

**Submission
No 167**

INQUIRY INTO VETERINARY WORKFORCE SHORTAGE IN NEW SOUTH WALES

Organisation: Australian Pet Welfare Foundation

Date Received: 21 July 2023

Inquiry into the veterinary workforce shortage in New South Wales

Australian Pet Welfare Foundation (APWF) submission
July 2023



Dr Jacquie Rand BVSc (Melb), DVSc (Guelph), MANZCVS, Dip ACVIM (Int. Med.)
Registered specialist veterinarian in small animal internal medicine
Emeritus Professor of Companion Animal Health, University of Queensland
Executive Director and Chief Scientist, Australian Pet Welfare Foundation

Dr Jade Norris BVSc Hons 1 (USyd) Dip Gov
Registered Veterinarian
Australian Pet Welfare Foundation



Inquiry into the veterinary workforce shortage in New South Wales

Contents page

Executive summary.....	3
Recommendations.....	4
Terms of reference 1(a) and (b).....	5-6
Terms of reference (c)	6-7
Terms of reference (d) and (e).....	7
Terms of reference (f) and (h).....	8
Terms of reference (i) (j) (k) (l) (m) (n).....	8-15
Terms of reference (g).....	16
References.....	17-19

Executive summary

Thank you for the opportunity to provide feedback on the veterinary workforce shortage in New South Wales. Australia is currently experiencing a critical veterinarian shortage. This shortage has existed for years and has been compounded by the Covid-19 pandemic. The current vet shortage is a complex problem and will require multiple solutions. High attrition rates and negative mental health are significant issues in the veterinary profession. Financial stress and occupational stress are identified as underlying reasons for the high attrition rates and negative mental health of veterinarians, and these contributing factors must be addressed in order to resolve the shortage.

The Australian veterinary profession is associated with low remuneration, high educational debt, high-stress working conditions (abuse from clients, limited resources), frequent ethical dilemmas (euthanasia of healthy or treatable animals), long working hours, high workloads, after hours on-call night work combined with day work, insufficient time off work and poor work-life balance. Due to vet shortages, remaining veterinarians have the added burden of being unable to take leave.

Evidence-based solutions are urgently needed to ensure a sustainable veterinary workforce in the long-term. A robust veterinary workforce is not only critical to maintain animal health and welfare but also has major implications for human health and welfare. Veterinarians are a fundamental part of 'One Health, One Welfare' which seeks to optimize the health and welfare of people, animals and their environment and recognises the interconnection between these elements. Veterinarians play critical roles in areas such as global health security through the prevention of zoonotic disease outbreaks; safe agricultural systems; wildlife medicine and conservation, biosecurity and maintaining the pet companionship bond which provides significant physical, mental and economic benefits to humans.

A critical issue is the euthanasia of healthy and treatable animals by veterinarians. Euthanasia of healthy or treatable animals including pets, stray animals and wildlife (also called financial or convenience euthanasia) represents a frequent ethical dilemma for veterinarians, and is a significant occupational stressor for veterinarians in private clinical practice and other contexts such as animal shelters or council pounds. Euthanasing healthy or treatable animals is well-documented as causing moral distress in veterinarians. Moral distress leads to negative mental health impacts (depression, trauma, increased suicide risk), burnout and subsequent attrition. Research also shows that employee turnover rates are positively related to euthanasia rate and that making euthanasia decisions on the basis of factors other than behaviour and health reasons is related to increased personnel turnover.

The current cost-of-living crisis and concurrent rental crisis have likely increased financial euthanasia of both pets and stray animals (mainly semi-owned stray cats and kittens), exacerbating this significant occupational stressor.

Preventing euthanasia of healthy and treatable animals is a key solution to reduce occupational stress, severe negative mental health impacts, burnout and attrition of veterinarians.

The NSW Rehoming Review report (2022) recommended Community Cat Programs as an evidence-based solution to significantly reduce euthanasia of healthy and treatable stray cats and kittens (which represent a large proportion of the convenience euthanasia). Other solutions include higher remuneration, HECs debt waivers, financial incentives for vets to work in rural, remote and regional areas, and strategies to improve overall working conditions and reduce work-related stress. In addition, veterinary graduate numbers and selection criteria should be reviewed to ensure suitability of veterinary student candidates for clinical work which meets the demand, including ensuring sufficient workforce for mixed and large animal practice in rural, remote and regional areas.

Recommendations

Recommendation 1: Evidence-based strategies should focus on retaining veterinarians in clinical practice and recruiting veterinarians to rural, remote and regional areas. Strategies should address issues including higher remuneration, HECS debt waivers, financial incentives for vets to work in rural, remote and regional areas, improved working conditions, reduced work-related stress, veterinary graduate numbers and suitability selection criteria.

Recommendation 2: Implement evidence-based strategies which prevent euthanasia of healthy and treatable animals by veterinarians to prevent associated severe negative mental health impacts and subsequent attrition.

Recommendation 3: Private clinical practices should not provide discounts to local governments for euthanasia services for healthy or treatable animals (including for stray animals) and instead charge local governments full price euthanasia fees if the animal is healthy or readily treatable. Instead, private clinical practice staff would be better served by providing financial incentives for low-income people for desexing, particularly for cats, rather than providing discounted euthanasia to councils for healthy and treatable animals.

Recommendation 4: Strategies which increase recruitment to rural, remote and regional areas including suitability selection criteria for veterinary student admission, HECS debt waivers and financial incentives for veterinarians to work in rural, remote and regional areas.

Recommendation 5: Domestic cats (owned, semi-owned and unowned) should be excluded from the legal definition of feral cats in legislation and regulation.

Recommendation 6: Legislation and regulation should be amended to enable Return-To-Field (RTF) for healthy or treatable cats (desexed and microchipped).

Recommendation 7: Legislation and regulation should be amended to allow cats to be registered and identified via microchip to an "organisation" rather than only to an individual person.

Recommendation 8: Legislation and regulation should be amended to remove prohibitive registration fees for cats.

Recommendation 9: Legislation and regulation should continue to prohibit mandatory cat containment (night curfews and 24/7 mandatory containment).

