



NSW Veterinary Practice Regulatory Framework

NSW Department of Primary Industries and
Regional Development

Submission of the
Australian Veterinary Association Ltd
July 2026

ava.com.au

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 2025 Ethics Index ranked veterinarians among the nation's top 5 ethical occupations¹.

¹ [Governance Institute 2025](#)



Executive Summary

The Australian Veterinary Association (AVA) welcomes the opportunity to provide feedback on the *NSW Veterinary Practice Regulatory Framework*.

This submission is informed by the AVA's "[Recommended key principles for veterinary practice acts in Australia](#)" and stakeholder consultation. Each response aligns with key principles including protection of animal welfare, restriction of acts of veterinary science to appropriately qualified practitioners, robust and risk-based regulation, and the role of veterinary boards in maintaining standards.

The AVA is broadly supportive of the direction of the proposed reform and considers it a significant opportunity to establish a modern, cohesive, and nationally aligned veterinary regulatory framework.

To be successful, reforms must:

- maintain strong protections for animal welfare and public safety,
- support a sustainable and well-utilised workforce,
- embed risk-based and systems-focused regulation, and
- ensure that financial and regulatory burdens on veterinarians remain proportionate and fair.

An emphasis is placed on the importance of structured and ongoing engagement between the Veterinary Board and the AVA, in the development of guidelines and supporting resources underpinning the new legislative framework. This is especially critical in key reform areas including the role and scope of veterinary nurses and approved persons, licensing of veterinary premises, and modern complaints management processes. Collaborative development will ensure that regulatory guidance is practical, consistent, and responsive to real-world veterinary practice, supporting effective implementation and maximising positive outcomes for animal welfare, the profession, and the community.

A balanced, well-resourced framework will enhance public trust, professional integrity, and access to high-quality veterinary services across New South Wales.

Reform Theme 1: Greater access to veterinary care across NSW

The AVA supports the introduction of licensed mobile and telehealth veterinary services where these models improve access to care. However, these services must operate within a framework that ensures:

- equivalent clinical standards and accountability,
- strong veterinarian-client-patient relationship (VCPR) foundations,
- clear scope limitations and escalation pathways, and
- robust data governance and record management.

Telehealth must be integrated into the broader veterinary system with flexibility to accommodate emerging technologies and remote monitoring tools.

The AVA maintains that restricted acts of veterinary science must remain the responsibility of registered veterinarians, with only carefully controlled, risk-based delegation permitted to others.



Reform Theme 2: Increase workforce capacity

The AVA supports the registration of veterinary nurses (noting that this term includes veterinary technologists) as a key reform to strengthen the profession and improve service delivery. This must include:

- clear qualification and competency standards,
- defined scope of practice, and
- strong supervision and accountability frameworks.

Implementation must be structured, proportionate, and workforce-sensitive, including:

- recognition of existing skills through Recognition of Prior Experience (RPE) and Recognition of Prior Learning (RPL) pathways,
- continuity of care during transition, and
- nationally consistent accreditation standards.

These reforms will enhance professional recognition, workforce retention, and utilisation, while maintaining veterinary oversight of clinical care.

Reform Theme 3: Protecting the mental health and wellbeing of the veterinary workforce

The AVA strongly supports a risk-based, proportionate complaints management framework that:

- prioritises serious risk to animal welfare and public safety,
- incorporates a systems-based and just-culture approach, and
- emphasises resolution, education, and prevention, rather than punitive outcomes.

The AVA also supports embedding mental health and wellbeing protections within the regulatory framework, including:

- clear and non-punitive approaches to impairment,
- access to confidential support and early intervention, and
- flexible regulatory responses that enable practitioners to remain safely in the workforce.

Protecting practitioner wellbeing is essential to safeguarding animal welfare, service quality, and workforce sustainability.

Reform Theme 4: Implement clear, risk-based regulation

The AVA supports the introduction of a licensing framework for veterinary premises, provided it is:

- clear, proportionate, and risk-based,
- inclusive of modern practice models (e.g. mobile, telehealth), and
- implemented through a phased and well-supported transition.



The AVA supports a veterinarian-led Veterinary Board with legal, governance, and consumer expertise to reflect modern regulatory complexity.

Critically, as Board functions expand, the AVA strongly emphasises that:

- additional regulatory costs must not be passed onto veterinarians,
- funding should be supported through government investment or alternative mechanisms, and
- fee increases must not undermine workforce sustainability or access to care.

Allied animal service businesses delivered without a registered veterinarian must also be clearly defined.

Reform Theme 5: Modernise regulatory settings

The AVA supports streamlining registration categories to align nationally and support mutual recognition, with:

- clear category definitions, including a definition of “veterinary professional” and “veterinary practitioner” where these terms are included in the legislation,
- consistency across jurisdictions, and
- recognition of the Australasian Veterinary Boards Council (AVBC) as a key national standard-setting body.

The AVA also supports:

- extending the Code of Conduct to all registered persons and licensed premises to ensure consistent standards, and
- a transparent, proportionate fees framework that does not create barriers for individuals or businesses to entry, retention, or access to services.



Discussion

Reform Theme 1: Greater access to veterinary care across NSW

AVA Position:

The AVA supports regulatory reform that strengthens animal welfare, public trust, and workforce sustainability, while maintaining that acts of veterinary science must be performed by appropriately qualified and regulated professionals.

1a. Do you support the licencing of mobile and telehealth services in line with a Standard established by the Board?

Response:

The AVA supports this reform in principle, provided it is implemented within a clear regulatory framework that ensures equivalent clinical standards, continuity of care, and robust oversight by the Veterinary Practitioners (Services) Board.

The AVA recognises that mobile and telehealth models can play an important role in improving access to veterinary services, particularly in rural, regional, and underserved communities. These models can enhance timeliness of care, support animal welfare outcomes, and provide flexibility for both practitioners and clients. However, their expansion must occur in a way that maintains public trust and protects the quality and safety of delivery of veterinary services.

Our position reflects input from the profession that highlights both the opportunities and risks associated with these service models. Veterinarians have emphasised that, while innovation is welcomed, regulatory settings must ensure that all acts of veterinary science are undertaken by appropriately qualified and accountable professionals, regardless of the service delivery model.

Accordingly, the AVA considers that licensing arrangements for mobile and telehealth services should be underpinned by the following preferred legislative outcomes:

- **Equivalent standards of care:**
Patients receiving care via telehealth or mobile services must be afforded the same standard of clinical assessment, diagnosis, treatment, and follow-up as those treated in traditional premises-based practice. This includes clear expectations regarding when a physical examination is required and when telehealth is clinically appropriate.
- **Clear accountability and Board oversight:**
All licensed services must fall clearly within the regulatory remit of the Veterinary Board, ensuring that practitioners and service providers are subject to consistent registration, monitoring, and disciplinary frameworks.
- **Continuity and coordination of care:**
Regulatory settings should promote appropriate continuity of care, including clear record-keeping requirements, communication with a patient's usual veterinary provider where relevant, and mechanisms to ensure that episodic or remote care does not fragment clinical responsibility.



