

Veterinary Workforce Shortage in New South Wales

Legislative Council's Portfolio Committee Number 4

Chair, Mr Mark Banasiak

Submission

Veterinary practice is regulated in New South Wales under the *Veterinary Practice Act 2003* (Act). The object of the Act (s 3) is to:

- (a) To promote the welfare of animals
- (b) To ensure consumers of veterinary services are well informed as to the competencies required of veterinary practitioners
- (c) To ensure that acceptable standards are required to be met by veterinary practitioners to meet the public interest and national and international trade requirements
- (d) To provide public health protection.

The key mechanisms within the Act to achieve these objectives include:

- regulating restricted acts of veterinary science
- registration of veterinary practitioners
- complaints and disciplinary processes
- licensing of veterinary hospitals
- appointment of inspectors, and
- establishment of the Veterinary Practitioners Board.

The Veterinary Practice Regulation 2013 (the Regulation) provides additional legislative support for the Act. It defines restricted acts of veterinary science, provides further instruction on registration of veterinary practitioners, complaints and veterinary proceedings and licensing of veterinary hospitals, and establishes the Veterinary Practitioners Code of Professional Conduct (the Code). The Code outlines the standard of professional conduct expected of veterinary practitioners. The Regulation is due for Staged Repeal on 1 September 2024.

The Veterinary Practitioners Board (Board) is a body corporate established under the Act (s79) and consists of eight members: four veterinarians representing specialist, urban, rural and academic sectors of the profession; two veterinarians selected by the Minister; and two non-veterinarians representing consumers of veterinary services.

Board members are appointed for a period of 3 years and the term of the current Board expires 30 June 2024.

The Act (s 79) also describes the functions of the Board which include:

1. To register veterinary practitioners and licence veterinary hospitals
2. To investigate complaints against veterinary practitioners
3. To take disciplinary action against veterinary practitioners
4. To provide advice to the Minister with respect to any other matter in connection with the administration of this Act



**Veterinary
Practitioners
Board**

The Board's [Strategic Plan 2023-2026](#) describes the goals of the Board which have been developed to achieve its strategic purpose of optimising animal welfare across NSW through the regulation of a sustainable and trusted veterinary profession.

The Act and the *Veterinary Practice Regulation 2013* are within the portfolio of the Minister for Agriculture, and Minister for Regional New South Wales, the Hon. Tara Moriarty MLC. The Board works closely with the Department of Primary Industries and other key stakeholders.

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Introduction

The Board welcomes the opportunity to provide a submission to this Upper House Committee inquiry into the veterinary workforce shortage in NSW. This submission will not address all the terms of reference for this inquiry, only those relevant to the Board's regulatory functions and those for which the Board is of the opinion it is able to make a helpful contribution to the matters raised.

In this submission the Board will outline the need for changes to veterinary practice, companion animal, and animal welfare legislation which will assist with creating a sustainable and trusted veterinary workforce in NSW.

The Board collects demographic, workforce, and complaints data annually and reports these data to the parliament, the profession, and the public through publications including [Annual Reports](#), its biannual newsletter [BoardTalk](#), and various presentations of descriptive [statistics](#) available from its website. This submission will rely on these data or secondary data to support potential solutions and recommendations.

Terms of reference

(a) The shortage of veterinarians across the profession, including clinical (small and large animal practice), government, academia, research, industry and pathology

The Board is aware of concerns that there is a shortage of veterinarians across the profession and that these concerns were exacerbated as a result of the COVID-19 pandemic, and in the delivery of services across New South Wales, particularly in rural and regional areas, during natural disasters and biosecurity emergencies.

The [number of veterinarians in NSW as at 30 June 2022](#) was 4,396 and this total number of veterinarians has been increasing by approximately 3% per annum from 2007 to 2022 (total increase of 56%).

Veterinarians are required to submit an Annual Return to the Board each year to maintain their registration. Based on these submissions from 2022, 76% of veterinarians were working in clinical practice; 4% working in government (including government research); 4% in academia; and 2% in the pharmaceutical sector. These percentages have remained relatively constant over the period 2015 to 2022. Areas experiencing a decrease over this period were non-practicing (-16%); pharmaceutical (-2%); private research and development (-7%); and TAFE (-3%).

