

Submission to the Productivity Commission

National Competition Policy Analysis 2025

Submitted by: The Regulation of Veterinary Nurses and Technologists
Working Party

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Executive Summary

The Regulation of Veterinary Nurses and Technologists Working Party (RVNTWP), a joint initiative of the [Veterinary Nurses Council of Australia](#) and the [Australasian Veterinary Boards Council](#), welcomes the opportunity to submit this response to the Productivity Commission's National Competition Policy Analysis.

We urge the Commission to prioritise the establishment of a national occupational licensing scheme for veterinary nurses and technologists. Currently, Western Australia is the only jurisdiction with statutory regulation for these roles. This fragmented approach creates significant barriers to labour mobility, limits workforce capacity, and compromises Australia's ability to respond effectively to biosecurity threats.

Key Recommendations:

- Implement a national occupational licensing scheme for veterinary nurses and technologists as a priority reform
- Align with international standards for allied veterinary professional regulation, such as those in the EU, UK, Ireland, and North America.
- Adopt a flexible legislative reform model—preferably an Applied Laws Model—based on jurisdictional readiness.

About the RVNT Working Party

The RVNT Working Party is a joint initiative between the Veterinary Nurses Council Australia (VNCA) and the Australasian Veterinary Boards Council (AVBC), established to explore the feasibility, benefits, and framework for regulating veterinary nurses and technologists across Australia. The goal is to develop a nationally harmonised regulatory framework that ensures public safety and improves animal welfare through expanded access to veterinary services.

Definitions

- **AVNAT:** The Australian Veterinary Nurse and Technologist Registration Scheme, a voluntary registration initiative launched by VNCA in 2019.¹
- **Veterinary Nurse:** An individual holding, at minimum, a Certificate IV in Veterinary Nursing.
- **Veterinary Technologist:** Sometimes referred to as veterinary technicians or “vet techs,” these professionals typically hold a Bachelor’s degree in Veterinary Technology.

¹ <https://www.vnca.asn.au/avnat/>

Response to Information Request 1: Occupational Licensing

Which occupations would be best suited to a national licensing scheme?

Veterinary nurses and veterinary technologists should be prioritised for a national licensing scheme for the following reasons:

1. **Regulatory Fragmentation:** Currently, only Western Australia (WA) has statutory regulation, while the voluntary AVNAT scheme has achieved only 6.2% participation in 6 years (approximately 1,100 registrants from 15,300 veterinary nurses and technologists nationally).^{2,3} The lack of a statutory framework outside of WA results in inconsistency in qualifications and scopes of practice in other jurisdictions.
2. **Patient Safety and Animal Welfare:** Unregulated staff may perform procedures with no minimum qualifications.
3. **Public Confidence:** Consumers expect a basic standard of training, ethics, and accountability for those providing care to their animals.
4. **Productivity and workforce utilisation:** With 15,000 registered veterinarians in Australia serving approximately 29 million pets (excluding wildlife and livestock) limiting the effective capacity of veterinary services.^{4,5,6,7} Regulation enables veterinary businesses to delegate specific acts of veterinary science to Veterinary Nurses and Technologists with confidence, unlocking more efficient use of veterinarians and enabling better distribution of workload across veterinary teams.
5. **Biosecurity imperatives:** Veterinary nurses and technologists play a vital role as the first point of contact for animals requiring treatment, making them essential for identifying and responding to Emergency Animal Diseases (EADs) that could have devastating economic and social outcomes. For example, a Foot and Mouth Disease outbreak in Australia is estimated to have a potential \$80–100 billion direct impact to Australia's economy.⁸
6. **High-Risk Duties:** Veterinary nurses and technologists handle controlled substances, perform medical procedures, and make clinical decisions that directly impact animal welfare and public health.
7. **Regulatory Efficiency:** Licensing enables national mobility and removes the burden of repeated credentialing across jurisdictions.