- **Protection of animal welfare and public safety:**
As a core principle, the legislation must ensure that expanded access does not inadvertently lower safeguards. This includes ensuring that high-risk or complex clinical situations are not inappropriately managed via telehealth where in-person care is required.
- **Restriction of acts of veterinary science to registered veterinarians:**
Any framework for telehealth or mobile services must reinforce that diagnosis, prescribing, and clinical decision-making remain the responsibility of registered veterinarians.
- **Appropriate regulation of premises and service models:**
While mobile and virtual care do not operate from traditional premises, there should still be clear, risk-based standards governing equipment, medicines storage and transport, biosecurity, and data security.
- **Risk-based compliance and complaints mechanisms:**
The regulatory framework should incorporate proportionate, risk-based approaches to compliance and complaints handling, recognising the different risk profiles of service models while maintaining strong protections for the public and animal welfare.
- **Adaptability of the regulatory framework:**
The AVA emphasises that the regulatory framework must be sufficiently flexible and principles-based to adapt to rapidly evolving technologies, service modalities, and models of care. This includes emerging telehealth capabilities, remote diagnostics, digital platforms, and future innovations that may transform how veterinary services are delivered. An adaptable framework will help ensure that regulation remains relevant, effective, and supportive of innovation, without requiring frequent legislative overhaul.

The AVA emphasises that the objective of reform should not simply be to enable new service models, but to ensure that these models are integrated into a coherent regulatory system that upholds professional standards and public confidence.

1b. What are some of the minimum standards which should apply to telehealth services to safeguard animal health and complement existing veterinary practices?

Response:

Standards should include a valid veterinarian-client-patient relationship (VCPR), access to clinical records, defined scope limitations, and clear escalation pathways to in-person care, where this is possible.

The AVA supports a principles-based, nationally consistent and adaptable framework that ensures telehealth services maintain high standards of care, while enabling innovation and improving access to services. Minimum standards should focus on achieving safe clinical outcomes, protecting animal welfare, and ensuring accountability, rather than prescribing overly rigid processes that may become outdated as technology evolves.

Key minimum standards and safeguards should include:

1. Veterinarian-Client-Patient Relationship (VCPR) (“Bona Fide” relationship) and “Under Care” definitions

- A Veterinarian–Client–Patient Relationship (VCPR) is fundamental to safe, ethical, and effective veterinary care. It ensures that decisions about an animal’s health are made



responsibly, with appropriate knowledge, professional oversight, and accountability. The need for a VCPR is driven by several key factors:

- Animal welfare: A valid VCPR ensures animals receive accurate diagnoses and appropriate treatment based on professional assessment.
 - Responsible use of medicines: Supply of veterinary medicines within a VCPR helps prevent misuse, reduces the risk of antimicrobial resistance, and protects both animal and public health.
 - Accountability and trust: The relationship establishes clear responsibility between the veterinarian and the client, fostering trust and ensuring ongoing care.
 - Legal and ethical compliance: Regulatory frameworks rely on the VCPR to define when veterinarians can prescribe, treat, or certify animals, ensuring professional standards are upheld.
- A clearly defined and enforceable VCPR must underpin all telehealth services.
 - The definition of “under care” and VCPR should be adapted to accommodate safe use of remote modalities, including circumstances where telehealth may support establishment or maintenance of the relationship.
 - The framework should allow that, in some contexts, technology may appropriately supplement or substitute elements of physical examination, where clinically justified.
 - This ensures regulation remains future-focused and adaptable, rather than tied to traditional models of care delivery. There should be recognition of emerging technologies that can support clinical assessment, including (but not limited to):
 - Walk-over weighing (WoW) systems in production animals,
 - Internet of Things (IoT)-enabled real-time health monitoring,
 - Remote diagnostics such as cardiac and glucose monitoring in companion animals.
 - As demonstrated in Washington State legislation², a VCPR can, in limited circumstances, be established or supported via telehealth where access barriers or urgency exist, provided:
 - the veterinarian has sufficient knowledge of the animal,
 - appropriate records are kept, and
 - follow-up or in-person examination occurs, where this is possible, within defined timeframes.
 - Regulatory settings should include clear guardrails, such as:
 - conditions under which telehealth may substitute for physical examination,
 - time limits on remote prescribing, and

² <https://www.billtrack50.com/billdetail/1920769>



- requirements for escalation to in-person care, where this is possible.

2. Clinical standards, scope and limitations

- Telehealth services must be subject to the same standards of care as in-person practice, with veterinarians exercising professional judgment on appropriateness of remote care.
- Standards should define:
 - what types of conditions are suitable for telehealth,
 - when telehealth is limited to triage, advice or follow-up, and
 - when an in-person examination is required before diagnosis or prescribing.
- In the absence of a VCPR (under a revised definition), services should be limited to:
 - teletriage, teleadvice, and emergency support.

3. Continuity of care and escalation pathways

- Telehealth providers must ensure:
 - clear escalation pathways to in-person care, where this is possible,
 - arrangements for follow-up and emergency care, and
 - appropriate coordination with the patient's usual veterinarian, where applicable.
- Clients must be informed of:
 - limitations of telehealth,
 - how to access in-person care, where this is possible, and
 - when escalation is necessary.

4. Clinical records and data governance

- Minimum standards should require:
 - comprehensive and contemporaneous clinical records,
 - documentation of telehealth consultations, including rationale where physical examination is not undertaken.
- Where third-party telehealth platforms are used:
 - ownership, control, and access to clinical records must be clearly defined,
 - veterinarians must retain appropriate professional autonomy, and

The framework should address the use, storage, and secondary use of data, ensuring privacy, transparency, and professional integrity.

5. Special circumstances (e.g. wildlife and unknown owners)

- Specific criteria should be developed for telehealth use in cases where:



- the animal is not owned, or ownership is unknown (e.g. wildlife, stray/abandoned animals),
 - there is an immediate welfare need, but normal consent pathways are not available.
- These provisions should align with existing emergency care principles and provide veterinarians with appropriate legal and professional protections.

6. Professional accountability and indemnity

- Given increasing and unpredictable litigation risk, professional indemnity insurance (PII) should be required for veterinarians providing telehealth services.
- Consideration may also be given to PII requirements for veterinary nurses if they become registered, noting that practice-level PII may cover employed staff.
- The AVA notes precedent in other jurisdictions, such as the ACT [Veterinary Practice Amendment Act 2025](#) where professional indemnity is mandated (for all ACT registered veterinarians).
- The AVA supports a consistent national approach to risk management.

7. Technology, privacy and security standards

- Telehealth providers must ensure that:
 - technology platforms comply with privacy and data protection laws,
 - systems are reliable and secure, and
 - contingency arrangements exist for technology failure.
- Veterinarians should maintain alternative communication pathways to ensure continuity of care in case of technical disruption.

