

Consultation Paper

June 2026

Strengthening the veterinary workforce and safeguarding animal health and welfare

Modernising the veterinary practice regulatory framework in New South Wales

Department of Primary Industries and Regional Development



Acknowledgement of Country

The Department of Primary Industries and Regional Development acknowledges that it stands on Country which always was and always will be Aboriginal land. We acknowledge the Traditional Custodians of the land and waters, and we show our respect for Elders past, present and emerging. We are committed to providing places in which Aboriginal people are included socially, culturally and economically through thoughtful and collaborative approaches to our work.

Artwork: 'On Country', Mumbulla Creative





Contents

Overview: Consultation on the <i>Veterinary Practice Act 2003</i>	4
Background	7
Proposed changes to the veterinary practice regulatory framework	11
Reform Theme 1 Greater access to veterinary care across NSW	14
Reform Theme 2 Increase workforce capacity	17
Reform Theme 3 Protecting the mental health and wellbeing of the veterinary workforce	21
Reform Theme 4 Implement clear, risk-based regulation	24
Reform Theme 5 Modernise regulatory settings	28

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More information

DPIRD website – [Veterinary Workforce Shortages](#)

Acknowledgements

The Department acknowledges and thanks the NSW Veterinary Practitioners Board and other key industry stakeholders for their valuable feedback and contributions to date, which have informed the development of this consultation paper.

A photograph showing a woman on the left and a man on the right, both wearing dark blue vests with a red logo and 'NSW' text. The man is also wearing a wide-brimmed straw hat. They are standing in a dirt paddock with a white fence and trees in the background. The woman is holding the head of a black pig, and the man is holding a rope attached to the pig's harness. The scene is lit with warm, golden light, suggesting late afternoon or early morning.

Overview: Consultation on the *Veterinary Practice Act* 2003

Purpose of this consultation

This consultation paper sets out proposed changes to the regulatory framework for veterinary services in NSW.

More than twenty years ago, The *Veterinary Practice Act 2003* (the Act) replaced the *Veterinary Surgeons Act 1986* to improve animal welfare and veterinary practice. At the time, these changes were a big step forward and established existing measures such as the current complaints investigation process, and licencing and registration requirements. However, veterinary science has evolved significantly since the current legislation was introduced, with changes in clinical practice, workforce composition, service delivery models, and use of technology. These developments have outpaced certain aspects of the framework, creating a need to better align legislative settings with contemporary practices and expectations.

This consultation paper sets out proposed changes to the regulatory framework for veterinary services in NSW. These proposed changes have been informed by engagement with the NSW Veterinary Practitioners Board (the Board) and feedback from industry, stakeholders, and the community. The reforms also draw on recommendations outlined in two parliamentary inquiries – the June 2024 Parliamentary Inquiry into Veterinary Workforce Shortage in NSW, and the September 2024 Parliamentary Inquiry into Pounds in NSW.

Your feedback will help ensure improvements to the Act respond effectively to the needs of the veterinary profession, animal owners, and the broader community, while supporting a contemporary and sustainable regulatory framework for the sector.

NSW Veterinary Practitioners Board



8 members
(6 veterinarians,
two consumer
representatives)



Regulates veterinary profession in NSW by administering the *Veterinary Practice Act 2003*:

- manages the registration of veterinary practitioners and licencing of veterinary hospitals
- investigates complaints against veterinary practitioners
- develops codes of professional conduct for veterinary practitioners.



Provides information to veterinary practitioners and consumers of veterinary services

Why reform is needed now

Responding to changing community needs.

On 9 June 2023 the NSW Parliamentary Inquiry into the Veterinary Workforce Shortage was self-referred by Portfolio Committee No. 4 – Regional NSW following media coverage about burnout in the veterinary profession, various reports of workforce shortages, and increased demands for veterinary care due to factors such as growing pet ownership¹.

The final report was published in June 2024, making 34 recommendations to help address a range of issues facing the veterinary profession in NSW.

The Inquiry highlighted critical areas for improvement in the current legislative framework, particularly in relation to workforce recognition and regulation, the need to better reflect modern approaches to veterinary service delivery, and a modernised complaints investigation process. These constraints limit the effectiveness of the existing regulatory framework regulation and inhibit the sector's ability to respond to changing community needs.

¹ (2023) *Western NSW vets struggle under punishing workloads as few new graduates arrive*, Australian Broadcasting Corporation
(2023) *Young vets push for brighter future for industry to reduce burnout, improve mental health*, Australian Broadcasting Corporation
(2023) *Long hours and overworked: regional Australia is facing a vet shortage*, the Guardian
(2022) *Vets are struggling with mental health and looking for an out*, The New Daily

Have your say

Consultation process and next steps

The Department of Primary Industries and Regional Development, in consultation with the NSW Veterinary Practitioners Board, is seeking feedback on proposed changes to the Act to respond to Inquiry recommendations and improve the regulatory framework for veterinary services. The reforms are structured around five key themes aimed at delivering a more contemporary, risk-based and fit-for-purpose regulatory system.

Consultation period: Consultation now open 5 June 2025, finishing 3 July 2026.

