

7th September 2026

Veterinary Surgeons Act Review Team

Email: VSAreview@dpi.qld.gov.au

Review of Queensland Veterinary Surgeons Act 1936

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 welcomes the opportunity to contribute to further consultation on the detailed drafting of the legislation, particularly the definitions of reserved veterinary acts, qualification pathways, recognition of prior learning and transitional arrangements, veterinary nurse and technologist scopes, and the treatment of animal training and behaviour professionals.

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,



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About Animal Care Australia

As a nationally recognised animal welfare organisation and Australian Registered Charity, 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 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

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Animal Care Australia (ACA) is a national incorporated association and registered charity representing the interests of animal keepers, carers, and breeders across a broad range of species.

Animal Care Australia 's purpose is to prevent and relieve animal suffering through education and advocacy, promoting responsible animal care and improved welfare outcomes. Established by experienced animal advocates, Animal Care Australia provides a trusted, evidence-based voice to government and the community.

Animal Care Australia brings together practical experience, species-specific knowledge and contemporary animal welfare principles. We advocate for evidence-based proportionate policies that focus on achieving genuine welfare outcomes for animals. We seek to ensure that the voices and experiences of responsible animal carers are considered in the development of effective animal welfare policy.

Animal Care Australia unites hobbyists, pet owners, and major animal groups to promote high standards of husbandry and safeguard the human-animal bond.

True animal welfare is best driven by education and practical expertise rather than restrictive regulation.

*Our guiding principle is simple: **animal welfare is animal care***

Submission approved: 7th September 2026

This submission has been developed in consultation with a range of members of Animal Care Australia.

This submission provides a broad perspective across all species of pets and companion animals. Animal Care Australia supports the species specific submissions of our member organisations.

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Background

The Veterinary Surgeons Act 1936 currently regulates veterinary surgeons, the practice of veterinary science and veterinary premises in Queensland.

Section 2A defines veterinary science as veterinary surgery or veterinary medicine and specifically includes:

- diagnosing diseases and injuries;
- giving advice based upon such a diagnosis;
- medical or surgical treatment;
- surgical operations;
- administering anaesthetics; and
- issuing certain certificates relating to an animal's health, diagnosis or treatment.

The Act also expressly allows some activities to be excluded from veterinary science where prescribed as animal husbandry or animal dentistry activities. Under the existing framework, a person who is not a veterinary surgeon must generally not practise veterinary science, subject to specified exceptions.

The Act additionally establishes the Veterinary Surgeons Board of Queensland and provides for approval of veterinary premises. The review presently being undertaken proposes reform across six broad areas:

1. veterinary science and acts of veterinary science;
2. registration;
3. veterinary premises and practices;
4. veterinary paraprofessionals;
5. compliance and disciplinary arrangements; and
6. governance of the Veterinary Surgeons Board.

The consultation proposes consideration of a risk-based system identifying activities reserved for veterinarians, activities capable of delegation and activities outside veterinary regulation. It also contemplates formal recognition, registration, title protection and defined scopes of practice for veterinary nurses and veterinary technologists.

Opening statement

Animal Care Australia welcomes the Queensland Government's review of the Veterinary Surgeons Act 1936 (Qld) and supports the development of contemporary legislation that protects animal welfare, public confidence and the sustainability of veterinary services.

The existing Act was developed for a veterinary profession and animal-care sector substantially different from that operating today. Modern animal care increasingly involves multidisciplinary teams and a range of appropriately trained professionals including veterinary surgeons, veterinary nurses, veterinary technologists, animal trainers, behaviour practitioners, rehabilitation professionals, animal attendants, groomers, breeders, shelter and rescue personnel and other animal-care professionals.

Animal Care Australia therefore supports modernisation of the legislation; however, reform must be risk-based, evidence-based and proportionate. In particular, Animal Care Australia is concerned that reform should not:

- unnecessarily restrict experienced veterinary nurses or other workers because they do not hold one particular contemporary qualification;
- create occupational barriers that fail to recognise previous qualifications, skills and experience;
- duplicate or conflict with existing qualification requirements under Queensland medicines legislation;
- unnecessarily restrict the legitimate work of animal trainers and behaviour practitioners;
- inadvertently classify routine animal husbandry, training, behaviour modification, enrichment, conditioning, grooming or welfare activities as veterinary science;
- create protected occupational categories without clearly defining scopes of practice;
- prevent Recognition of Prior Learning (RPL), skills recognition, qualification equivalence or grandfathering for established practitioners;
- unnecessarily limit veterinary workforce utilisation in rural and regional Queensland; or
- establish a regulatory Board responsible for veterinary nurses and technologists without meaningful representation from those professions.

Animal Care Australia supports a framework in which high-risk activities are appropriately reserved to veterinary surgeons, while other activities can be undertaken by people with appropriate competency, training, and supervision. The legislation should regulate risk and competency, rather than assuming that every service relating to animal health or wellbeing must be performed by a veterinarian.

Detailed Comparison and Animal Care Australia's Position

The following tables provide comparison of the proposed changes to the current Act.

