practical, risk-based, and fit-for-purpose.

The AVA acknowledges the importance of flexible regulatory pathways such as minor use and permit registrations, which are intended to provide timely access to therapeutics where no fully registered alternatives exist. These pathways are particularly critical in supporting the health and welfare of minor species, wildlife, and niche production systems. However, the AVA has been made aware that the APVMA permit section may not be currently meeting legislated timeframes, undermining the intent of these provisions. The AVA supports maintaining a 100 per cent target for meeting legislated timeframes, noting that predictability and timeliness are essential to encouraging innovation, safeguarding animal health, and maintaining the competitiveness of Australia’s agricultural industries.

The AVA supports timely assessment of serious adverse experience reports within 20 business days as a critical measure of APVMA performance. However, we recommend a broader approach that also evaluates the effectiveness of APVMA responses to adverse events. Timely action must be accompanied by clear, transparent communication of outcomes and any regulatory or systemic improvements made. Furthermore, the AVA encourages greater promotion of the Adverse Experience Reporting Program (AERP) to veterinarians and the broader community to strengthen post-market surveillance and improve confidence in the safety and efficacy of veterinary medicines.

Recommendations:

- That the APVMA explore the potential for assuming regulatory oversight of *compounded veterinary medications*, an area of current regulatory uncertainty. Inclusion within the formal regulatory framework would support consistency, quality, and animal safety, particularly where no registered alternatives exist.
- That the APVMA prioritise sufficient resourcing and workforce capacity in this area to ensure legislated timelines are met and that these streamlined pathways deliver on their purpose of timely and pragmatic access to necessary veterinary medicines.
- That the APVMA broaden its performance metrics for the Adverse Experience Reporting Program to include not only the timeliness of assessments, but also the responsiveness and communication of outcomes, and that it strengthens promotion of the program to veterinarians and stakeholders to encourage greater reporting and continuous improvement.

**National harmonisation:**

The AVA sees merit in leveraging the AgVet Code's national application to support broader harmonisation of medicines and poisons regulation. Inconsistent state-based scheduling, prescribing, and supply rules add significant complexity. A national approach, potentially coordinated through the APVMA's strategic leadership, could deliver efficiencies and better animal welfare outcomes.

Strategic Pillar 3: Building Foresight Capability

The AVA welcomes the APVMA's focus on future-readiness and strategic intelligence. Foresight is essential to respond effectively to emerging challenges including climate change, zoonotic disease risks, antimicrobial resistance, and shifting consumer expectations.

The AVA holds concerns regarding the APVMA's capacity to proactively identify and respond to emerging supply issues that impact access to critical veterinary therapeutics. The recent IV fluids shortage highlighted the significant negative impacts such disruptions can have on the veterinary profession and, most importantly, on animal welfare. Unlike the TGA, which has established mechanisms to respond swiftly to human health medicine shortages, the APVMA currently lacks a comparable framework for the animal health sector.

Recommendations:

- That the APVMA's foresight efforts include formalised engagement with professional peak bodies such as the AVA, as well as horizon scanning across:
 - Emerging animal health threats
 - Shifts in veterinary service delivery and product use
 - Changes in global regulatory trends and One Health partnerships
- The APVMA should explore mechanisms that enable timely responses to supply chain risks, including enhanced monitoring, early warning systems, and stakeholder engagement.
- That the APVMA plays a role in advocating for sovereign manufacturing capability and secure supply chains for critical veterinary therapeutics.

Strategic Pillar 4: Striving for Operational Excellence

The AVA supports efforts to enhance operational performance, including through digital transformation and service delivery reforms.

Recommendation:

- That performance indicators include targets for:
 - Timeliness of product registration and assessment
 - Stakeholder satisfaction
 - Clarity and accessibility of guidance from APVMA staff and materials provided

APVMA–TGA alignment:

Veterinarians and sponsors continue to experience confusion and administrative burden due to lack of



clarity around the respective roles of APVMA and TGA in regulation of certain product classes (e.g. disinfectants, biologics, antimicrobials).

Recommendation:

- That APVMA seek to strengthen collaboration with the TGA to reduce duplication, clarify responsibilities, and develop joint guidance on overlapping regulatory issues, particularly where human and animal health intersect (e.g. antimicrobial stewardship).

Strategic Pillar 5: Attracting, Developing and Retaining Talented People

The veterinary sector shares the APVMA's concern with workforce attraction and retention, especially in specialist regulatory and technical roles. Workforce capacity is critical to the success of the APVMA's mission.

Recommendations:

- That the APVMA's workforce strategy includes targeted recruitment of veterinarians and veterinary scientists with field experience.
- That the APVMA consider collaboration with the AVA and veterinary schools to promote regulatory careers and establish training pathways.

Conclusion

The AVA broadly supports the direction and structure of the APVMA's draft Strategic Plan 2025–30. We welcome the opportunity to continue working collaboratively with the APVMA to ensure regulatory settings are effective, responsive and trusted.

Should the APVMA require further detail on any of the feedback provided, we would be pleased to engage in further consultation.

Contact

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