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1 May 2025

NSW Department of Planning, Housing and Infrastructure
Office of Local Government
Locked Bag 3015
NOWRA NSW 2541

By email only: ca.review@olg.nsw.gov.au

Dear Sir/Madam,

Re: Companion Animals Act Review

Thank you for the opportunity to provide comment on the review of the *Companion Animals Act 1998* (the Review).

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 rapidly growing 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 that veterinarians have access to the animal health products they require to maintain and improve 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. Healthy animals are much less susceptible to disease and infection, and good animal health is essential to good animal welfare.

Animal Medicines Australia commends the NSW Government's commitment to supporting responsible pet ownership and is pleased to provide the following comments on the Review for consideration by the Office of Local Government (OLG).

Key points

- Veterinary medicines are crucial tools used by veterinarians to support the health, welfare and wellbeing of livestock, pets, and other animals under human care.

- Veterinarians are essential for accessing medicines to prevent, manage and treat many animal diseases. Without adequate access to veterinary services, animal health and welfare may suffer from illnesses, injuries and diseases and sub-optimal treatments.
- AMA welcomes the opportunity to work with the NSW Government to identify strategies for supporting NSW's growing pet population and supporting responsible pet ownership.
- Nationally consistent companion animal policies would help facilitate responsible pet ownership practices by providing greater clarity for governments, pet owners and veterinarians.

Access to animal health services

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 rapidly growing pet industries. Every animal in Australia should have ready access to veterinary care when required.

The COVID19 pandemic highlighted just how important it is to prevent infectious diseases in both humans and animals. It is estimated that around 60 per cent of infectious diseases are zoonotic – that is, they are spread between animals and people.¹ Advances in animal health products, including preventative parasite control and vaccines facilitate strong companion animal relationships and enable us to safely share our homes with our pets. By preventing and controlling diseases and parasites in our pets, we are able to ensure good animal health and welfare while protecting ourselves and our families from diseases or parasites like fleas, ticks and worms that can spread in our homes and affect people.

From 2020 to 2022, pet ownership reached new heights in Australia as new owners took advantage of the opportunity afforded by flexible work from requirements imposed by the COVID-19 pandemic. AMA's *Pets in Australia* survey found that an estimated 28.7 million pets are now calling home to around 6.9 million households in Australia.² This includes more than 2 million dogs and 1.5 million cats in NSW. With around 69% of all households in Australia offering a home to at least one pet, responsible pet ownership has never been more important. It is equally important that pet owners are provided with sufficient support to facilitate responsible ownership practices – including access to animal health services and education regarding good animal health, welfare and hygiene.

Having ready access to the tools and innovative technologies necessary to keep animals healthy, via an extensive, sustainable veterinary sector, is key to sustainable and resilient companion animal sectors in Australia, with subsequent environmental, economic and social benefits.

The veterinary workforce shortage

The veterinary workforce shortage is evident across all sectors, including livestock and companion animal clinical practice, research and academia, industry, government and pathology. These shortages pose significant challenges not just for companion animal health outcomes but also for public health, biosecurity and mental wellbeing of veterinarians and support staff.

Veterinarians were included on the Priority Migration Skilled Occupation List in 2021, 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 2023 Skills Priority List report.³ In 2022, for the first time, veterinary nurses were also assessed as being in shortage.

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

¹ UN Environment Programme. Preventing the next pandemic - Zoonotic diseases and how to break the chain of transmission: https://www.unep.org/resources/report/preventing-future-zoonotic-disease-outbreaks-protecting-environment-animals-and?_ga=2.108792130.1749639790.1643851599-340431516.1643851599

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

³ National Skills Commission. Skills Priority List: <https://www.jobsandskills.gov.au/download/19475/skills-priority-list-key-findings-report-2023/2205/2023-spl-key-findings-report/pdf>

resulted in a lack of available veterinary services in rural areas, the rapid increased demand resulting from a growth in pet ownership has also resulted in a lack of capacity in the companion animal sector.

The challenges associated with maintaining a sustainable workforce are equally varied and complex. 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 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.⁴

Financial pressures, negative interactions with the community and on social media, as well as long working hours combined with high caseloads were highlighted as drivers for poor mental health outcomes in the veterinary profession.