1. Definition of Veterinary Science and Reserved Veterinary Acts

Current Law	Proposed Change	ACA / Industry Concern	Recommended Position
Section 2A broadly defines veterinary science as veterinary surgery or veterinary medicine. It includes diagnosis of disease or injury, advice based on diagnosis, medical or surgical treatment, surgery, anaesthesia and certain veterinary certification.	Replace or supplement the broad existing approach with a risk-based framework identifying veterinary acts that are reserved exclusively to veterinarians, activities that may be delegated, and activities that fall outside veterinary regulation.	ACA supports risk-based regulation but is concerned that an overly broad definition of a reserved veterinary act could unintentionally capture legitimate activities undertaken by other animal professionals.	Reserved veterinary acts should be clearly and narrowly prescribed by legislation or regulation, based upon demonstrable animal-welfare, biosecurity or public-health risk.
The present definition focuses strongly on diagnosis and treatment.	Potential new scopes could focus on particular procedures or activities rather than simply the concept of practicing veterinary science.	Without carefully drafted boundaries, activities relating generally to health or wellbeing could become regulated even where veterinary qualifications are neither necessary nor proportionate.	The legislation should clearly distinguish veterinary diagnosis and medical treatment from non-veterinary animal care, education, husbandry, training and behaviour services.
Animal husbandry activities can currently be excluded from veterinary science by regulation.	A new framework could specifically identify activities outside veterinary regulation.	This provides an opportunity to remove longstanding uncertainty for animal-care professionals.	New framework should contain a category of non-reserved animal-care activities rather than relying upon exemptions granted after an activity has been characterised as veterinary science.

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Animal Care Australia's position

Animal Care Australia supports moving from a broad prohibition model to a genuine risk-based reserved-acts model. The starting point should not be: ***“Is this activity connected with animal health?”***

The appropriate question should instead be: ***“Does this activity present sufficient clinical, animal welfare, biosecurity or public-health risk that it must be restricted to a veterinarian?”***

This distinction is particularly important in the contemporary animal-care industry.

2. Veterinary Nurses

Current Law	Proposed Change	ACA / Industry Concern	Recommended Position
The Veterinary Surgeons Act contains a definition of an “animal nurse”, referring to a person who has successfully completed a course of training approved by the Board and performs prescribed veterinary-related duties. However, there is no contemporary comprehensive statutory registration scheme comparable to veterinarian registration.	Consider formal registration and title protection for veterinary nurses and defined scopes of practice.	Registration could improve professional recognition and workforce utilisation, but mandatory entry qualifications could displace experienced workers.	ACA supports professional recognition where demonstrably beneficial, provided there are multiple fair pathways to registration.

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Current Law	Proposed Change	ACA / Industry Concern	Recommended Position
Veterinary nurses currently operate substantially through employment, supervision and other legislation governing medicines and veterinary practice.	A registered veterinary nurse profession could have prescribed functions that may be undertaken under different levels of veterinary supervision.	Poorly designed regulation could make currently competent workers unable to continue working.	Existing practitioners must be given grandfathering, RPL and competency-assessment pathways.
Queensland medicines legislation already defines veterinary nurses for particular medicine authorities by reference to employment and a qualification making the person eligible for full membership of the Veterinary Nurses Council of Australia.	Veterinary legislation could introduce a separate qualification and registration test.	Two different statutory definitions of “veterinary nurse” could create unnecessary complexity and conflicting eligibility requirements.	Veterinary legislation and medicines legislation should be reviewed together and harmonised.

Animal Care Australia’s position

Animal Care Australia acknowledges the increasingly skilled role of veterinary nurses and recognises the case for clearer professional recognition.

However, Animal Care Australia would oppose a model under which, from an arbitrary commencement date, an experienced veterinary nurse could no longer practice because that person does not hold one specifically prescribed contemporary qualification

Industry competency has developed over decades. Workers may hold:

- current qualifications;
- superseded veterinary nursing qualifications;
- interstate qualifications;
- overseas qualifications;
- related veterinary or animal-care qualifications;
- university studies;
- partial qualifications combined with extensive experience; or
- substantial workplace competency developed before the introduction of current qualifications.

A modern regulatory framework must accommodate these circumstances.

3. Qualifications for Veterinary Nurses

This is one of Animal Care Australia's primary concerns.

Current Law

The existing Veterinary Surgeons Act does not operate as a comprehensive modern registration system for veterinary nurses.

However, other Queensland legislation already attaches qualification requirements to particular activities.

- Under the Medicines and Poisons (Medicines) Regulation 2021, for example, a person falling within the veterinary nurse category for specified medicines authorities must:
- be employed to practice veterinary nursing; and
- hold a qualification making that person eligible for full membership of the Veterinary Nurses Council of Australia.

The Regulation then prescribes circumstances in which such veterinary nurses may administer or possess particular scheduled medicines under veterinary supervision or direction.

Proposed Change

The review proposes formal statutory recognition of veterinary nurses, potentially including:

- registration;
- title protection;
- recognised qualifications;
- scopes of practice;
- professional standards; and
- disciplinary regulation.