Approximately 85% of professional veterinary services revenue is derived from companion animal services,¹ and the demand for companion animal veterinary services is derived from the number of households owning companion animals. For the period 2019 to 2022, there was an average annual increase in households within NSW of approximately 1.5%,² accompanied by an average annual increase

¹ Australian Bureau of Statistics 2001, 8564.0 Veterinary Services, Australia, 199-2000, ABS. [Available](#).

² Australian Bureau of Statistics n.d., New South Wales, 2021 Census Community Profiles, Time Series Profile, ABS. [Available](#).

of 7.9% in dog ownership and 8.6% in cat ownership.³ For the same period, there was an average annual increase of 5.2% in the number of veterinarians in clinical practice in NSW.⁴

Based on the above analysis, it is likely that the average annual increase in the total numbers of veterinarians in NSW over the same period (5.2%) would have been more than sufficient to address changes in demand for companion animal veterinary services (1.5%) in the absence of the COVID-19 increase in pet ownership. It is also likely that the shortage of veterinarians, in addition to being exacerbated by the COVID-19 pandemic, is due to a stabilisation or decline in the number of full time equivalent (FTE) veterinarians in NSW.

(b) The challenges in maintaining a sustainable veterinary workforce, including recruitment and retention rates

[In 2022](#), 97 veterinarians voluntarily removed themselves from the register (2.2% of all registered veterinarians). Most veterinarians who voluntarily removed themselves from the register did so because they were moving interstate (52%), overseas (31%), or retiring (9%). Four veterinarians (less than 0.1% of the total number of veterinarians in NSW) described their reason for voluntary removal as 'Leaving the profession' (three veterinarians in 2021).

The categories of 'Retirement' and 'Leaving the profession' combined made up 13% of removals. Hence, there is potential for at least 85% of veterinarians who removed themselves from the register to return to practice in NSW.

It is likely that experienced veterinarians (who are approaching or entering retirement) were typically required to work more than 38 hours per week during their career, that is, more than the current equivalent of one FTE. These traditional models of veterinary work (long clinic opening hours, long shift times, and after-hours commitments) are no longer suitable. Consequently, as these veterinarians leave the profession, the number of veterinarians required to replace them is often more than one FTE.

The Board does not (yet) collect information regarding hours worked or type of employment (full time, part time or casual) but research from the Australian Veterinary Association (AVA) 2018 revealed that 27% of respondent veterinarians were working part-time and that this was an increase of 4% from the previous AVA survey (conducted in 2016).⁵ The 2018 AVA survey noted that 25% of male and 28% of female veterinarian respondents were working part-time. [Data from the 2022 registration year](#) show that 62% of veterinarians registered in NSW are women and approximately 80% of veterinary graduates in 2022 were women.

There has been a general trend to part time employment across all industries since the 1980s.⁶ Whilst women are generally considered to prefer part-time work, the percentage of men working part time has increased from 5.4% in 1980 to 19.1% in 2020.⁶

³ Animal Medicines Australia 2023, Pets in Australia: A national survey of pets and people, AMA. [Available](#).

⁴ Veterinary Practitioners Board 2023, BoardTalk June 2023. [Available](#).

⁵ AVA 2019, Australian Veterinary Workforce Survey 2018, Australian Veterinary Association. [Available](#).

⁶ National Skills Commission n.d., State of Australia's Skills 2021, The rise in part time employment, Australian Government. [Available](#).

Given that Award rate annual salaries progress from approximately \$60,000 to \$85,000,⁷ it is possible that a greater proportion of veterinarians take parental leave over their partners for financial reasons. When they return to work, these veterinarians may choose, or need, to work part-time for a variety of reasons leading to further reductions in the number of FTE veterinarians available to work in NSW.