The Australian Veterinary Association is working hard to improve these issues, by improving understanding of the pressures faced by the profession, provide support, and promote good workplace practices. A collaborative, innovative and whole-of-industry approach is required, however, to develop both short- and long-term strategies for addressing the drivers behind the declining veterinary workforce and meeting the challenges facing the sector in retaining and maintaining a sustainable workforce.

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 responsible pet ownership and 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. AMA supports the provision of further support to attract and retain veterinarians – particularly in regional and rural areas.

AMA recommends extending the regulatory framework to include registration of the broader veterinary care team (including veterinary nurses and other para-veterinary staff) by the NSW Veterinary Practitioners Board. Registration of the entire veterinary team would facilitate the establishment of professional standards for the broader veterinary care team to work under the supervision of registered veterinarians. Expanding the capacity for the entire veterinary care team to provide animal health care services would improve the efficiency of the care team, attract additional staff into veterinary nursing and para-professional roles by providing desirable career opportunities and relieve pressure from veterinarians.

As our community emerges from the pandemic, new pressures and challenges are also 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. While most felt they had no need to take their pet to the vet, other barriers cited included a lack of available veterinary services.

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 NSW's growing pet population will be essential to achieving this goal.

⁴ Australian Veterinary Association. Veterinary Wellness Strategy:
<https://www.ava.com.au/siteassets/resources/thrive/documents/ava-short-report-research-findings.pdf>

Supporting veterinarians and vulnerable pet owners

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.

Currently, many veterinary practices and charities provide support and assistance to people in crisis situations, often in the form of “in-kind” labour. 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.

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.

AMA recommends the NSW Government develop a mechanism for supporting the veterinary profession in the provision of support and veterinary services and ongoing care to vulnerable people and their pets.

Nationally consistent companion animal policies

Across Australia, 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.

Companion animal ownership, breeding, licensing and welfare is the responsibility of state and local governments. Varied existing regulatory frameworks result in a multiplicity of regulatory requirements and restrictions for pet owners and delivers outcomes that may not support responsible pet ownership, including poorer animal health and welfare outcomes.

Consumers may have limited visibility or understanding of how to choose and support responsible companion animal businesses. Nationally consistent companion animal policies would provide greater confidence for pet owners that they were supporting responsible breeding and welfare practices and increase the likelihood of a pet being returned to them if it is lost or stolen. Nationally consistent standards, codes and regulatory requirements for supporting industries, such as grooming and kennelling, would also facilitate and support the generation of new qualifications, training programmes and accreditation frameworks.

Greater national consistency in companion animal policy settings that ensure the same standards apply irrespective of jurisdiction and that “all animals are treated identically in law” would help facilitate responsible pet ownership practices. Nationally consistent companion animal policies would provide clarity for governments, better informed policy making and increase regulatory efficiency regarding companion animal ownership, breeding and welfare, as well as provide opportunities for targeted investments in infrastructure based on knowledge of pet populations.

For governments, consistent policy and regulatory settings would assist in achieving policy outcomes, especially in biosecurity, animal welfare and consumer protection imperatives.

AMA encourages the NSW government to promote nationally consistent companion animal policy settings when conducting the Review, to provide greater clarity for governments, pet owners and veterinarians.

In Summary:

Animal Medicines Australia commends the NSW Government's commitment to supporting the growing pet population in NSW.

Efforts to better understand the experiences of pet owners, ownership drivers and challenges can create better, more responsive systems and processes to support pet owners and promote enduring, positive, responsible and beneficial pet ownership experiences.

Ensuring access to the tools and innovative technologies necessary to keep animals healthy, via an extensive, sustainable veterinary sector, is key to sustainable and resilient companion animal sectors in Australia, with subsequent environmental, economic and social benefits.

Animal Medicines Australia encourages the NSW Government to promote nationally consistent companion animal policy settings that provide greater clarity for governments, pet owners and veterinarians.

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

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Katie Asplin', followed by a horizontal line.

Dr Katie Asplin

Director, Animal Health Policy and Engagement