Animal Care Australia / Industry Concern

Animal Care Australia's concern is not with appropriate qualification standards themselves, it is

how those standards are designed and how existing workers are treated. Legislation should not create an artificial position whereby a person competent to perform veterinary nursing work on the day before commencement suddenly becomes legally unqualified to perform that work on the day after commencement.

A qualification is an important indicator of competence. It should not always be treated as the only possible evidence of competence, particularly when regulating an existing workforce retrospectively. There is also a danger in embedding a particular qualification title or training product too rigidly within legislation.

National vocational education qualifications change over time. Qualifications are superseded, replaced and restructured. Legislation should therefore avoid becoming dependent upon a qualification code that may subsequently cease to exist.

Recommended Position

Animal Care Australia recommends that eligibility should recognise:

Pathway 1 – Current Australian qualification

A person holds a recognised current veterinary nursing qualification.

Pathway 2 – Superseded Australian qualification

A person holds a previously recognised veterinary nursing qualification.

Pathway 3 – Equivalent qualification

A person holds an interstate or international qualification assessed as substantially equivalent.

Pathway 4 – Recognition of Prior Learning / competency assessment

An established worker demonstrates competence against an approved occupational competency framework.

Pathway 5 – Transitional / grandfathering registration

A person who can demonstrate that they have lawfully and substantially practiced as a veterinary nurse for a prescribed period prior to commencement may receive registration subject to appropriate transitional requirements.

Animal Care Australia recommends that legislation establish the principles for recognition while detailed qualification lists are maintained through regulation or Board-approved standards capable of being updated when national qualifications change.

4. Recognition of Prior Learning

Current Law	Proposed Change	ACA / Industry Concern	Recommended Position
There is currently no broad statutory veterinary nurse registration pathway requiring RPL arrangements.	Registration could make proof of formal occupational competency necessary.	Experienced workers may be excluded unless prior learning and experience are formally recognised.	RPL and competency recognition should be expressly accommodated in transitional arrangements.
RPL exists within Australia's nationally recognised VET system.	The regulator may instead decide registration solely according to possession of listed qualifications.	This risks duplicating competency assessment and undermining nationally recognised RPL processes.	Where an RTO has been lawfully awarded a qualification through compliant RPL, the regulator should treat that qualification in the same manner as the same qualification obtained through training and assessment.

Animal Care Australia's position on RPL

Animal Care Australia strongly recommends that the Government distinguish between:

1. qualification recognition, and
2. the pathway through which a qualification was achieved.

Under Australia's vocational education and training system, a qualification obtained through valid Recognition of Prior Learning is the same nationally recognised qualification as one obtained through a conventional training pathway.

A regulator should therefore not discriminate between:

- a person awarded a qualification through training and assessment; and
- a person awarded the same qualification following valid RPL.

Where there is concern about an individual's ongoing competence, that should be addressed through professional standards, recency-of-practice requirements, continuing professional development or competency assessment.

It should not be addressed by undermining legitimate recognition of prior learning.

5. Grandfathering of Existing Veterinary Nurses

Animal Care Australia recommends a dedicated transitional registration period. An existing practitioner could be required to demonstrate appropriate evidence such as:

- employment history;
- position descriptions;
- references;
- veterinary surgeon attestations;
- records of professional development;
- existing qualifications;
- evidence of clinical skills;
- portfolios;
- logbooks;
- competency assessment; or
- a combination of these.

The regulator could then provide:

- unconditional registration, where competence is demonstrated;
- conditional registration, requiring limited identified gap training; or
- supervised transitional registration, where additional competence needs to be demonstrated.

This would protect animal welfare without unnecessarily removing experienced workers from an industry already facing workforce pressures.

6. Veterinary/Animal Technologists

Current Law	Proposed Change	ACA / Industry Concern	Recommended Position
Veterinary /Animal technologists are not presently established as a distinct registered occupation under the Veterinary Surgeons Act.	Create formal recognition, registration, title protection and a defined scope of practice for veterinary/Animal technologists.	ACA recognises the potential value of this occupational group. However, its relationship with veterinarians and veterinary nurses must be clear.	Establish a clearly defined occupational scope based upon competency and risk.
The existing framework effectively revolves primarily around veterinary surgeons and non-veterinarians working under appropriate supervision or exemptions.	A technologist category may sit between veterinary surgeon and veterinary nurse in terms of education and permitted clinical activities.	Merely creating a title without prescribing meaningful differences in scope risks occupational confusion.	Government should publish a completely proposed scope-of-practice matrix before finalising legislation.
No statutory distinction presently defines how veterinary/animal technology qualifications interact with veterinary nursing qualifications.	Bachelor's degree veterinary technology qualifications may form the principal entry pathway.	Transition, equivalency and recognition arrangements will be required.	Qualification pathways should recognise equivalent interstate and international education and relevant previous qualifications.

Animal Care Australia's position

Animal Care Australia supports recognising higher-level veterinary paraprofessional capability where evidence demonstrates that appropriately trained people can safely undertake specified clinical tasks.