Recommendation 10: Legislation and regulation should be amended to prohibit deeming domestic cats that are in traps or entering shelters, pounds, private veterinary practices, rescue groups or similar facilities as being 'feral'.

Recommendation 11: Legislation and regulation should be amended to prohibit deeming domestic cats that are in traps or entering shelters, pounds, private veterinary practices, rescue groups or similar facilities as being 'less socialised' or 'unsuitable for adoption' based on fear behaviours exhibited prior to habituation, and prior to providing the cat with reasonable habituation time (based on science) in a non-stressful environment.

Recommendation 12: Alternative rehoming avenues should be used for less socialised healthy or treatable cats where these cats are not adopted such as 'Working cat' rehoming and Return-to-Field (RTF) to reduce euthanasia of healthy and treatable animals and associated severe negative mental health impacts on veterinarians.

TERMS OF REFERENCE

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

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

Australia is currently experiencing a critical overall shortage of veterinarians. This shortage is more pronounced in rural, remote and regional areas but is also increasingly an issue in metropolitan and urban areas (AVA 2023). Over three-quarters of veterinary practitioners responding to the Australian Veterinary Association (AVA) Workforce Survey 2021 had advertised vacancies within their practices in the previous 12 months, of which only 21 per cent were filled within three months, while 31 per cent of vacancies took more than 12 months to fill or were still unfilled. Regional practices have been closing clinics because of a lack of veterinary staff in recent years (AVA 2023). Clinical practice is one of the main areas affected by the shortage. There are also reports of government vet shortages in some areas (Hayes 2022).

A high level of attrition is recognised as a major factor. In addition, in rural, remote and regional areas, recruitment (attracting vets to these areas) is also reportedly a major problem (AVA 2023). In 2021, veterinarians were added to the Australian priority skilled migrant list in an attempt to ease the shortage (Hilton 2023). There are over 13,900 registered veterinarians in Australia and approximately 9,100 of these vets are in private clinical practice, caring for pets, livestock animals, horses, and wildlife and exotic animals (Australasian Veterinary Boards Council 2022, Hayes 2022).

The AVA Workforce Survey 2021 showed that of the vets working in clinical practice, less than 30 per cent were in mixed, large animal or equine practice, and approximately two-thirds were in companion animal practice (VSANZ 2023). Veterinarians are numerically rare in comparison to other health professionals. In Australia, there are 420 human medical practitioners per 100,000 population compared to just 36 clinical practice vets per 100,000 (AIHW 2023).

The vet shortage has been compounded by the COVID-19 pandemic which has seen a 20%–30% increase in demand for veterinary services. There has been a substantial boom in pet ownership since 2019, with an estimated 30.4 million pets nationally. The proportion of pet-owning households has increased significantly from 61% to 69% in just over two years. It is estimated that 6.9 million households in Australia currently have pets (AMA 2021).

It has been suggested that attrition is the significant cause of the shortage, rather than a lack of veterinary graduate supply. In Australia, seven Australian universities produce approximately 500–550 veterinary graduates annually. In addition, it has been reported that veterinarians may not be leaving the veterinary profession in general, but rather that they are leaving clinical practice specifically (Nelson-Pratt 2018), and that the best strategy to meet the demand for clinical practice vets is to retain veterinarians (in clinical practice) rather than increasing the numbers of graduates (Arbe 2021).

This is consistent with surveys from Australia which show that while veterinary practices may be struggling to recruit veterinarians (for clinical practice), the general number of registered veterinarians has been increasing (Professionals Australia Survey 2022, Arbe 2021).

Investigation of annual veterinary graduate numbers should also be undertaken as Animal Emergency Australia have raised concerns that in 2021 the number of students enrolled in Australian veterinary science programs totalled 1,890 – a significant decrease from 2,440 students enrolled in 2010 (AEA 2023). Furthermore, selection of veterinary student candidates should be reviewed to ensure suitability to clinical work which matches workforce demand, including sufficient graduates suited to mixed and large animal practice in rural, remote and regional areas.

Recommendation 1: Evidence-based strategies should focus on retaining veterinarians in clinical practice and recruiting veterinarians to rural, remote and regional areas. Strategies should address issues including higher remuneration, HECs debt waivers, financial incentives for vets to work in rural, remote and regional areas, improved working conditions, reduced work-related stress, veterinary graduate numbers and suitability selection criteria.

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

Occupational and financial stress are identified as underlying reasons for veterinarian burnout, negative mental health and subsequent attrition from clinical practice. Financial and occupational stress must be addressed in order to reduce attrition from clinical practice and address the shortage.

Euthanasia of healthy or treatable animals (also called convenience euthanasia, objectionable euthanasia or financial/economic euthanasia) represents a frequent ethical dilemma encountered by clinical vets and is a significant occupational stressor for veterinarians in private clinical practice, animal welfare organisation shelters and facilities providing contract council pound services, among other contexts (Connelly 2022, Hilton 2023, Rollin 2011).

Please note that in Australia many councils in regional areas and some in major cities have contracts with private veterinary practices to treat and euthanase animals. This results in many staff in these practices being exposed to the adverse mental health effect associated with killing healthy and treatable dogs and cats. Some councils also refer people with stray cats directly to private veterinary practices.

Euthanasia of healthy and treatable animals by veterinarians involves pets, wildlife and stray animals, particularly semi-owned stray cats and kittens. Recent research estimates that approximately 50,000 mostly healthy or treatable cats and kittens were euthanased in Australia annually in animal shelters, council pounds and rescue groups (Chua 2023). The total number of healthy cats and kittens euthanased annually across Australia would be higher as this estimate does not include private practices that were not providing council pound services. Euthanasia of healthy and treatable animals by veterinarians can also involve other types of animals such as racing animals (e.g., greyhounds) and research animals, among others.

Euthanasia of healthy or treatable animals is well-documented as causing moral distress in veterinarians. Moral distress has been found to be a significant contributing factor in clinician burnout, intention to leave one's position and psychological distress (Kogan 2023). Veterinarians suffer devastating mental health impacts when required to kill healthy or treatable animals repeatedly. These impacts include trauma (perpetrator-induced traumatic stress), depression, substance abuse, and increased suicide risk (Andrukonis 2020, Whiting 2011, Reeve 2006, Tiesman 2015, Cooney 2023). Research shows the suicide rate of Australian veterinarians is four times higher than the general population (Jones-Fairnie 2008). Research also shows that Australian veterinarians have higher rates of depression, stress, and burnout than the general population (Hatch 2011, Hilton 2023).

