

13th May 2025

Department of Primary Industries and Regions
Policy and Governance Team, Biosecurity
Email: PIRSA.VeterinaryServicesAct@sa.gov.au

Veterinary Services Regulations Discussion Paper

Animal Care Australia is a national incorporated association established to consult with government in advocating for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, companion animals, animals used for educational or entertainment purposes or kept for conservation.

Animal Care Australia is only providing responses to the questions within the Discussion Paper that fall within our purview.

QUESTION: Should extracorporeal shock wave therapy be included in the definition of 'veterinary service'?

Animal Care Australia does not support the inclusion of extracorporeal shock wave therapy in the definition as it is NOT a veterinary procedure and can be safely performed by trainers and other professionals, particularly within the dog and horse communities.

Having stated that, there is a note of concern that it should only be administered by a person who has received suitable training on the procedure.

QUESTION: Is there any other act or activity that should be prescribed by the regulations to be excluded from the definition of veterinary service? In particular:

- **are there any other procedures relating to reproduction (artificial breeding procedures or pregnancy diagnosis) that should be excluded**

Animal Care Australia supports the table of exclusions including the new proposed exclusions.

Animal Care Australia repeats our objection to artificial insemination being classified as an 'invasive procedure' when in Australia artificial insemination (AI) is performed in three ways – all will be deemed as invasive procedures:

1. Transcervical Insemination (TCI) – not reliable and requires 'fresh semen' for greatest success for dogs and cats.
2. Transvaginal Insemination (TVI) – can use frozen or aged semen – but again has a lower success rate for dogs and cats.
3. Surgical Artificial Insemination (SAI) – uses fresh, aged, or frozen semen – has the highest success rate for a range of animals.

Animal Care Australia supports the continued ability for individuals to be able to perform certain procedures including non-surgical AI, under veterinary supervision as prescribed by the proposed Exemptions (Section 95 of the Bill). This raises the question as to why there has been no separation of the different procedures used to perform AI?

Exception 10 (page 13) states: “... **are considered invasive, however these procedures are routinely carried out by non-veterinarians in the management of cattle and pigs.**”

If the premise is that the procedure is routinely carried out by non-veterinarians, why is the exception only for cattle and pigs when there are other species that are ‘routinely inseminated by non-veterinarians’ who are well versed in these procedures and who are more than capable of performing them with no poor welfare outcomes?

For purposes of Section 6(3) Composition of Board:

Section 6(3) of the VS Act provides that “Before recommending veterinarians with primary registration for appointment as members of the Board, the Minister may consult with a prescribed peak body representing the veterinary profession in the State”.

It is proposed that the South Australian division of the Australian Veterinary Association be the prescribed peak body for the purposes of Section 14(4)(a). Note that prescribing the peak body does not bind the Minister to consulting with the prescribed peak body.

While Animal Care Australia acknowledges the NOTE included within this proposal, Animal Care Australia does not support the SA division of the AVA being recognised as the peak body. Despite the note, there is every chance the AVA would hold influence over the appointment of their members in preference to veterinarians who are not members of their association.

This recognition should not be permitted given the continued influence of ideological politics within the AVA. These politics are a major contributor to why the AVA does not represent the majority of practising veterinarians in this country.

Our position also applies to:

For purposes of Section 14(4)(a) Functions

Section 14(4)(a) of the VS Act provides that the Board must consult on a proposed code, standard or guidelines, or variation, substitution or revocation (as the case requires), with veterinarians, a prescribed peak body representing the veterinary profession in the State or relevant stakeholders in accordance with a scheme determined by the Board and approved by the Minister.

If the veterinary representation on the Board is to be made up of solely AVA members, then any scheme determined by that Board would potentially be ‘ideologically influenced.’ This has become more than apparent with the composition of the Australian Capital Territory’s Animal Welfare Advisory Council where codes of practice and legislative substitutions have been successfully introduced that have full ideological basis and not based on scientific evidence.

Should you require further details please do not hesitate to reach out as we would be happy to meet with you and further discuss this matter.

Kind regards,



Michael Donnelly
President
0400 323 843
president@animalcareaustralia.org.au

About Animal Care Australia

As a nationally recognised animal welfare organisation, Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, animals used for educational or entertainment purposes or kept for conservation, and in particular native birds, reptiles, and mammals.

Animal Care Australia was founded in early 2018 to establish an organisation run solely by volunteers to lobby for real animal welfare. With extreme animal rights and animal liberationist ideologies influencing government legislation, regulation, and policy at our expense and to the detriment of our animals and pets, it has become necessary to provide government with a balancing voice.

By uniting the broad spectrum of animal groups, collectively we offer an experienced, sensible approach to animal welfare.

By educating our members and the public about the importance of treating animals with kindness and respect for their needs and promoting the humane treatment of animals to improve animal welfare outcomes, Animal Care Australia is in the unique position of lobbying and advocating for all animals within our care.

Animal Care Australia provides priority to the following:

- advocating for stronger welfare outcomes
- advocating to increase education of the public in animal welfare and best care techniques
- educate the public on handling their animals with kindness & respect and the importance of their needs
- educate the public in the differences between animal welfare and animal rights