8. Experience, competency and professional judgment

- Veterinarians providing telehealth services must:
 - have appropriate clinical experience and competence,
 - exercise professional judgment in determining when telehealth is appropriate, and
 - maintain ongoing professional development relevant to digital service delivery.
- As seen in international models (Washington Telemed Bill), requirements for recent hands-on clinical experience may support safe telehealth practice.



1c. Are there any other factors to consider when permitting persons who are not registered veterinarians to perform restricted acts of veterinary science?

Response:

The AVA emphasises that restricting acts of veterinary science to appropriately qualified and regulated persons is fundamental to protecting animal welfare, public safety, and consumer confidence. Any consideration of permitting non-veterinarians to undertake restricted acts must be guided by a risk-based, nationally consistent, and clearly enforceable regulatory framework.

In line with AVA policy, “acts of veterinary science” include diagnosis, treatment, prescribing, invasive procedures, and certification - activities that require the advanced knowledge, clinical reasoning, and accountability uniquely held by registered veterinarians. Accordingly, any departure from this principle must be limited, clearly justified, and supported by robust safeguards.

Key factors that should be considered include:

1. Protection of animal welfare and public safety

- The primary consideration must always be the protection of animal welfare.
- Restricted acts should only be performed by non-veterinarians where there is clear evidence that risks can be appropriately managed.
- Higher-risk procedures (e.g. invasive techniques, anaesthesia, diagnosis, prescribing) should remain exclusively restricted to veterinarians.
- Specifically with regards to approved persons carrying out “equine dentistry”, proposed accreditation pathways should not permit accredited non-veterinarians to independently diagnose or treat equine dental disease.
 - If these pathways are expanded, the legislation should clearly distinguish between:
 - Assisting a veterinarian
 - Technical support roles
 - Independent diagnosis and treatment of disease
 - The last of these should remain the responsibility of registered veterinarians.
- With regard to “anaesthesia free dentistry” in companion animals; the independent diagnosis and treatment of dental disease must remain an act of veterinary science performed by registered veterinarians, or registered veterinary nurses under the required level of supervision.

2. Clear definition and consistency of restricted acts

- Legislation should provide a clear and nationally consistent definition of restricted acts of veterinary science, ensuring:
 - clarity for the profession and the public,
 - alignment across jurisdictions, and
 - minimisation of regulatory gaps or inconsistencies.



- This is particularly important given variability across jurisdictions and the emergence of new service models and technologies.

3. Delegation, supervision and accountability

- In some limited circumstances, appropriately trained and licensed paraprofessionals may perform specified acts of veterinary science but must be under the supervision of a veterinarian who is responsible for their work. Whether this supervision is direct, or indirect, will vary with the relative risk of the procedures to be performed. (AVA Policy: [Restricted acts of veterinary science](#))
- Where delegation occurs, it must be:
 - clearly defined,
 - limited to appropriate tasks or scopes of practice, and
 - undertaken under the direction and appropriate supervision of a registered veterinarian.
- The level of supervision³ (immediate, direct, indirect) should be determined based on:
 - the risk and complexity of the procedure, and
 - the training and competence of the individual.

4. Regulation of veterinary nurses and non-veterinary providers

- Veterinary nurses (noting that this term includes veterinary technologists) should be formally regulated under veterinary practice legislation, with:
 - defined scopes of practice,
 - recognised qualifications and training standards,
 - continuing professional development requirements, and
 - clear professional and ethical obligations.
- For non-veterinary animal health providers operating independently:
 - a licensing system should be considered for higher-risk activities, and
 - a mandatory code of conduct should apply to all providers, ensuring minimum standards of safety, competence, continuing professional development and ethical practice.

³ Levels of supervision being: Immediate supervision (where a veterinarian is present with the animal), Direct supervision (where a veterinarian is present at the same premises) or Indirect supervision (where a veterinarian is available to provide advice and guidance, but may not be physically present)



- Veterinary nurses and non-veterinary providers must not be permitted to perform restricted acts of veterinary science outside a registered veterinary premises, or the required level of supervision.
- Veterinary Boards should be adequately resourced to play a central role in:
 - determining competency standards,
 - approving training pathways, and
 - overseeing compliance.

5. Professional indemnity and risk management

- All individuals performing delegated or regulated animal health services should be subject to appropriate professional indemnity coverage, either individually or through their employing business.
- The regulatory framework should support effective complaints handling and disciplinary processes, with the ability to investigate:
 - the individual performing the task,
 - the practice, business or system setting that is responsible for the service delivery, and
 - the supervising veterinarian (where relevant).

6. Research, industry and husbandry contexts

- In contexts such as research and livestock industries, where some procedures may be undertaken by non-veterinarians:
 - there must be clear legislative exemptions,
 - strict competency requirements, and
 - mandatory veterinary oversight.
- Even where exemptions apply, the principle of animal protection must remain paramount, and standards such as analgesia, training, and supervision must be enforced.



Reform Theme 2: Increase workforce capacity

AVA Position:

The AVA supports regulatory reform that strengthens animal welfare, public trust, and workforce sustainability, while maintaining that acts of veterinary science must be performed by appropriately qualified and regulated professionals.

2a. Do you support the proposed approach to establish registration for veterinary nurses and technologists?

Response:

The AVA supports the introduction of mandatory registration for veterinary nurses as an important reform to strengthen animal welfare, improve consumer protection, and enhance the effectiveness and sustainability of the veterinary workforce. However, this support is contingent on the establishment of a nationally consistent, well-defined regulatory framework that clearly articulates qualifications, scope of practice, and professional accountability.

1. Recognition of veterinary nurses as qualified professionals

- The AVA strongly supports restricting the use of the title “Veterinary Nurse” to individuals who:
 - hold recognised qualifications (minimum Certificate IV in Veterinary Nursing or equivalent), and
 - meet defined professional standards, including ongoing continuing professional development.
- Formal registration would:
 - enhance professional recognition and accountability,
 - improve public trust, and
 - align veterinary nursing with comparable regulated professions in human healthcare.
- The AVA supports recognition of the Australian Veterinary Nurses and Technicians ([AVNAT](#)) Voluntary Registration Scheme, administered by the Veterinary Nurses Council of Australia (VNCA), as a foundational model that could be incorporated into legislation.

2. Defined scope of practice and delegation frameworks

- A core requirement of any registration model is a clearly defined scope of practice, aligned to education, training and competency.
- It is essential that:
 - acts of veterinary science such as diagnosis, prescribing, and complex or invasive procedures remain only permitted to be undertaken by registered veterinarians, and
 - any delegated tasks are performed under the specified and appropriate direction and supervision of a registered veterinarian.
- This maintains alignment with AVA policy that restricting acts of veterinary science is critical to protecting animal welfare, public health, and biosecurity.



3. Supervision and accountability

- The framework must clearly articulate:
 - levels of supervision (immediate, direct, indirect),
 - the responsibilities of both the veterinary nurse and supervising veterinarian, and
 - mechanisms for accountability and oversight by the Veterinary Board.
- Complaints and disciplinary systems should be able to:
 - assess the conduct and competence of veterinary nurses directly, and
 - consider the role of supervising veterinarians where relevant.