Veterinary/Animal technologists should not simply become a renamed or more highly qualified veterinary nurse. If two occupations are to be statutorily regulated, their respective:

- educational expectations;
- levels of responsibility;
- permitted procedures;
- supervision requirements;
- autonomous functions; and
- professional accountability
- must be clearly distinguishable.

7. Scope of Practice Matrix

Animal Care Australia recommends development of a publicly accessible scope-of-practice framework distinguishing at least:

Occupational Group	Indicative Regulatory Approach
Veterinary surgeon	Diagnosis, prescribing, major surgery and other reserved veterinary acts
Veterinary/ Animal technologist	Defined advanced technical/clinical functions within legislated scope and appropriate veterinary oversight
Registered veterinary nurse	Defined nursing and clinical support functions with appropriate supervision
Veterinary assistant / animal attendant	Animal care, handling and prescribed support activities
Animal trainer / behaviour professional	Training, behavioural assessment and modification within a non-veterinary scope
Groomer	Grooming and routine coat/skin observation without veterinary diagnosis
Rehabilitation / conditioning professional	Non-diagnostic physical conditioning and permitted rehabilitation activities

Occupational Group	Indicative Regulatory Approach
Animal owner / breeder / carer	Routine husbandry, first aid and prescribed animal-care activities

This matrix should be developed through consultation with each affected profession, rather than solely through consultation with veterinarians.

8. Dog Trainers and Animal Behaviour Professionals

This area warrants particular attention.

Current Law

Veterinary science currently includes:

- diagnosing disease or injury; and
- giving advice based upon such a diagnosis.

Animal behaviour and training are not inherently veterinary science. Professional trainers routinely:

- assess observable behaviour;
- identify antecedents and consequences;
- assess environmental triggers;
- develop training plans;
- undertake behaviour modification;
- use desensitisation and counter-conditioning;
- provide enrichment advice;
- develop management strategies;
- educate owners and handlers;
- train cooperative husbandry behaviours; and
- refer animals for veterinary assessment where a medical contribution is suspected.

Proposed Change

A risk-based definition of veterinary acts could provide greater clarity. However, depending upon drafting, behavioural activities could potentially become captured if the following terms are drafted too broadly:

- diagnosis;
- treatment;
- behavioural disorder;
- clinical behaviour;
- behavioural condition; or
- therapy

Animal Care Australia / Industry Concern

Animal trainers should not be prohibited from assessing and describing observable animal behaviour merely because the same behaviour may sometimes have a medical component. For example, trainers commonly work with:

- fear;
- aggression;
- reactivity;
- resource guarding;
- frustration;
- separation-related behaviour;
- excessive barking;
- handling sensitivity;
- arousal;
- impulse-control difficulties;
- socialisation problems; and
- learned avoidance behaviour.

A trainer identifying these behaviours is not necessarily making a veterinary diagnosis. Similarly, developing a behaviour modification program does not necessarily constitute treatment of disease. Animal Care Australia recognises that some presentations can have medical causes. Responsible trainers should therefore recognise referral thresholds.

Recommended Position

The legislation should expressly clarify that the following are not veterinary acts when performed within a person's competence:

- observation and description of animal behaviour;
- functional assessment of behaviour;
- animal training;
- behaviour modification;

- environmental modification;
- enrichment;
- desensitisation;
- counterconditioning;
- cooperative care training;
- owner/handler education; and
- management planning.

This exemption should operate provided the practitioner does not:

- purport to diagnose disease or injury;
- prescribe veterinary medicines;
- represent themselves as a veterinarian;
- perform another reserved veterinary act; or
- knowingly continue treatment of a presentation requiring veterinary assessment without appropriate referral.

9. The Term “Diagnosis” in Behaviour Practice

Animal Care Australia recommends particular care in the use of the word diagnosis. Veterinary diagnosis should appropriately remain a protected clinical activity where it involves determining the presence or nature of disease, injury or another medical condition. However, animal professions also use assessment terminology in a non-medical sense. For example:

“The dog is displaying fear-related behaviour when unfamiliar people approach.”

is different from:

“The dog has a neurological disorder causing aggression.”

The first is an observation and behavioural assessment. The second may constitute a clinical diagnosis.

The new legislation or accompanying guidance should make this distinction clear. Without clarity, uncertainty could discourage appropriate early behavioural intervention and create unnecessary referrals for matters that do not require veterinary treatment.

10. Veterinary Behaviourists and Non-Veterinary Behaviour Professionals

Animal Care Australia recommends preserving a distinction between:

- veterinary behavioural medicine, and
- animal behaviour and training practice.

Veterinary surgeons with specialised behavioural expertise may appropriately:

- diagnose medical or psychiatric conditions;
- investigate physiological causes;
- prescribe medications;
- incorporate medical treatment into behaviour management.

Non-veterinary animal behaviour professionals may appropriately:

- assess behaviour;
- design training and modification programs;
- work with learning processes;
- provide management strategies; and
- work collaboratively with a veterinarian.