Feedback: Stakeholders and members of the community are invited to provide feedback at: nsw.gov.au/have-your-say



How to provide feedback

Stakeholders and members of the community are invited to provide feedback through the **NSW Have Your Say** website. Alternatively, written submissions may be provided to the Department of Primary Industries and Regional Development – Veterinary Workforce Shortages via email at vpa.review@dpiird.nsw.gov.au no later than 5pm 3 July 2026.

 www.nsw.gov.au/have-your-say

 vpa.review@dpiird.nsw.gov.au

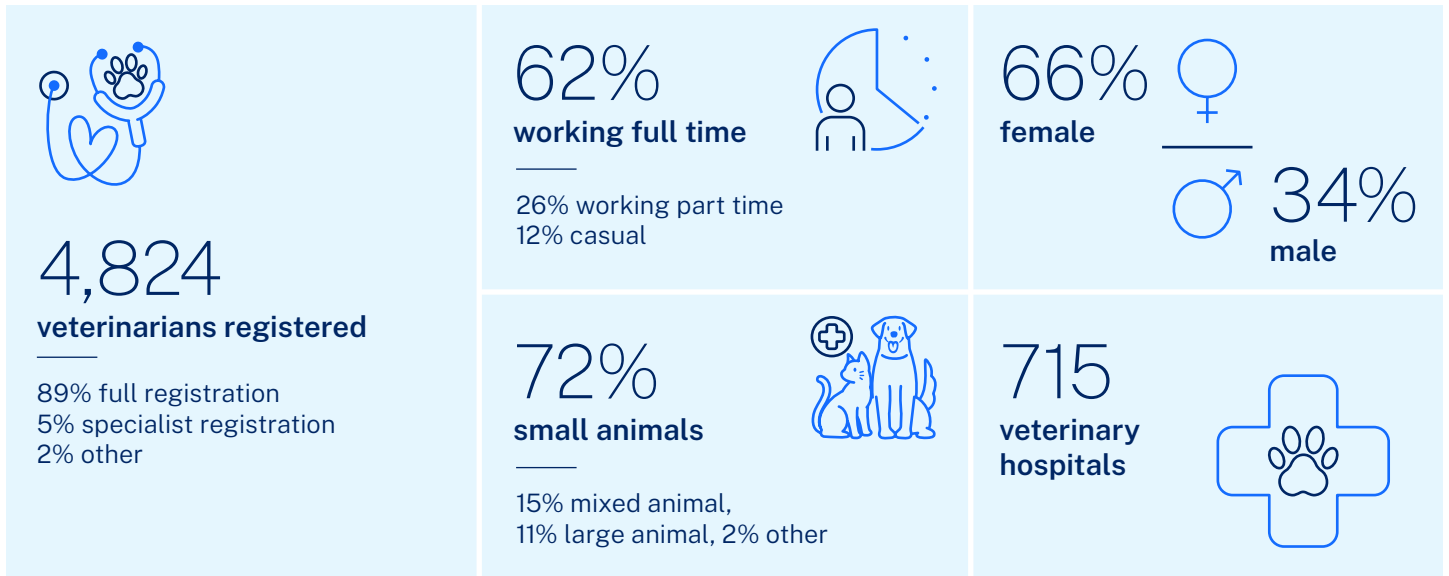
Privacy and confidentiality

Written submissions will be published unless marked confidential.

Background



The NSW veterinary sector



Source: NSW Veterinary Practitioners Board (2025)

The NSW veterinary sector is a diverse and essential part of the state's animal health and welfare system, supporting companion animals, production animals, wildlife, and broader public health outcomes.

Veterinary services are delivered across a range of settings, including private clinics, mixed and rural practices, specialist and referral hospitals, emergency and after-hours services, and government and industry roles. The sector is a multi-disciplinary workforce, including veterinarians, veterinary nurses, technicians, and other support staff, who together contribute to the delivery of animal care across metropolitan, regional and remote NSW.



Veterinary Practice Regulatory Framework

*Principally focussed
on the registration and
oversight of veterinarians
and veterinary hospitals*

The regulatory framework for veterinary practice in NSW is primarily established under the *Veterinary Practice Act 2003*, which regulates veterinary practice through restricted acts of veterinary science, provides for the registration of veterinary practitioners and licencing of veterinary hospitals, sets minimum professional standards, and establishes a statutory role of the NSW Veterinary Practitioners Board as the regulator. The framework is principally focussed on the registration and oversight of veterinarians and veterinary hospitals, with an emphasis on professional conduct, disciplinary processes, and the protection of animal welfare and public confidence in veterinary services.

Restricted acts of
veterinary science



Registration of
veterinarians



Licencing of
veterinary hospitals



Register



Code of conduct



Annual reporting



Complaints and
disciplinary
proceedings



Inspectors



Source: *Veterinary Practice Act 2003*



Restricted acts of veterinary science are specific procedures that only a registered veterinary practitioner is legally permitted to perform. They are declared by regulation and generally cover high-risk procedures – such as diagnosis, surgery, and anaesthesia – where performing them without qualifications is likely to cause harm or suffering to an animal.

Exemptions currently apply, such as where the person is the owner of the animal or an employee of the owner, in emergencies, or veterinary students under direct supervision.

Whilst this framework has provided a stable regulatory foundation, it largely reflects a traditional model of veterinary practice rather than a modern veterinary workforce including expanded roles, new service delivery models, and demand for flexible risk-based regulatory approaches.

As a result, there is a growing need to ensure the framework continues to support safe, high-quality care while enabling innovation, workforce sustainability and improved access to services across NSW.

Findings of the Parliamentary Inquiry into Veterinary Workforce Shortages in NSW

The Inquiry made 34 recommendations including seven that identified opportunities

In June 2024, Portfolio Committee No. 4 – Regional NSW released its final report on the Veterinary Workforce Shortage in NSW. The Inquiry highlighted the complex and interrelated factors contributing to workforce shortages, including education and training pathways, workforce retention, mental health and wellbeing, access to services in regional and remote communities, workforce data limitations, and regulatory settings.

The Inquiry made 34 recommendations² to help address these issues, including seven that identified opportunities to improve the veterinary practice regulatory framework (see summary below).

Recommendation 3

Develop a clearer regulatory framework for the provision of telehealth veterinary services to complement the delivery of after-hours services and potentially help reduce the burden on the veterinary workforce.

Recommendation 4

Ensure mobile veterinary clinics can be easily registered to deliver veterinary care, particularly in areas with no clinic within a reasonable distance. Any changes must ensure mobile clinics work collaboratively to ensure they can provide essential additional veterinary services without causing detriment to local clinics.