4. Workforce sustainability and access to care

- Registration of veterinary nurses has the potential to:
 - improve workforce utilisation,
 - support veterinarians through an increased ability for veterinary nurses to work at their full scope of practice, and
 - help address workforce shortages, particularly in regional and rural areas.
- It is also likely to contribute to:
 - improved retention of skilled veterinary nurses,
 - enhanced career pathways for veterinary nurses, and
 - increased job satisfaction, through recognition as regulated professionals with defined responsibilities and progression opportunities.

5. Education, training and continuing professional development

- Registration must be linked to:
 - nationally recognised qualifications,
 - consistent accreditation standards, and
 - mandatory continuing professional development (CPD) requirements, including recording of CPD.
- The AVA supports ongoing involvement of the profession in:
 - development of training packages, and
 - ensuring education aligns with contemporary clinical practice and workplace health and safety requirements.
- Standards should be regularly reviewed by an appropriate national professional body to ensure they remain current.



6. Integration with broader regulation of animal health service providers

- Registration of veterinary nurses should form part of a broader, coherent regulatory framework for all animal health service providers, including:
 - veterinarians,
 - veterinary nurses, and
 - non-veterinary providers.
- This ensures consistent protections for:
 - animal welfare,
 - consumers, and
 - the integrity of veterinary services.
- It is particularly important given the increasing presence of unregulated providers, which poses risks to animal welfare and public confidence.

7. Safeguarding core veterinary functions

- While supporting enhanced roles for veterinary nurses, the AVA emphasises that:
 - diagnosis and treatment decisions must remain with registered veterinarians, and
 - veterinary nurses must not independently undertake acts that require veterinary-level clinical judgment.
- This ensures that expanded utilisation of the nursing workforce complements, rather than replaces, veterinary expertise.

2b. Are there additional implementation/transitional issues that should be considered?

Response:

The AVA supports a carefully staged and well-governed transition to any registration framework for veterinary nurses, ensuring that new regulatory requirements strengthen, rather than disrupt, existing service delivery or workforce stability. Implementation should focus on maintaining animal welfare standards, supporting the current workforce, and ensuring clarity of roles and responsibilities.

Key implementation and transitional issues for consideration include:

1. Recognition of prior experience and learning

- Transitional arrangements should explicitly provide for Recognition of Prior Experience (RPE) for individuals who are currently working, or have previously worked, in veterinary nursing roles but who may not hold a formally recognised qualification.
- A formal “grandparenting” mechanism, established and overseen by the regulatory body, should be implemented to enable these individuals to:
 - demonstrate competence based on their experience,



- be assessed against defined standards, and
 - transition into registration without unnecessary exclusion from the workforce.
- This mechanism is essential to ensure continuity of the existing skilled workforce, particularly in practices and regions where experienced but unqualified staff play a critical role in service delivery.
- In parallel, an alternative pathway via Recognition of Prior Learning (RPL) should be available, allowing individuals to:
 - meet registration requirements with qualifications obtained through regulator-approved education providers.
- To ensure consistency, fairness, and maintenance of professional and animal welfare standards, both RPE (grandparenting) and RPL pathways should be:
 - time-limited,
 - subject to clear competency assessment, and
 - aligned with nationally recognised qualification standards,

2. Maintaining continuity of care and animal welfare

- Implementation must ensure there is no disruption to veterinary services or unintended consequences for animal welfare.
- Transition arrangements should:
 - avoid workforce shortages or sudden restrictions on service delivery, and
 - ensure that appropriately experienced staff can continue to practise while completing registration requirements.
- At all stages, the framework should reinforce that animal welfare outcomes remain the overriding priority.

3. Supervision frameworks during transition

- Existing requirements for immediate, direct or indirect supervision, depending on task complexity and practitioner experience, should remain in place during transition.
- The regulatory framework should clearly define:
 - the levels of supervision required,
 - the responsibilities of supervising veterinarians, and
 - how these evolve as veterinary nurses become registered.

4. Allocation of professional responsibility and liability

- Registration of veterinary nurses should be accompanied by clarification of legal responsibility and liability.
- As veterinary nurses become formally registered:



- they may assume some degree of professional accountability for the tasks they perform,
 - veterinarians must retain overall responsibility for clinical decision-making and patient care, particularly in relation to restricted acts.
- This clarification has the potential to:
 - reduce ambiguity in complaints handling, and
 - provide greater protection for both veterinarians and veterinary nurses within a team-based model of care.

5. Workforce impacts and practice readiness

- Implementation timelines should be realistic and phased, allowing:
 - practices to adapt to new regulatory requirements, and
 - staff to obtain necessary qualifications or recognition.
- Consideration should be given to:
 - regional and rural workforce shortages, and
 - the potential impact of new requirements on service availability.
- Supporting measures (e.g. education access, transitional support programs) will be important to ensure equitable uptake across diverse practice settings.

6. Alignment with existing schemes and national consistency

- The transition should align, where possible, with existing frameworks such as:
 - the AVNAT voluntary registration scheme, and
 - established national training packages.
- A consistent, harmonised approach across jurisdictions will:
 - reduce regulatory burden,
 - support workforce mobility,
 - improve clarity for employers, practitioners, and the public, and
 - support the progression to a national veterinary registration framework for veterinarians and veterinary nurses



Reform Theme 3: Protecting the mental health and wellbeing of the veterinary workforce

AVA Position:

The AVA supports regulatory reform that strengthens animal welfare, public trust, and workforce sustainability, while maintaining that acts of veterinary science must be performed by appropriately qualified and regulated professionals.

3a. Do you support enabling a modern, risk-based approach to complaints management?

Response:

The AVA supports the transition to a modern, risk-based complaints management framework, recognising that this approach provides a more proportionate, efficient, and fair system for complainants, veterinarians and veterinary nurses. A tiered, risk-based model enables regulatory resources to be directed toward serious matters impacting animal welfare, public safety, and professional conduct, while allowing lower-risk concerns to be resolved more efficiently and constructively.

To achieve the intended benefits, the AVA considers that the framework should incorporate the following key elements:

1. Effective triage and proportionate response

- All complaints should be subject to early triage, with prompt acknowledgement of receipt.
- A significant proportion of complaints (often relating to communication, expectations, or cost concerns) should be:
 - managed through mediation or facilitated communication.
 - resolved quickly through dismissal where appropriate,
 - redirected to appropriate external bodies.
- This approach reduces unnecessary regulatory burden and allows focus on higher-risk misconduct matters.

2. Clear timeframes and procedural fairness

- Complaints should be made within 12 months of the issue becoming apparent, to ensure:
 - fairness to registered persons,
 - access to reliable contemporaneous evidence, and
 - efficient resolution.
- Extended timeframes may compromise the ability to:
 - accurately assess clinical decision-making, and
 - fairly evaluate circumstances that may have changed significantly over time.
- Timeframes for assessment and resolution should be:



- proportionate to the severity of the complaint, and
- clearly communicated, with regular updates provided to regulated persons, consistent with best practice in other health regulatory systems.