These services are complementary rather than mutually exclusive.

The legislation should encourage multidisciplinary collaboration rather than creating unnecessary professional monopolies.

11. Animal Husbandry and Routine Animal Care

Current Law

Section 2A already recognises that prescribed animal husbandry activities may fall outside veterinary science.

Proposed Change

The review provides an opportunity to establish a clearer risk-based exclusion framework.

Animal Care Australia / Industry Concern

Routine activities should not require veterinary oversight merely because they have some relationship to health or welfare.

Examples may include:

- routine grooming;
- coat and nail care;
- bathing;
- routine husbandry;
- body condition monitoring;
- exercise and conditioning;
- enrichment;
- preventative handling;
- puppy development;
- animal training;
- routine observations;
- non-diagnostic nutrition education;
- routine first aid within an appropriate scope; and
- welfare monitoring.

Recommended Position

The legislation should contain a clear principle that ordinary animal husbandry and animal-care activities are not veterinary acts unless a particular activity is expressly reserved on risk grounds.

12. Referral Obligations for Non-Veterinary Professionals

Animal Care Australia supports establishing clear referral expectations without turning non-veterinary occupations into veterinary-regulated professions.

An animal professional should refer to or recommend veterinary assessment when there is reasonable cause to suspect:

- disease;
- significant injury;
- pain;
- poisoning;
- neurological dysfunction;
- serious physiological abnormality;
- a condition requiring prescription medication; or
- another matter outside the practitioner's scope.

This represents good professional practice.

However, referral requirements should not be drafted so broadly that every behaviour or welfare issue automatically requires a veterinary consultation.

13. Delegation of Veterinary Acts

Current Law	Proposed Change	ACA / Industry Concern	Recommended Position
Non-veterinarians generally cannot practice veterinary science for fee or reward except within limited statutory arrangements.	Introduce veterinary acts that may be delegated to appropriately skilled people.	This could substantially improve workforce utilisation, but only if delegation rules are workable.	ACA supports a structured delegation model.
Existing provisions rely heavily upon veterinary direction or supervision.	Different supervision levels may potentially apply according to procedure and practitioner.	Undefined terminology can make lawful practice difficult to determine.	Define supervision levels precisely.

Animal Care Australia recommends at least three concepts be distinguished:

➤ Direct supervision

The veterinarian is physically present and able to immediately intervene.

➤ Indirect supervision

The veterinarian has authorised the activity, has sufficient knowledge of the case and is available to provide assistance, but need not be physically beside the worker.

➤ Remote professional direction

The veterinarian has established appropriate clinical instructions and remains contactable through telecommunications. The appropriate supervision level should depend upon:

- the activity;
- animal risk;
- practitioner competence;
- complexity of the case; and
- availability of escalation.

14. Competence Rather Than Job Title Alone

Animal Care Australia strongly recommends that permitted activities be linked to demonstrated competence, not merely occupational title. Not every veterinary nurse necessarily has identical practical competence. Similarly, an experienced practitioner may hold advanced skills in one area and limited experience in another. The legislation should therefore allow:

qualification + demonstrated competence + appropriate supervision

rather than assuming that holding an occupational title provides universal competence across every procedure permitted to that occupational category.

Employers and supervising veterinarians should retain responsibility for ensuring delegated activities are appropriate for the particular individual.

15. Students and Trainees

Queensland legislation already recognises trainee arrangements in relation to medicines and veterinary activities. Any new framework should ensure students can continue to obtain genuine workplace competency. Veterinary nursing and veterinary/animal technology students must be able to perform practical tasks under appropriate supervision.

If legislation is too restrictive, it can produce the unintended result that students cannot lawfully practice the competencies they are required to demonstrate before becoming qualified.

Animal Care Australia therefore recommends explicit provisions for:

- veterinary students;
- veterinary/animal technology students;
- veterinary nursing students;
- trainees;

- work placement;
- supervised assessment; and
- structured clinical learning.

16. Relationship with Nationally Recognised Training

Where Queensland legislation relies upon VET qualifications, ACA recommends consultation with:

- relevant Jobs and Skills Councils;
- registered training organisations;
- veterinary employers;
- veterinary nurses;
- training package experts;
- industry representatives; and
- regulators.

Legislation should not create requirements that conflict with national training-package outcomes. Neither should legislation inadvertently require an RTO to certify competence outside the scope of a nationally endorsed qualification.

17. Qualification Codes Should Not Be Hard Coded Into Primary Legislation

Animal Care Australia recommends avoiding legislative provisions such as:

“A veterinary nurse must hold qualification [specific training package code].”

Training package codes and qualifications are routinely superseded. A preferable legislative model would define an:

- approved veterinary nursing qualification
- with regulations or regulatory standards prescribing accepted current and superseded qualifications.

That allows the framework to evolve without requiring amendment of the primary Act every time the national training system changes.

18. Overseas Qualifications

Any registration system should contain a transparent mechanism for recognising overseas-qualified veterinary nurses and veterinary technologists.

