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KG:MD

Department of Primary Industries and Regional Development - Agriculture and Biosecurity

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Response to: Strengthening the Veterinary Workforce and Safeguarding Animal Health and Welfare Consultation Paper (June 2026)

Introduction

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.

Response to consultation paper

Thank you for the opportunity to provide feedback on the proposed reforms to the Veterinary Practice Act 2003.

Animal Care Australia acknowledge the significant challenges currently facing the veterinary industry, including workforce shortages, increased service demand, mental health pressures, regional access issues, and the need to recognise the contribution of the broader animal care workforce.

The animal health and welfare sector has changed considerably since the introduction of the Veterinary Practice Act 2003. Modern animal care relies on a multidisciplinary workforce including veterinarians, veterinary nurses, animal attendants, trainers, behaviour professionals, shelter workers, assistance dog professionals, animal management officers, and other skilled animal care providers.

Animal Care Australia support the objective of developing a modern, risk-based regulatory framework. However, it is critical that reform does not unintentionally create barriers, reduce workforce participation, or fail to recognise the skills and experience already existing within the industry.

The future success of these reforms will depend on achieving a balance between regulation, animal welfare, workforce sustainability, and practical industry application.

Reform Theme 1 – Greater Access to Veterinary Care Across NSW

Support for Mobile Veterinary Services and Telehealth

Animal Care Australia support the development of clearer pathways for mobile veterinary services and telehealth.

Regional and remote communities continue to face significant challenges accessing veterinary care, and modern service delivery models must be supported.

Mobile veterinary services have the potential to improve:

- access to animal health services
- early intervention
- preventative care
- welfare outcomes
- support for remote communities

Telehealth also provides an opportunity to improve access, particularly for:

- follow-up consultations
- triage
- behavioural support
- preventative health advice
- ongoing client education

RECOMMENDATIONS

ANY FRAMEWORK DEVELOPED MUST:

- **ENSURE REQUIREMENTS ARE PRACTICAL AND ACHIEVABLE**
- **AVOID EXCESSIVE ADMINISTRATIVE BURDEN**
- **SUPPORT SMALL BUSINESSES**
- **RECOGNISE DIFFERENT SERVICE DELIVERY MODELS**
- **PROVIDE CLEAR GUIDANCE ON CLINICAL LIMITATIONS**

MOBILE AND TELEHEALTH SERVICES SHOULD COMPLEMENT EXISTING VETERINARY SERVICES RATHER THAN CREATE UNNECESSARY COMPETITION OR ADDITIONAL PRESSURE.

Reform Theme 2 – Increase Workforce Capacity

Recognition of Veterinary Nurses and Technologists

Animal Care Australia strongly support greater recognition of veterinary nurses and veterinary technologists.

Veterinary nurses are essential members of the animal health workforce, and formal recognition has the potential to:

- improve career pathways
- increase retention
- improve professional standards
- strengthen animal welfare outcomes

The introduction of title protection and registration is a significant change and must be carefully managed.

Qualification Requirements and Recognition of Existing Experience

While minimum qualification requirements provide consistency, the industry must recognise that many highly skilled veterinary nurses entered the profession through workplace training and experience.

Some of the most capable and knowledgeable animal care professionals may not currently hold formal qualifications.

Introducing mandatory qualification requirements without appropriate transition arrangements could:

- remove experienced workers from the industry
- worsen existing workforce shortages
- disadvantage regional practices
- undervalue practical competency

RECOMMENDATIONS

THE REGISTRATION PATHWAY SHOULD INCLUDE:

1. A COMPREHENSIVE RECOGNITION OF PRIOR LEARNING (RPL) PROCESS

EXPERIENCED WORKERS SHOULD HAVE ACCESS TO FAIR ASSESSMENT PATHWAYS RECOGNISING:

- **WORKPLACE EXPERIENCE**
- **DEMONSTRATED COMPETENCE**
- **PROFESSIONAL DEVELOPMENT**
- **INDUSTRY CONTRIBUTION**

2. APPROPRIATE TRANSITION PERIODS

IMPLEMENTATION MUST ALLOW SUFFICIENT TIME FOR:

- **WORKERS TO GAIN QUALIFICATIONS**
- **EMPLOYERS TO ADJUST**
- **TRAINING PROVIDERS TO MEET DEMAND**

3. ACCESSIBLE TRAINING OPTIONS

TRAINING PATHWAYS MUST CONSIDER:

- **REGIONAL LEARNERS**
- **MATURE WORKERS**
- **EXISTING EMPLOYEES**
- **FINANCIAL BARRIERS**

Expanding Scope of Practice for Veterinary Nurses

Animal Care Australia support appropriate expansion of veterinary nurse responsibilities where individuals have demonstrated competence.

Effective utilisation of veterinary nurses may assist with:

- reducing pressure on veterinarians
- improving workflow efficiency
- increasing job satisfaction
- improving retention

However, scope expansion must be based on competence, not qualification alone.

A qualification provides foundation knowledge, but workplace experience, supervision and ongoing professional development remain critical.

RECOMMENDATIONS

SCOPE OF PRACTICE SHOULD:

- **CLEARLY DEFINE ACTIVITIES**
- **RECOGNISE LEVELS OF EXPERIENCE**
- **ALLOW PROGRESSIVE SKILL DEVELOPMENT**
- **ESTABLISH SUPERVISION REQUIREMENTS**
- **CLARIFY PROFESSIONAL ACCOUNTABILITY**

Recognition of Broader Animal Industry Professionals

The veterinary workforce does not operate independently from the broader animal care industry.

Many animal professionals contribute significantly to animal health and welfare outcomes, including:

- animal shelter workers
- animal attendants
- animal behaviour professionals
- assistance dog trainers
- animal management officers
- wildlife carers
- animal welfare officers

These individuals often possess extensive species knowledge, handling skills, and behavioural expertise.

Reforms should ensure these professionals are recognised rather than unintentionally restricted.

Accredited Persons Performing Restricted Acts

We support the development of a clearer accreditation framework for non-veterinarians performing approved activities.

This provides an opportunity to recognise skilled professionals and improve workforce capacity.

However, accreditation must not become overly restrictive or prevent appropriately trained individuals from contributing to animal welfare.

RECOMMENDATIONS

ACCREDITATION SHOULD:

- **RECOGNISE NATIONALLY ACCREDITED TRAINING**
- **RECOGNISE INDUSTRY EXPERIENCE**
- **INCLUDE PRACTICAL COMPETENCY ASSESSMENT**
- **PROVIDE CLEAR PATHWAYS**
- **AVOID UNNECESSARY DUPLICATION**

Reform Theme 3 – Mental Health and Complaints Reform

Animal Care Australia strongly support reform of the complaints process.

The veterinary profession faces significant mental health challenges, and regulatory systems should support improvement and accountability without unnecessary harm.

A risk-based complaints system provides a more balanced approach.

Benefits include:

- reducing unnecessary stress
- addressing inappropriate complaints
- focusing resources on genuine welfare concerns
- recognising workplace systems and shared responsibility

The move away from placing responsibility solely on veterinarians better reflects modern team-based veterinary care.

Reform Theme 4 – Risk-Based Regulation

Animal Care Australia support regulation that focuses on actual risk rather than professional titles alone.

Animal welfare outcomes depend on:

- knowledge
- competence
- experience
- appropriate supervision
- ongoing development

A risk-based model allows the workforce to be used effectively while maintaining safeguards.

Reform Theme 5 – Modern Regulatory Settings

Animal Care Australia support updating outdated terminology and introducing clearer scopes of practice.

However, the development of these scopes must include consultation with the broader animal care sector, not only veterinary stakeholders.

Animal welfare involves many professions, and future legislation should reflect this.

