



Permitting companion dogs and cats in aircraft cabins

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 Food Standards Australia New Zealand (FSANZ) consultation examines the human food safety risks associated with permitting companion cats and dogs in aircraft cabins. FSANZ has assessed that the overall risk to human food safety is low when appropriate mitigation measures are implemented. However, the proposal also refers to requirements for veterinary health certification to ensure animals are “fit to fly” and free from infectious diseases.

While the proposed changes provide benefits for passengers and airlines, they may have significant implications for veterinarians and animal welfare. The AVA addresses 2 key concerns in our submission:

- The ambiguity and professional risks associated with requiring veterinarians to issue "fit to fly" certifications.
- The inflexible restriction on opening animal carriers during flights, which may hinder emergency interventions needed to protect animal welfare.

Introduction

Veterinarians are frequently asked to provide "health certificates" or "fit to fly certificates" for animals prior to travel. These requests often occur on short notice, with owners often presenting animals for examination just days before scheduled travel. Additionally, many transport providers require certification within two weeks of date of travel, further limiting the veterinarian's ability to conduct a thorough assessment. In some cases, veterinarians may identify medical conditions requiring further investigation, yet there may be insufficient time to determine if travel is contraindicated.

Currently, there are no formal rules, regulations, or guidelines from any Australian authority regarding "fit to fly" certification. Despite this, veterinarians are often placed under pressure to issue these certificates, sometimes against their professional judgment.

A veterinarian has no control over how an animal is managed during transit and should not be held accountable for its welfare during travel. Certification implying an animal is “fit to fly” places undue responsibility on the veterinarian for circumstances beyond their knowledge or influence, posing a professional risk to the veterinarian.

Key Issues

1. Health Certification

Scope of veterinary certification

Veterinarians should only be required to assess and state the health condition of an animal as observed or determined at the time of examination. The scope of any medical opinion provided must be based on the level of examination and diagnostic investigations performed, particularly for animals with pre-existing medical conditions, age-related concerns, or breed-related health risks (e.g., brachycephalic breeds).

Appropriate documentation

The AVA recommends that veterinarians issue a "health examination report or assessment" rather than a "fit to fly certificate." This document should:

- Clearly state the date of examination.
- Outline the extent and limitations of the health assessment conducted.



- Identify any medical conditions or concerns that may impact travel.
- Provide professional guidance on risks associated with transport modes (e.g., air travel as cargo or in-cabin).
- Recommend further investigations if required.

Client communication and education

Veterinarians should explain to clients that a health examination report does not guarantee safe travel. Airlines and transport providers are responsible for assessing whether an animal meets their travel requirements. Some airlines now employ veterinarians or have internal protocols to make this determination.

Vaccination considerations

There is no standard regulatory requirement for vaccinations in relation to companion animal travel. However, veterinarians should use their professional discretion to determine whether an animal's vaccination status is adequate to protect against potential exposure to infectious diseases during transit. The combination of travel stress and exposure to other animals can increase disease risk, making up-to-date vaccinations advisable.

Approval to travel

The decision to approve an animal for transport ultimately rests with the transport provider and the owner of the animal, based on the veterinary health assessment provided.

2. Opening of animal carriers

The FSANZ proposal states that carriers must remain closed at all times during flight, including for feeding or administering medications. While maintaining containment is important for safety and hygiene, an absolute prohibition raises serious animal welfare concerns. It is also noted that animal welfare legislation across Australia requires that animals must not be allowed to suffer unnecessarily.

Emergencies including breathing difficulties, overheating, physical injuries, vomiting, seizures, or signs of distress can occur unexpectedly. Inability to open a carrier to intervene in such situations may result in preventable suffering or even death. This is unacceptable from an animal welfare perspective and inconsistent with basic veterinary and community standards of care.

The AVA strongly recommends that protocols allow, under appropriate guidance, the opening of an animal carrier if there is a clear and immediate risk to the animal's health or life. Clear criteria should be established to guide when and how carriers may be opened, balancing safety, public health, and animal welfare considerations. This flexibility would ensure that animal health emergencies can be managed appropriately without compromising overall cabin safety.

Recommendations

The AVA recommends improvements to the FSANZ proposal to ensure the appropriate balance of public health protection, professional responsibilities of veterinarians, and the welfare of travelling animals.

- Veterinarians should not be required to provide “fit to fly” certificates. Instead, veterinarians should be requested to provide a health assessment report that:
 - Reflects the animal's condition at the time of examination.



- Outlines any limitations of the assessment.
 - Highlights any relevant risks associated with travel, including different modes of travel.
- The responsibility for determining whether an animal is fit to travel should rest with the transport provider and the owner, not the private veterinarian.
- Airlines should allow animal carriers to be opened during flight under controlled circumstances where there is an immediate risk to the animal's health or welfare, following defined procedures to ensure both safety and animal welfare obligations are met.

Conclusion

The AVA supports initiatives that allow greater flexibility for companion animal travel, provided that public health, veterinary responsibilities, and animal welfare are properly considered.

To protect veterinarians and ensure that the welfare of animals travelling in aircraft cabins is safeguarded appropriately, it is critical that FSANZ and the aviation sector adopt clear, realistic, and fair requirements regarding veterinary health certification and emergency access to animals during flights.

The AVA encourages FSANZ and airlines to adopt these recommendations to uphold the highest standards of public health, professional integrity, and animal welfare.

Contact

Dr Robyn Whitaker

Senior Advocacy Officer

publicvetaffairs@ava.com.au