Recommendation 5

Update the complaints investigation process to allow for a streamlined process, and to distinguish between substantial complaints and those which are frivolous or vexatious.

Recommendation 7

A review of the *Veterinary Practice Act 2003* and its associated regulation is prioritised immediately following, or in conjunction with, the review of the *Prevention of Cruelty to Animals Act 1979*.

Recommendation 24

Introduce a regulatory framework for veterinary nurses and veterinary technicians – including minimum qualifications, title protection, professional standards, oversight by a professional board and appropriate rates of pay.

Recommendation 25

That the regulatory framework for veterinary nurses and technicians be provided under the same legislation as the regulation of veterinarians, and aligned with other registration schemes in place for veterinary nurses and technicians.

Recommendation 27

Determine whether some restricted acts of veterinary science could be extended to veterinary nurses and technicians.

In October 2024, the Parliamentary Inquiry into Pounds in NSW³ also highlighted veterinary pressures within the broader animal welfare system amongst other recommendations to reduce the number of animals rehomed and improve the operation of pounds across NSW, including the following recommendation:


Recommendation 22

Implement relevant recommendations in Portfolio Committee No. 4 – Regional NSW's Veterinary Workforce Shortage in New South Wales report.

In response, the NSW Government committed to reviewing the *Veterinary Practice Act 2003* and *Veterinary Practice Regulation 2013*, in consultation with the Veterinary Practitioners Board. A copy of the NSW Government response can be found on the Inquiry website.

² Source: *Parliamentary Inquiry on the Veterinary Workforce Shortage in NSW - Final Report*

³ Source: *Inquiry into Pounds in New South Wales - NSW Government Response, December 2024*



Proposed changes to the veterinary practice regulatory framework

Reform objectives

The reforms are centred on people, access and trust

The proposed reforms aim to modernise the veterinary regulatory framework in NSW and ensure it remains fit-for-purpose in a contemporary practice environment.

The reforms are centred on people, access and trust – supporting the workforce who deliver veterinary care, improving access to veterinary services for communities across NSW, and strengthening confidence in the delivery and regulation of veterinary care. The proposed changes recognise the critical role played by veterinary professionals in animal welfare, public health, primary industries, biosecurity protection, and community wellbeing; while acknowledging the increasing pressures facing the sector, particularly in regional and remote NSW.

To achieve these objectives, the proposed legislative reforms centre around five key themes:

-
- | | |
|---|--|
| 1 | Theme 1
Greater access to veterinary care across NSW |
| 2 | Theme 2
Increase workforce capacity |
| 3 | Theme 3
Protect the mental health and wellbeing of the veterinary workforce |
| 4 | Theme 4
Implement clear, risk-based regulation, and |
| 5 | Theme 5
Modernise regulatory settings to reflect contemporary practice and community expectations. |
-

Together these themes are intended to deliver a more supportive, practical and responsive regulatory framework for the sustainability of the veterinary sector into the future.

Regulatory impacts

A balanced and proportionate approach built on existing regulatory structures

The proposed changes seek to modernise the framework to better reflect contemporary veterinary practice, through fair, equal and risk-based regulation. Collectively, these reforms are intended to support a balanced approach that promotes workforce sustainability, animal welfare, and safe and accessible veterinary services across NSW.

Assessment against the NSW Government Guide to Better Regulation and outcomes of two parliamentary inquiries indicates that legislative intervention is justified to address risks within the sector. This includes improvements to the complaints investigation process, recognising the role of veterinary nurses in legislation, and providing clarity around the operation of mobile and telehealth veterinary services. In the absence of clear regulatory standards, consumers may not have sufficient information to inform certain decisions around animal care, or an understanding of the qualifications and required conduct of service providers. This may adversely affect animal welfare, public confidence, trade outcomes and health. The reforms therefore seek to strengthen minimum standards, improve transparency and enhance accountability across the sector.

The reforms are expected to result in some additional administrative, compliance and implementation costs for the sector, government and the Board. However, they are considered a lower-cost regulatory option by leveraging existing regulatory structures rather than creating new bodies or duplicative systems. Any costs are not expected to be onerous and are anticipated to be outweighed by longer-term benefits for consumers, businesses and individuals in the veterinary profession, including a more sustainable workforce, improved animal welfare outcomes and maintained access to veterinary services.