Moral distress can be defined as the powerlessness, anger, and guilt that veterinarians experience when they are unable to practice medicine according to their own ethical standards (such as euthanasing an animal that is healthy or has a treatable condition) (Kogan 2023). This is not surprising given that most veterinarians enter the field to treat disease, alleviate pain and suffering, and provide high-quality of life for their animal patients. Yet veterinarians are often called upon to kill healthy animals or animals with a treatable condition (Rollins 2011). Most veterinarians consider euthanasia of a healthy animal to conflict with their role as patient advocate (Cooney 2023).

The relationship between euthanasia of healthy or treatable animals by veterinarians and moral distress, negative mental health impacts, burnout and subsequent attrition is well-documented (AVA 2022, Kogan 2023, Kipperman 2017, Rollin 2011, Hatch 2011). In addition, abuse from clients is documented as a key stressor for Australian veterinarians, decreasing job satisfaction (AVA 2022). In many cases, this abuse likely stems from clients feeling highly stressed when they have to make a decision not to treat or limit treatment for their pet for financial reasons, particularly if that results in the pet being euthanased.

Research also shows that employee turnover rates are positively related to euthanasia rate and that making euthanasia decisions on the basis of factors other than behaviour and health reasons (for example, euthanasing healthy kittens, puppies and wildlife because they are considered to require too much care or because the pet owner cannot afford vet treatment) is related to increased personnel turnover (Rogelberg 2007). Preventing euthanasia of healthy and treatable animals is a key solution to reduce occupational stress, negative mental health impacts, burnout and attrition in veterinary clinical practice.

Recommendation 2: Implement evidence-based strategies which prevent euthanasia of healthy and treatable animals by veterinarians to prevent associated negative mental health impacts and subsequent attrition (please see below).

Recommendation 3: Private clinical practices should not provide discounts to local governments for euthanasia services for healthy or treatable animals (including for stray animals) and instead charge local governments full price euthanasia fees if the animal is healthy or readily treatable. Instead, private clinical practice staff would be better served by providing financial incentives for low-income people for desexing, particularly for cats, rather than providing discounted euthanasia to councils for healthy and treatable animals.

1(d) the role of, and challenges affecting, veterinary nurses

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

Veterinary nurses and overseas trained veterinarians will experience similar problems as those experienced by Australian trained veterinarians outlined in this submission. These include occupational stressors such as client abuse and negative mental health impacts from euthanasing healthy and treatable animals, and financial stress from low remuneration combined with long working hours and high workloads. Please see recommendations.

- (f) the arrangements and impacts of providing after-hour veterinary services**
- (h) the particular challenges facing the veterinary profession and the shortage of veterinarians in regional, rural and remote New South Wales**

Rural, remote and regional veterinary practices are often forced to provide both emergency 24-hour on call and daytime GP clinical practice services. Many vets work throughout the night and are then expected to work the next day due to a lack of availability of other veterinarians in the community. This creates severe sleep deprivation and presents serious risks to the veterinarian’s safety and well-being. In metropolitan areas such as Sydney there are various dedicated emergency after hours hospitals with teams specialising in emergency critical care. This allows GP clinical practices in the surrounding areas to refer any after-hours emergencies to these hospitals which protects staff from work overload and dangerous sleep deprivation.

Recommendation 4: Strategies which increase recruitment to rural, remote and regional areas including suitability selection criteria for veterinary student admission, HECS debt waivers and financial incentives for veterinarians to work in rural, remote and regional areas.

- (i) the role played by veterinarians in providing care to lost, stray and homeless animals, injured wildlife and during emergency situations**
- (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**
- (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**
- (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**
- (m) strategies to improve access to veterinary care**
- (n) any other related matter.**

To retain veterinarians in clinical practice it is critical to prevent euthanasia of healthy and treatable animals by veterinarians – this is a key solution to reduce severe occupational stress, devastating mental health impacts, burnout and high levels of attrition among veterinarians in clinical practice.

Of note, a recent publication reported that the worst quartile of councils with intakes of >50 cats in New South Wales had estimated euthanasia rates from 67% to 100% (Chua 2023). Across NSW, councils operating their own pounds kill on average 41% of impounded cats and kittens. Because many councils in regional areas and some in major cities have contracts with private veterinary practices to treat and euthanase animals, this exposes many veterinarians and veterinary nurses to the adverse mental health effects resulting from outdated ineffective methods of domestic cat management in urban areas.

A One Welfare approach to managing domestic cats which optimizes animal, human and environmental well-being is urgently needed to reduce the large numbers of healthy cats and kittens being killed. These approaches are based on high intensity cat desexing programs, targeted to low socio-economic areas from where the largest numbers of stray cats and kittens are emanating from.

Recommendation 2: Implement evidence-based strategies to prevent euthanasia of healthy and treatable animals by veterinarians to prevent associated negative mental health impacts and subsequent attrition (please see details below).

Evidence-based **solutions** to prevent euthanasia of healthy and treatable animals and associated veterinarian attrition include the following (background information is also included):

1. Government implement a **'Veticare'** system which would provide accessible veterinary care to disadvantaged pet owners. This would assist many low-income families, and also help to protect veterinarians and veterinary staff from the adverse mental health impacts of financial euthanasia due to clients who cannot afford veterinary care for their pet.
2. Provision of affordable **pet-friendly rental accommodation** sufficient to meet the demand across Australia. Legislation against 'no pets' clauses.
3. Applying the **'Pets For Life'** concept strategies where owners and stray cat semi-owners are supported to keep their pet or stray cat (versus relinquishment), which is a cost-effective strategy to implement. This should include funding for programs to help disadvantaged pet owners keep pets with their families by assisting with veterinary costs.