Assessment should consider:

- qualification level;
- curriculum;
- clinical experience;
- animal welfare standards;
- legislative knowledge;
- medicines competency;
- practical capability; and
- English-language competence where relevant to safe practice.

Applicants should be able to undertake targeted gap training rather than being forced to repeat an entire qualification where substantial equivalence exists.

19 Veterinary Premises and Practice Licensing

Current Law	Proposed Change	ACA / Industry Concern	Recommended Position
The existing Act requires veterinary practice to be conducted at approved veterinary premises, subject to the legislative framework.	Replace premises approval with a contemporary veterinary practice licensing system capable of accommodating mobile services, telehealth and modern business models.	Modernisation is appropriate, but the definition of a veterinary practice must not capture unrelated animal businesses merely because a veterinarian provides services within them.	Define veterinary practice according to the provision of veterinary services, not merely the presence or employment of a veterinarian.
The Board may impose conditions concerning equipment, hygiene, drugs, employee qualifications and branches of veterinary science practiced at premises.	Practice-level clinical governance obligations may increase.	Regulatory obligations could extend significantly to businesses rather than individual veterinarians.	Requirements should be proportionate to the nature and risk of services provided.

Animal Care Australia supports regulatory arrangements that enable:

- mobile veterinary services;
- outreach services;
- farm-based care;
- emergency services;
- telehealth; and
- multidisciplinary animal-care facilities.

20. Multidisciplinary Businesses

Increasingly, animal-care businesses provide combinations of:

- veterinary services;
- training;
- behaviour services;
- boarding;
- grooming;
- rehabilitation;
- daycare;
- breeding support; and
- allied animal services.

The fact that a veterinarian works within such a business should not automatically convert every service offered by that business into veterinary practice.

Animal Care Australia recommends that only the veterinary component of a multidisciplinary service fall within veterinary practice licensing requirements unless there is a clear risk-based justification for broader regulation.

21. Veterinary Medicines

Veterinary medicines appropriately require strong controls. Animal Care Australia does not support allowing non-veterinary professionals to diagnose conditions or prescribe prescription veterinary medicines outside authorised arrangements.

However, where a veterinarian has assessed an animal and prescribed a treatment, appropriately trained veterinary nurses or technologists should be capable of administering medicines within clearly defined scopes.

Current Queensland medicines legislation already recognises veterinary nurses for

specified medicine dealings and supervision circumstances. Any new Veterinary Act must therefore be drafted alongside the Medicines and Poisons Act 2019 and Medicines and Poisons (Medicines) Regulation 2021.

Conflicting definitions should be avoided.

22. Title Protection

Animal Care Australia supports protecting titles where consumers could reasonably rely upon those titles as indicating a regulated professional qualification.

If the titles:

- Registered Veterinary Nurse; and
- Registered Veterinary Technologist

are introduced, only registered persons should be entitled to use them. However, Animal Care Australia cautions against unnecessarily restricting broad descriptive terms that are already established throughout the animal-care industry without evidence of consumer harm. Title protection should protect consumers—not operate as an unnecessary restraint on lawful occupations.

23. Registration Fees

If registration becomes compulsory for veterinary nurses or technologists, government should assess the financial impact. Workers should not be subjected to substantial annual fees simply to fund a regulatory system from which they receive limited benefit.

Fees should be:

- cost-reflective;
- transparent;
- proportionate to income and regulatory risk; and
- subject to public accountability.

Reduced or transitional fees should be considered during implementation.

24. Continuing Professional Development

If veterinary nurse or technologist registration includes CPD requirements, ACA supports proportionate ongoing professional development. However, CPD should be

flexible. Acceptable activities could include:

- formal courses;
- workshops;
- conferences;
- workplace training;
- clinical education;
- webinars;
- mentoring;
- professional reading;
- competency development; and
- recognised industry education.

A highly prescriptive or costly CPD model could disproportionately affect regional workers and lower-paid veterinary support professionals.

25. Rural and Regional Queensland

The effect of occupational regulation on rural and regional veterinary services must be specifically assessed. Queensland already experiences geographic workforce challenges. Any reform that reduces the pool of people able to perform routine or delegated animal-care activities could:

- increase veterinary workloads;
- increase costs;
- delay treatment;
- reduce service availability; and
- negatively affect animal welfare.

Risk-based delegation and recognition of competent paraprofessionals could, conversely, improve rural service availability.

Animal Care Australia therefore supports reform that expands safe workforce capability rather than unnecessarily narrowing it.

26. Veterinary Surgeons Board Governance

Current Law

The Veterinary Surgeons Board consists of six members. Under the current statutory composition, the majority of Board members are required to be eligible veterinary surgeons.

Proposed Change

The review proposes strengthening Board:

- representation;
- transparency;
- accountability; and
- decision-making capability.

Animal Care Australia / Industry Concern

If the Board becomes responsible for regulating veterinary nurses and veterinary technologists, it would no longer be appropriate for those professions to have no meaningful statutory voice within governance.

This is particularly significant where the Board may determine:

- registration standards;
- scopes of practice;
- professional conduct;
- competency;
- disciplinary matters; and
- qualification recognition

for non-veterinary occupations.