1

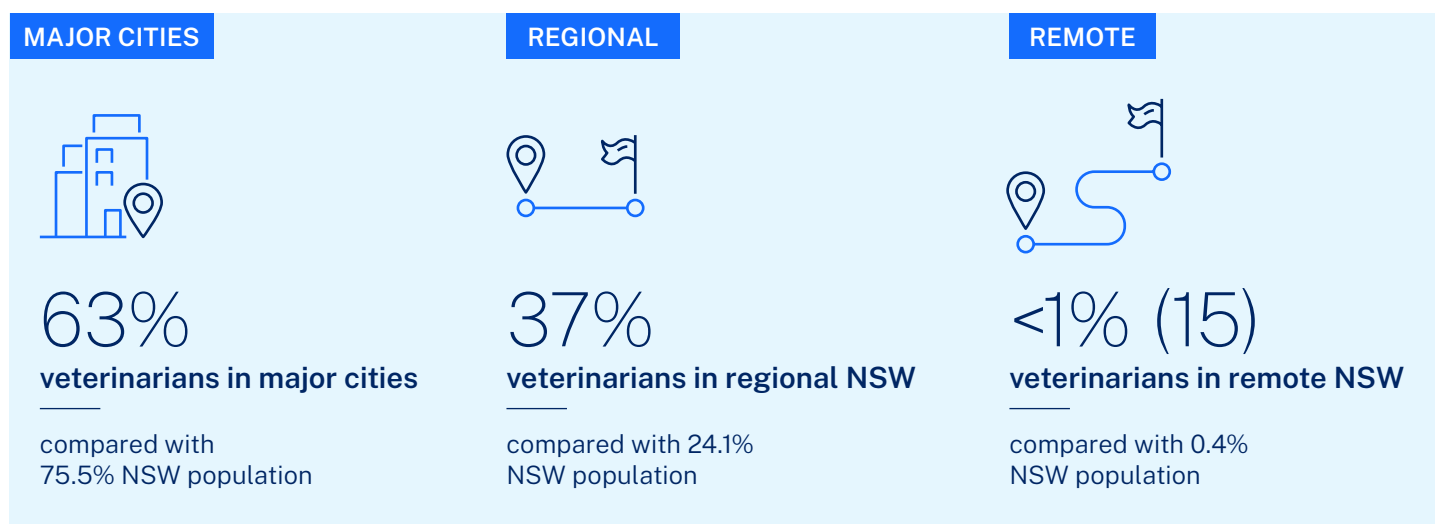
Reform Theme 1

Greater access to veterinary
care across NSW



Reform Theme 1 Greater access to veterinary care across NSW

By improving delivery, particularly in regional and remote areas by leveraging workforce capability, and targeted accreditation.



Source: NSW Veterinary Practitioners Board, New South Wales - Workforce Report 2025

Key issues

The Act has not kept pace with changes in the veterinary industry, and currently does not clearly support contemporary service delivery models (such as mobile or telehealth services), workforce flexibility, or innovation in practice.

The Parliamentary Inquiry into the Veterinary Workforce Shortage in NSW (Inquiry) acknowledged that access to veterinary care was a concern for many farmers and pet owners, impacted by a range of factors – including the closure or reduction in open hours of a number of veterinary practices. Veterinary care is disproportionately lower in regional and remote NSW, with a decrease in clinics also providing after-hours care.

The absence of clear, modern, and consistent regulatory settings for emerging modes of care, combined with gaps in oversight of veterinary premises, reduces the Board's ability to ensure safe, equitable and sustainable access to veterinary services across the state. For mobile clinics, this inhibits the timely establishment of mobile service delivery models that could improve access to veterinary care in regional and remote areas, where workforce shortages are most acute. In telehealth, a lack of explicit settings has led to confusion around what services can and cannot be delivered through telecommunications, with limited ability for the Board to oversee quality or safety. Across both service models, the absence of clear regulatory provisions limits the Board's ability to ensure consistent standards of practice, and that the sustainability of existing local veterinary clinics are not adversely impacted.

In addition, the Board's ability under the current Act to accredit individuals (persons who are not registered veterinarians) to perform restricted acts of veterinary science operates largely as a static 'set and forget' model. There are limited ongoing regulatory controls, such as the ability to impose conditions, require continuing professional development, adherence to a code of conduct, or ensure regular renewal and assessment. With the Board only accrediting a relatively small number of persons to date, this presents an opportunity to strengthen these provisions to support greater uptake and improved access to veterinary services, particularly in regional and remote areas.

Proposed reforms

Licencing of mobile veterinary services

Establish a clear licencing pathway for mobile clinics, supported by a Mobile Veterinary Services Standard established by the Board and released prior to commencement of new requirements. Under these proposed changes, mobile veterinary services could either be delivered as part of an existing veterinary practice or hospital (i.e. a fixed premises and associated mobile services) or be a licenced premises that provides mobile services as its primary mode of care.

The proposed licencing framework will support improved access to veterinary care in regional and remote areas and positive animal welfare outcomes, while ensuring appropriate safeguards are in place to maintain clinical quality and the sustainability of local veterinary services. The Mobile Veterinary Services Standard would set out minimum requirements for operation, such as staffing, equipment and clinical governance, and require appropriate arrangements with local veterinary premises to support continuity of care, including after-hours and emergency follow-up arrangements where required. Licence conditions will specify any additional requirements tailored to the premises, such as the scope of permitted clinical activities.

Regulate veterinary telehealth services

Establish a licencing framework for telehealth services, with services delivered in accordance with a Telehealth Veterinary Services Standard established by the Board and released prior to commencement of new requirements. Telehealth veterinary services enable the use of video, audio, and remote monitoring in the provision of veterinary services.

As with mobile services, under the proposed changes telehealth may be a veterinary service provided by existing veterinary premises, or through dedicated telehealth businesses. The new provisions will provide clarity around veterinary services that may only be provided via telehealth where sufficient patient information is available, including access to relevant medical history to enable safe clinical decision making for diagnosis and treatment. Telehealth as a tele-triage service will also be provided for under the proposed licencing pathway.

The Telehealth Veterinary Services Standard would establish minimum requirements for safe practice, clinical governance, record-keeping, and other necessary safeguards to ensure appropriate risk-based and consistent delivery of telehealth veterinary services.

Enhanced modernised accreditation framework

Improve and strengthen the accreditation pathway for persons to perform specified restricted acts of veterinary science for greater transparency and accountability. In considering an application for accreditation to perform restricted acts of veterinary science, the Board would consider demonstrated competence, relevant education or training, and whether the person is fit and proper, having regard to matters such as character, professional history and any relevant criminal history. Accredited persons would be required to operate within a licenced veterinary premises, comply with a code of conduct, provide an annual return, and meet any ongoing continuing professional development requirements as determined by the Board. These measures would ensure accredited persons are subject to contemporary, consistent and proportionate regulatory obligations aligned with those applying to veterinarians.

Have your say



- 1a. Do you support the licencing of mobile and telehealth services in line with a Standard established by the Board?
- 1b. What are some of the minimum standards which should apply to telehealth services to safeguard animal health and complement existing veterinary practices?
- 1c. Are there any other factors to consider when permitting persons who are not registered veterinarians to perform restricted acts of veterinary science?