Veterinarians registered elsewhere are required to provide the Board with a Letter of Professional Standing (LOPS) from their most recent veterinary regulator. In 2022, the Board received 81 LOPS's, most from other Australian jurisdictions (29), followed by the United Kingdom (22), New Zealand (9), and South Africa (8). If the veterinarian is restoring their name to the register and their most recent regulator was the Board, no LOPS is required. Approximately 120 veterinarians restored their name to the register in 2022.

The number of veterinarians in NSW increases each year with additions derived from new registrations from Australian and overseas universities, and veterinarians previously registered in NSW restoring their name to the register. Approximately 370 veterinarians were added to the register and approximately 100 veterinarians removed themselves from the register in 2022.

As well as for various personal reasons, veterinarians may prefer flexible work arrangements, including part time or casual work, to improve well-being and work satisfaction and reduce stress.^{8, 9}

In summary, whilst there is clear evidence for an increase in the number of veterinarians each year, these numbers are unlikely to reflect changes in FTE veterinarians and a valid and reliable metric needs to be developed to better describe veterinary workforce capacity.

(c) The burn-out and mental health challenges facing the veterinary profession

The Board is aware of research detailing the incidence of mental health challenges and suicide in the veterinary profession and developed a [policy](#) and [guideline](#) describing its Health Program for Veterinarians largely informed by procedures developed by the Medical Council of NSW.

Veterinarians are required to inform the Board of any physical or mental impairment, disability, condition or disorder that detrimentally affects or is likely to detrimentally affect their physical or mental capacity to practice. Declarations regarding impairments are recorded at the time of registration and renewal of registration (Annual Return). The Board receives approximately 40 notifications each year including both mental and physical impairments (< 1% of total registrants). A small number of veterinarians are managed via the Board's Health Program.

The Board is concerned that complaint investigations against veterinarians or the fear of these investigations could adversely affect the mental health of veterinarians. For the 2022 financial year, the Board received 81 formal complaints against 115 individual veterinarians. This represents 3-4% of veterinarians working in clinical practice. There was an average annual increase in the number of formal complaints received of 8.2% in the period 2007 to 2022 (total increase 224%). Whilst around 75% of complaints are dismissed the risk or threat of a complaint and the experience may contribute to the stress experienced by veterinarians. [Feedback from veterinarians](#) the subject of a complaint, suggests

⁷ Annual Wage Review 2022-2023, Determination, Animal Care and Veterinary Services Award 2020 [MA000118]. [Available](#).

⁸ Ray TK, Pana-Cryan R 2021, 'Work flexibility and work-related well-being', *Int J Environ Res Public Health*, vol. 18, no. 6. [Available](#).

⁹ Australian Government n.d, Flexible working arrangements, Fair Work Ombudsman. [Available](#).

that whilst most are comfortable with the decision and reasons for the decision, fewer are comfortable with the process. Many believe the process to be stressful, unfair, too long (average time for all complaints 142 days) and that there is a presumption of guilt. Unfortunately, the processes used by the Board are largely fixed by veterinary practice legislation.

If current trends in the number of complaints continue, in 5 years the Board will be processing over 120 complaints per year which will consume most of the Board's time and significant resources if the current complaint processing model is not changed. Based on historical data approximately 75% of these complaints will be dismissed and up to 5% withdrawn.

Given the potential for health declarations and complaint investigations to add to the stressors faced by veterinarians the Board recommends changes to veterinary practice legislation to ensure health issues can be managed outside complaint processes, and or disciplinary proceedings. These can be more generally described within the legislation to allow the Board to evolve and adopt best practice approaches to the investigation of complaints and management of health issues.

(d) The role of, and challenges affecting, veterinary nurses

Veterinary nurses comprise approximately 42% of the veterinary services workforce in Australia¹⁰ and yet there is no legislated definition of a veterinary nurse (or technician) in NSW.

Accordingly, any person is able to refer to themselves as a veterinary nurse or technician and perform duties assigned to veterinary nurses or technicians. Non-veterinarians must not perform [restricted acts of veterinary science](#) (unless in [exempt circumstances](#)) with the exception of administration of an anaesthetic agent under immediate and direct supervision of a veterinarian. Australian Qualifications Framework (AQF) level IV veterinary nurses may obtain a licence to take radiographs.