Please see: <https://humanepro.org/page/tools-bring-pets-life-your-community> and <https://humanepro.org/programs/pets-for-life>

4. A **"One Welfare"** approach to domestic animal management, particularly urban stray cat management is urgently needed in Australia. **One Welfare** aims to optimise and balance the well-being of people, animals and their social and physical environment.
5. Funding to increase the number of dedicated referral wildlife veterinary hospitals. This would significantly reduce euthanasia of treatable wildlife by GP clinical practices.
6. Shifting from punishment-oriented approaches to **support-based models of domestic animal management** (Hawes 2020).
7. **To reduce euthanasia of healthy and treatable cats and kittens, prevention is key including:**
 - **Targeted desexing of owned and semi-owned stray cats (Community Cat Programs as recommended by the NSW Rehoming Review report 2022)** is an essential strategy to significantly reduce the number of stray cats and kittens and subsequently reduce intake into shelters, pounds, private practices providing pound services and rescue groups. Reducing intake will significantly reduce euthanasia of healthy and treatable cats and kittens (Kreisler 2022).
 - By significantly reducing euthanasia of healthy and treatable cats and kittens, **Community Cat Programs** will significantly reduce devastating mental health impacts on vets and attrition.
8. Online training for local government Animal Management Officers (AMOs) with a focus on strategies to reduce intake and euthanasia.

9. Stray cat strategies to reduce euthanasia of healthy and treatable cats and kittens by veterinarians:

1) Community Cat Programs

- Cost is the main barrier to desexing, therefore proactive **Community Cat Programs** based on high-intensity free desexing and microchipping of owned and semi-owned stray cats targeted to areas of high cat intake and complaints (typically disadvantaged low-income areas) are recommended to significantly reduce the number of stray cats and kittens and intake into shelters and pounds, private practices and rescue groups. These programs are very effective at assisting stray cat semi-owners to desex, microchip and adopt the stray cats they are feeding (turning undesexed semi-owned stray cats into desexed pet cats).
- Proactive **Community Cat Programs** are preventative and scientifically proven to reduce the number of stray cats and unwanted kitten litters in targeted areas - thereby reducing intake and euthanasia of healthy cats and kitten and associated mental damage to veterinary staff and stray cat semi-owners.
- Earlier this year, the NSW government announced \$8.3 million in funding for community cat programs and facilities. Please refer to the NSW Rehoming Review Report: <https://www.olg.nsw.gov.au/councils/responsible-pet-ownership/rehoming-practices-review/>
- **Banyule Council in Victoria** set up a free Community Cat program to desex, microchip and register owned and semi-owned stray cats, with a focus on suburbs with high cat-related calls. In just three years, the council reduced impoundments by 61% and numbers killed by 74%. In contrast, after Yarra Ranges Council implemented mandatory containment, in 2017, there was a 68% increase in impoundments and 18% increase in euthanasia in the third year. Over 8 years of the Banyule program, euthanasia decreased to 0.2 cats/1000 residents compared to an average of 2 cats/1000 residents for NSW (Chua 2023)
- **At least 50% of cats entering pounds and shelters are kittens less than six months old.** The strongest predictor of whether a cat is desexed is household income (Chu 2009). These figures highlight why Community Cat Programs are urgently needed across Australia (Alberthsen 2016).
- Most semi-owners and stray cats are found in disadvantaged low socio-economic areas (Rand 2023).
- Registration costs of \$59 per cat plus a \$81 fee if the cat was desexed when older than 4 months - even if it was acquired when it was older- are prohibitive. These are a barrier to people caring for stray cats to adopt these cats and a barrier to low - income people getting their cat desexed and microchipped. Costs of managing cats by councils, including costs of euthanasing 41% of impounded cats, exceed the income from registration fees by 7 times, not including administrative costs for the registration system. **Therefore, these registration fees should be abolished because they are perpetuating the cycle of kittens being born to die.**

2) Multi-cat situations

- **The relevant Act and Regulation should be amended to allow cats to be registered and identified via microchip to an “organisation” rather than only to an individual person.**
- This is critical in order to reduce euthanasia rates as scientific evidence shows that desexing semi-owned stray cats and returning them to their home where they continue to be fed and cared for by cat caregivers will reduce stray cat numbers in that area. This in turn reduces cat and kitten intake into shelters/pounds/private veterinary practices and rescue groups, and reduces euthanasia of healthy and treatable cats and kittens by veterinarians, as well as reducing nuisance issues associated with undesexed cats in the community.
- In situations where a semi-owner is feeding 1-2 stray cats, they will often be willing to put their individual contact details on the cat’s microchip record and registration and take full ownership, provided microchipping, desexing and registration is free.
- **For multi-cat situations** (often inappropriately referred to as colonies) in urban areas or on rural properties around farm buildings, it is usually not financially feasible for the semi-owner (feeding the cats) or farmer to pay registration fees for 6 to 30 or more cats. In these situations, the semi-owner or farmer will continue to feed and care for the cats but an organisation (welfare agency, rescue group or farm business) should be allowed to be registered without a charge as the owner or secondary contact on the council and microchip records, to enable these cats to be desexed and effectively reduce stray cat numbers in that area, reduce intake and prevent euthanasia of healthy and treatable cats and kittens by veterinarians.

3) Working cats

Organisations should rehome less socialised cats to ‘working cat’ homes where these cats cannot be adopted as traditional pets or returned to their semi-owners after being desexed. **Working cats** (also called ‘**Barn cats**’) are often placed in farming properties, barns, grain sheds, industrial businesses or other types of businesses where they are fed and cared for by designated cat caregivers and operate as rodent control. This type of adoption increases rehoming avenues for less socialised cats and reduces euthanasia of healthy and treatable cats by veterinarians. Registration for cats should be abolished but while still required, should be free for “working cats”.

4) Return-to-Field (RTF) strategy

Return-to-Field (RTF) programs are another highly effective way to manage healthy stray cats admitted to shelters, pounds and private practices providing pound services and reduce euthanasia, particularly for cats that are less socialized which are at high risk of euthanasia or a long length of stay before they are adopted. If the cat is in good body condition and healthy, then someone either owns the cat or a semi-owner is feeding and caring for the cat. These cats are desexed, microchipped (initially to an organisation until the owner or carer is located) and then returned to where they were found. Research shows that cats are 13 times more likely to return to owners by means other than a visit to a shelter (Lord 2009).

