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2 July 2024

Veterinary Practice Review
Transport Canberra and City Services
GPO Box 158
CANBERRA ACT 2601

By email only: communityengagement@act.gov.au

Dear Sir/Madam,

Re: Veterinary Practice Review

Thank you for the opportunity to provide comment on the ACT Government's review of the *Veterinary Practice Act 2018* discussion paper (the Discussion paper).

Animal Medicines Australia (AMA) is the peak industry association representing the registrants and approval holders of veterinary medicines and animal health products in Australia. They are the local divisions of global innovators, manufacturers, formulators and registrants that supply essential veterinary medicines and animal health products that are critical to supporting Australia's \$34 billion livestock industry and the \$33 billion pet industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

AMA member companies play a vital role in Australia's food production, agricultural trade and biosecurity preparedness, as well as ensuring the health and wellbeing of our pets, wildlife and competition animals. AMA members develop, register and supply innovative new medicines including vaccines and anti-infection medicines to prevent and control outbreaks of animal disease, as well as medicines and treatments that enable good health and wellbeing, and the production of food and fibre products that are safe for human consumption and use. Healthy animals are much less susceptible to disease and infection, and good animal health is essential to good animal welfare.

AMA and its members have a long-standing commitment to an animal health industry that is responsible and sustainable. Our members' products are essential tools that can help meet economic, environmental and social challenges. We look forward to continuing to work with government to improve animal health outcomes across the livestock, equine and companion animal sector.

Ensuring access to animal health products is vital to maintaining not only the health and wellbeing of the animals in our care, but also Australia's rigorous biosecurity systems, public health and access to safe, nutritious, affordable food.

Animal Medicines Australia is pleased to provide the following comments on the review of the *Veterinary Practice Act 2018* discussion paper for consideration by the ACT Government.

General comments

Animal Medicines Australia commends the ACT Government's commitment to the provision of sustainable veterinary services in the ACT and ensuring that veterinary practitioners and support staff are provided with the support they require to deliver these services.

AMA notes that the timeframe for consultation was insufficient to allow for thorough consideration by relevant stakeholders. The absence of the consultation on the [ACT Have Your Say Consultation Projects](#) page reduced the consultation period to just 3 or 4 weeks for many stakeholders.

This review has broad implications for the veterinary profession in the ACT and the animals and community it serves. AMA would welcome a thorough, meaningful approach to consultation and engagement with key stakeholders to ensure an inclusive, evidence-based review process.

The Discussion Paper would benefit from a comprehensive regulatory impact assessment to clearly outline potential social and economic impacts on the veterinary profession and community. This would facilitate meaningful evaluation of the potential impacts of the proposed measures by stakeholders.

AMA recognises the professional expertise of the Australian Veterinary Association (AVA) in relation to the practical measures relevant to their profession and supports their comments.

Consultation Topic 2: Broader issues around veterinary practice in the ACT

Regulation of the broader veterinary profession, including veterinary nurses

In 2021, veterinarians were included on the Priority Migration Skilled Occupation List, meaning that employer-sponsored nomination and visa applications for veterinarians will be given priority processing. Nevertheless, veterinarians remain an occupation considered to be in shortage in the 2022 Skills Priority List report.¹ In 2022, veterinary nurses were also assessed as being in shortage.

Declining numbers of veterinarians across all sectors, including livestock and companion animal clinical practice, research and academia, industry, government and pathology, poses significant challenges not just for animal health outcomes but also for food production and trade, innovation, environmental outcomes and biosecurity.

As detailed by the Australian Veterinary Association, the drivers behind the veterinary workforce shortage are varied and complex. While a long-term decline in demand in the livestock sector has resulted in a lack of available veterinary services in rural areas, the increased demand resulting from a rapid growth in pet ownership has also resulted in changes in industry structure. The challenges associated with maintaining a sustainable workforce are equally varied and complex.

Veterinary nurses are integral to the veterinary care team and the broader veterinary profession. The veterinary care team benefits significantly from veterinary nurses who are provided with quality training and opportunities for continuing professional development.