A photograph of a person from the waist down, wearing khaki cargo pants and a red shirt, standing in a grassy field. A brown dog is standing next to the person, looking towards the right with its mouth open. The background shows a blurred landscape under a blue sky with clouds.

2

Reform Theme 2

Increase workforce
capacity

Reform Theme 2 Increase workforce capacity

By recognising the broader workforce and setting of minimum standards to optimise roles and responsibilities.

42%

Veterinary nurses comprised approximately 42% of the veterinary workforce in 2021⁴



3,000

An estimated 3,000 – 5,000 individuals work in **veterinary nursing roles in NSW with no regulatory recognition**⁵



50%

Around 50% of veterinary nurses nationally **leave the profession within five years**⁶



20%

Approximately 20% of veterinary nurses in NSW are working with **no formal qualifications** (no Certificate IV in Veterinary Nursing or Bachelor of Veterinary Nursing/Technology)⁶



Key issues

The Act does not reflect the structure, capability, or multi-disciplinary nature of the modern veterinary workforce. While practitioners operate within integrated clinical teams, supported by veterinary nurses, technologists and other accredited persons, the regulatory system focuses on the registration and conduct of veterinarians alone. This creates gaps in recognition, accountability and oversight across the broader workforce and limits the system's ability to fully support safe, efficient and sustainable service delivery.

The Inquiry identified the absence of formal recognition and regulation of veterinary nursing in NSW as a key issue. Veterinary nurses, technologists and technicians are estimated to make up a substantial proportion of the workforce, with a proportion of these having significant practical experience despite no formal qualifications. Under the current Act, veterinary nurses have no protection of title, no minimum qualification requirements, and no defined competency standards. Responsibility for veterinary nursing activities rests with the veterinarian, rather than being supported by a framework that recognises the contribution and skill of veterinary nurses.

The Inquiry noted that recognising and empowering veterinary nurses through regulation could both improve access to care and reduce workforce pressure on veterinarians.

⁴ Options for Registration of Veterinary Nurses, Australasian Veterinary Boards Council

⁵ Veterinary Practitioners Board, New South Wales. Workforce Report 2025

⁶ Veterinary Nursing Skills Review Report June 2025

Proposed reforms

Establishing a registration scheme for veterinary nurses and technologists

Proposed changes will introduce provisions to formally recognise the role of veterinary nurses (including veterinary technologists) in NSW. This includes establishing a registration scheme with:

- **minimum qualification requirements**, being:
 - holding a qualification in veterinary nursing granted by a registered training organisation, or
 - a qualification approved in writing by the Board as a qualification in veterinary nursing
 - recognising that veterinary nursing qualifications are continuing to evolve, including through the current Skills Insight review into veterinary nursing
- a requirement to comply with **professional standards** in a Code of Conduct
- **establishing a 'Scope of Practice'** that defines the role, functions and services of a veterinary nurse, and recognises veterinary nurses may take on a greater role in the delivery of veterinary services with the appropriate training and education throughout their career; and
- **protection of title** for registered veterinary nurses.



Registration pathway for veterinary nurses without formal qualifications

While it is general practice for veterinary nurses to undertake formal training to support employment as a veterinary nurse, a proportion of veterinary nurses in NSW do not hold formal qualifications. However, these veterinary nurses, particularly those who have worked as a veterinary nurse for many years, often have significant skills and experience.

A new registration scheme will recognise those veterinary nurses without minimum qualifications but with sufficient experience and knowledge by providing for a one-time alternative pathway for registration as part of transitional provisions. This reflects a similar approach to that taken to introduce a registration scheme for paramedics in 2018, and would require veterinary nurses to confirm:

- competency across key skills, and
- recency of practice (a minimum number of hours prior experience working as a veterinary nurse).

The role of veterinary nurses and restricted acts of veterinary science

Veterinary nurses have an important role in the delivery of all restricted acts of veterinary science, and it is proposed to recognise this in legislation. The proposed settings will acknowledge that veterinary nurses support procedures that are restricted acts under the direction of a veterinarian, with adequate supervision required consistent with guidance developed by the Board. Depending on the restricted act concerned, and the skills and experience of the veterinary nurse, this may be:

- immediate supervision (where a veterinarian is present with the animal)
- direct supervision (where a veterinarian is present at the same premises) or
- indirect supervision (where a veterinarian is available to provide advice and guidance, but may not be physically present).

Supported by a Scope of Practice, this means that veterinary nurses may take on more responsibility in certain procedures that are restricted acts of veterinary science as their training, education and competency grows over their career, maintaining appropriate oversight by a veterinarian.

Have your say



2a. Do you support the proposed approach to establish registration for veterinary nurses and technologists?

2b. Are there additional implementation/transitional issues that should be considered?





3

Reform Theme 3

Protecting the mental
health and wellbeing of the
veterinary workforce

Reform Theme 3

Protecting the mental health and wellbeing of the veterinary workforce

By clarifying roles, sharing responsibilities across the workforce, and establishing supportive regulatory settings.

4x

Veterinarians suicide rate
amongst veterinarians is up to four times
higher than the general population



88%

On average, up to 88% of
complaints are dismissed,
10% are upheld, and 2% issued reprimands



Source: Case R, Alabakis J, Bowles K-A, Smith K: Suicide prevention in high-risk occupations: an Evidence Check rapid review brokered by the Sax Institute (www.saxinstitute.org.au) for the NSW Ministry of Health, 2020. doi:10.57022/zfla9501

Key issues

The veterinary industry has been subject to growing workforce shortages over the last decade, with a national recognition of its critical status since 2021⁷. These shortages are particularly acute in regional and remote NSW. In 2024, the Parliamentary Inquiry into the Veterinary Workforce Shortage in NSW acknowledged that pressures on veterinarians is impacting retention in the workplace, with stress and burnout amongst veterinarians well documented. Around 25% of veterinary respondents to a 2019 survey had taken time off work due to stress or mental health⁸.

