25 March 2003

Mr Tony Hinton
Commissioner
Productivity Commission
PO Box 80
BELCONNEN ACT 2616

Dear Mr Hinton

Thank you very much for taking the time to meet with us on Friday the 21st March 2003 and for listening to our perception that the TTMRA and MRA are being used as a gateway for entry into Western Australia by veterinary graduates from non-accredited veterinary schools.

The Australasian Veterinary Boards Council (AVBC), a grouping of all Australian Veterinary Boards and the New Zealand Veterinary Council, has established an accreditation body, within that organization, to accredit veterinary schools in both Australia and New Zealand. Further, the AVBC, after reviewing the accreditation procedures of the Royal College of Veterinary Surgeons in the UK and the American Veterinary Medical Association in North America, has entered into a relationship with those bodies to accredit graduates from veterinary schools accredited by those bodies. Currently the AVBC recommends primary registration be given to:

- graduates from all veterinary schools in Australia, New Zealand, the United Kingdom and from the University of Pretoria in South Africa.
- veterinary graduates from veterinary schools in the United States of America and Canada who have passed the appropriate examinations to be registered in the respective States and Provinces of those countries can also be directly registered.

The AVBC hopes that:-

- Irish veterinary graduates may shortly be added to the list following an accreditation visit by representatives of the Royal College and the AVBC to that country's veterinary school.
- European veterinary schools will soon develop an accreditation system similar to those recognised by the AVBC, for in doing so the pool of persons able to undertake primary veterinary registration in Australia will be increased.

It is only by increasing the diversity of competent veterinary surgeons available to work in Australia that the profession can assure that it will remain on the cutting edge of professional development and, thus, be able to continue to service the needs of the

community in a highly professional and competent manner. Although veterinary graduates from non-accredited veterinary programs can register to work in Australia after successfully completing the National Veterinary Examination (NVE), the ability of a veterinary graduate to directly register through university accreditation, without the requirement to sit the NVE, encourages a freer flow of qualified persons. The Trans Tasman Mutual Recognition Agreement (TTMRA) and the Mutual Recognition Agreement (MRA) were designed to further assist with that freedom of movement of qualified persons but these agreements have also given veterinary surgeons from non-accredited universities a gateway into Western Australia.

It is perceived that the intent of the TTMRA and the MRA was to allow persons with suitable qualification to have workplace mobility between New Zealand and Australia and between Australian States and Territories. Within the veterinary context it is further perceived that suitable veterinary qualifications means that one has obtained those qualifications from an accredited veterinary school whose accreditation is either undertaken by or endorsed by the AVBC. This Board has no objection to persons using either the TTMRA or the MRA to register in this State if that person's qualifications are endorsed by the AVBC but there has been instances of individuals seeking to register in Western Australia via the MRA, who have been registered in another State and are from non-accredited veterinary programs.

In one particular case a European veterinary graduate from a non-accredited veterinary program registered in New Zealand and then, without ever setting foot in New Zealand, used her New Zealand registration to register via TTMRA in Victoria and then used her Victorian registration to register in Western Australia via the MRA. New Zealand, we were informed, was required to register this person due to a treaty commitment and Victoria was required to register this person as a signatory to the TTMRA. This person graduated in her home country having done her final studies in Equine Medicine but received general registration in both New Zealand and Victoria. Her competencies as a general veterinary practitioner were questionable.

This one situation demonstrates a flaw in both the TTMRA and the MRA legislation. There are further examples of individuals coming from non accredited veterinary programs who have registered and worked short term in some Australian States and/or in New Zealand, and used the MRA/TTMRA to gain registration with various Australian Boards. Although all of the Australian and New Zealand veterinary Boards/Councils have agreed to curtail the registration of persons with veterinary degrees not accredited by the AVBC, this apparent loophole in the TTMRA and MRA legislation still exists and appears to be outside the intent of the legislation.

This Board is not saying that veterinary programs not accredited by the AVBC are below the Australian/New Zealand veterinary standard and that these persons should be excluded from the West Australian workplace. What this Board is saying is that if the veterinary facility is non-accredited, this Board is unable to assess the standard of veterinary education graduates from these facilities have received. Students who graduate from non-accredited facilities and who seek to work in Australia can

demonstrate their competencies in veterinary science by sitting the National Veterinary Examination. If, without sitting the examination, an individual from a non-accredited veterinary program can demonstrate that s/he has a high level of a particular veterinary skill that will benefit the West Australian community, that person can, and is in many circumstances, given a restricted registration in Western Australia. This Board, for example, gives restricted registration every year to several Irish equine veterinary surgeons to work in Western Australia during the horse stud season. The restricted registration limits that person's work to the approved field of veterinary science in West Australia. Such restricted registrations are not subject to the TTMRA and MRA.

It would be appreciated if the Productivity Commission during its review of the Trans Tasman Mutual Recognition Agreement and the Mutual Recognition Agreement would close the gateway that allows persons from veterinary schools that are not accredited by the AVBC or whose accreditation has not been endorsed by the AVBC from using those Agreements to enter Western Australia and potentially compromise the veterinary services to the Western Australian community.

Thanking you for your consideration of this Board's request.

Yours sincerely

A D Keefe
REGISTRAR