This is an effective way to ensure that free-roaming owned cats and semi-owned stray cats find their way home given that reclaim rates are very low for unidentified animals in shelters and pounds and private practices providing pound services. RTF is undertaken extensively and successfully in the US (Spehar & Wolf 2019, Kreisler 2022). **Legislation needs to be amended to allow this to occur.**

5) Reject the current approach to free-roaming stray cats known as *Trap-adopt or kill*.

Trap-adopt or kill has been used routinely in Australia for decades and has failed to reduce the number of free-roaming stray cats (NSW Seizures Pound Data Reports). *Trap-adopt or kill* results in high euthanasia rates and has a very high socio-economic cost (Chua 2023) including causing negative mental health impacts to veterinarians and significantly contributing to attrition rates. On average, councils are killing 41% of impounded cats and kittens in NSW (Chua 2023) with veterinarians involved.

6) Reject mandatory cat containment (mandatory night and 24/7 curfews) which has detrimental effects including increasing cat intake and euthanasia of healthy and treatable cats and kittens (and negative mental health impacts on vets) and is ineffective at reducing free-roaming stray cat numbers in both the short and long term (Rand 2023, RSPCA Australia 2018).

Please see: <https://petwelfare.org.au/2022/08/31/australian-pet-welfare-foundation-position-statement-on-cat-containment/>

Containment of pet cats to their owners' properties should be strongly encouraged where cats' physical and mental needs can be met and it is feasible for the owner from a financial perspective and is allowed by the landlord. **But mandatory containment should be rejected because it increases intake and euthanasia of healthy and treatable cats and it creates a barrier to stray cat semi-owners) taking ownership of the stray cat they are feeding. Mandatory containment will not protect native wildlife, the commonly cited justification, because it does not measurably reduce the number of free-roaming cats.**

7) Bedtime feeding of cats is recommended as a highly effective way for cat owners to keep pet cats safely inside at night, especially difficult to contain "door-dasher" cats, and has minimal to no additional cost. Cats are fed inside with half their daily food in the morning, and half just before the owner goes to bed (securing the cat indoors before the evening meal is fed). This method of night containment should be promoted to residents because it is very effective for protecting threatened and endangered species susceptible to cat predation - most of which are nocturnal mammals.

10. Owned pet cat strategies to reduce euthanasia of healthy/treatable cats and kittens by veterinarians

Impounded cats with an identified owner should be released to owners as soon as possible, and reasonable payment plans should be negotiated for impoundment fees and registration fines, rather than continuing to hold the cat after the owner has been located (Rand 2023). Requiring an owner to pay a fine or fee before returning the cat to the owner should be avoided to help reduce euthanasia of healthy and treatable cats and kittens by veterinarians.

11. Legal definition of cats

- To effectively reduce the number of free-roaming stray cats, intake and euthanasia, and negative mental impacts on veterinarians it is critically important to accurately distinguish between **domestic cats** and **feral cats**. Misclassifying domestic cats as feral cats prevents a resolution to the free-roaming stray cat problem in Australia.
- The definitions utilised by Australia’s leading national animal welfare organisation, the Royal Society for Prevention of Cruelty to Animals (RSPCA), the Commonwealth Government and some state governments including Victoria is recommended, with cats categorized based on how and where they live.
- All Australian jurisdictions should define all cats with some dependence on people (direct or indirect) living in the vicinity of where people live, as **domestic cats**. Cats that have no relationship with or dependence on humans, that live and reproduce in the wild (i.e., do not live where people live) should be defined as **feral cats** (in accordance with RSPCA Australia, Commonwealth government and Victoria state government definitions).
- **Domestic cats should be excluded from the legal definition of feral cats.** This will enable the implementation of effective domestic cat management strategies supported by the community which reduce euthanasia, and negative mental health impacts on veterinarians.
- Cat management strategies should recognise three subcategories of **domestic cats** including:
 - **Owned cats** – these cats are identified with and cared for by a specific person and are directly dependent on humans. They are usually sociable, although sociability varies. These cats are also called pet cats.
 - **Semi-owned cats** – these cats are directly dependent on humans and are intentionally fed by people who do not consider they own them. These cats are of varying sociability and are sometimes called stray cats. They live in and around cities, towns and buildings on farming properties.
 - **Unowned cats** – these cats are indirectly dependent on humans and receive food from people unintentionally, such as via food waste bins. These cats are of varying sociability and are sometimes called stray cats.
- **Feral cats** have no relationship with or dependence on humans (neither direct nor indirect), survive by hunting or scavenging for food, and live and reproduce in the wild (e.g., forests, woodlands, grasslands, deserts).

Feral cats do not live in the vicinity of where people live and they do not receive food from humans intentionally (direct feeding) or unintentionally (e.g., from food waste bins). Feral cats are completely unsocialised to humans and have none of their needs fulfilled by humans. **Feral cats** are not found or trapped in the vicinity of where people live, they are not the subject of nuisance complaints and they do not enter Australian council pounds or animal shelters (RSPCA Australia Annual Statistics).
- The term ‘feral’ should not be used as a cat definition category on intake, or as a reason for euthanasia in council pounds or shelters given that ‘feral cats’ do not enter council pounds or shelters.

