



Australian Veterinary Association Priorities for the next Australian Government

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The Australian Veterinary Association

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock and wildlife. Government veterinarians work with our animal health, public health and biosecurity systems while other members work in industry for pharmaceutical and other commercial enterprises. We also have members who work in research and teaching in a range of scientific disciplines.

Introduction

Veterinary roles extend beyond caring for the health and welfare of our pets and production animals. Veterinarians are the inspectors, field officers and pathologists that secure the safety of our food, ensure market access for our exports, and help to safeguard the human population from zoonotic diseases (those that pass from animals to humans).

The veterinary profession strives to protect the health and welfare of our animals and our community. The Australian Governments, at federal as well as state and territory levels, have a crucial role to play in leading and supporting these efforts.

The AVA is calling on all political parties and candidates to commit to providing national leadership in animal welfare, biosecurity and the fight against antimicrobial resistance. The government must invest in the veterinary profession to optimise the health and welfare outcomes for Australia's animal industries and the community.

National leadership in animal welfare & biosecurity

A national animal welfare framework

The human-animal relationship is one of the foundations of our society. Animals are integral to our way of life, and the community more than ever before expects high standards of animal welfare. Australians expect their governments to take an active role in ensuring this occurs.

This is a role that the Australian Government did play until 2013, when funding for the Australian Animal Welfare Strategy (AAWS) was withdrawn. The AAWS brought together a broad range of representation to foster an evidence-based and balanced approach to animal welfare reform across all animal use sectors.

Since the AAWS was discontinued, the lack of an inclusive framework has seen the development of greater polarisation within the community, and loss of community confidence. Review and completion of animal welfare standards has been significantly delayed. Lack of harmonisation has meant increased costs for businesses complying with multiple regulatory regimes across domestic borders. Animal welfare enforcement within states and territories remains under-resourced. Due to a complete lack of national leadership we have witnessed extraordinary failures to safe-guard the welfare of exported Australian livestock.^{1,2}

Since 2013 the AVA has been calling on the government to reinstate a national animal welfare framework. The veterinary profession has consistently provided leadership on issues of national animal welfare importance, including live export and pet food regulation. The lack of an animal welfare framework was identified in the Productivity Commission review of regulation of Australian Agriculture in 2017³, as well as the Moss Review of live export regulation in 2018⁴. It is time the government invested in a solution for cohesive and sustainable animal welfare reform.

Without national leadership, Australia's ability to demonstrate high animal welfare standards to our international trading partners is weakened. This also erodes our ability to maintain community confidence in all types of animal use domestically.

The AVA recommends:

The Australian Government should dedicate resources to re-establish a national animal welfare framework. Veterinarians should be included as key stakeholders to provide expert advice on animal health and welfare to the government. The new framework should facilitate:

- the development of science based, balanced and enforceable animal welfare standards which are harmonised across jurisdictions.
- incremental and sustainable improvements in animal welfare outcomes across all sectors.

Live animal export

Animal welfare science has advanced significantly since the beginning of the live export trade half a century ago. Despite this, little has changed in the management of the animals during this time.

The [AVA policy on live export](#) states that: *“Ideally, Australian food animals should be slaughtered as close to the site of production as practicable to minimise transport and handling stress, and to ensure they are protected by appropriate and enforceable animal welfare and slaughter standards.”*

However, where live export occurs, the policy sets out a range of measures that must be in place to safeguard the welfare of exported animals.

The Australian Standards for the Export of Livestock (ASEL) take into account the relevant World Organisation for Animal Health (OIE) guidelines for transport of animals by sea; these require space for animals to comfortably rest, move and access food and water, and that animals should not be transported at all during conditions of extreme heat and cold.

And yet, we have evidence of numerous, repeated breaches of these requirements over many years, with little action by the regulator to address and reform the industry. This year, following revelations in the public domain of serious breaches^{1,2}, we have seen welcome action by the Minister for Agriculture to implement change; however the proposed new ASEL standards do not go anywhere near far enough to give the community the confidence it needs in this trade going forward.