3. Tiered complaints pathways

- The framework should support differentiated pathways depending on complaint type, for example:
 - Low-risk/non-misconduct complaints: rapid resolution, mediation, or dismissal.
 - Moderate concerns: education, supervision, or conditions on practice.
 - Serious misconduct: formal investigation, disciplinary action, or tribunal processes.
- This aligns with approaches seen in human health regulation and supports timely, appropriate, and cost-effective outcomes.

4. Systems-based and “just culture” approach

- The AVA strongly supports a shift toward a systems-based, just-culture approach to complaints management.
- Investigations should explicitly consider:
 - human factors,
 - workload and staffing pressures,
 - communication processes,
 - supervision and governance structures,
 - access-to-care and financial constraints, and
 - broader practice-level systems.
- This ensures that:
 - responsibility is not inappropriately attributed to individuals where systemic factors contributed, and
 - findings promote quality improvement and prevention, rather than purely punitive outcomes.

5. Emphasis on education, improvement and resolution

- The primary objective of the complaints system should be to:
 - uphold positive animal health and welfare outcome,
 - improve clinical standards, communication, and systems,
 - address complainant concerns, and
 - maintain public trust in the profession.
- Where appropriate, outcomes should include:



- education, training, or supervision,
 - practice-level improvements, and
 - mediated resolutions that allow clients to feel heard and understood.
- Only serious professional misconduct should progress to formal hearings and public reporting.

6. Role of expertise in decision-making

- Complaints processes should include appropriate representation, particularly:
 - veterinarians and veterinary nurses with relevant clinical expertise in the area under review.
- This ensures:
 - appropriate interpretation of clinical standards and scopes of practice, and
 - fair and informed decision-making.

7. Support and wellbeing

- The complaints process is a significant psychological stressor for veterinarians and veterinary nurses and contributes to burnout and workforce attrition.
- Consideration should be given to:
 - provision of support services, including mental health support,
 - clear guidance and templates to assist veterinarians and veterinary nurses in responding to complaints, and
 - processes that minimise unnecessary procedural burden.

8. Transparency, consistency and appeals

- The framework should include:
 - a transparent Complaints Investigation Standard,
 - clear definitions of misconduct linked to the Code of Conduct, and
 - robust, accessible appeal mechanisms for decisions relating to complaints and registration.
- This promotes confidence in the regulatory system for both registered persons and the public.

9. Efficiency and cost considerations

- Implementation should, where possible, leverage existing systems and models to minimise duplication and regulatory burden.
- A risk-based approach inherently supports:
 - efficient use of resources, and
 - reduction in time and cost associated with managing low-risk complaints.



3b. Are there any other ways the regulatory framework should support the mental health of veterinary practitioners outside of the complaints process?

Response:

The AVA strongly supports the inclusion of proactive, preventative, and supportive mechanisms within the regulatory framework to promote and protect the mental health and wellbeing of veterinary teams. Given the well-documented pressures faced by the profession, regulatory settings must actively contribute to a safe, supportive, and sustainable working environment, rather than inadvertently exacerbating stress or discouraging help-seeking behaviour.

Key areas for consideration include:

1. Clear and supportive approach to impairment

- The regulatory framework should adopt a clear distinction between “health conditions” and “impairment”, consistent with models such as the Australian Health Practitioner Regulation Agency mandatory reporting guidelines.
- “Impairment” should be defined as a condition that:
 - has, or is likely to have, a serious and detrimental impact on a person’s ability to practise safely,
 - is not being effectively managed, and
 - presents a risk to animal welfare or public safety.
- Importantly, not all health conditions should trigger regulatory action or reporting - particularly where they are:
 - being appropriately managed, and
 - not impacting workplace performance.
- This distinction is critical to:
 - remove stigma and fear,
 - encourage veterinarians and veterinary nurses to seek treatment early, and
 - prevent under-reporting or delayed intervention.
- A supportive, non-punitive, approach to impairment should be embedded in legislation or regulation, ensuring it is consistently applied and clearly understood.

2. Confidential, early intervention and support pathways

- The framework should facilitate access to:
 - confidential mental health support services,
 - early intervention programs, and
 - peer and professional support networks.



- This could include formal partnerships with:
 - AVA initiatives such as THRIVE, and
 - external mental health and counselling services.
- Early, confidential support helps to:
 - reduce escalation to impairment,
 - improve wellbeing, and
 - minimise downstream impacts on complaints and workforce attrition.

3. Regulatory flexibility and proportionate responses

- The regulatory system should allow for flexible, tailored responses where a regulated person is experiencing health challenges, including:
 - conditions on practice,
 - supervision or mentoring arrangements,
 - modified work scopes, or
 - temporary limitations where necessary.
- These responses should be:
 - proportionate to the level of risk, and
 - focused on supporting safe return to practice, rather than punishment.
- Consideration should also be given to privacy protections, such as:
 - omitting sensitive details of impairment from public registers, consistent with approaches in other jurisdictions.

4. Embedding wellbeing into professional standards

- The regulatory framework should reinforce expectations that veterinarians and veterinary nurses:
 - attend to their own health and wellbeing, and
 - support colleagues to do the same, consistent with the AVA's Code of Professional Conduct.

5. Continuing professional development (CPD)

- While a requirement for CPD should be included in the legislation, it should not be prescriptive with respect to the nature of the CPD required. Rather, the Board should be empowered to set the specific CPD framework and requirement. This allows for the development of CPD requirements as best practice methods evolve without needing to update legislation.
- The CPD framework should aim for national harmonisation and be based on advice from the AVBC. The AVBC has published a detailed framework for outcomes-based, competency-linked CPD for Australian veterinarians (Hodgson, Lenard & Keane, 2026).



- CPD requirements for registered veterinarians and veterinary nurses should:
 - be developed with reference to requirements established or proposed in other Australian jurisdictions, with a view to harmonisation;
 - be outcomes-based and competency-linked, consistent with the AVBC's CPD framework (Hodgson, Lenard & Keane, 2026) rather than purely hour-based
- CPD requirements should explicitly include non-technical competencies, such as:
 - mental health and wellbeing,
 - resilience and stress management,
 - communication skills, and
 - reflective practice.
- Consideration could be given to:
 - mandatory wellbeing-focused CPD, particularly for early career veterinarians and veterinary nurses or those returning to practice.
- This aligns with approaches in human healthcare, where a significant proportion of CPD is directed toward reflection, self-assessment, and professional wellbeing.

6. Addressing systemic and workplace factors

- Regulatory frameworks should acknowledge and, where possible, address systemic contributors to poor mental health, including workload pressures and workplace culture.
- This aligns with a “just culture” and systems-based approach, recognising that individual wellbeing is influenced by the broader practice environment.