12. Cat Habituation time

- Cats entering shelters, pounds, private veterinary practices providing pound services, rescue groups, rehoming groups or similar facilities must be given sufficient time to habituate in an appropriate non-stressful environment, regardless of whether the cat displays fear behaviours (e.g., hissing, growling, striking or hiding) prior to habituation¹ occurring.
- **Providing sufficient habituation time (according to the science) in a non-stressful environment will significantly reduce the number of healthy and treatable cats euthanased by veterinarians.**
- **Background:** When cats in a trap cage or entering shelters/pounds/private vet practices or other similar facilities exhibit behaviours such as hissing, growling, striking or hiding, this represents a normal fear response to an unfamiliar environment, this does not mean the cat is a feral cat, a less socialised cat or unsuitable for adoption (Overall 2013).
- Cats trapped in the vicinity of where people live, and cats associated with nuisance complaints or entering Australian council pounds, shelters, private veterinary practices or rescue groups are all domestic cats (owned, semi-owned or unowned), they are not feral cats (RSPCA Australia 2018, Australian Government 2015, Victorian State Government 2020, RSPCA Australia Annual statistics 2022).
- Deeming domestic cats that are in traps or entering shelters/pounds/private practices or rescue groups as being 'feral', 'less socialised' or 'unsuitable for adoption' based on fear behaviours exhibited prior to habituation is scientifically invalid and inhumane, **and should be legally prohibited.**
- **Outcome decisions:** Outcome decisions based on behavioural characteristics must be deferred to allow the cat sufficient time to habituate to the unfamiliar environment (e.g., shelter or pound), given the likelihood that these cats will experience high levels of fear in a trap cage or unfamiliar environment, and that different behaviours will be observed *after* habituation has occurred.
- It is not scientifically possible for a veterinarian, animal behaviourist or any other person, regardless of their experience or training, to immediately assess the behavioural characteristics, suitability for adoption or socialisation level of a cat in a trap cage or on entry to a shelter/pound/private veterinary practice or other similar facility, with any accuracy. This is because **based on veterinary behavioural science, it is only possible to make accurate behaviour assessments *after* the cat has habituated to the unfamiliar environment**, and this requires a time period and the provision of an appropriately calm and comfortable environment for the cat. All cats must also receive a health assessment by a registered veterinarian to rule out any health conditions which may affect behaviour.
- Habituation time can vary between individual cats. **Scientific studies show that the average time for cats to habituate to a shelter-like environment is five days to five weeks** (Di Gangi 2022) and ranges from a minimum of 3 days to five weeks or longer to habituate (Rochlitz 1998, Kessler 1997, Ellis 2014, DiGangi 2022, Jacobsen 2022, Slater 2013, Kerr 2018). Cats should be given multiple behaviour assessments gradually over time to increase their opportunities to display socialised behaviours (Slater 2013).

- Any timid or less socialised cats should be managed using humane behavioural modification programs and where appropriate moved to a more suitable environment such as foster care where behavioural modification programs can continue and the cat is given more time to habituate (Kerr 2018).
- After provision of sufficient habituation time (according to the science) in an appropriate environment, some cats may still be very timid. Where a cat cannot be adopted as a pet or returned to their original location to be fed and cared for by cat caregivers (semi-owners) after desexing, organisations should use alternative rehoming avenues for very timid or less socialised cats such as adoption as **‘Working cats’**. **Return-to-field is another option that should be legalised.**
- 1. **Habituation** is the cessation or decrease in a response to a stimulus that is the result of repeated exposure to the stimulus (Overall 2013). In this context **Habituation** is the cessation or decrease in the cat’s fear response to the unfamiliar environment (e.g., shelter) that is the result of repeated exposure to the unfamiliar environment over time.

13. Stray dog strategies to reduce euthanasia of healthy or treatable dogs by veterinarians

- Strategies to assist dog owners to prevent their dog from straying are particularly important in locations of high stray dog intake which are typically low socioeconomic areas. Given that 98% of dog owners supported containing dogs on their property, education about the importance of containment is not likely an effective use of resources, and other methods are indicated.
- Strategies include assisting owners with secure dog fencing and pet dog identification and desexing rates with free microchipping and desexing programs targeted to areas of high stray dog impoundments and complaints (low-income areas) (Rand 2023).
- Straying dogs should be released to owners as soon as possible, and reasonable payment plans should be negotiated for impoundment fees and registration fines, rather than continuing to hold the animal after the owner has been located (Rand 2023). Requiring an owner to pay a fine or fee before returning the dog to the owner should be avoided.
- Increasing the proportion of pet dogs that are identified with identity tags, collars and microchips facilitates local residents and neighbours as well as veterinarians returning stray dogs directly back to their neighbours, and authorities returning stray dogs back to their owners without impounding.
- Cost is a barrier to constructing and maintaining containment systems such as dog fencing, and a lack of secure dog fencing contributes to dogs straying, particularly in low socioeconomic areas. Assisting dog owners with building or repairing dog fencing, particularly for dog owners with recurrent stray dog impoundments, and for households in areas of high stray dog intake, proactively reduces stray dog admissions and euthanasia.

14. Owned pet dog strategies to reduce euthanasia of healthy/treatable dogs by veterinarians

- Strategies that reduce owner-surrendered admissions and euthanasia include free desexing and microchipping programs targeted to locations contributing to high intake to reduce unwanted puppies being born and surrendered.
- Other strategies include free behaviour counselling services, funding assistance with veterinary health care costs, temporary boarding of pets during times of personal crises, food banks, training classes, and public education campaigns. These are components of ‘Pets for Life programs’.

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

Current legislative and regulatory frameworks are major barriers to implementing strategies which will significantly reduce the euthanasia of healthy and treatable animals by veterinarians and thereby reduce severe negative mental health impacts on vets associated with euthanasia and improve retention rates in clinical practice.

These areas include:

1. The legal definition of cats. Domestic cats (owned, semi-owned and unowned) should be excluded from the legal definition of feral cats.
2. Return-to-Field (RTF) for cats.
3. Microchipping and registering cats to an organisation rather than to an individual only (such as for Multi-cat situations).
4. Cat habituation time - Deeming domestic cats that are in traps or entering shelters/pounds/private veterinary practices/rescue groups or similar facilities as being 'feral', 'less socialised' or 'unsuitable for adoption' based on fear behaviours exhibited prior to habituation is scientifically invalid and inhumane, and should be legally prohibited.
5. Removal of prohibitive registration fees for cats.

Please see details above regarding these legislative issues. Legislative and regulatory recommendations include:

Recommendation 5: Domestic cats (owned, semi-owned and unowned) should be excluded from the legal definition of feral cats in legislation and regulation.

Recommendation 6: Legislation and regulation should be amended to enable Return-To-Field (RTF) for healthy or treatable cats (desexed and microchipped).

Recommendation 7: Legislation and regulation should be amended to allow cats to be registered and identified via microchip to an "organisation" rather than only to an individual person.

Recommendation 8: Legislation and regulation should be amended to remove prohibitive registration fees for cats.

