

Veterinary Council of New Zealand submission on the Productivity Commission Review of Mutual Recognition Schemes

The Veterinary Council of New Zealand (VCNZ) appreciates the opportunity to comment on the review of the Mutual Recognition and Trans Tasman Mutual Recognition (TTMR) legislation.

This submission focuses on the operation of the TTMR legislation in relation to the registration of veterinarians in New Zealand and Australia.

The TTMR legislation cemented the close and cooperative relationship which existed between the Australian and New Zealand veterinary jurisdictions through the Australasian Veterinary Boards Council (AVBC) and has provided an overarching framework for the AVBC to continue to work towards the harmonisation of Australasian standards, while recognising the jurisdictional authority of the respective regulatory authorities.

Under the auspices of the AVBC, New Zealand and Australian jurisdictions cooperate by way of:

- a joint Australasian accreditation process for veterinary schools
- a shared process for assessing and making recommendations to the relevant jurisdiction on applications for specialist registration
- a common preliminary registration examination for overseas trained veterinarians holding non recognised qualifications
- a standard format for the final registration examination for overseas trained veterinarians holding non recognised qualifications
- consistency of registration policies (with some minor exceptions which to date have not caused any difficulties)

While VCNZ considers TTMR is achieving its purpose of harmonising standards between Australian and New Zealand veterinary jurisdictions, we would like the Commission to consider the following points:

- despite VCNZ publicising this route to registration, the TTMR provisions do not appear to be widely used by New Zealand registered veterinarians seeking registration in Australia. We have received only two TTMR requests from Australian jurisdictions to directly verify registration/good standing status in the last year. This compares with 25+ requests from veterinarians for a certificate of good standing to be sent to Australian jurisdictions - which indicates that the veterinarian concerned is applying for registration in Australia under state veterinary legislation rather than TTMR. This lack of uptake of the TTMR option may be because most Australian jurisdictions do not actively offer this streamlined means of registration to New Zealand veterinarians. By contrast VCNZ alerts Australian veterinarians to the alternate TTMR route to registration on enquiry and via the website. A separate TTMR registration application form is also available via the website.

- An increasing number of overseas qualified unregistered veterinarians resident in Australia are applying for registration via the New Zealand registration examination process with no intention of residing in New Zealand. This is possibly because of the differential in registration examination fees between New Zealand and Australia. In New Zealand the fees must be calculated in accordance with Audit Office and Treasury Guidelines and are subject to scrutiny by the Parliamentary Regulations Review Select Committee. While fees are set to ensure cost recovery these applications impact on staff resourcing time which could be more productively spent in processing applications from those who intend to reside and practise in New Zealand. VCNZ therefore supports measures to impose residency requirements for prospective applicants for initial registration in New Zealand or Australia to reduce such jurisdiction shopping and hopping.
- VCNZ has not had to impose conditions on Australian veterinarians registering in New Zealand under TTMR. It has however been concerned about the implications of the policy of some Australian jurisdictions to register examination candidates who have passed the preliminary examination but not yet demonstrated their competence to practise by passing the final clinical examination. In the event of such veterinarians seeking registration in New Zealand VCNZ can of course impose the same supervision and any other conditions that apply to that veterinarian's registration in Australia. VCNZ would however wish to be assured that such supervision was robust and incorporated the same monitoring and reporting requirements that are applied to NZ veterinarians under supervision. The lack of legal certainty around the Council's ability to impose requirements over and above those imposed by the Australian jurisdiction is of concern.
- VCNZ supports moves for a national Australian system for the registration of veterinarians.

Thank you for the opportunity to comment.

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