Recommended Position

If veterinary nurses and technologists become regulated professions, the Board should include:

- registered veterinary surgeon representation;
- veterinary nurse representation;
- veterinary technologist representation;
- independent/community representation; and
- appropriate government/regulatory expertise.

Where direct Board membership is not practicable, statutory professional advisory committees should be established.

27. Regulatory Capture

Animal Care Australia considers that legislation should contain safeguards against regulatory capture. Veterinary regulation must protect:

- animals;
- consumers;
- biosecurity;
- public health; and
- professional standards.

It should not be used to protect the commercial interests or occupational territory of one profession. Decisions about whether an activity should be reserved must therefore be supported by evidence demonstrating that restriction is necessary to manage material risk. Competition, convenience or professional preference alone should not determine scope restrictions.

28. Compliance and Enforcement

Animal Care Australia supports the proposed move toward graduated, risk-based compliance. Regulators should have options including:

- education;
- guidance;
- improvement notices;
- conditions;
- undertakings;
- targeted supervision;
- suspension; and
- cancellation or prosecution for serious matters.

Minor administrative non-compliance should not automatically receive the same regulatory response as conduct presenting a serious animal welfare risk.

29 Transitional Arrangements

Any substantial reform should include a transition period of sufficient duration. Animal Care Australia recommends a minimum staged implementation covering:

Stage 1 – Education

Publication of:

- final scopes;
- qualification requirements;
- registration requirements;
- protected titles;
- fees;
- supervision requirements; and
- transition pathways.

Stage 2 – Voluntary / transitional registration

Existing practitioners submit applications and evidence.

Stage 3 – Gap assessment

Practitioners who require additional competency undertake targeted assessment or gap training.

Stage 4 – Full commencement

Mandatory requirements begin only after workers have had a reasonable opportunity to comply.

Existing lawful workers should not face enforcement while genuinely progressing through an approved transitional pathway.

Recommended Principles for Qualification Recognition

Animal Care Australia recommends that the legislation or subordinate instruments incorporate the following principles.

Principle 1 – Competency

Regulation should ensure practitioners possess the skills and knowledge necessary for their occupational scope.

Principle 2 – Qualification neutrality

Where equivalent competency exists, legislation should not unnecessarily favour one education provider or pathway.

Principle 3 – Recognition of superseded qualifications

A qualification should not cease to have value merely because the national training system replaces it.

Principle 4 – RPL recognition

A nationally recognised qualification obtained through valid RPL should be treated equally to the same qualification obtained through training.

Principle 5 – Existing-worker transition

Competent existing workers should have a fair pathway into any new registration system.

Principle 6 – Overseas equivalence

International qualifications should be capable of objective assessment.

Principle 7 – Targeted gap training

Applicants should only be required to address demonstrated competency gaps rather than repeat competencies already established.

Principle 8 – Regulatory flexibility

Detailed qualification schedules should generally sit in subordinate instruments capable of keeping pace with changes to national education systems.

Recommended Principles for Animal Trainers and Behaviour Professionals

Animal Care Australia recommends the Government adopt the following explicit policy position:

‘Animal training and non-veterinary behaviour modification should not be classified as veterinary science merely because those activities affect an animal's behaviour or welfare.’

Within the limits of their competence, Animal trainers and behaviour practitioners should remain able to:

- observe;
- assess;
- describe;
- analyse;
- manage; and
- modify behaviour

Veterinary referral should occur where there is reasonable suspicion of an underlying medical condition or where veterinary diagnosis, prescribing or treatment is required. This creates an appropriate collaborative model:

Trainer identifies behavioural presentation → veterinarian investigates possible medical contribution where indicated → trainer and veterinarian collaborate where appropriate.

This is preferable to:

all behaviour concerns → veterinary profession exclusively.

Matters Requiring Further Clarification From Government

Before final legislation is prepared, Animal Care Australia recommends that the Department publicly answer the following questions.

Veterinary Nurses

- What exact qualification will be required?
- Will superseded qualifications be recognised?
- Will veterinary nurses without formal qualifications be grandfathered?
- Will RPL be recognised?
- What evidence will existing practitioners be required to provide?
- Will there be conditional registration?
- What practical procedures will a veterinary nurse be permitted to perform?
- Will nurses be able to perform specified activities without a veterinarian physically present?
- What CPD requirements will apply?
- What registration fees are proposed?

Veterinary/Animal Technologists

- What qualification will define a veterinary technologist?
- What separates the technologist scope from the veterinary nurse scope?
- Which additional clinical procedures will technologists be permitted to perform?
- Will overseas veterinary technology qualifications be recognised?
- Will there be pathways for experienced veterinary nurses with advanced competency?

Trainers and Behaviour Practitioners

- Will behavioural assessment constitute diagnosis?
- Will behaviour modification constitute treatment?
- Will the legislation distinguish veterinary behavioural medicine from animal training and behaviour modification?
- Will trainers remain able to work with aggression, fear, reactivity, separation-related behaviour and similar presentations?
- What circumstances will trigger mandatory veterinary referral?