² VNCA – direct communication on AVNAT registrant numbers, May 2025

³ <https://www.jobsandskills.gov.au/data/occupation-and-industry-profiles/occupations/3613-veterinary-nurses>

⁴ Data from AVBC: 15,260 registered veterinarians in Australia as of 30 June 2023

⁵ https://animalmedicinesaustralia.org.au/wp-content/uploads/2022/11/AMAU008-Pet-Ownership22-Report_v1.6_WEB.pdf#:~:text=Australia's%20pet%20population%20is%20estimated%20to%20be.in%202016%20and%202019%20before%20the%20pandemic.

⁶ <https://www.health.gov.au/topics/doctors-and-specialists>

⁷ Australian Veterinary Association (AVA): Inquiry into the veterinary workforce shortage in NSW (Initial Summary). Assessed: <https://www.ava.com.au/siteassets/advocacy/veterinary-workforce/inquiry-into-veterinary-workforce-shortages-in-nsw---ava-initial-summary.pdf>

⁸ <https://www.aspistrategist.org.au/is-australias-biosecurity-system-ready-for-foot-and-mouth-disease/>

What would be the first steps towards a national licensing scheme for selected occupations?

Immediate steps should include:

1. **Securing endorsement from the Agricultural Ministerial Council** to formally consider veterinary nursing and technology regulation as a national priority.
2. **Development of National Principles:** develop a set of agreed national principles for the regulation of veterinary nurses and technologists, including minimum qualifications, scope of practice, and regulatory objectives.
3. **Model Legislation Drafting:** Request the Parliamentary Counsel's Committee to prepare model legislation, informed by the agreed national principles. This would ensure consistency and provide a legislative blueprint for participating jurisdictions.
4. **Intergovernmental Agreement (IGA):** Secure an IGA to commit participating jurisdictions to the implementation of the national scheme and define transitional and administrative arrangements.
5. **Nominate a Host Jurisdiction (if Applied Laws Model):** If the Applied Laws model is adopted, identify a host jurisdiction to pass the primary legislation, with other jurisdictions enacting mirror laws. This can happen in a phased manner, with additional jurisdictions signing up over time.

Why did previous attempts fail and how to overcome barriers?

Earlier efforts to regulate veterinary nurses and technologists in Australia were unsuccessful due to jurisdictional reluctance and limited resources. However, the situation has shifted significantly. The veterinary sector now faces a range of urgent, well-recognised challenges, including workforce pressures, challenges with rising costs of providing services, and increasing biosecurity demands. While legislative approaches still vary across jurisdictions, there is growing openness for reform among key stakeholders, including veterinary regulators. Importantly, the sector itself has developed solutions and infrastructure to support reform — such as the AVNAT registration scheme — providing a strong foundation for a national licensing framework to be leveraged by government. A survey conducted by the AVBC found that 88% of respondents supported the regulation of veterinary nurses and technologists.⁹

How could a renewed attempt overcome the barriers to a national licensing scheme?

Importantly, foundational work is already underway through the efforts of the RVNT Working Party, VNCA, and AVBC. This includes:

- **Collaboration with Skills Insight** to define national units of competency, update qualifications, and align training with international benchmarks.¹⁰

⁹ https://avbc.asn.au/wp-content/uploads/2022/11/Att-7.3a-Survey-Results_Options-for-Registration-of-Veterinary-Nurses.pdf

¹⁰ <https://skillsinsight.com.au/project/veterinary-nursing-review/>

- **Formal recognition of veterinary technologists as a healthcare profession** under OSCA (Occupation Standard Classification for Australia).¹¹
- **Ongoing maintenance and promotion of the AVNAT voluntary registration scheme**, which can provide the basis for a future statutory register, easing the transition to national regulation.¹²

What benefit would a national scheme provide over expanded automatic mutual recognition?

A national licensing scheme is the ideal solution for the following reasons:

1. **Increasing need for interjurisdictional mobility:** especially during national emergencies like bushfires or floods or in response to emergency animal disease outbreaks.
2. **Improved workforce utilisation:** Enables strategic deployment of Veterinary nurses and technologists to address regional and rural shortages
3. **Stronger public protection:** Clear public and animal safety standards. Provides consistent complaints resolution and disciplinary mechanisms
4. **Helps address existing cross-jurisdictional inefficiencies:** addresses compliance variability faced by veterinary practices operating across state lines.

How could the PC quantify benefits?

