Northern Territory veterinarian regulations amendments  
Australian Veterinary Association policy briefing  
19 November 2012

Background
In 2010 the Northern Territory Government began a review of the Veterinarian Act 1994. This review included the publication of two discussion papers. The AVA provided considerable input to this review.

In August 2012, after the proroguing of the Parliament and prior to the 2012 NT Election, the then-Labor Government made changes to the Veterinarians Regulations. Veterinarians were notified of these changes by the Veterinary Board of the Northern Territory in its September 2012 newsletter.

Summary
The AVA Northern Territory Division has a number of concerns with these changes, which we have detailed below.

Scaling and polishing the teeth of animals (Section 6 (1)(n))
This amendment was not flagged during the consultation process through either of the discussion papers and so has been implemented without the AVA having the opportunity to discuss the matter with the Government.

Had this issue been included in the consultation process the AVA would have provided advice against this decision. In the opinion of the AVA these dental procedures should only occur under anaesthesia and under the supervision of a registered veterinarian. This is important to ensure that:

- Consumers are protected.
- The health and welfare of the animal is prioritised.
- The safety of the operator is maintained.

The scaling and polishing of animals' teeth are services offered by most veterinary clinics. While it is not necessary for these procedures to be delivered by the veterinarian directly, they should only occur on anaesthetised animals and under direct veterinary supervision.

By including this under Section 6 of the Veterinarians Regulations (6.Services prescribed not to be veterinary services), the Government is opening up the opportunity for non-veterinarians to work on animals' teeth without veterinary oversight or proper anaesthesia. This will lead to poor outcomes for the consumers and animals, as well as placing service deliverers at unnecessary risk.

Scaling to remove tartar is done using specialised powered tools and very sharp hand instruments. Even the slightest head movement by the patient could result in injury to the patient's mouth.

Not only is the risk of injury high without proper anaesthesia, the resulting ‘cleaning’ is likely to be very superficial as access to subgingival areas (the hidden surfaces) of every tooth is impossible in unanaesthetised animals. The removal of tartar from only visible dental surfaces has little effect on an animal’s health. Many patients also require the administration of analgesics and antibiotics after scaling and polishing to provide pain relief and ensure that bacteria released during the process do not circulate in the body leading to kidney and heart disease.
Finally, veterinarians are accountable under the *Veterinarians Act 1994*. This means that the community has an effective recourse to protect both animals and consumers against mistreatment. Unregistered operators would not be regulated by this Act. In cases with adverse outcomes or mistreatment, the only recourse would be through animal welfare and consumer protection legislation. Experience from other unrestricted veterinary services strongly suggests that these mechanisms will have limited effectiveness in protecting either animals or their owners in the event of unregistered operators performing unsatisfactory services.

**Equine dentistry (Sections 6 (1)(l,m))**

Equine veterinarians provide dental services to horses around Australia and are regulated in the Northern Territory by the *Veterinarians Act 1994*.

For many years people without veterinary qualifications have been providing equine dental services by rasping and floating teeth, teeth extraction and other dental procedures. These dental service providers have not been regulated or accredited with any registration body.

The scientific knowledge of equine oral health has expanded considerably in recent decades and there is now an increased understanding of the animal welfare implications of equine dentistry. There’s a much greater understanding of the broader health implications of poor oral health in horses. For example, problems in the teeth and mouth can cause weight loss, higher incidence of colic, endocarditis, poor performance and unusual behaviour.

With the greater scientific knowledge now available, the AVA believes that untrained and unregulated service providers pose a considerable health and welfare risk to horses.

It is important for the consumer protection of horse owners that anyone undertaking procedures on horses’ teeth can complete an accurate diagnostic examination, which can only be performed by a registered veterinary surgeon. Owners need to know that no harmful conditions or underlying causes of disease have been missed. They are entitled to expect that anyone practising dentistry is properly trained, accredited and regulated.

The AVA maintains that all dental procedures on horses and related species should be performed by registered veterinarians or equine dental providers under direct veterinary supervision.

**Access to restricted drugs (Section 7 (1))**

Under NT legislation, permits may be granted for non-veterinarians to use veterinary drugs including restricted sedatives and euthanasiates. The AVA is concerned about animal welfare implications as well as the poor monitoring and auditing of these permits, leading to potential dangers to the wider community.

While personnel can be trained in the administration of drugs, it is impossible to train the person for all scenarios.

In the case of euthanasia drugs, these can cause considerable pain and suffering to an animal if they are not injected correctly by the intravenous route. To maintain skills in administering drugs intravenously it is important to practise this skill regularly and this is unlikely to occur in the case of non-veterinarians.

Euthanasia drugs also are a public health risk as it can enter the food chain causing deaths of non-target animals; and if these drugs are accidentally consumed, it can be potentially lethal.

Alternative euthanasia methods for non-veterinarians include carbon dioxide gas, shooting, and captive bolt use. For these reasons the AVA does not consider it appropriate for non-veterinarians to use euthanasia drugs.
The AVA strongly believes that veterinary drugs should only be prescribed by a registered veterinarian. This allows the veterinarian to ensure a correct diagnosis has been made and that the person administering the medication is fully aware of the correct administration technique along with the potential side effects or complications of its use.

**Recommendations**

1. That Section 6(1) (n) *scaling and polishing the teeth of animals* be removed from the Veterinarians Regulations.

2. That all dental procedures on horses and related species should be performed by registered veterinarians or equine dental providers under direct veterinary supervision.

3. That the Government revisits the decision of the previous government in allowing the Chief Health Officer to issue permits for non-veterinarian access to euthanasia drugs.