The Inquiry acknowledged the regulatory framework for veterinary practice could be improved to help reduce these pressures, including the complaints and investigation process. The current framework does not reflect a risk-based approach, is narrowly focussed on the professional conduct of veterinarians, and limits the Board's ability to triage complaints based on risk and severity, with the Inquiry recognising the time and resources dedicated to serious matters versus frivolous or vexatious complaints.

Critically, the existing complaints process only allows complaints to be made against a veterinarian. The Board is unable to take into account systemic issues or contributing factors within a veterinary practice, or consider the actions of anyone who is not a registered veterinarian. This can place undue pressure and disproportionate accountability on a veterinarian during the complaints investigation process.

The Board also has limited ability to respond where concerns arise regarding a practitioner's health, wellbeing or capacity to practice safely. This reduces opportunities for timely, collaborative and proportionate interventions that could better support practitioner's wellbeing, continuity of practice, and public confidence in safe veterinary practice. The absence of flexible regulatory mechanisms limits the Board's ability to support early intervention and safe return-to-practice arrangements.

⁷ Australian Veterinary Association (2021). *Veterinary Workforce Survey 2021*

⁸ Portfolio Committee No. 4 (2024). *Veterinary workforce shortage in New South Wales*.

Proposed reforms

Adopt a more contemporary, risk-based complaints model

Proposed reforms will establish a modern complaints framework that includes a tiered, risk-based complaints assessment and triage process to prioritise matters involving higher risks to animal welfare, public confidence or safe practice. This risk-based approach would give the Board greater ability to dismiss frivolous, vexatious or misconceived complaints, and include a pathway to direct low risk complaints (such as fee disputes) to the veterinary premises for an initial attempt at resolution. This approach will allow the Board to focus on high risk incidents involving serious malpractice and misconduct.

A modern complaints framework proposes a shift from the singular focus on the professional conduct of veterinarians, to one which reflects the broader workforce (i.e., veterinarians, veterinary nurses, and accredited persons) and premises (i.e., veterinary hospitals and practices). Similarly, this includes the ability for the Board to impose, amend or remove conditions for registered persons or licenced premises following an investigation.

The Board will develop a transparent Complaints Investigation Standard to support these changes, which would outline the complaints management process in detail. This includes where a broader range of responses may apply following a complaint – including education and supervision – where appropriate, where there is no finding of unsatisfactory conduct or misconduct. This will help support the Board to work with the profession to grow and improve where opportunities are identified.

Flexible and proportionate wellbeing support for practitioners

Proposed changes would enable a greater range of responses the Board may take to respond to risks voluntarily raised by practitioners regarding health, wellbeing or capacity to practice safely, with a focus on early intervention and support. Measures may include agreed practice adjustments, wellbeing supports, voluntary temporary suspension arrangements where appropriate, and plans to return to practice tailored to individual circumstances. Where necessary, these measures may be included as a condition of registration.

These mechanisms are intended to support practitioner wellbeing and safe ongoing participation in the profession, recognising that early and supportive engagement can often prevent matters from escalating into more serious regulatory concerns. Consistent with comparable arrangements applying under national health practitioner regulation, any information or documentation obtained or created by the Board in relation to these matters would be treated as confidential and is intended to be exempt from the *Government Information (Public Access) Act 2009*.

Have your say



- 3a. Do you support enabling a modern, risk-based approach to complaints management?
- 3b. Are there any other ways the regulatory framework should support the mental health of veterinary practitioners outside of the complaints process?

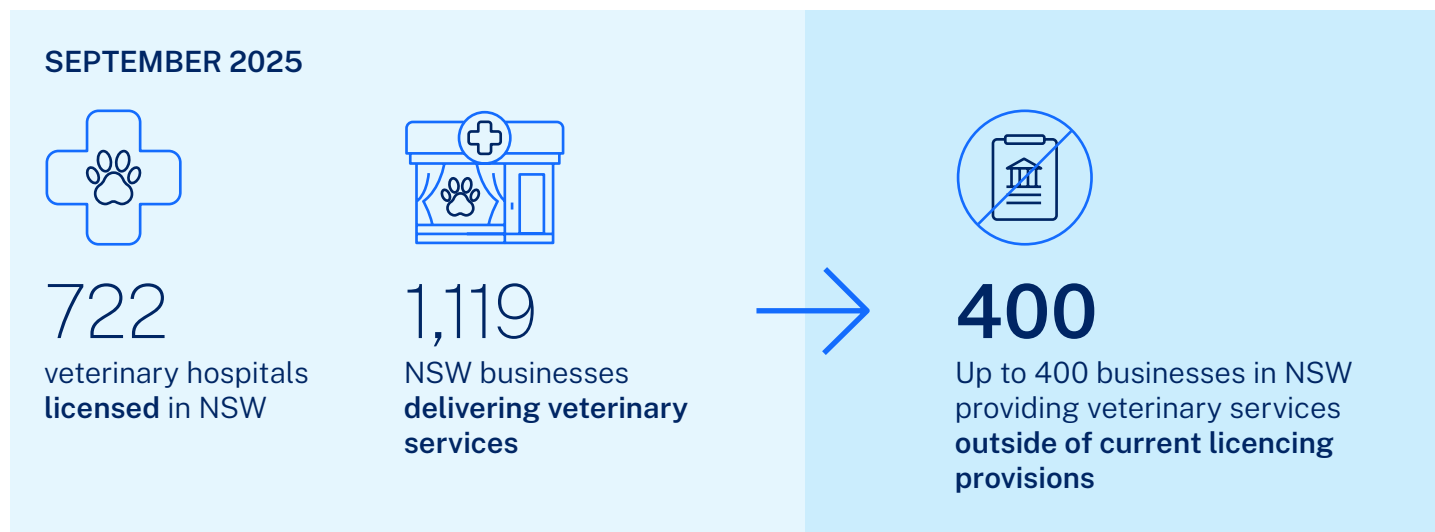


4

Reform Theme 4
Implement clear,
risk-based regulation

Reform Theme 4 Implement clear, risk-based regulation

By enabling the NSW Veterinary Practitioners Board to be a contemporary, fit-for-purpose, risk-based regulator.



