

NSW Draft Medicines, Poisons and Therapeutic Goods Regulation

The Cat Protection Society of NSW is deeply concerned about the proposed Medicines, Poisons and Therapeutic Goods Regulation which – if left unchanged – will impact on the health, welfare and wellbeing of feline patients of veterinarians, as well as contribute further stress to an already stressed veterinary workforce.

The absence of consultation with the veterinary sector is noted, and this factor alone should be cause to review the current draft, taking into consideration the views and expertise of veterinary practitioners.

The Regulatory Impact Statement cannot be a legitimate RIS when *an entire profession impacted by the regulation was not consulted*.

The proposed changes to the NSW Medicines, Poisons and Therapeutic Goods Regulation will add further burdens and restrict what is good welfare practice, such as safely combining drugs in one syringe given as a single injection. If veterinarians cannot do that, it will cause unnecessary suffering and distress to cats.

Cat Protection does not employ veterinarians, but we work with private practices who provide care to thousands of cats and kittens for us each year.

The veterinary workforce is under extreme pressure, with a workforce shortage so serious that it is the subject of a NSW Parliamentary Inquiry: [Veterinary workforce shortage in New South Wales \(nsw.gov.au\)](https://www.parliament.nsw.gov.au/committees/inquiries/veterinary-workforce-shortage-in-new-south-wales)

The impacts of the shortage are far-reaching, from the health and safety of veterinary team members, to biosecurity threats, animal welfare, and national, state and local economic impacts.

A consistent theme in submissions and the hearings was the lack of respect for and understanding of the complexities and costs in contemporary veterinary practice. We find it distressing that this lack of respect and understanding is reflected here, and we are concerned that the draft regulation, if it proceeds in its current form, will be the proverbial last straw for some veterinary practices.

While we appreciate the aims of the draft regulation are to deal with human health (and human criminal) issues, we also note the vital importance of the veterinary workforce to human health, both directly (for example, in biosecurity) and indirectly (for example, in supporting the human-animal bond which provides significant human physical and mental health benefits). In a One Health/One Welfare framework, the impact on veterinarians and the consequent impacts on animals must be considered before finalising this regulation.

We urge the NSW Ministry of Health to meet with veterinarians and the Australian Veterinary Association to listen to their concerns and to redraft the regulation with consideration of their feedback.

Kristina Vesk OAM
Chief Executive Officer
Cat Protection Society of NSW

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