AMA supports the proposal to extend the regulatory framework in the ACT to include registration of veterinary nurses and other para-veterinary staff. Registration of veterinary nurses and para-veterinary staff would facilitate the establishment of professional standards for the broader veterinary care team to work under appropriate direction and/or supervision of registered veterinarians. Expanding the capacity for the entire veterinary care team to provide animal health care services would reduce

¹ Australian Government, Jobs and Skills Australia: Skills Priority List; <https://www.jobsandskills.gov.au/data/skills-shortages-analysis/skills-priority-list>

workload pressures on veterinarians, improve the efficiency of the care team and attract additional staff into veterinary nursing and para-professional roles by providing desirable career opportunities.

Mental health and wellbeing of veterinary staff

Similar to human health services, the provision of veterinary services is essential to ensuring good animal health and welfare, ready supply of food and fibre, and maintenance of biosecurity and public health. In contrast to human health services, however, the veterinary profession relies almost entirely on private funding, with little public funding provided. Compounded by prolonged and significant periods of generational and societal change, workload pressure, chronic underfunding and under-resourcing of the profession have contributed to burn-out and poor mental health outcomes across the sector. The *Australian Veterinary Association Veterinary Wellness Strategy* found that 66.7% of people said they had experienced a mental health condition at some stage (compared with 61.8% of the general population) and that, tragically, veterinarians are up to four-times more likely than the general population to die by suicide – and twice as likely as other health professionals.²

Financial pressures, negative interactions with the community and on social media, as well as long working hours combined with high case loads were highlighted as drivers for poor mental health outcomes in the veterinary profession. These challenges are compounded by the ongoing veterinary workforce shortages.

AMA welcomes measures to support the mental health crisis in the veterinary profession, including the provision of financial support for veterinary medicine students to undertake practical work placements in the ACT and provide educational fee relief to encourage early career veterinarians to work in the ACT.

Expanding the scope of the ACT Government's 'Respect in the Workplace' campaign to address the increasing incidence of verbal and physical assault of veterinary care teams would serve to remind and educate the community regarding the impact of their behaviour and actions.

Meeting the challenges facing the sector in retaining and maintaining a sustainable workforce, as well as providing better support models for veterinary care and educating the community regarding appropriate behaviour in veterinary practices, will assist in alleviating some of the pressure on veterinary services and contribute to improved mental wellbeing of veterinary staff.

Improving respite care for animals

Social support models for subsidised sustenance, boarding and veterinary care

Pet-crisis support for access to urgent health care

Noting that the above three consultation topics are interconnected, AMA has provided a combined response to the measures relating to social support for animal health care services.

Our pets form an important component of most Australians' lives, whether for companionship, assistance, teaching care and responsibility, or for physical and mental health benefits.

An estimated 28.7 million pets reside in around 6.9 million Australian households. pet ownership reached new heights with work-from-home requirements imposed by the COVID-19 pandemic. Post-pandemic, new pressures and challenges are placing considerable stress on pet owners, such as natural disasters, increasing living costs, inflation and access to housing. This can lead to difficult decisions to find alternate care arrangements for a beloved pet and rising rates of pet surrender are apparent.

² Australian Veterinary Association: Veterinary Wellness Strategy;
<https://www.ava.com.au/siteassets/resources/thrive/documents/ava-short-report-research-findings.pdf>

The relationship between humans and their pets, known as the human-animal bond, is a mutually beneficial relationship between people and animals, influenced by behaviours considered essential for the health and wellbeing of both. Human and animal health sectors, however, tend to operate in silos – meaning that policy development rarely delivers positive outcomes for both people and their pets.

To ensure that as many Australians as possible can access the myriad benefits associated with pet ownership, we seek a policy environment that facilitates responsible pet ownership practices. Ensuing access to veterinary services for the ACT’s growing pet population will be essential to achieving this goal.

Veterinarians provide essential primary care to Australia’s livestock, pets and wildlife, as well as being critical to preventing and responding to potential disease incursions that threaten to impact Australia’s \$34 billion livestock and \$33 billion pet industries. Every animal in Australia should have ready access to veterinary care when required.

As our community emerges from the pandemic, new pressures and challenges are emerging for pet owners. AMA’s *Pets in Australia* survey continues to find that veterinarians are seen as the most trusted source of advice for pet health issues – with 84% of dog owners and 69% of cat owners taking their animals to the vet in the last 12 months. Nevertheless, around 68% of pet owners reported they had considered not going to the vet when needed (or going less often) in the past 12 months - up significantly from an already high 55% in 2021.³

SEC Newgate’s *Mood of the Nation* August 2022 survey identified that, while pet surrendering is still very low, surrender rates have increased since the pandemic – with a skew towards those with greater social and financial vulnerabilities.⁴ These data paint a portrait of people stretched thin and stressed out, having to give up their loved pets. It suggests a need for supporting services to help keep pet owners with their animals through difficult times, particularly given the clear mental health benefits associated with companion animals.