Other Animal Professionals

How will the Act affect:

- groomers;
- animal rehabilitation practitioners;
- canine conditioning professionals;
- animal massage/myotherapy practitioners;
- nutrition advisers;
- breeders;
- shelter and rescue workers;
- wildlife carers;
- animal attendants;
- assistance-dog trainers; and
- other animal-care practitioners?

Governance

- Will veterinary nurses and veterinary technologists receive seats on the Board?
- Who will determine the scope of practice for those professions?
- Will non-veterinary animal industries be consulted before an activity is declared a reserved veterinary act?
- Will decisions to expand reserved acts require a formal regulatory impact assessment?

Key Recommendations

Animal Care Australia recommends that the Queensland Government:

1. Adopt a genuinely risk-based reserved-acts framework rather than broadly defining all animal health-related activities as veterinary practice.
2. Clearly identify acts reserved exclusively to veterinary surgeons.
3. Create a transparent schedule of veterinary acts capable of delegation to competent veterinary nurses, technologists and other appropriately authorised persons.
4. Explicitly exclude legitimate animal training and behaviour modification from veterinary science, except where a practitioner performs veterinary diagnosis, prescribing or another reserved veterinary act.
5. Protect routine animal husbandry, enrichment, grooming, conditioning and animal-care activities from unnecessary veterinary regulation.
6. Provide statutory recognition for veterinary nurses and veterinary technologists only where the resulting framework clearly improves animal welfare, workforce utilisation and consumer protection.
7. Establish clear and distinct scopes of practice for veterinary nurses and veterinary technologists.
8. Do not prescribe a single current qualification as the only pathway for existing workers.
9. Recognise current, superseded, equivalent and overseas qualifications.
10. Create formal existing-worker and grandfathering arrangements.
11. Recognise RPL as a valid pathway to nationally recognised qualifications.
12. Permit targeted competency assessment and gap training rather than unnecessary repetition of full qualifications.
13. Avoid hard-coding individual training package qualification codes into primary legislation.
14. Align veterinary legislation with the Medicines and Poisons regulatory framework.
15. Develop clear definitions of direct, indirect and remote veterinary supervision.
16. Protect supervised learning opportunities for veterinary, veterinary technology and veterinary nursing students.
17. Require evidence of material risk before adding an activity to the list of reserved veterinary acts.
18. Undertake specific rural and regional workforce impact assessment before imposing new occupational restrictions.

- 19.** Ensure registration fees for veterinary nurses and technologists remain proportionate and transparent.
- 20.** Ensure veterinary nurses and veterinary technologists have meaningful representation in regulatory governance if they become regulated by the Veterinary Surgeons Board.
- 21.** Ensure Board decision-making reflects animal welfare and consumer interests rather than occupational protectionism.
- 22.** Introduce graduated and proportionate compliance measures.
- 23.** Provide an adequate transition period before new offences or mandatory registration provisions commence.
- 24.** Undertake further consultation on the actual drafting of reserved acts and scopes of practice before legislation is introduced.

Conclusion

Animal Care Australia supports modernising Queensland's veterinary legislation.

- ✓ The existing Veterinary Surgeons Act 1936 reflects a very different period in veterinary practice and does not adequately recognise contemporary veterinary teams or the wider network of professionals involved in animal care. However, modernisation should not simply mean expanding the boundaries of veterinary regulation.
- ✓ Effective contemporary regulation should recognise that animal welfare is best supported by a multidisciplinary workforce operating within clearly defined scopes of competence.
- ✓ Veterinary surgeons appropriately retain responsibility for veterinary diagnosis, prescribing, surgery and other high-risk clinical activities.
- ✓ Veterinary nurses and veterinary technologists should be enabled to use their skills appropriately.
- ✓ Experienced workers should not lose their careers because a new regulatory system fails to recognise prior competence.
- ✓ Recognition of prior learning and previous qualifications should be recognised.
- ✓ Animal trainers and behaviour professionals should remain able to perform legitimate training and behaviour work without being characterised as unlawfully practicing veterinary science.
- ✓ Routine animal husbandry and animal-care activities should remain outside veterinary regulation unless there is compelling evidence of risk requiring restriction.

Animal Care Australia therefore encourages the Queensland Government to pursue reform based upon:

- **risk rather than professional territory;**
- **competence rather than title alone;**
- **recognition rather than unnecessary exclusion;**
- **collaboration rather than professional monopoly; and**
- **animal welfare rather than regulatory expansion for its own sake.**

A carefully designed framework can improve professional recognition, workforce capability, animal welfare and public confidence simultaneously.

Animal Care Australia welcomes the opportunity to contribute to further consultation on the detailed drafting of the legislation, particularly the definitions of reserved veterinary acts, qualification pathways, recognition of prior learning and transitional arrangements, veterinary nurse and technologist scopes, and the treatment of animal training and behaviour professionals.

This submission can be published in full on the website including the signatory's name.

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,



Michael Donnelly
President
Animal Care Australia

KG:MD