Source: ABS (2025) Data Cube 3

Key issues

The existing Act currently only regulates a portion of the veterinary sector - restricted to the registration of veterinarians, and the licencing of veterinary hospitals undertaking major surgery (procedures that require general anaesthetic, or spinal anaesthetic).

Other veterinary premises have no licencing or oversight under the Act, despite delivering clinical services to the public. This is inconsistent with the majority of jurisdictions which regulate a wider range of veterinary premises, including Queensland, Western Australia, South Australia and the Australian Capital Territory.

This not only means there is currently no clear licencing pathway for mobile clinics or telehealth services (see Reform Theme 1), but also creates an unequal regulatory burden across veterinary hospitals which must be licenced, and other veterinary practices and premises which are not licenced. This also reflects a gap in oversight by the Board which is out of step with modern consumer and community expectations. Further, it restricts the complaints process to exclude consideration of, and responses to, broader factors within a veterinary premises which may have contributed to a complaint (See Reform Theme 3).

The Veterinary Practitioners Board is the statutory body responsible for regulating veterinary practice in NSW. In line with other proposed changes to the Act, the Board's functions as a regulator could be better supported through the legislation in line with modern standards and to better reflect the modern veterinary workforce.

Proposed reforms

An equitable and wholistic licencing approach

Licensing both veterinary hospitals and veterinary practices provides equitable and consistent regulation across all veterinary premises, provides a clear pathway for premises seeking to deliver veterinary care through a range of models (including mobile and telehealth services), and improves visibility and information on the broader veterinary care network in NSW, where this is currently limited to veterinary hospitals.

It ensures that the equipment, facilities and protocols of a veterinary premises comply with standard requirements for the safety and quality of veterinary care.

The proposed licencing framework for veterinary services in NSW includes:

- **two categories of veterinary premises:**

- veterinary hospitals (no change) and
- veterinary practices – other businesses delivering veterinary services that do not meet the definition of veterinary hospitals (e.g. consulting rooms).

Veterinary premises may deliver their services through fixed premises, mobile and/or telehealth services – consistent with Standards developed by the Board.

- **licence holder** – responsible for compliance with legislative obligations
- **a redefined role for superintendents** from the ‘management’ of the premises, to the clinical supervision of regulatory requirements and veterinary science practices
 - NB: accredited persons are currently authorised with reference to a ‘supervising veterinarian’ who for the purpose of this section, may fulfil this role where there is not an existing superintendent.

Licensing all veterinary premises also provides a key opportunity to improve the complaints management framework in NSW, as it provides the Board with the ability to consider, and respond to, a broader range of factors that may be relevant to a complaint outside the professional conduct of an individual veterinarian.

Exemptions may apply where a veterinarian, veterinary nurse or technologist, or accredited person is:

- an employee of a public sector agency
- working under another Act or Law (e.g. the *Animal Research Act 1985* or the *Companion Animals Act 1998*)
- employed at a temporary event, such as an agricultural show or competition.

Improving the operation of the Veterinary Practitioners Board

Membership

The Veterinary Practitioners Board is currently comprised of six veterinarians and two consumer representatives. To reflect broader proposed changes with regard to veterinary nurses, future membership of the Board is proposed to include representation from the veterinary nursing profession to provide expertise and input on matters concerning the regulation and support to veterinary nurses in NSW.

Powers to establish mandatory standards and guidelines

With the veterinary sector undergoing change and innovation, the Board has the opportunity to better support the profession with the ability to develop, consult on and update from time to time:

- **standards** developed in consultation with the veterinary profession that must be complied with to support the delivery of legislation, such as for complaints management, veterinary premises and mobile and telehealth services, and
- **guidelines** to help support and advise the sector on existing and emerging issues and opportunities, such as (for example) the management of mental health and wellbeing in veterinary practice, and mentoring support for new graduates.

Have your say



4a. What implementation/ transitional factors should be considered when establishing a licencing framework for veterinary practices/ other veterinary services businesses?

4b. How could the Board's membership better reflect modern veterinary practice?



5

Reform Theme 5

Modernise
regulatory settings



Reform Theme 5 Modernise regulatory settings

By providing clarity and certainty for industry and meet contemporary animal welfare and community expectations.



Modern registration
framework



Fees and charges



Penalty and offences



Statutory review of
regulatory framework

Key issues

By considering the proposed changes outlined in this paper, there is an opportunity to ensure the framework is fit for purpose both now and in the years to come, including where greater alignment can be achieved between jurisdictions, and where language and definitions can be reviewed to reflect contemporary veterinary science.

Stakeholder feedback identified the current regulatory framework contains outdated provisions, unclear definitions, a lack of transparency and inconsistencies that limit its ability to support a contemporary, risk-based and workforce-responsive regulatory system.

The existing fee and cost recovery settings were established for a more limited regulatory framework and may no longer adequately support the expanded scope of functions proposed under the reforms. A contemporary and sustainable fees framework is needed to support the effective administration of regulatory systems and ensure services can continue to be delivered efficiently and consistently.

Penalty and offence provisions may also require updating to ensure they remain effective, proportionate and aligned with modern regulatory expectations. In some areas, the current settings may no longer appropriately reflect the seriousness of non-compliance under an expanded framework or comparable animal welfare legislation, including the *Prevention of Cruelty to Animals Act 1979*. Updated provisions may be needed to clarify regulatory obligations, and support appropriate compliance and enforcement outcomes.

