Commission Tony Hinton
MRA Review,
Productivity Commission
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Dear Commissioner Hinton

FLEXIBLE REGISTRATION OF VETERINARY SURGEONS

I refer to the meeting between Sarah Box, yourself, myself and Kevin Doyle of 28 April 2003 at which you suggested that we send a submission setting out the needs of the veterinary profession for mobility among jurisdictions.

The Veterinary Profession has a significant need to move between jurisdictions. Approximately 30% of respondents have indicated that they operate inter state in any year (Australian Veterinary Boards Council).

The Australian Veterinary Association is the professional body for veterinarians in Australia. We receive numerous complaints about the process and cost of individual State registration acts because this provides an active barrier to the mobility of veterinarians who wish to carry out acts of veterinary science in states and territories other than those in which they are registered.

The Trans-Tasman Mutual Recognition Agreement and Mutual Recognition among the States and Territories have gone some way to addressing the situation but the system is still very cumbersome.

Registration of Veterinary Surgeons is required by law and certain activities ("acts of veterinary science") are limited to performance by veterinary surgeons. Some "acts" may be performed by lay persons trained and accredited for the purpose. This is to protect the public and the animals. The principal reasons for registration include:

- animal welfare and some procedures are limited to veterinary surgeons by welfare legislation in each jurisdiction
- the prescribing and dispensing of prescription animal remedies and other controlled drugs, which are controlled by law

The nature of the industries served by the profession and of the profession itself requires greater mobility than other professions. The principal reasons are:

1. It's a small and very diverse profession of approximately seven thousand practitioners and its diversity is exemplified by the 22 special interest groups of the AVA.
2. There are many specialities, the Australian College of Veterinary Scientists has some 17 chapters each reflecting a special form of endeavour. Fellowship of the College can lead to registration as a specialist. Other veterinarians have particular interests and expertise or limit their activities to particular species or veterinary procedures.
3. Litigation and insurance issues require the handling of animals by veterinarians even if this is not required by legislation. Practitioners who provide advice or consultation interstate without registration in the jurisdiction have been sued and their indemnity insurance has failed to protect them.
4. Small jurisdictions eg ACT, Northern Territory, Tasmania and South Australia have difficulties in accessing specialists (some specialities are not represented in some jurisdictions). The fees and registration procedures are a disincentive for interstate visits particularly at short notice.
5. Some industries, such as the poultry and pig industry industries, require particularly trained veterinarians and travel interstate is often required. Interstate movement is needed for national enterprises and company veterinarians as well as by small enterprises.
6. Many practices cover several states some but not all are located near borders and some have arrangements with interstate facilities eg racetrack and feed lot veterinarians and veterinary consultants.
7. Emergency animal diseases require movement of veterinarians, government and private, to carry out response and surveillance activities
   - Such needs will increase with time and the formation of an Australian Veterinary Reserve will require practitioners around Australia to respond immediately to outbreaks to support Government Veterinarians.
8. Locums tenens, smaller jurisdictions have difficulty in getting access to locums during periods of emergency or leave and registration costs and procedures limit them.
9. Natural disasters require immediate attention to burnt stock or access for treatment during floods. Some jurisdictions have emergency provisions and during a declared emergency qualified but unregistered veterinarians can participate.
10. Public service veterinarians may carry out acts of veterinary science in meat inspection, research or disease control and are required to travel interstate. If preforming acts of veterinary science they should be registered in the jurisdiction concerned.

AVA recognises efforts made through Trans Tasman mutual recognition and the Mutual Recognition Agreement between the States and Territories that allow veterinarians to move between jurisdictions without a full reinvestigation of their

qualifications. They need a letter of good standing from the State in which they are registered. This involves expensive paper work and re-registration fees and is difficult where movements may be very occasional or at short notice into unexpected jurisdictions.

Models

1. The model of car registration where qualifications / registrations taken out in the State of residence and practice being allowed in other jurisdictions. Familiarity with State laws relating to professional practice animal welfare and drugs and poisons is necessary. Re-registration in a new jurisdiction within a limited time would be required after re-location.

   It is recognised that small jurisdiction would have trouble funding investigations but this can be socialised among the states.
2. National Registration performed by the commonwealth or the AVBC using the Australian Pesticides and Veterinary Medicines Authority and Foods Standards Australia and New Zealand as the model. Qualifications would be assessed and persons registered at the Commonwealth level and put on a central register and control of their activities would be under State legislation in the same way as occurs with drugs and poisons and food standards.
3. Improvement of mutual recognition arrangements would be achieved by having a central register held by AVBC or a central agency with all jurisdictions notifying new registrations to the central register. Any restrictions on practice, de-registrations or pending investigations would be supplied by individual jurisdictions to the central registry. By this means veterinarians could enter a new jurisdiction by transmission of an email message. Fees for the new jurisdiction this could be provided within an allowed period of time.

   AVA recognises that current attempts to provide national registration through improvement in arrangements for primary secondary state registrations are being made. The model will result in increased costs and cumbersome administrative procedures.

Yours sincerely,

Margaret Conley
Chief Executive Officer

cc. Ms Sarah Box