The AVA were key contributors to the 2018 review of ASEL in which we made a series of comprehensive submissions with reference to current animal welfare science.^{5,6,7,8} The Government’s own Moss Review outlined important changes needed in the the live export regulatory regime, and yet there has been limited meaningful change as a result.

The AVA recommends:

- All morbidity and mortality data should be recorded and reported on every voyage, with a view to making immediate, continuous and ongoing improvements to animal welfare. This data must be publicly available to ensure transparency.
- At least one independent veterinarian must be on board every shipment, regardless of voyage length.
- Heat stress risk assessment must be applied to all livestock voyages that cross the equator, at all times of the year.
- Allometric principles must be used to determine space allocation in registered premises and on-board ship.
- Urgent changes must be made to ensure all ships are fitted with appropriate non-abrasive flooring, and adequate trough space.
- Irrespective of stocking density, thermoregulatory physiology indicates that sheep on live export voyages to the Middle East during May to October will remain susceptible to heat stress and die due to the expected extreme climatic conditions during this time. Accordingly, voyages carrying live sheep to the Middle East during May to October cannot be recommended.
- Immediate implementation of all recommendations of the Moss Review and the Heat Stress Risk Assessment Technical Review Panel must occur.

Disease surveillance and emergency animal disease response

The movement of animals and people around the world has never been so rapid. In a single day, a person can wake on one side of the globe, and before the day is done, fall asleep on the other. Tight border security and disease surveillance is critically important to maintain Australia's favourable animal health status and for the early detection of animal disease emergencies.

Emergency animal diseases are a significant threat to animal industries, and veterinarians are key to Australia's surveillance capacity. The risks of emergency animal diseases will continue to increase as climate change impacts distribution of vector-borne diseases.⁹

The agricultural sector, at farm-gate, contributes 3% to Australia's total gross domestic product (GDP). The Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES) estimates that the gross value of farm production for 2018-19 will be \$61 billion.¹⁰ This is an asset that the government must protect. Every dollar spent on prevention and preparedness protects against potentially billions in losses.

The equine influenza outbreak in 2007-08 cost Australian governments over \$370 million in response activities. It also cost a further \$1.5 billion in indirect costs to the horse industry and the Australian economy.¹¹ This is dwarfed by the prospect of a foot and mouth disease outbreak, which has been estimated to cost at least \$7 billion and up to \$16 billion depending on the speed with which we contain the outbreak.¹² The total amount could blow out to \$50 billion over 10 years in costs to industry.¹³

Effective disease surveillance and response capabilities, as well as animal traceability (such as the proposed horse traceability register) will mean the difference between a manageable outbreak, and a catastrophic impact on our important livestock industries. And it is veterinarians who are on the frontline of biosecurity, disease surveillance and emergency response.

In 2015, the OIE evaluated the performance of Australia's veterinary services¹⁴. The report evaluated Government veterinary staffing levels as 'severely inadequate' in some jurisdictions. The report also noted a reliance on private veterinarians which is not supported by any formal agreements to ensure their involvement when required. These veterinary roles, both public and private, are critical to biosecurity, food safety and the ongoing profitability of our agricultural industries.

In a time of heightened risk from emerging and exotic disease, it is imperative that Australia's governments appropriately invest in veterinary staff at each level of government. There must also be enhanced government funding of schemes which recruit private veterinary participation in disease surveillance and investigation, such as the [National Significant Disease Investigation](#) Program (NSDIP), and training of private veterinarians in EAD response.

The AVA recommends:

- Increased government funding for the National Significant Disease Investigation Program to establish a sustainable means for private veterinary practitioners to support animal disease surveillance and investigation.
- Increased government funding for emergency response training for private veterinary practitioners.
- Increased employment of veterinarians in key government animal health and biosecurity roles in line with the OIE audit of veterinary services.

