



6 February 2023

Committee Secretary
Joint Standing Committee on Migration
PO Box 6021
Parliament House
Canberra ACT 2600

Dear Committee Secretary,

RE: PROPOSED CHANGES TO IMMIGRATION VISAS TO ALLEVIATE THE AUSTRALIAN VETERINARY INDUSTRY CRITICAL SKILL SHORTAGE

I want to express my grave concern for the current state of the veterinary industry in Australia due to the already dire and escalating critical workforce shortage. I am calling on the Government to urgently assist the profession by revising the current immigration visa requirements for veterinary professionals. Veterinarians play a crucial role in animal, human and community well-being in Australia, and their contribution to society is highly valued, impacting our nation daily. As such, please accept this submission for the Joint Standing Committee's ongoing inquiry - *Migration, Pathway to Nation Building*, to which the critical veterinary shortage is highly relevant.

Vetlink Employment Service

I am a veterinarian and the owner of Vetlink Employment Service (Est. 1997), an Australian-based specialist recruitment agency solely for the veterinary profession. Vetlink places veterinarians and veterinary nurses into jobs in all states and territories of Australia. I was one of two representatives of the Australian Veterinary Association (AVA) who spoke at the Joint Standing Committee's previous inquiry into Australia's Skilled Migration Program. The Committee recognised the critical veterinary shortage, and vets were included on the Priority Migration Skilled Occupation List (PMSOL) in 2021. On a daily basis, I communicate with a host of veterinary professionals – veterinarians, veterinary nurses and practice owners, throughout the nation. In my 25 years of veterinary recruitment, I have never seen such a severe veterinary shortage.

Veterinary Workforce Skills Shortage

It is well documented that Australia is experiencing a severe and critical shortage of veterinary professionals in the workforce, with both veterinarians and veterinary nurses

listed on the Australian Government National Skills Commission's Skills Priority List for 2022.¹ The crisis has only been amplified as a direct effect of the COVID-19 pandemic and subsequent response. A Workforce Survey by the Australian Veterinary Association (AVA)² revealed that 31% of practices advertising for vets take 12 months or longer to fill vacancies. This is in the face of unprecedented growth in pet ownership.

A survey by Animal Medicines Australia (AMA) of Australian households showed that since 2019, the proportion of pet-owning households increased from 61% to 69%, with an estimated growth of pets owned in Australia from 28.5 million in 2019 to 30.4 million pets in 2021.³ According to the survey, vets remain the top source of information for pet-related issues.

The demand for veterinary services extends beyond companion animals, however. Veterinarians are crucial in ensuring livestock health and well-being, preserving Australia's stringent biosecurity status. Australia's shortage of veterinarians, particularly in rural and regional areas, is a serious concern given the recent Japanese Encephalitis Virus outbreak and the risk of livestock diseases such as Lumpy Skin Disease (LSD) and Foot and Mouth Disease (FMD) on national biosecurity.

Veterinarians have almost four times the suicide rate of the general population and double that of other healthcare professionals.⁴ Employed veterinarians are being exposed to unsustainable workloads. With demand for work higher than ever and lack of adequate staffing commonplace, veterinarians are often subjected to extended and additional shifts, inadequate holiday periods and, in many cases, the additional stress of after-hours duties, especially in rural and remote areas. Attrition rates in the profession are high, exacerbating the current vet shortage, and in most cases, are due to the toll of stress, burnout and deteriorating mental health. Vets cannot be expected to endure this much longer.

One cannot overlook the integral role veterinary nurses play in modern veterinary practice. Veterinary nurses provide invaluable support to veterinarians and, in their own right, provide nursing care to sick animals and communicate with and educate pet owners. Reducing administrative barriers to immigration for suitably qualified international veterinary professionals will help immediately address these critical gaps in the workforce.