Veterinary nurses (AQF level IV) and veterinary technicians (AQF level 7) have skills and knowledge that can be of significant assistance in the management of veterinary patients and practices. Their lack of protection of title, limited options for career development and remuneration,⁷ likely represent significant challenges to the sustainability of this workforce. The ability of unqualified persons to perform tasks involved in managing the care of animals, whilst not restricted acts of veterinary science, has the potential to significantly impact the health and welfare of animals. Restricting certain tasks to veterinary nurses and technicians has the potential to improve animal welfare outcomes and relieve pressure on veterinarians.

[Research by the Sustainable Practice Committee](#) of the Australasian Veterinary Boards Council (AVBC) found that 88% of respondents to a survey of participants within the veterinary industry, across a broad range of roles, was supportive of protection of title and registration of veterinary nurses.

The [World Organisation for Animal Health](#) noted that NSW does not regulate veterinary paraprofessionals, leading to a lower level of advancement than comparable countries such as the UK and USA. The Board is of the opinion that there is scope to expand the role of veterinary nurses through a formal accreditation process in order to create a veterinary nursing and technician profession.

¹⁰ Australian Industry and Skills Committee 2021, Veterinary Nursing, National Industry Insights Report. Available: <https://nationalindustryinsights.aisc.net.au/industries/animal-care-and-management/veterinary-nursing>. Accessed 23 February 2022.

The Board supports the conclusions from the research above which recommended a national approach to the registration of veterinary nurses in Australia. Recognition of this national veterinary nurse registration body should therefore be a priority for any changes to veterinary practice legislation in NSW.

(e) The role of, and challenges affecting, overseas trained veterinarians

The Board is responsible for regulating the veterinary profession to ensure that acceptable standards are required to be met by veterinary practitioners to meet the public interest and national and international trade requirements. The qualifications acceptable for full (general) registration in Australia are based on [recommendations from the AVBC](#) and include both Australian and overseas trained veterinarians. Overseas trained veterinarians who do not possess qualifications acceptable for full registration but with [qualifications eligible for registration as a specialist](#) may also be granted full registration by the Board with conditions restricting their practice to their area of specialty. These veterinarians must then apply for and be granted specialist registration.

The Board also has the power to approve [limited registration](#) (for a specific period or purpose) for overseas veterinarians who do not have an AVBC recommended qualification. The Board uses this policy to register veterinarians completing qualifications to gain full registration. In addition, where these graduates can demonstrate acceptable skills, knowledge and experience, they may be granted limited registration to address identified needs such as for the role of On-Plant Veterinarians in abattoirs and equine practice veterinarians for the Thoroughbred breeding season. As at 30 June 2022, there were 48 veterinarians with limited registration in NSW (25 in 2021).

Overseas trained veterinarians with full, specialist and limited registration generally represent approximately 15% of registered veterinarians in NSW.

Once all required documents are received by the Board, applications for registration are typically processed within 7 days independent of whether the veterinarian's qualifications are from Australia or overseas. Some applications for limited registration require Board approval and may therefore take up to 6 weeks to process as the Board meets monthly.

The Board is of the opinion that the current system and supporting legislation is sufficiently robust to promote animal welfare and protect the public and sufficiently flexible to enable veterinarians with qualifications not approved by the AVBC to provide appropriate support for the profession in NSW.

Under National Recognition of Veterinary Registration, veterinarians registered in NSW have deemed registration (if there is an equivalent type of registration) in all other Australian States and Territories. One of the Board's functions is to cooperate with other jurisdictions in Australia and New Zealand to further a common and harmonious approach to the administration of legislation hence any significant departure from current procedures would require consultation and support from other jurisdictions.

