



Australian Veterinary Association

Submission on ACT Restricted Acts of
Veterinary Science

December 2019



The Australian Veterinary Association (AVA)

The Australian Veterinary Association (AVA) is the only national association representing veterinarians in Australia. Founded in 1921, the AVA today represents 9000 members working in all areas of animal science, health and welfare.

Veterinary roles extend far beyond caring for the health and welfare of our pets and production animals. Veterinarians are the pathologists, field officers and inspectors that secure the safety of our food, ensure market access for our exports, and help to safeguard the human population from zoonotic diseases.

Summary

The AVA is pleased to comment on the proposed ACT Restricted Acts of Veterinary Science consultation and thanks the ACT Veterinary Practitioners Board for the opportunity to do so.

The AVA supports harmonisation of veterinary legislation between ACT and NSW regarding restricted acts of veterinary science. We do, however, wish to make the following three recommendations to improve animal welfare outcomes for animals in the ACT.

Recommendations

[Schedule 1, Part 1.2 item 1](#)

Pregnancy testing of cattle must also be included as a restricted act – not only horses. This is important from an animal health and welfare perspective, as only veterinary pregnancy testers can diagnose reproductive diseases and advise on management of health issues impacting future reproductive performance.

Pregnancy testing of cattle is an invasive procedure not without risks, especially when ultrasound probes are used. The AVA is aware of cases where rectal perforation and subsequent peritonitis has occurred following pregnancy testing by lay operators, and without immediate veterinary expert diagnosis and treatment resulting in death of the cows. Incorrect diagnoses by non-veterinary lay testers has previously led to calvings occurring during transport of animals, including during live export, and this risk is also an animal welfare concern.

Recommendation: that item 1 be amended to also include diagnosing pregnancy in cattle (in addition to horses).

[Schedule 1 Part 1.2 item 15](#)

This restricted act prohibits carrying out any treatment or procedure that involves insertion of anything into listed passages and cavities. The strict interpretation of this may prohibit an owner of an animal applying topical treatments prescribed by a veterinary practitioner into the eyes or ears of an animal, such as eye drops or ear drops.

Recommendation: that item 15 be amended to be clearer that topical treatments prescribed by a veterinary practitioner can be applied into the eyes or ears of an animal by its owner.



[Schedule 1, Part 1.2 item 17](#)

The exemption “other than tooth cleaning” is problematic as it potentially provides a loophole for lay “anaesthesia-free dentists” to work on animals in the ACT.

Anaesthesia-free dentistry refers to the practice of attempting to perform a scale and polish on the teeth of a fully conscious animal. This is often performed by people who lack appropriate training and qualifications. The practice of anaesthesia-free “dentistry” is problematic for several reasons:

- comprehensive examination, diagnosis and treatment cannot properly proceed whilst an animal is conscious;
- undertaking procedures of this nature on a conscious animal requires the animal to be physically restrained, which is aversive and may have negative psychological and behavioural consequences for the animal;
- persons undertaking the procedure place themselves (and potentially other persons) at risk of being bitten or suffering other injuries inflicted by the distressed animal; and
- the term “dentistry” is potentially misleading: at best, anaesthesia-free dentistry is a purely cosmetic activity which delivers no health care benefits, and at worst it has the potential to mask underlying dental pathology resulting in delayed treatment of dental disease, and long-term suffering by the animal.

Periodontal disease (the most common disease of dogs and cats) requires that the subgingival areas be probed and cleaned. This is an uncomfortable, and sometimes painful, procedure when done properly and is not possible to do effectively on a fully conscious patient.

Simply removing the calculus that is visible on the tooth above the gum line is ineffective, because it does not clean the tooth root surface to allow healing of periodontal structures and reversal of dental disease. If the subgingival area is not cleaned, bacteria can continue to lodge in the area with the potential to lead to systemic disease (e.g. cardiac or renal disease).

An animal is required to be physically restrained for an “anaesthesia-free” procedure, and this can cause significant anxiety for the animal. Because the animal is conscious, it will be fully aware of any pain involved in the procedure. This is stressful for the animal and can lead to longer term anxiety, aversion to being touched around the face and muzzle, and an increased tendency to bite.

Recommendation: that Item 17 be amended to make any dental procedure on any animal other than a horse, an act of veterinary science. It is recommended that a further item be added which specifies that tooth cleaning of companion animals must be performed under general anaesthetic, by a veterinarian, or under the direct supervision of a veterinarian (to allow for veterinary nurses to perform this task under veterinary supervision on fully anaesthetised animals).

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