Proposed reforms

Amend the objects of the Act

Update the objects of the Act to recognise and support the sustainability of the veterinary workforce and the delivery of contemporary veterinary services in NSW.

Clear definitions and language

Clarify definitions, including a clearer and more consistent focus on 'veterinary services' as the central regulatory concept, to better reflect current practice settings and ensure the framework remains contemporary, coherent and fit for purpose. Includes introducing a definition of 'veterinary services' to reflect the range of services provided by the profession and regulated under the Act.

Modernise the registration framework

Streamline categories of registration

To better align with other jurisdictions, the proposed registration framework moves from a five-category system for veterinarians, to a two-category system of general and specialist veterinarians. Veterinarians with existing Full, Honorary, Limited and Provisional registration would be transferred to **General** or **Specialist** registration, subject to conditions as necessary.

Veterinary nurses and technologists will have one category of registration.

Proposed reforms continued

Introduce a scope of practice

Proposed reforms reflects more modern approaches used in the human health sector, with a Scope of Practice to clearly outline roles, responsibilities and functions across the veterinary workforce and support safe delegation within licensed veterinary premises. This includes developing Scopes of Practice for:

- vets with General registration
- vets with Specialist registration
- veterinary nurses and technologists
- accredited persons.

Scopes of practice will be developed by the Board in consultation with key stakeholders. A registered person would be required to operate within their Scope of Practice and any other conditions of their registration. This Scope of Practice will provide for a broad scope of activities, within which registered persons must operate in line with their conditions of registration, training, experience and competence (whilst also enabling new skills to be developed with appropriate supervision).

Code of Conduct framework

The proposed changes will apply a Code of Conduct to all registered persons and licence holders of veterinary premises to support consistent standards and shared accountability across the veterinary profession.

Any changes will maintain the existing intent of the code of conduct in place for veterinarians, while ensuring the language and settings are clear and in line with contemporary professional and ethical obligations, and introduce new requirements relating to fitness to practice, public conduct and professional reputation, and compliance with other relevant laws. The revised code of conduct will be developed by the Board in consultation with key stakeholders.

Introduce a fit and proper person requirement

In line with other contemporary frameworks, introduce a fit and proper person test for registration and licencing, to ensure that persons authorised to provide veterinary services are suitable to do so. In determining whether a person is fit and proper, the Board may have regard to matters including the person's history of compliance with this Act or any corresponding or relevant legislation, any previous disciplinary or regulatory action including suspension or cancellation of registration or licence, the person's relevant criminal history, and any conduct or behaviour indicating that the person is not of good character or reputation. This test is intended to support consistent, transparent and contemporary assessments of suitability for entry and ongoing participation in the veterinary profession and related services.

Extend the veterinary register

For greater public transparency and confidence, proposed changes will extend the current register to include all registered persons and licenced veterinary premises. The register will include prescribed information such as the full name and address of the registered person or licenced premises, a unique authorisation number, details of qualifications held (including, for specialist veterinarians, the relevant branch of veterinary science), the premises at which the person is practising, and any conditions, restrictions or limitations applying to the authorisation. Private information such as home address may be held on the register for contact purposes but not made publicly available.

The proposed changes also improve transparency around the operation of interstate veterinarians with deemed registration practising in NSW by requiring notification to the Board when these veterinarians commence work in NSW, and including these veterinarians on the register.

Proposed reforms continued

Restricted acts of veterinary science

Existing provisions that require the Minister to seek advice from an advisory committee before making changes to the restricted acts of veterinary science will remain as part of proposed reforms. This advice will be considered in proposing any changes to the restricted acts of veterinary science as part of a modern framework, including the exemptions that apply where the person is the owner of the animal, or an employee of the owner, a veterinary student, or under emergency situations.

Amend existing fees and charges

Updates to the regulatory framework will require an updated fees and charges schedule to support the expanded range of regulatory functions under the proposed reforms, including registration, licensing, and related regulatory activities. Proposed changes will enable the recovery of reasonable costs associated with complaints handling and disciplinary proceedings to support the effective administration of a contemporary, risk-based regulatory system.

Changes will also provide for annual indexation of fees in line with CPI, following consultation with the veterinary profession. Consistent with existing arrangements, Ministerial approval will be required for any proposed increases exceeding CPI, or any other significant fee changes. The framework would also enable the Board to waive, reduce or vary fees or recoverable costs in appropriate circumstances, to ensure fairness, flexibility and proportionality in the application of charges.

Update penalty and offence provisions

Modernising the regulatory framework will require consistent amendments to penalties and offences to support regulatory compliance, and uphold animal welfare, public safety and trade integrity. Recognising that the overwhelming majority of the profession act professionally and comply with their obligations, penalty and offence settings will be reviewed to ensure they remain proportionate, effective, and align with contemporary regulatory expectations. This would include consideration of greater harmonisation with related statutory schemes, particularly the *Prevention of Cruelty to Animals Act 1979*, to promote consistency, remove unnecessary duplication and support a coherent and integrated regulatory approach across animal welfare and veterinary services legislation.

Provide for a statutory review

To ensure any changes to the regulatory framework are working as intended and inform any further improvements, the proposed reforms include a statutory review five years following commencement. Statutory reviews provide a structured approach to assess the effectiveness of the legislative changes, identify any gaps or unintended operational impacts, and ensure the regulatory framework continues to support safe, contemporary and sustainable veterinary practice in NSW.

Have your say



- 5a. Do you support streamlining the registration categories for veterinarians in line with other jurisdictions? What issues should be considered?
- 5b. Do you support extending the code of conduct framework to all registered persons and licence holders of veterinary premises?
- 5c. In establishing a contemporary fees and charges framework, what safeguards or considerations should be included to ensure the framework remains fair, proportionate and sustainable?



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