KEY RECOMMENDATIONS SUMMARY

ANIMAL CARE AUSTRALIA RECOMMEND THAT THE NSW GOVERNMENT:

- 1. SUPPORTS VETERINARY NURSE REGISTRATION WHILE PROTECTING EXISTING SKILLED WORKERS.**
- 2. IMPLEMENTS STRONG RECOGNITION OF PRIOR LEARNING PATHWAYS.**
- 3. ENSURES QUALIFICATIONS ARE ACCESSIBLE BEFORE MANDATORY REQUIREMENTS COMMENCE.**
- 4. RECOGNISES PRACTICAL COMPETENCY ALONGSIDE FORMAL EDUCATION.**
- 5. INCLUDES BROADER ANIMAL INDUSTRY REPRESENTATIVES IN DEVELOPING SCOPES OF PRACTICE.**
- 6. ENSURES REGULATION SUPPORTS WORKFORCE GROWTH RATHER THAN CREATING BARRIERS.**

7. PROVIDES CLEAR PATHWAYS FOR SKILLED NON-VETERINARY PROFESSIONALS.
8. MAINTAINS AFFORDABILITY FOR SMALL BUSINESSES AND REGIONAL SERVICES.
9. ENSURES EXPANDED REGULATION DOES NOT UNINTENTIONALLY REDUCE ANIMAL CARE ACCESS.

Conclusion

The proposed reforms represent an important opportunity to modernise animal health regulation in NSW.

Recognition of veterinary nurses, improved utilisation of skilled professionals, modern service delivery models and improved complaints processes are positive steps forward.

However, successful implementation must recognise that animal welfare outcomes are achieved by a broad and experienced workforce.

Regulation should protect animals and consumers while also supporting the people who have dedicated their careers to animal care.

A flexible, practical, and inclusive framework will strengthen the veterinary industry, support workforce sustainability, and improve outcomes for animals and the communities that rely on these services.

Please also refer to the attached Overview of the proposed changes and industry impact.

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.

On behalf of the Animal Care Australia Committee,



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Veterinary Practice Act Reform Comparison & Industry Impact Analysis

Overview

The current Veterinary Practice Act 2003 primarily regulates:

- registered veterinarians
- veterinary hospitals
- restricted acts of veterinary science
- complaints against veterinarians only
- veterinary professional conduct

The consultation paper identifies that this framework reflects a traditional veterinary model and does not adequately recognise modern multidisciplinary veterinary teams, including nurses, technicians, and alternative service models.

The reforms focus on five major changes:

1. Access to veterinary care
2. Workforce capacity
3. Mental health and complaints reform
4. Risk-based regulation
5. Modernisation of legislation

1. Veterinary Nurses & Technicians – Major Industry Change

Current Framework

Currently:

- veterinary nurses are not formally regulated
- no protected title
- no mandatory qualification requirements
- no registration
- accountability sits largely with supervising veterinarians

Proposed Change

Introduce a registration scheme for:

- veterinary nurses
- veterinary technologists

Including:

- minimum qualification requirements

- Code of Conduct
- defined Scope of Practice
- protected title of “registered veterinary nurse”

A transitional pathway is proposed for experienced nurses without qualifications.

Likely Industry Impact

Positive impacts

Greater professional recognition

This is arguably the biggest cultural change.

Veterinary nurses may move closer to human healthcare models where nurses are recognised professionals rather than support staff.

Potential outcomes:

increased career pathways
 improved retention
 increased wages over time
 greater responsibility
 improved professional standards

Increased demand for qualifications

Likely impact on training providers:

- increased Certificate IV Veterinary Nursing demand
- increased RPL demand for experienced nurses
- possible bridging programs required
- increased need for CPD courses

This could significantly impact RTOs delivering animal care qualifications.

Risk / Challenges

Workforce shortages may temporarily worsen

If implemented poorly:

- experienced but unqualified nurses may leave
- small regional clinics may struggle
- registration costs may discourage staff

Industry will need:

- long transition periods
- affordable RPL
- recognition of existing skills

2. Expanded Scope of Practice for Veterinary Nurses

Current

Only veterinarians can perform restricted acts unless exemptions apply.

Restricted acts include higher-risk activities such as:

- diagnosis
- surgery
- anaesthesia

Proposed

Allow appropriately qualified/registered veterinary nurses to assist with some restricted acts under:

- immediate supervision
- direct supervision
- indirect supervision

depending on:

- skill
- qualification
- experience
- procedure risk

Industry Impact

Benefits

Could reduce vet workload by allowing nurses to perform more tasks.