(f) The arrangements and impacts of providing after-hour veterinary services

The *Veterinary Practice Regulation 2013* ([sch 2](#)) outlines the Veterinary Practitioners Code of Professional Conduct (Code). The Code (cl 8) requires a veterinarian, when accepting an animal for diagnosis or treatment, to ensure they are available for the ongoing care of the animal, or to make arrangements for another veterinarian to take over the care of the animal.

This requirement during after-hours is therefore met by veterinarians providing 24 hour, 7 days per week care either by themselves or with colleagues from the same veterinary practice, by sharing the

burden with colleagues from nearby practices, or through a dedicated after-hours practice. In recent years a number of businesses have also created triage services which filter after-hours calls through telemedicine services staffed by veterinarians or veterinary nurses.

Dedicated after-hours services are more common in major cities and inner regional areas of NSW which can lead to longer travel times for clients in outer regional and remote areas. Veterinary practices that choose to continue to provide after-hours services in an area may feel obligated, due to animal welfare concerns, to provide these services to clients of other practices, imposing an additional burden on their staff. Informal arrangements adopted by some veterinary practices may therefore adversely affect the economics of practices taking on this burden and their employee well-being and job satisfaction.

The public increasingly expects veterinary practices providing after-hours services to be staffed by veterinarians 24 hours. In some veterinary practices that continue to provide after-hours cases staff may not be present at the practice after-hours leading to gaps in care. The Board has received complaints against individual veterinarians under these circumstances when clients believe they were not adequately informed of these gaps in service provision.

In addition to companion and production animals, veterinary practices also receive calls from the public after-hours in relation to wildlife emergencies and stray companion animals. Veterinarians are not obliged under the Code (cl 8) to attend to these animals. However, under the Code (cl 3), veterinarians must not refuse to provide either first aid treatment, timely referral, or euthanasia as appropriate to an animal in their presence.

As noted above, the impact of requirements to provide after-hours veterinary services is generally greater in areas outside major cities due to greater distances between veterinary practices and fewer dedicated after-hours practices. In addition, equine and production animal after-hours services also often require visits rather than animals being brought to a veterinary practice. Travel from veterinary practices creates greater work health and safety concerns and a greater time commitment when providing after-hours services.

(g) The impact of the current legislative and regulatory framework on veterinarians

The Board has held discussions with key stakeholders on the fit for purpose nature of the State's veterinary regulatory framework in meeting the government objectives and considers the *Veterinary Practice Act 2003* and accompanying *Veterinary Practice Regulation 2013* (Regulation) both require significant amendment. These changes should provide for greater flexibility to ensure registration, licensing and complaints procedures are modern, agile, and able to remain fit for purpose.

1. Registration

Provisional registration applies to graduands who can then convert to full (general) registration upon submission of a testamur. It is now possible to receive primary source verification from universities of completion of degree requirements rendering this approach redundant.

Details of specific continuing professional development (CPD) activities are prescribed in the Regulation (cl 10) and must be entered in the Annual Return creating a significant burden for veterinarians if enforced and potentially focusing these activities in areas of less value to the veterinarian. The approach to CPD needs to be able to evolve and remain evidence based rather than overly prescriptive.

The legislation currently provides for dealing with health issues under complaints provisions (Act (s 45A)). Managing health issues in a process separate to complaints is considered best practice.

2. Licensing

The Act (s 65) requires all premises where general or spinal anaesthesia is performed to be licensed unless there are specific exempt circumstances. With some exceptions, the Act (s 70) requires a veterinarian or veterinarians to maintain a controlling interest in the licence. As a result, there are difficulties for research facilities and wildlife facilities in meeting these requirements and in other examples businesses create complex structures in order to comply.

Whilst data collected from Annual Returns from veterinarians allows the Board assist planning in areas such as workforce shortages, no data is required by hospitals and hence the size, services and species of animal being treated is not readily available to examine to determine workforce capacity, availability of services for the public, or capacity to respond to an emergency or biosecurity event.