We recommend that the Productivity Commission model the potential economic benefits of regulating veterinary nurses and technologists considering the following economic aspects:

- **Workforce productivity gains** from increased utilisation of veterinary nurses and technologists in veterinary service delivery.
- **Reduced liability and error costs** through minimum professional standards and accountability.
- **Enhanced service access** particularly for rural and regional communities where there is an opportunity for veterinary nurses and technologists to provide services under remote veterinarian supervision.
- **Biosecurity risk mitigation** protecting agricultural industries.
- **Professional retention benefits** reducing costly workforce turnover.

¹¹ Australian Bureau of Statistics '269 Miscellaneous Health Professionals' (Webpage) <<https://www.abs.gov.au/statistics/classifications/osca-occupation-standard-classification-australia/2024-version-1-0/browse-classification/2/26/269>>.

¹² <https://www.vnca.asn.au/avnat-registration-scheme/avnat-register/>

Response to Information Request 2: International Standards

Unlike many other comparable jurisdictions, Australia does not have a statutory licensing framework for these roles. This absence creates regulatory divergence that impacts both **domestic workforce capacity** and **international mobility**.

What is the impact of a lack of harmonisation?

- **Export of Qualifications:** Australian-trained veterinary nurses and technologists often face recognition barriers overseas due to the absence of a statutory regulatory framework, limiting their ability to work in countries such as the UK, USA, and Canada where regulation is well-established.
- **Import of Skilled Labour:** Similarly, comparably trained professionals from overseas cannot easily be assessed or recognised for work in Australia, despite having met robust international standards. This hinders efforts to address veterinary workforce capacity and limits labour mobility under free trade agreements and mutual recognition regimes.
- **Compliance and Duplication:** Without national statutory recognition, duplicative internal assessment processes are required in Australian veterinary practices for hiring, onboarding, or ensuring fitness to practise of international veterinary nurses and technologists.
- **Innovation and Scope Expansion:** Misalignment also acts as a brake on the adoption of advanced practice models used internationally because the lack of regulatory clarity in Australia constrains legal delegation of responsibilities.

There are multiple international frameworks and standards that Australia could harmonise with, including the UK, Ireland, USA, Canada, Japan, and notably South Africa. The South African Veterinary Council (SAVC) is the statutory body for veterinarians, veterinary nurses, veterinary technologists, as well as animal health technicians, laboratory animal technologists, and veterinary physiotherapists. This model is notable for its comprehensive, team-based approach to veterinary healthcare regulation, with defined scopes of practice and a unified professional framework.

Aligning with international standards in allied veterinary professional regulation would reduce compliance duplication, increase international recognition, enhance domestic workforce capacity, and enable the safe and effective delegation of clinical responsibilities. It is a high-priority area for reform that aligns with Australia's international animal trade and welfare commitments and domestic productivity goals.

Response to Information Request 3: Other Competition Reform Options

Which sectors or policy areas need reform to further promote competition?

As evidenced by the outcomes of the NSW Parliamentary Inquiry into the Veterinary Workforce Shortage, the veterinary services sector requires urgent reform due to:

1. **Geographic service gaps:** Rural and regional areas face severe veterinary shortages limiting competition and access to veterinary care.
2. **Workforce mobility barriers:** Current regulatory fragmentation prevents efficient workload allocation.
3. **Service delivery constraints:** Supervision requirements limit innovative service models and telehealth opportunities

Specific reform priorities:

- **Enable innovative service delivery models** including telehealth.
- **Facilitate rural service provision** through reduced supervision requirements for registered veterinary nurses and technologists.
- **Strengthen emergency response capacity** through nationally coordinated workforce deployment of registered veterinarians, veterinary nurses and veterinary technologists.

Conclusion

The regulation of veterinary nurses and technologists represents a critical competition reform opportunity that would deliver significant economic and social benefits. The current regulatory fragmentation creates barriers to labour mobility, limits workforce capacity, and undermines Australia's biosecurity preparedness.

The RVNT Working Party strongly recommends that the Productivity Commission prioritise this as a key reform initiative. The veterinary sector stands ready to support implementation through existing industry frameworks and stakeholder networks.

We welcome the opportunity to provide additional information or participate in further consultations to support the Commission's analysis.

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