7. Reducing stigma and encouraging help-seeking

- A key objective of the regulatory framework should be to:
 - normalise discussion of mental health,
 - reduce stigma associated with seeking support, and
 - ensure veterinarians and veterinary nurses are not deterred from accessing care due to fear of regulatory consequences.
- Clear guidance should be provided on:
 - when health issues must be reported, and
 - what support mechanisms are available.



Reform Theme 4: Implement clear, risk-based regulation

AVA Position:

The AVA supports regulatory reform that strengthens animal welfare, public trust, and workforce sustainability, while maintaining that acts of veterinary science must be performed by appropriately qualified and regulated professionals.

4a. What implementation/transitional factors should be considered when establishing a licencing framework for veterinary practices/other veterinary services businesses?

Response:

The AVA supports the introduction of a licensing framework for veterinary premises, recognising that it will improve consistency, accountability, and public confidence across all models of veterinary care. However, successful implementation will depend on a carefully staged and practical transition process that recognises the diversity of veterinary service delivery and minimises disruption to existing services.

Key implementation and transitional factors include:

1. Clear definitions of “veterinary practices (premises)” and “veterinary services businesses”

- The framework should adopt contemporary, harmonised definitions of “veterinary practices (premises)”, ensuring it captures the full range of service delivery models, including:
 - fixed practices (clinics and hospitals),
 - consulting rooms,
 - mobile veterinary clinics and hospitals, and
 - emerging service models such as telehealth-enabled businesses.
- Businesses that deliver allied animal services without the employment or direct involvement of a registered veterinarian must be clearly defined, including their scope of services and how these will be licenced and regulated.
- Businesses providing allied animal services must not include “veterinary” (or its derivations) in their business name or marketing material.

2. Phased and flexible Implementation

- A phased implementation approach is essential to allow:
 - practices to understand new requirements,
 - sufficient time for compliance, and
 - regulators to develop systems and processes.
- Transitional periods should:
 - recognise existing compliance arrangements,
 - provide clear milestones, and



- include appropriate grace periods where necessary.
- Consideration should be given to the capacity of smaller, rural, and mobile practices, which may face greater challenges in meeting new requirements.

3. Proportional and risk-based compliance requirements

- Licensing requirements should be proportionate to the level of risk associated with the services provided, recognising differences between:
 - hospitals, clinics, and consulting rooms, and
 - mobile or low-infrastructure services.
- A risk-based approach will:
 - reduce unnecessary regulatory burden,
 - support innovation, and
 - allow regulatory attention to focus on higher-risk environments.

4. Costs and financial and administrative impacts

- The introduction of licensing will have direct and indirect cost implications for practices, including:
 - licensing fees,
 - compliance costs (e.g. infrastructure, record-keeping, systems), and
 - administrative burden.
- It is important that:
 - fees are proportionate and transparent,
 - duplication with existing regulatory requirements is avoided, and
 - wherever possible, existing systems are leveraged to minimise cost.
 - Cost impacts should be carefully considered to avoid unintended consequences for service access, particularly in rural and regional areas.
- Licensing requirements should not place added administration burden on veterinary business

5. Responsible person requirements, ownership and governance

Veterinary business ownership models should be flexible to support business innovation and create career progression pathways for veterinary nurses and other team members, The AVA supports reform to the existing model, which currently requires majority ownership by a registered veterinarian, however, any reform must include clear safeguards to ensure clinical governance remains under veterinary oversight. This should include requirements that:

- a registered veterinarian is responsible for clinical decision-making and standards of care,
- governance structures protect against commercial or non-clinical influences compromising animal welfare, and



- ownership arrangements do not permit unregulated lay control over clinical activities or restricted acts of veterinary science.

This balanced approach supports modern workforce development and retention, while ensuring that the primary obligation to animal welfare and professional standards is preserved.

- The framework should clearly define accountability at the practice level, including:
 - nomination of a responsible veterinarian,
 - person in charge of the premises,
 - clear roles and responsibilities for governance, compliance, and clinical standards for accountable persons.
- Transitional arrangements should:
 - provide clarity on eligibility and expectations for these roles, and
 - allow time for practices to establish appropriate governance structures.

6. Integration with existing regulatory systems

- Implementation should aim to integrate with existing registration, complaints, and compliance systems, reducing duplication and administrative burden.
- Leveraging established frameworks (e.g. those used in human health or other jurisdictions) will:
 - improve efficiency,
 - reduce implementation costs, and
 - support consistency across the broader regulatory landscape.

7. Workforce and operational impacts

- Licensing requirements may affect:
 - staffing structures,
 - operational workflows, and
 - access to services.
- Transitional arrangements should ensure:
 - continuity of care,
 - minimal disruption to service delivery, and
 - support for practices adapting to new regulatory expectations.

8. Education, guidance and support for compliance

The AVA strongly recommends the establishment of formal, ongoing engagement mechanisms between the Veterinary Board and key professional bodies, including the AVA, to support the



development and implementation of guidance materials, standards, and supporting resources associated with the new legislation.

This collaboration is particularly critical in areas of significant reform and practical application, including:

- the roles, scope, and supervision requirements of veterinary nurses and approved persons,
- the licensing and operational standards for veterinary premises (including mobile and non-traditional models), and
- the design and implementation of modern complaints management processes.

Early and continued engagement will ensure that guidance is:

- practical, evidence-based, and informed by frontline experience,
- consistently interpreted and applied across the profession, and
- supportive of successful implementation, compliance, and high-quality patient care outcomes.

Clear guidance materials and support should be provided to:

- explain licensing requirements,
- outline compliance expectations, and
- assist practices in meeting new standards.

This may include:

- templates, checklists, and advisory services,
- education campaigns to ensure understanding across the profession.

9. Future-proofing and adaptability

- The licensing framework should be flexible and adaptable to:
 - evolving service delivery models (e.g. mobile, telehealth, corporate structures), and
 - emerging technologies.
- A principles-based approach will help ensure the framework remains relevant over time without requiring frequent legislative change.

4b. How could the Board's membership better reflect modern veterinary practice?

Response:

The AVA supports a Board composition that continues to be veterinarian-led, while incorporating a broader range of expertise to reflect the increasing complexity of modern veterinary practice, regulatory expectations, and community needs.

To achieve this, the Board's membership should evolve to ensure it is balanced, multidisciplinary, and representative of contemporary veterinary service delivery models, while maintaining its core focus on animal welfare, public protection, and professional standards.



Resourcing and support of the Board's expanded functions must be adequately and sustainably provided, without using mechanisms that increase financial and other burdens on individuals and businesses.

Key considerations include:

1. Retaining strong veterinary representation

- The Board should maintain a majority of registered veterinarians, ensuring:
 - decisions are informed by clinical expertise,
 - appropriate understanding of professional standards, and
 - credibility with the profession.
- Consideration should be given to ensuring representation across:
 - diverse areas of practice (e.g. companion animal, production animal, equine, unusual & exotic animals, public health, wildlife), and
 - different practice models (e.g. private practice, corporate, mobile, telehealth, government roles).
 - Veterinary nurse scope of practice

2. Inclusion of complementary expertise

- In addition to veterinarians, the Board should include members with expertise in:
 - veterinary nursing,
 - law and regulation,
 - governance and risk management, and
 - consumer representation which is important to ensure community expectations are understood, and maintain public confidence in the regulatory system
- This broader expertise supports:
 - more robust complaints handling,
 - improved policy development, and
 - alignment with modern regulatory expectations.
 - the need for balanced technical and legal expertise, ensuring the Board can operate effectively in increasingly complex regulatory environments.