3. Complaints

Complaint processes are detailed in the Act (Pt 5) and provide the Board with minimal options for dealing with client concerns. As per the medical literature, performance issues are best dealt with through education, conduct issues through discipline, and health issues through support. The Board's options under the legislation are limited to discipline. In addition, quality management literature suggests the focus should be on processes to mitigate the impact of human error and yet the complaints focus is on the individual not the system. The key for a profession is how it deals with mistakes to correct and prevent adverse outcomes in the future, and a no-blame culture of open disclosure which has the capacity to review systems is more likely to achieve better animal welfare outcomes than a focus on punishment of individuals. The current system is not fit for purpose in that it creates stress for members of the profession and is unlikely to effectively address the underlying issues and improve animal welfare outcomes.

(h) The particular challenges facing the veterinary profession and the shortage of veterinarians in regional, rural and remote New South Wales

The [distribution of veterinarians in NSW](#) is different to the distribution of the general population. In NSW, 75% of the general population live in major cities, 19% in inner regional areas, and 6% in outer regional areas. By contrast, 61% of veterinarians live in major cities, 31% in inner regional areas, 8% in outer regional areas.

Research into rural health worker shortages has suggested familiarity and interest in these areas, social connection and place integration, community satisfaction, and fulfilment of life aspirations as important factors.¹¹ The [Federation of Veterinarians of Europe](#) has suggested the shortage of veterinarians in rural and remote areas is due to unfavourable working conditions, difficulties achieving a desired work-life balance, and lack of demand from production animal owners more conscious of costs.

Data from registrations support the importance social factors with a greater percentage of graduates from Charles Sturt University choosing to work in rural and remote areas of NSW compared to graduates

¹¹ Cosgrove C, Malatzky C, Gillespie J, 2019, 'Social determinants of rural health workforce retention: A scoping review', *International Journal of Environmental Research and Public Health*, vol. 16, no. 3. [Available](#).

from The University of Sydney. For the period 2013-2022, the majority of graduates from Charles Sturt University were working in inner regional and outer regional areas whilst the majority of graduates from The University of Sydney were working in major cities. Charles Sturt University focuses on educating students with rural backgrounds and with an interest in rural veterinary practice.¹² Total numbers in inner regional areas however are similar due to the greater number of graduates from The University of Sydney.

Rural veterinary shortages, as per shortages in other areas, create difficulties for veterinarians in these areas to manage working conditions, client expectations and veterinarian work-life balance and therefore potentially exacerbate problems with attracting and retaining veterinarians in rural and remote areas.

Another major challenge is the potential for the profession to manage biosecurity breaches and environmental emergencies into the future. The Board has acknowledged this issue and created a policy, [Workforce Capacity Emergency Response](#), to assist in dealing with such events. The Board acknowledges in this policy that many retired veterinarians have significant production animal experience and could readily upskill to assist with emergency responses.

(i) *The role played by veterinarians in providing care to lost, stray and homeless animals, injured wildlife and during emergency situations*

Regarding lost and stray animals, a person who seizes a dog or cat under the *Companion Animals Act 1998* (s 62) must cause it to be delivered as soon as possible to its owner (if the owner can be identified) or to the council pound or other authorised council officer. No council has a right to refuse to accept a stray animal.

In practice, many people deliver animals to their local veterinarian because it is not practicable for them to deliver the animal to a pound. In this circumstance, the veterinarian may choose to accept the animal but is not obligated to do so. However, under the *Companion Animals Act 1998*, there is no obligation for a council officer to collect a stray animal from any public or private place, which includes a veterinary hospital. Veterinarians choosing to assist lost and stray animals may then be required to provide for their care until their owners can be found or asked to assist with re-homing.

As previously noted, if the animal is presented to a veterinarian, the veterinarian is required under the Code (cl 3), to provide first aid, timely referral to another veterinarian or euthanasia as appropriate. A veterinarian may seize an animal so severely injured, diseased, or in such condition that it is cruel to keep it alive for the purpose of euthanasia under the *Prevention of Cruelty to Animals Act 1979* (s 26AA).

This leaves a gap in responsibility for animals that are not so severely injured, diseased or in such condition that it is cruel to keep them alive. Veterinary hospitals commonly fulfil this role, despite having no legal authority or responsibility to do so.