Fighting Antimicrobial Resistance

The World Health Organization has described antimicrobial resistance (AMR) as one of the key global health issues facing our generation. It is a threat to both human and animal health, and we need sustainable, multisectoral approaches to address this critical issue. Globally, about 700,000 deaths may be caused each year by AMR.¹⁵

The Office of Australia's Chief Scientist stated that in Australia, the increasing number of antibiotic-resistant infections appearing in the community and acquired during international travel represent a looming public health issue.¹⁶

In 2015, the Australian Government released its first ever [national strategy](#)¹⁷ to combat antimicrobial resistance. One of the key objectives was development of nationally coordinated One Health surveillance of antimicrobial resistance and antimicrobial usage. While this resulted in funding for a national surveillance system in the human health sector, **there was no equivalent funding for similar surveillance in animals.**

In its 2018-19 budget, the Federal Government allocated a further \$5.9 million to support research on AMR in the human health sector. There were no matching funds to enable similar work in animals. This is a significant gap.

It has been shown that antimicrobial resistance can be passed to humans through the food chain. Consumers are becoming increasingly aware of food safety issues, including those related to AMR. While there is presently good reason to believe that Australian animal products are among the world's best in this regard, we lack the hard, scientific evidence to demonstrate our favourable status.

Without concurrent human and animal AMR research and surveillance in Australia we cannot fully understand the emerging threats. The AVA estimates that an effective surveillance system could be established for animals for around \$1.6-2 million per annum.

A number of antimicrobial stewardship initiatives have already been put in place through private efforts in the animal health sector. The AVA has been providing leadership to veterinarians on the issue of AMR for close to 30 years, including investing in development of resources to promote best practice prescribing of antimicrobial therapies. While the veterinary profession has stepped up to the challenge, significant investment is still needed from the Australian Government if we are to win this fight. Without action, AMR poses a significant threat to our healthcare systems, national economy and way of life.

The AVA recommends:

- Establishment of a national veterinary antimicrobial usage and resistance surveillance system. This should mirror that which is used in the human health sector, to ensure synergies within a One Health framework, at an estimated cost of \$1.6-2 million per year.
- The Government should match funding provided for research into AMR in the human health sector by funding the equivalent investment of \$5.9 million to support AMR research in animals.

Investing in the veterinary profession

Better regulation: Restricted acts of veterinary science

The veterinary profession is regulated by states and territories, and this legislation is designed to protect the interests of both the consumers of veterinary services, and animals.

Legislated “restricted acts of veterinary science” include making a diagnosis or performing invasive procedures on animals. They are restricted because of the inherent risks to animal health and welfare associated with these procedures: only a qualified veterinarian possesses the required level of training to perform them competently. However, in Victoria, there are no legislated restricted acts, and in other jurisdictions, inconsistency between definitions of these restricted acts is having a detrimental impact on Australian agriculture, biosecurity, and animal welfare.

In some states such as Western Australia, deregulation of restricted acts has reduced the opportunity for veterinarians to visit farms, by allowing some routine services such as pregnancy diagnosis to be provided by non-veterinary lay providers. This has led to a reduction in qualified veterinarians in rural areas.

This decline in farm visits by vets has reduced opportunities to provide advice on herd-health and productivity, as well as provision of passive surveillance for emergency animal diseases of economic importance.

Animal welfare also suffers where procedures such as equine dentistry, bovine pregnancy diagnosis, cattle spaying, and small ruminant castrations over 3 months of age are undertaken by lay operators.

The AVA recommends that regulation of restricted veterinary acts should be harmonised nationally and enforced in the interests of animal welfare, improved farm productivity, disease surveillance and prevention of exotic disease incursions.

The AVA’s position as to what should be included in these restricted acts can be found in the [restricted acts of veterinary science policy](#).

Regulation of other animal health service providers

All animal health paraprofessionals, including veterinary nurses and veterinary technicians, and non-veterinary animal health providers, should be appropriately regulated to ensure appropriate animal welfare and consumer protection.

Recent changes in Australia have seen an increase in animal health service provision performed by people who are not veterinarians, and as such not regulated. At the same time, the public expectations for animal welfare have significantly increased. There is real concern that the lack of adequate regulation is leading to poor animal welfare outcomes, does not adequately protect consumers, and puts at-risk Australia’s favourable biosecurity status. While there are state-based animal welfare laws that address complaints about cruelty to animals, there is no real ability to address competency issues for many of those unregulated individuals working with animals.