Recommendation 9: Legislation and regulation should continue to prohibit mandatory cat containment (night curfews and 24/7 mandatory containment).

Recommendation 10: Legislation and regulation should be amended to prohibit deeming domestic cats that are in traps or entering shelters, pounds, private veterinary practices, rescue groups or similar facilities as being 'feral'.

Recommendation 11: Legislation and regulation should be amended to prohibit deeming domestic cats that are in traps or entering shelters, pounds, private veterinary practices, rescue groups or similar facilities as being 'less socialised' or 'unsuitable for adoption' based on fear behaviours exhibited prior to habituation, and prior to providing the cat with reasonable habituation time (based on science) in a non-stressful environment.

Recommendation 12: Alternative rehoming avenues should be used for less socialised healthy or treatable cats where these cats are not adopted, such as 'Working cat' rehoming and Return-to-Field (RTF) to reduce euthanasia of healthy and treatable animals and associated severe negative mental health impacts on veterinarians.

Please contact the Australian Pet Welfare Foundation (APWF) if you would like to discuss these important issues further.

Thank you.

Yours sincerely,

Dr Jacquie Rand BVSc (Melb), DVSc (Guelph), MANZCVS, Dip ACVIM (Int. Med.)
Registered specialist veterinarian in small animal internal medicine
Emeritus Professor of Companion Animal Health, University of Queensland
Executive Director and Chief Scientist, Australian Pet Welfare Foundation

Dr Jade Norris BVSc Hons 1 (USyd) Dip Gov
Registered Veterinarian
Australian Pet Welfare Foundation

References

1. Allison Andrukonis & Alexandra Protopopova (2020) Occupational Health of Animal Shelter Employees by Live Release Rate, Shelter Type, and Euthanasia-Related Decision, *Anthrozoös*, 33:1, 119-131, DOI: 10.1080/08927936.2020.1694316
2. Alberthsen C, Rand J, Morton J, Bennett P, Paterson M, Vankan D. Numbers and Characteristics of Cats Admitted to Royal Society for the Prevention of Cruelty to Animals (RSPCA) Shelters in Australia and Reasons for Surrender. *Animals (Basel)*. 2016 Mar 16;6(3):23. doi: 10.3390/ani6030023.
3. Animal Medicines Australia (2022). Pets and the Pandemic report. Available here: https://animalmedicinesaustralia.org.au/wp-content/uploads/2021/08/AMAU005-PATP-Report21_v1.41_WEB.pdf
4. Animal Emergency Australia: <https://animalemergencyaustralia.com.au/blog/the-veterinary-shortage-and-what-you-can-do-to-help/>
5. Arbe Montoya AI, Hazel SJ, Hebart ML, McArthur ML. Risk factors associated with veterinary attrition from clinical practice: a descriptive study. *Aust Vet J*. 2021 Nov;99(11):495-501. doi: 10.1111/avj.13111.
6. Australian Institute of Health and Welfare. Australian Government (2023): <https://www.aihw.gov.au/reports/workforce/health-workforce>
7. Australian Pet Welfare Foundation (APWF) Australian Pet Welfare Foundation (APWF) 2021 End-year progress report: Community Cat Program. Available at: <https://petwelfare.org.au/>
8. Australian Veterinary Association (AVA)a: <https://www.ava.com.au/media-centre/media-releases/ava-welcomes-the-nsw-government-parliamentary-enquiry-as-the-vet-shortage-grows/>
9. Australian Veterinary Association (AVA)b 2022 – 2023 Federal Pre-Budget Submission. Available here: https://treasury.gov.au/sites/default/files/2022-03/258735_australian_veterinary_association.pdf
10. Chu K, Anderson WM, Rieser MY. Population characteristics and neuter status of cats living in households in the United States. *J Am Vet Med Assoc*. 2009 Apr 15;234(8):1023-30. doi: 10.2460/javma.234.8.1023.
11. Chua, D., Rand, J., & Morton, J. (2017). Surrendered and stray dogs in Australia-Estimation of numbers entering municipal pounds, shelters and rescue groups and their outcomes. *Animals*, 7(7), 50.
12. Cooney, K.; Kipperman, B. Ethical and Practical Considerations Associated with Companion Animal Euthanasia. *Animals* 2023, 13, 430. <https://doi.org/10.3390/ani13030430>
13. Connolly CE, Norris K, Martin A, Dawkins S, Meehan C. A taxonomy of occupational and organisational stressors and protectors of mental health reported by veterinary professionals in Australasia. *Aust Vet J*. 2022 Aug;100(8):367-376. doi: 10.1111/avj.13167.
14. *Animal Behavior for Shelter Veterinarians and Staff* (2022) By: Brian A. DiGangi (Editor), Victoria A. Cussen (Editor), Pamela J. Reid (Editor), Kristen A. Collins (Editor). 2nd Ed. Wiley Blackwell.
15. Ellis JJ, Protopapadaki V, Stryhn H, Spears J, Cockram MS. Behavioural and faecal glucocorticoid metabolite responses of single caging in six cats over 30 days. *Vet Rec Open*. 2014 Nov 8;1(1):e000056.
16. Hatch PH, Winefield HR, Christie BA, Lievaart JJ. Workplace stress, mental health, and burnout of veterinarians in Australia. *Aust Vet J*. 2011 Nov;89(11):460-8. doi: 10.1111/j.1751-0813.2011.00833.x.
17. Hazel SJ, Jenvey CJ, Tuke J. Online Relinquishments of Dogs and Cats in Australia. *Animals*. 2018; 8(2):25. <https://doi.org/10.3390/ani8020025>