¹ <https://www.nationalskillscommission.gov.au/topics/skills-priority-list>

² Australian Veterinary Association. 2021. *Veterinary Workforce Survey 2021*.
<https://www.ava.com.au/siteassets/news/ava-workforce-survey-analysis-2021-final.pdf>

³ Animal Medicines Australia. 2019. *Pets in Australia: A national survey of pets and people*.
https://animalmedicinesaustralia.org.au/wp-content/uploads/2019/10/ANIM001-Pet-Survey-Report19_v1.7_WEB_low-res.pdf

⁴ Hatch, P., Winefield, H., & Lievaart, J. (2011), Workplace stress, mental health and burnout of veterinarians in Australia. *Australian Veterinarian Journal*.

Temporary Skill Shortage Visa (Subclass 482)

Currently, the Temporary Skill Shortage Visa (Subclass 482) excludes a large pool of suitably qualified overseas veterinarians from entering Australia. The exclusion is due to the requirement for at least two years of relevant work experience in the occupation/field. There is currently a shortage of new graduate and experienced veterinarians in Australia. According to our database, the percentage of new graduate veterinary jobs has doubled from ~ 20% of all full-time jobs advertised in 2016 to ~40% of all full-time jobs advertised in 2022.

A large pool of suitably qualified new graduate veterinarians from overseas would like to work in Australia. Many employers are willing to employ new graduate vets from other countries, including the United Kingdom and Ireland, with recognised qualifications. In a pre-COVID-19 survey (2019) conducted by Vetlink of veterinary students from Edinburgh, Glasgow, London, Cambridge, Liverpool, Nottingham, Bristol and Dublin, of the 970 respondents, 365 expressed interest in working in Australia as a new graduate veterinarian.

The Accredited Employer Work Visa in New Zealand (similar to the 482 visa) does not require vets to have experience to be eligible to apply for the visa. Many overseas new graduate veterinarians who want to work in Australia take jobs in New Zealand because they cannot secure a suitable visa in Australia.

Further, the requirement for two years of relevant work experience had only existed since 18 March 2018, when the Temporary Work (Skilled) visa (Subclass 457) was abolished and replaced with the Temporary Skill Shortage Visa (Subclass 482).

I ask that the Government urgently abolish the eligibility requirement of two years of clinical experience for suitably qualified overseas veterinarians to be eligible for the Temporary Skill Shortage Visa (Subclass 482) so that new graduate vets from overseas can fill vacancies in Australia. The change would have a very positive and immediate impact on the veterinary shortage.

The two-year work experience requirement is unnecessary for grant of the Subclass 482 visa, as visa applicants are, in any case, required to meet the Australian and New Zealand Standard Classification of Occupations (ANZSCO) criteria to be eligible for a Subclass 482 visa. ANZSCO is a skill-based classification used to classify all occupations in the Australian and New Zealand labour markets. The ANZSCO requirements are set by the Australian Bureau of Statistics. The ANZSCO requirements set out, amongst other things, the qualification and/or work experience required for a person to be able to perform the tasks associated with an occupation.

The Department of Home Affairs' policy states the following in relation to assessing Subclass 482 visa applicants against the ANZSCO criteria for a nominated occupation:

“When assessing this requirement, the Australian and New Zealand Standard Classification of Occupations (ANZSCO) should be referred to as the principal source of information on the skill requirements for the nominated occupation – that is, the level of qualification required and/or the number of years of experience a person should have in order to be able to perform the occupation.”⁵

According to ANZSCO, veterinarians must “have a level of skill commensurate with a bachelor degree or higher qualification.”⁶ No work experience is required for a person to meet the ANZSCO requirements for the occupation of veterinarian. That is, the Australian Bureau of Statistics considers that a person with a relevant and recognised bachelor degree is able to competently perform the tasks and duties of a veterinarian.

Furthermore, the skills assessing authority for veterinarians, the Australasian Veterinary Boards Council (AVBC), does not require applicants to have relevant work experience to be issued with a skills assessment for migration purposes. A recognised bachelor degree qualification is sufficient to meet the AVBC's requirements.

Working Holiday Visa (Subclass 417) and Work and Holiday Visa (Subclass 462)

Under existing conditions, veterinarians on a 417 or 462 visa can only work for an employer for up to six months (with some exceptions). Veterinary practices are severely overstretched, and recruiting and inducting veterinarians who can only stay at the practice for six months is arduous and expensive. I recognise the recent temporary waivers on the six-month work limitation. The temporary waivers are due to cease on 30 June 2023.