In addition to companion animals, veterinarians are often presented with injured wildlife, including after-hours. As above, these animals are treated or euthanased and the veterinarian's costs are usually not recovered.

¹² Heath TJ, Hyams J, Baguley J, Abbott KA, 2007, 'Effect of different methods of selection on the background, attitudes and career plans of first year veterinary students', *Australian Veterinary Journal*, vol. 84, no. 6.

Members of the public and veterinarians are promoting animal welfare and providing a valuable service to councils and National Parks and Wildlife (NPWS), and the Board is of the opinion that these organisations and the relevant legislation could be changed to better support veterinarians. The Board has worked with local government and NPWS previously and would be eager to consult with these and other stakeholders to resolve these issues.

(j) The impact of the current veterinary shortage on animal welfare, including the impact on the economy, members of the public seeking veterinary care for animals, pounds and shelters, the animal agribusiness industry, companion animal breeders and others

Any shortage of veterinarians has the potential to adversely affect animal welfare, the economy and the various organisations, services and businesses that support animal welfare. Emergencies, such as bushfires and floods, and biosecurity breaches could have a devastating impact upon the economy and the animal agribusiness industry.

The veterinary profession has previously experienced oversupply and undersupply and it is likely that the current changes in industry structure, with an associated movement to less full time work, and changes to dog and cat ownership have created an undersupply. This undersupply has likely improved working conditions and salaries for many veterinarians which may lead to better animal welfare outcomes in the future by creating a more sustainable workforce. There is anecdotal evidence that market forces are beginning to lead to a resolution of these issues.

Both extremes in workforce supply may lead to adverse animal welfare outcomes and the Board is of the opinion that a cautious approach is required before adopting any measure to address the current veterinary shortage. As noted above, ideally, workforce capacity, and fluctuations in workforce capacity, should be assessed by a valid and reliable metric rather than total numbers or the number of veterinarians per head of population.

(k) Current barriers to accessing veterinary care for members of the public, particularly those with lower incomes or who live in regional, rural and remote locations

An analysis of complaints data for the last 5 years reveals that of the 421 complaints processed by the Board, 336 (80%) were derived from areas where the median household annual income for the post code was less than \$40,000.

(l) Strategies to support the current veterinary workforce, as well as ways to increase the number of practising veterinarians particularly in regional, rural and remote New South Wales

As noted previously, there is good evidence from registration data that graduates from Charles Sturt University in Wagga Wagga are more likely to practice in regional and rural areas of NSW than graduates from The University of Sydney hence more graduates from Sydney are required to achieve the same number of veterinarians in these areas.

(m) Strategies to improve access to veterinary care

It is apparent that market-based solutions to dealing with after-hours obligations in rural areas, stray companion animals, and injured wildlife have imposed significant stressors upon some members of the veterinary profession and are not currently providing sustainable access to veterinary care for these sectors. The profession and regulators in these areas need to collaborate to develop solutions to this problem and in doing so improve the sustainability of the veterinary profession in NSW.

(n) *Any other related matter*

No comment.

Recommendations

1. Priority be given to a review of veterinary practice primary and supporting legislation given the industry has evolved over the last 20 years but the legislation has not. This review should focus on amendments in the areas of complaint investigations, management of health concerns, obligations regarding advocacy for animal welfare, after-hours requirements, and regulation of paraprofessionals.
2. Research be funded and undertaken to create valid and reliable metrics of veterinary workforce capacity such that relevant data can be collected by the Board and shared with the government, profession and public. These metrics will be essential for assessing the capacity of the profession to respond to emergencies such as fire and flood, and biosecurity events and to trends in veterinary client expectations.
3. Facilitation of discussions among the profession, local government and NPWS to review relevant legislation and processes to reduce the financial and emotional burden that the profession bears in the care of stray companion animals and injured wildlife. As noted above, the industry has evolved, and it is apparent that current market-based solutions are failing to provide these sectors with sustainable access to veterinary care.