



Departmental Standard – Secure Storage of S8 Medicines Queensland Health

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) submission to the *Queensland Health Departmental Standard – Secure Storage of S8 Medicines* outlines a critical issue affecting veterinarians who provide essential services in regional and remote areas—namely, the inability to lawfully store S8 medications in vehicles overnight when attending animals away from their usual practice location. Current requirements, which prohibit overnight vehicle storage, are impractical and pose significant risks to safety, medication integrity, and service continuity. The AVA proposes a targeted amendment to Table 3 of the Storage Standard to create a veterinary-specific exemption, mirroring provisions already available to ambulance officers and the Royal Flying Doctor Service. This would permit secure, concealed storage in locked vehicles, under defined conditions. The proposed solution is consistent with the Medicines and Poisons Regulation 2021 and addresses widespread confusion stemming from inconsistent interpretations across QLD Public Health Units. Clear, practical updates to the Standard will support safe, lawful veterinary practice and improve health and welfare outcomes for animals in Queensland.

Introduction

The AVA welcomes the opportunity to provide feedback on the *Departmental Standard – Secure Storage of S8 Medicines* as part of Queensland Health’s April 2025 consultation. This submission highlights challenges faced by veterinary professionals in regional and remote areas when complying with current storage requirements and proposes practical amendments that will enhance service delivery while maintaining appropriate safeguards.

1. Key Challenge: Storage of S8 Medicines During Remote Veterinary Work

Veterinarians in Queensland frequently travel to remote or rural locations to provide essential services, often requiring overnight stays away from their registered practice premises. In these cases, it is necessary to transport and store S8 medications securely. However, the current *Departmental Standard* (Version 2, 1 July 2023) creates significant uncertainty and compliance challenges.

Table 3 of the Standard currently states:

“S8 medicines may not be left in vehicles overnight or when the vehicle is unattended.”

This restriction applies to veterinarians attending animals outside their usual place of practice, with no exemption for practical realities faced in regional and remote work. Unlike ambulance officers or the Royal Flying Doctor Service (RFDS), veterinarians do not currently benefit from any alternative approved storage arrangements for S8 medications while in the field.

2. Risks and Limitations of Current Options

Veterinarians are currently left with only two impractical options:

- Keep the drugs in personal custody at all times – which increases risk of personal harm (robbery, assault), and may breach accommodation providers’ rules.



- Leave the drugs in a locked vehicle — which is currently not permitted under the Storage Standard, despite the potential use of secure, concealed compartments.

Neither option satisfies the need for safe, lawful, and practical storage. The inconsistency in advice from Public Health Unit (PHU) officers further exacerbates confusion and non-uniform compliance across the state.

3. Proposed Solution: Introduce a Veterinary-Specific Exemption

We propose an amendment to Table 3 of the Storage Standard to create a specific exemption for registered veterinary surgeons, aligning their permissions with those granted to ambulance officers and the RFDS.

Suggested Amendment to Table 3:

Column 1	Column 2	Column 3
S8 medicines being carried for the purpose of attending animals by a veterinary surgeon	A place the person is attending to treat animals that is not the person's usual place of practice	The S8 safe is a: 1. Bag, box or similar container kept in the veterinarian's personal custody; or 2. Concealed metal compartment designed for storage of the bag, box or container in a vehicle*. The vehicle must be kept locked when unattended.

4. Legislative and Policy Alignment

The Medicines and Poisons Regulation 2021 already defines a “medicine store” as including any part of a vehicle used for storage. Our proposal is fully consistent with this legislative definition and merely seeks clarification and inclusion in the Standard's exemptions.

5. Addressing Stakeholder Questions

Does the Storage Standard provide enough clarity?

No. There is ambiguity around how veterinarians can lawfully comply with storage requirements when working in the field, particularly overnight.

Has the Storage Standard provided flexibility?

No. The lack of provision for secure vehicle storage when unattended or overnight restricts effective veterinary service delivery.

Alternative approaches?

Yes – include a veterinary-specific exemption, as outlined above. *Noting that the medication



storage facility within a vehicle would also need to meet requirements for maintaining appropriate temperature ranges to ensure the quality and efficacy of stored medications. For example, the cold chain must be maintained through adequate refrigeration.

Conclusion

Veterinarians play a critical role in Queensland's biosecurity, animal health and welfare, public health, and food security systems. In regional and remote areas, their ability to operate safely and legally is essential. Updating the Departmental Standard to allow secure, locked vehicle storage of S8 medications—under strict conditions—will support veterinary professionals while upholding public health standards.

We urge Queensland Health to adopt the proposed amendment and to also provide clear guidance to reduce regulatory ambiguity and improve safety for both veterinary professionals and the communities they serve.

Contact

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