In light of the current critical and ongoing veterinary shortage, could the Government abolish the six-month work limitation so that overseas vets can work in Australian practices for reasonable lengths of time and provide support and relief to existing staff?

The Youth Mobility Scheme Visa in the UK (their Working Holiday Type Visa) is a two-year visa with no six-month work limitation. I.e. an Australian vet in the UK can work for an employer for up to two years.

⁵ POLICY - MIGRATION REGULATIONS - SCHEDULES[Sch2Visa482] Temporary Skill Shortage visa (subclass 482) – visa applications

⁶ <https://www.abs.gov.au/statistics/classifications/anzsco-australian-and-new-zealand-standard-classification-occupations/2021/browse-classification/2/23/234/2347>

To be eligible to apply for a Working Holiday Visa, applicants need to be between 18 and 30 years of age (there are some exceptions). Increasing the age limit to 35 will increase the number of vets available for short-term work in Australia. I understand that when the Australia-United Kingdom Free Trade Agreement comes into effect, the age range will increase for British Citizens (417 visa).

Immigration Visas for Veterinary Nurses

There is currently no clearly defined and reasonable visa pathway for veterinary nurses to enter Australia and obtain permanent residency. Veterinary nurses that lived and worked in Australia during the COVID-19 pandemic for at least 12 months between 1 February 2020 and 14 December 2021 on a Temporary Skill Shortage Visa (Subclass 482)⁷ may transition to an Employer Nomination Scheme Visa (Subclass 186), but this pathway is due to cease on 1 July 2024, according to the Home Affairs Website⁸. This visa pathway does not apply to veterinary nurses wishing to enter Australia now.

The only other pathway to permanent residency for veterinary nurses is to transition from a Skilled Employer Sponsored Regional (Provisional) Visa (Subclass 494) to a Permanent Residence (Skilled Regional) Visa (Subclass 191). A vet nurse wanting to transition from a 494 visa to a 191 visa must stay at one practice for at least three years before applying (if they leave the practice for any reason, there is no rollover, i.e. the three years start again).

Furthermore, the eligibility requirements for grant of a Subclass 494 visa are onerous. A veterinary nurse must have at least three years of relevant work experience. They must also have a positive skills assessment issued by Vetassess. The skills assessment incurs an additional cost (currently \$1,058.20 plus an additional \$685.30 for priority processing). Without priority processing (limited to a very small number of applicants), skills assessment applications are processed by Vetassess within approximately 12 and 20 weeks⁹.

There is currently a shortage of veterinary nurses in Australia.

In Summary

Amendments to the current immigration visas for veterinary professionals offer an immediate solution to provide relief for employers and improve their employees' working conditions.

⁷ Migration Regulations 1994 (Cth) regs 5.19(5)(a)(iii) and Migration (Specified persons and periods of time for regulation 5.19) Instrument (LIN 22/038) 2022, Item 4(3)

⁸ <https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-listing/employer-nomination-scheme-186/temporary-residence-transition-stream>

⁹ <https://www.vetassess.com.au/skills-assessment-for-migration/professional-occupations/application-process>

Proposed amendments:

- Remove the requirement for two years' experience to be eligible for the Temporary Skill Shortage Visa (Subclass 482);
- Abolish the 6-month work limitation for the Working Holiday Visas (417 and 462) and increase the age limit from 30 to 35;
- Create a clear and reasonable pathway for veterinary nurses to secure permanent residency. This could be achieved by adding the occupation of veterinary nurse to the Medium and Long-term Strategic Skills List or amending regulation 5.19(5) of the Migration Regulations to allow all Subclass 482 visa holders to transition to the permanent Subclass 186 visa.

Please consider the current veterinary shortage in terms of what it will mean for animal health, welfare and biosecurity, and human mental health and well-being.

Thank you for considering the immigration visa changes I have proposed to alleviate Australia's current critical veterinary shortage.

Yours sincerely,



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