People experiencing crisis situations such as homelessness, domestic or family violence, or mental health crises, tend to be socially isolated and experiencing increased stress. A pet often provides significant emotional and social support and can even provide short-term health benefits – but, due to a lack of available support, pets can also act as a barrier to seeking assistance.

The veterinary sector bears significant economic costs by providing support and assistance to people in crisis situations, often in the form of “in-kind” labour. Veterinarians have a legal responsibility to provide care for unowned animals and not only forego their usual income but also bear the cost of labour and materials associated with that care – in a manner that is not replicated in any other sector.

Veterinarians, veterinary nurses and administrative staff are generally not trained to work with vulnerable people who are experiencing crisis, grief, trauma or emotional distress. Veterinary social workers are trained in engaging with vulnerable people in highly stressful or emotional scenarios and can take responsibility for the human health aspects of veterinary care, thereby enhancing patient outcomes, improve mental health and social connection and provide critical support for veterinarians and other animal health providers.

By better understanding the experiences of pet owners, ownership drivers and challenges the ACT Government and animal health care industries can create better more responsive systems and processes to support pet owners and promote enduring, positive, responsible and beneficial pet ownership experiences.

AMA recommends the ACT Government develop mechanisms for veterinary services and ongoing care to vulnerable people and their pets. This could include:

- Mechanisms that provide support for vulnerable pet owners and those experiencing crisis situations, such as:

³ Animal Medicines Australia. *Pets in Australia*; <https://animalmedicinesaustralia.org.au/report/pets-in-australia-a-national-survey-of-pets-and-people-2/>

⁴ SEC Newgate. *Mood of the Nation*; <https://www.secnewgate.com.au/>

- Financial assistance in the form of grants or subsidies to establish and expand temporary respite care programs for vulnerable pet owners,
- Provision of animal-friendly facilities for vulnerable pet owners to access during a crisis (e.g. those experiencing Domestic and Family Violence),
- Supporting the collaboration between veterinary care and social services, e.g. by integrating pet care into existing social support programs (such as shelter, food banks etc.) and providing social support services as part of the provision of veterinary services,
- Financial support for low-income and vulnerable pet owners to maintain good animal health and welfare outcomes, and
- Subsidising services offered by veterinary clinics providing community, charity and public good services to vulnerable pet owners.
- Mechanisms that support the provision of veterinary services during emergency situations, such as:
 - Creating a mechanism by which veterinarians can access funding to cover the costs associated with urgent animal care during emergencies, as well as treating wildlife and unowned animals,
 - Establish a 24-hour veterinary hotline to provide advice and assistance to pet owners and triage cases during emergency situations, and
 - Raise public awareness about the importance of timely veterinary care and resources available during an emergency.

Where possible, consideration should be given to working towards a nationally consistent approach to policies and services that promote and support good animal health and welfare outcomes for pet owners experiencing crisis or vulnerability and during emergency situations.

In Summary:

Animal Medicines Australia commends the ACT Government's commitment to the provision of sustainable veterinary services in the ACT and ensuring that veterinary practitioners and support staff are provided with the support they require to deliver these services.

AMA supports:

- The proposal to extend the regulatory framework in the ACT to include registration of veterinary nurses and other para-veterinary staff,
- The provision of further government support to address the mental health crisis in the veterinary profession, including financial support for veterinary medicine students to undertake practical work placements in the ACT and provide educational fee relief to encourage early career veterinarians to work in the ACT,
- Expanding the scope of the ACT Government's 'Respect in the Workplace' campaign to address the increasing incidence of verbal and physical assault of veterinary care teams to educate the community regarding the impact of their behaviour and actions,
- The development of mechanisms that provide support for vulnerable pet owners and those experiencing crisis situations, and
- The development of mechanisms that support the provision of veterinary services during emergency situations.

If we can provide further information at any time, please do not hesitate to contact me.

Yours Sincerely,



Dr Katie Asplin

Director, Animal Health Policy & Engagement