18. Hawes SM, Hupe T, Morris KN. Punishment to Support: The Need to Align Animal Control Enforcement with the Human Social Justice Movement. *Animals*. 2020; 10(10):1902. <https://doi.org/10.3390/ani10101902>
19. Hayes L, Manyweathers J, Maru Y, Davis E, Woodgate R, Hernandez-Jover M. Australian veterinarians' perspectives on the contribution of the veterinary workforce to the Australian animal health surveillance system. *Front Vet Sci*. 2022 Aug 18;9:840346. doi: 10.3389/fvets.2022.840346.
20. Hemy M, Rand J, Morton J, Paterson M. Characteristics and Outcomes of Dogs Admitted into Queensland RSPCA Shelters. *Animals (Basel)*. 2017 Sep 1;7(9):67. doi: 10.3390/ani7090067.
21. Hilton KR, Burke KJ, Signal T. Mental health in the veterinary profession: an individual or organisational focus? *Aust Vet J*. 2023 Jan;101(1-2):41-48. doi: 10.1111/avj.13215.
22. Jacobson LS, Ellis JJ, Janke KJ, Giacinti JA and Robertson JV (2022) Behavior and adoptability of hoarded cats admitted to an animal shelter *Journal of Feline Medicine and Surgery* Vol. 24(8) e232–e243.
23. Jones-Fairnie H, Ferroni P, Silburn S, Lawrence D. Suicide in Australian veterinarians. *Aust Vet J*. 2008 Apr;86(4):114-6. doi: 10.1111/j.1751-0813.2008.00277.x.
24. Barry S. Kipperman dvm Philip H. Kass dvm, phd Mark Rishniw bvsc (2017) Factors that influence small animal veterinarians' opinions and actions regarding cost of care and effects of economic limitations on patient care and outcome and professional career satisfaction and burnout *JAVMA* Vol 250 No. 7: 785-794. DOI: <https://doi.org/10.2460/javma.250.7>:
25. Kessler MR and Turner DC (1997) Stress and adaptation of cats (*Felis silvestris catus*) housed singly, in pairs and in groups in boarding catteries. *Animal Welfare* 1997, 6: 243-254.
26. Kreisler RE, Pugh AA, Pemberton K, Pizano S. The Impact of Incorporating Multiple Best Practices on Live Outcomes for a Municipal Animal Shelter in Memphis, TN. *Front Vet Sci*. 2022 Jun 24;9:786866. doi: 10.3389/fvets.2022.786866.
27. Lord L.K., Ingwersen W., Gray J.L., Wintz D.J. Characterization of animals with microchips entering animal shelters. *J. Am. Vet. Med. Assoc.* 2009;235:160–167. doi: 10.2460/javma.235.2.160
28. Nelson-Pratt A. 2018 Are vets really leaving the profession? *Vet Rec* 2018;182:580. doi: 10.1136/vr.k2191
29. Overall, Karen. *Manual of Clinical Behavioral Medicine for Dogs and Cats - E-Book*. United Kingdom, Elsevier Health Sciences, 2013.
30. Rand, Jacquie, Zohre Ahmadabadi, Jade Norris, and Michael Franklin. 2023. "Attitudes and Beliefs of a Sample of Australian Dog and Cat Owners towards Pet Confinement" *Animals* 13, no. 6: 1067. <https://doi.org/10.3390/ani13061067>
31. Rand J. Engaging with semi-owners. RSPCA Australia Feline Futures Animal Welfare Seminar Feb 2021 <https://hub.rspca.org.au/books/animal-welfare-seminar-2021/page/day-one>
32. Reeve, Charlie & Rogelberg, Steven & Spitzmueller, Christiane & Digiacomio, Natalie. (2006). The Caring-Killing Paradox: Euthanasia-Related Strain Among Animal-Shelter Workers1. *Journal of Applied Social Psychology*. 35. 119 - 143. 10.1111/j.1559-1816.2005.tb02096.x.
33. Rochlitz I, Podberscek A L and Broom D M (1995) The behaviour and welfare of cats in quarantine. In: *Proceedings of the Seventh International Conference on Human-Animal Interactions* pp 89. Afrac: Geneva, Switzerland.
34. Rollin BE. Euthanasia, moral stress, and chronic illness in veterinary medicine. *Vet Clin North Am Small Anim Pract*. 2011 May;41(3):651-9. doi: 10.1016/j.cvs.2011.03.005.
35. RSPCA Australia (2018) Identifying Best Practice Domestic Cat Management in Australia: Available online: <https://kb.rspca.org.au/downloads/research-reports/>



36. RSPCA Australia Annual Statistics. Available online: <https://www.rspca.org.au/sites/default/files/RSPCA%20Australia%20Annual%20Statistics%2021-2022.pdf> (accessed 1 June 2023).
37. Slater, Margaret & Garrison, Laurie & Miller, Katherine & Weiss, Emily & Drain, Natasha & Makolinski, Kathleen (2013) Physical and Behavioral Measures that Predict Cats' Socialization in an Animal Shelter Environment during a Three Day Period. *Animals: an Open Access Journal from MDPI*. 3. 1215-1228. 10.3390/ani3041215.
38. Spehar DD and Wolf PJ (2019) Integrated Return-To-Field and Targeted Trap-Neuter-VaccinateReturn Programs Result in Reductions of Feline Intake and Euthanasia at Six Municipal Animal Shelters. *Front. Vet. Sci.* 6:77. doi: 10.3389/fvets.2019.00077
39. Threat abatement plan for predation by feral cats, Commonwealth of Australia, 2015.
40. Tiesman HM, Konda S, Hartley D, Chaumont Menéndez C, Ridenour M, Hendricks S. Suicide in U.S. Workplaces, 2003-2010: a comparison with non-workplace suicides. *Am J Prev Med.* 2015 Jun;48(6):674-82. doi: 10.1016/j.amepre.2014.12.011.
41. Veterinary Schools of Australia and New Zealand (VSANZ) Rethinking Veterinary Education report 2023: Available: https://vsanz.org/wp-content/uploads/2023/07/VSANZ_Rethinking-Vet-Ed_Low-Res-FINAL-CLEAN.pdf
42. Victoria State Government: <https://www.environment.vic.gov.au/invasive-plants-and-animals/feral-cats>
43. Whiting TL. Veterinary Practice - The Canadian multinational veterinary workforce. *Can Vet J.* 2021 Nov;62(11):1195-1201.
44. Zito S, Morton J, Paterson M, Vankan D, Bennett PC, Rand J, Phillips CJ. Cross-Sectional Study of Characteristics of Owners and Nonowners Surrendering Cats to Four Australian Animal Shelters. *J Appl Anim Welf Sci.* 2016;19(2):126-43. doi: 10.1080/10888705.2015.1121145.