3. Reflecting the broader veterinary ecosystem

- Modern veterinary practice increasingly involves:
 - team-based care,
 - corporate and multi-site service delivery.
- While maintaining veterinary leadership, consideration could be given to:



- input mechanisms (e.g. advisory committees) that reflect these broader perspectives,
- ensuring the Board is informed about workforce structures and operational realities.

4. Strengthening governance

- The AVA supports the Board having representation on relevant committees and stakeholder groups across the veterinary sector, to:
 - ensure consistency with information sharing and in decision-making, and
 - improve communication of outcomes back to the full Board.
- This will strengthen governance, oversight, and organisational cohesion.

5. Enhancing inter-jurisdictional and cross-sector capability

- Board membership or advisory capability should include expertise in:
 - inter-jurisdictional regulation, and
 - interaction with other legislative frameworks (e.g. animal welfare, biosecurity, medicines regulation).
- This is increasingly important to support:
 - national consistency,
 - recognition of veterinary and veterinary nurse registration across jurisdictions, and
 - coordination with related regulatory bodies.

6. Strengthening engagement with the profession

- The AVA supports:
 - formal representation of the profession, including appointment of a member connected to the AVA NSW Division, and
 - regular engagement between the Board and the AVA to discuss:
 - emerging issues,
 - policy development, and
 - legislative reform.
- This supports a more collaborative and informed regulatory environment.

7. Supporting expanded board functions

- As the Board's role expands to include - licensing of all veterinary premises; oversight of a broader range of animal health service providers; and enhanced complaints and compliance functions, it is imperative that appropriate, sustainable funding and resourcing is provided by Government to support:
 - compliance and enforcement,



- investigation processes, and
 - regulatory governance.
- The AVA strongly emphasises that this expanded regulatory burden must not be funded through increased registration fees imposed on veterinarians. Veterinarians already face significant financial pressures, including costs associated with individual registration, practice compliance, professional indemnity, continuing professional development, professional body membership, and broader business overheads, often in the context of comparatively constrained earning capacity.
- Placing additional financial burden on veterinarians risks:
 - reducing workforce retention,
 - limiting access to veterinary services, particularly in rural and regional areas, and
 - undermining the sustainability of the profession.
- Accordingly, any expansion of regulatory functions should be supported through government investment or alternative funding mechanisms, recognising that effective veterinary regulation delivers public good outcomes, including animal welfare food and biosecurity.



Reform Theme 5: Modernise regulatory settings

AVA Position:

The AVA supports regulatory reform that strengthens animal welfare, public trust, and workforce sustainability, while maintaining that acts of veterinary science must be performed by appropriately qualified and regulated professionals.

5a. Do you support streamlining the registration categories for veterinarians in line with other jurisdictions? What issues should be considered?

Response:

The AVA supports streamlining veterinary registration categories where this promotes national consistency, clarity, and mobility of the veterinary workforce, particularly in the context of National Recognition of Veterinary Registration (NRVR). However, this reform must be carefully implemented to ensure that it maintains appropriate safeguards for animal welfare, professional standards, and public confidence.

Key considerations include:

1. National consistency and alignment

- Registration categories should be harmonised with other Australian jurisdictions to:
 - support mutual recognition,
 - facilitate mobility of veterinarian and veterinary nurses across state and territory borders, and
 - reduce administrative complexity for registered persons working in multiple jurisdictions.
- Terminology should be standardised to avoid confusion.
- Alignment is particularly important given increasing workforce mobility and evolving models of practice.

2. Clear definition and structure of registration categories

- Registration categories for veterinarians should be clearly defined in legislation, including:
 - general (full) registration,
 - specialist registration,
 - limited registration (e.g. for specific purposes or supervised roles), and
 - honorary or non-practising categories.
- The AVA supports:
 - specialists also holding general registration, ensuring consistency in professional obligations and standards.



3. Australasian Veterinary Boards Council (AVBC)

- The AVBC plays a critical role in:
 - promoting national consistency,
 - supporting quality assurance of veterinary services,
 - facilitating cooperation between Veterinary Boards, and
 - maintaining educational standards necessary for registration frameworks to operate effectively.
- The AVA recommends that the role of the AVBC be explicitly recognised and defined in the Act or Regulations.
- Formal recognition of the AVBC will strengthen alignment between jurisdictions and support effective implementation of NRVF frameworks.
- The Act should enable the Veterinary Board to make decisions based on the recommendations of the AVBC (including recognition of education courses and registration of specialists).

4. Fit and proper person/good character test

- Registration requirements should include a clearly defined “fit and proper person” test, incorporating assessment of:
 - professional conduct,
 - ethical behaviour, and
 - suitability to practise.
- The framework should:
 - allow for rehabilitation and proportionality, recognising that individuals may demonstrate improved conduct over time,
 - ensure criteria are transparent, fair, and consistently applied, and
 - be developed in consultation with the profession, including the AVA.
- This is essential to maintain both public confidence and procedural fairness.

5. Transparency and information sharing across jurisdictions

- Consideration should be given to establishing a nationally consistent register of veterinarians who have been removed and not reinstated, including:
 - clear criteria for temporary and permanent removal, and
 - mechanisms for information sharing between jurisdictions.
- This would support:
 - consistent regulatory responses under NRVF arrangements, and
 - enhanced protection of animal welfare and the public.



6. Data collection and workforce insights

- While regulated at a state and territory level, the veterinary workforce is national in nature.
- The sector needs improved national workforce planning and nationally collated data is essential to support this. It is important that veterinary legislation facilitates the appropriate sharing of workforce data nationally.
- Veterinary Boards currently collect valuable workforce and demographic data through registration processes at the state and territory levels.
- With appropriate privacy protections and practitioner consent, there may be opportunities to:
 - share de-identified or consented data with organisations such as the AVA and other relevant government departments,
 - support workforce planning and policy development, and
 - better understand service gaps and workforce needs.
- Any such data sharing must comply with the Privacy Act and clearly define purpose, scope, and consent mechanisms.

7. Clarity for practitioners and administrative efficiency

- Streamlining registration categories should:
 - simplify the registration process,
 - reduce duplication and confusion, and
 - improve regulatory efficiency.
- Clear guidance and communication will be essential to support registered persons during transition and ensure consistent interpretation especially for workers relocating from, or working across, other jurisdictions.

5b. Do you support extending the code of conduct framework to all registered persons and licence holders of veterinary premises?