Examples may include:

- increased nurse consultations
- preventative care
- monitoring procedures
- client education
- delegated clinical tasks

This may help address veterinary shortages.

Concerns

Clear boundaries will be critical.

Questions industry should ask:

- Who determines competence?
- Does qualification automatically equal capability?
- How is experience recognised?
- Will liability sit with vet or nurse?
- Will insurance change?

3. Mobile Veterinary Services

Current

Legislation does not clearly support modern mobile veterinary models.

Proposed

Create:

- mobile veterinary licences
- Mobile Veterinary Services Standards
- requirements around:
 - staffing
 - equipment
 - governance
 - emergency follow up

Industry Impact

Positive

Could improve:

rural veterinary access

home-based care

aged client support

animal welfare outcomes

May create new business models.

Concerns

Existing clinics may worry about:

- competition
- after-hours burden
- mobile operators taking profitable work but leaving emergencies

The proposal attempts to address this through continuity-of-care requirements.

4. Veterinary Telehealth

Current

Limited legislative clarity.

Proposed

Introduce:

- telehealth licensing
- Telehealth Veterinary Services Standards
- rules around:
 - diagnosis
 - treatment decisions
 - record keeping
 - access to patient history

Industry Impact

Opportunities

Potential growth areas:

- online triage
- behavioural consultations
- follow-up appointments
- chronic condition monitoring
- rural support

Risks

Industry needs clarity around:

- prescribing medication remotely
- client-vet relationship requirements
- animal welfare risks
- interstate providers

5. Accreditation of Non-Veterinarians Performing Veterinary Acts

Current

Limited accreditation pathway.

The paper describes it as a “set and forget” model with limited ongoing oversight.

Proposed

Accredited persons must:

- demonstrate competence
- show relevant education/training
- meet conduct requirements
- undertake CPD
- provide annual reporting

Industry Impact

This may significantly affect:

- animal technicians
- shelter workers
- animal management officers
- livestock industries
- animal trainers/behaviour practitioners

Potential benefits:

clearer pathways

recognition of skilled non-vets

better use of workforce

Concern:

over-regulation of experienced animal professionals

6. Complaints System Reform

Current

Complaints focus on individual veterinarians.

The Board cannot properly consider:

- workplace systems
- other staff involvement
- organisational factors

Proposed

Move to:

- risk-based complaints
- triaging serious vs minor matters

- ability to dismiss vexatious complaints
- include nurses, accredited people, and premises

Industry Impact

Positive

Could reduce:
 stress on vets
 unnecessary investigations
 mental health pressure

The paper notes up to **88% of complaints are dismissed** under the current system.

Challenge

More people become accountable:

- nurses
- businesses
- accredited persons

This increases professional responsibility.

7. Code of Conduct & Scope of Practice Expansion

Current

Mainly applies to veterinarians.

Proposed

Apply professional standards to:

- vets
- nurses
- technologists
- accredited persons
- veterinary premises

Industry Impact

This creates a more professional industry structure but may increase:

- compliance obligations
- documentation requirements
- training requirements
- costs

Overall Industry Impact Summary

Sector	Likely Impact
Veterinarians	Reduced workload, better delegation, but shared clinical models
Vet nurses	Major professional recognition, registration, career growth
Experienced unqualified nurses	Need transition/RPL pathway
RTOs	Significant growth in qualification demand
Clinics	Increased compliance but clearer workforce structure
Regional communities	Better access through mobile/telehealth
Animal industries	Potential recognition of skilled non-vet roles
Consumers	Increased transparency and accountability

Key Industry Concern Areas for Consultation Response

Animal Care Australia would recommend focusing feedback on:

1. Recognition of existing experienced workers

- strong RPL pathways
- avoid losing skilled staff

2. Qualification requirements

- ensure nationally recognised training pathways exist before mandatory registration

3. Scope creep

- clearly define what nurses can/cannot perform

4. Costs

- registration fees
- CPD burden
- small clinic impacts

5. Recognition beyond veterinary clinics

- shelters
- animal care facilities
- behaviour specialists
- assistance dog sector
- animal management officers