Some paraprofessionals are already regulated through the veterinary practice legislation in some states to perform specific professional tasks under the supervision or control of a veterinarian (for example, veterinary nurses in Western Australia).

The AVA recommends:

- National harmonisation of veterinary practice legislation. Due to the increasingly critical role of private veterinarians in biosecurity and disease surveillance, national harmonisation of veterinary practice legislation should be addressed by the Agriculture Ministers' Forum (AGMIN) and encouraged by the Australian Government.
- Harmonisation should seek to support the role of veterinarians on farms and properties by retaining critical routine services such as cattle pregnancy diagnosis and equine dentistry as restricted acts of veterinary science.
- Allied animal health service providers, including paraprofessionals and non-veterinary animal health providers, should be appropriately regulated to ensure adequate animal welfare and consumer protection.

Sustainable veterinary services

Where there are animals, there needs to be veterinarians. Veterinarians play a critical role in animal, human and community wellbeing in Australia. Vets are uniquely qualified to ensure the safety of the food we eat, guard access to export markets, and care for those companion animals that are increasingly becoming genuine members of our families.

It's essential that the nation has the right number of vets to meet the needs of Australia's animals and their owners throughout urban and regional Australia.

However, the future sustainability of the veterinary workforce is currently at risk from multiple directions. Veterinary careers themselves are becoming less sustainable; veterinary incomes are significantly lower than similar professionals such as doctors and dentists, while their university fees are the same. Rural practices are finding it extremely difficult to attract and keep graduates. Even urban practices are struggling to fill vacancies as workforce attrition increases. Poor mental health of veterinarians is also a significant issue and contributes to vets exiting the profession.

Rural program incentives

There are many incentive programs to attract and keep human health professionals in rural and remote areas, however there are no equivalent programs available to assist with sustaining vital veterinary services in the bush. The government should consider the introduction of programs which would encourage rural veterinary placements. Examples include Commonwealth Scholarships or HECS discounts for veterinary students who are then bonded to work in a rural location for a period of time. Subsidised housing is offered to rural doctors, and could be considered for rural vets starting out in country-town positions. Considering the value that veterinarians add to rural farming businesses, food security and surveillance for significant diseases, making sure we have vets on the ground in our regional locations should be a high priority for the Australian Government.

Reduced immigration barriers for international veterinarians recognised by AVBC

Currently veterinary practice owners are struggling to fill vacancies in their hospitals despite advertising widely for veterinary practitioners. This is occurring not only in rural areas, but increasingly also in urban practice. Lack of staff and high caseloads can lead to burn-out and declining mental health in veterinarians doing extra shifts and long hours to service their patients and clients.

Reducing administrative barriers to immigration by suitably-qualified international veterinarians would help to address this short-fall. The Department of Home Affairs should fast-track visa applications by internationally-trained veterinarians whose degrees are recognised by the Australasian Veterinary Boards Council (AVBC), so that they can more easily work in Australia. AVBC recognition of their degrees ensures high standards of professional practice are maintained, equivalent to standards of Australian veterinary graduates.

Higher education fee support

Veterinary education is one of the most expensive courses to deliver as identified in the [Deloitte Access Economics' Cost of delivery of higher education report](#).¹⁸ The Government recognised this in their 2017-18 Higher Education reform package, with the inclusion of a veterinary student loading equivalent to that of a medical student under the Commonwealth Grants Scheme. However, the

package did not pass through the Senate. This means vet graduates enter the workforce with high debt and on relatively low incomes, and retaining them in this essential profession is proving challenging.

The AVA recommends:

- Introduction of the veterinary student fee loading proposed in the 2017-18 Higher Education Reform Package. This would reduce veterinary graduate debt and help reduce attrition from the profession due to financial hardship.
- Development of incentive programs to attract and retain veterinary graduates in rural and remote areas, equivalent to those for human health providers. The AVA is eager to work with the Government to achieve this objective.
- Reduction of administrative barriers to immigration by international veterinarians whose degrees are recognised by the Australasian Veterinary Boards Council. This will help to address the current shortage of veterinarians seeking clinical practice placement, which has become a critical issue for the profession.

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