Response:

The AVA supports extending the Code of Conduct framework to apply to all registered persons and licensed veterinary premises, recognising that modern veterinary service delivery involves a broader range of professional, paraprofessional and non-veterinary business structures or service models. A consistent, enforceable Code of Conduct is essential to ensure high standards of care, accountability, and public confidence across the entire veterinary and animal care sector.



Key considerations include:

1. Consistency of professional and ethical obligations

- All regulated persons - including veterinarians, veterinary nurses, and other approved or licensed providers - should be held to consistent core standards of professional and ethical conduct.
- This includes obligations relating to:
 - acting in the best interests of animal welfare,
 - maintaining professional and individual competence,
 - honest and transparent communication with clients, and
 - appropriate collaboration with other registered persons and animal health providers.
- Extending the Code across all registered persons and licensed premises supports:
 - a consistent, integrated regulatory system,
 - alignment with complaints and compliance frameworks, and
 - improved clarity for both practitioners and consumers.
- It also supports a level playing field, ensuring that all regulated persons are subject to comparable standards and oversight.

2. Application to veterinary premises and business entities

- Extending the Code of Conduct to all types of licensed veterinary premises (including corporate entities) is an important reform.
- This ensures that:
 - practice-level governance, systems, and culture are subject to regulatory oversight, and
 - accountability is not solely placed on individual practitioners where systemic or organisational factors are relevant.
- This aligns with a modern, systems-based regulatory approach, recognising that quality of care is influenced by both individual and organisational factors.

3. Alignment with scope of practice

- While the Code of Conduct should apply broadly, it must be appropriately contextualised to reflect:
 - differences in scope of practice,
 - levels of training and qualification, and
 - professional responsibilities of each category of registrant.
- Importantly:



- non-veterinarians must not undertake activities that fall outside their competence, and
- restricted acts of veterinary science must only be performed under the direction and supervision as permitted by veterinary board approval and regulation.

4. Continuing professional development and accountability

- The AVA supports extending mandatory CPD requirements to all registered veterinary nurses and approved persons (eg equine dental service providers), including:
 - structured requirements for ongoing learning, and
 - formal recording and reporting mechanisms.
- This ensures that all regulated persons:
 - maintain competence over time, and
 - are accountable for their professional development.
- These CPD requirements should be included in a Code of Conduct for all registered persons.

5. Enforcement, compliance and consequences

- The Code of Conduct must be supported by:
 - clear enforcement mechanisms, and
 - meaningful consequences for non-compliance.
- This includes:
 - the ability to investigate complaints,
 - apply sanctions proportionate to the breach, and
 - ensure consistency of outcomes across all regulated persons and entities.
- Extending the Code ensures that regulatory action can be taken where conduct falls below expected standards, regardless of the role of the individual or organisation.

6. Protection of the integrity of the veterinary profession

- The Code should include provisions that:
 - require all regulated persons to act in a manner that upholds the integrity and reputation of the veterinary profession, and
 - prohibit misleading, deceptive, or harmful conduct, including statements or actions that may unjustifiably undermine professional standards or public trust.
- This is particularly important in a more diverse service environment, ensuring that all participants contribute positively to community confidence in veterinary care.



5c. In establishing a contemporary fees and charges framework, what safeguards or considerations should be included to ensure the framework remains fair, proportionate and sustainable?

Response:

The AVA supports the development of a contemporary fees and charges framework that is fair, sustainable, and aligned with the realities of veterinary practice, while ensuring that regulation remains effective and properly resourced. As regulatory functions expand - particularly with the introduction of licensing frameworks, broader registration categories, and enhanced compliance activity - it is critical that fee structures are carefully designed to avoid unintended negative impacts on the profession and service access.

Key safeguards and considerations include:

1. Proportionality to income and business costs

- Fees must be proportionate to the earning capacity of veterinary professionals as a group and the operational costs of veterinary businesses.
- The veterinary profession operates within:
 - relatively constrained margins,
 - significant overheads (staffing, equipment, compliance, insurance), and
 - increasing cost pressures across the sector.
- Fee settings should recognise these constraints to avoid:
 - creating financial hardship of individual practitioners,
 - discouraging workforce participation,
 - increasing pressures on businesses, and
 - reducing access to veterinary services, particularly in rural and regional areas.

2. Government responsibility for expanded regulatory functions

- As regulatory responsibilities expand, the AVA strongly emphasises that increased operational costs must not be recovered solely through higher registration or licensing fees imposed on veterinarians or veterinary businesses.
- Expanded Board functions - such as:
 - licensing of premises,
 - broader oversight of service providers, and
 - enhanced complaints and enforcement systems,deliver significant public benefit (animal welfare, biosecurity, consumer protection).
- Accordingly, these functions should be supported through appropriate government funding or alternative funding mechanisms, rather than disproportionately burdening the profession.



3. Transparency and accountability in fee setting

- The framework should ensure clear transparency in:
 - how fees are calculated,
 - what regulatory activities they fund, and
 - how resources are allocated.
- Regular reporting on:
 - Board expenditure, and
 - regulatory outcomes,

will strengthen confidence that fees are being used appropriately and efficiently.

4. Avoiding barriers to entry and retention

- Fee structures should not create barriers to entry, re-entry, or continued participation in the profession, particularly for:
 - early-career veterinarians and veterinary nurses,
 - part-time workers, and
 - those returning after career breaks.
- Consideration could be given to:
 - scaled or tiered fee structures,
 - reduced fees for specific cohorts, or
 - flexible payment arrangements.

5. Phased implementation and predictability

- Any increases or changes to fees should be clearly communicated in advance to allow for financial planning.
- Sudden or significant increases should be avoided, as they can place undue stress on both individuals and businesses.

6. Alignment with risk and regulatory effort

- Fees should reflect a risk-based approach, ensuring that:
 - higher-risk activities or service models contribute proportionately to regulatory costs, and
 - low-risk practitioners or premises are not overburdened.
- This supports fairness and aligns with broader risk-based regulatory principles.

7. Flexibility and responsiveness

- The fee framework should include mechanisms to:



- regularly review and adjust fees in response to changing economic conditions, workforce dynamics, and regulatory needs.
- This ensures that fees remain:
 - fair over time, and
 - responsive to sector-wide pressures.

AVA policies and resources

[Recommended key principles for veterinary practice acts in Australia](#)

[Licensing of veterinarians](#)

[Regulation of animal health service providers](#)

[Restricted acts of veterinary science](#)

[Veterinary nursing - Australian Veterinary Association](#)

[The diagnosis and treatment of animals by non-veterinarians - Australian Veterinary Association](#)

[Telemedicine practice](#)

[Veterinary referrals and second opinions](#)

[Safeguarding and improving the mental health of the veterinary team](#)

[Employment of new veterinary graduates](#)

[Clinical veterinary internships](#)

[Equality, diversity and inclusion](#)

[Animal welfare and human wellbeing – vulnerability of clients and veterinary staff](#)

[Enhancing veterinary care through veterinary social services](#)

[Contextualised care](#)

[Great veterinary workplaces](#)

[THRIVE](#)

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