



Under the Care of a Veterinarian: What We Are Hearing from the Profession

The Veterinary Council's April 2026 amendments to the Code of Professional Conduct introduced two significant changes: a formal definition of what it means for an animal to be "under the care of a veterinarian", and a three-tier framework for veterinarians who provide a specific and limited range of veterinary services. Both changes are now in effect.

As implementation gets underway, the Council has been receiving feedback from veterinarians and veterinary businesses across a range of practice settings — companion animal, production animal, and equine. This article summarises the key themes emerging from that feedback, explains the Council's position on each, and outlines the practical steps being taken to support compliance.

The Council's overall view is that the changes reinforce expectations that were already in the Code. They make those expectations explicit, transparent, and consistently applied. Where the profession identifies genuine operational difficulties, the Council is committed to working through those collaboratively.

This guidance has been prepared with the assistance of generative AI tools. All content has been reviewed and approved by Veterinary Council of New Zealand staff with relevant professional and regulatory expertise.

1. The Written Agreement Requirement

One of the most widely discussed changes is the requirement for a written, signed agreement when accepting animals into care. Several groups of veterinarians have raised concerns that this creates an administrative burden and could deter new clients — particularly in the companion animal setting.

What the Code requires

When a veterinarian accepts an animal under their care, they must document the agreement to provide veterinary services to the specified animal(s), confirm that the client has accepted the terms, and record this in the clinical record. The agreement should describe the services being provided, include emergency and after-hours arrangements, and contain an expiry clause and provision for annual review.

What the profession is asking

- Will this create a barrier for new clients, especially in small animal practice?
- Does this apply to every consultation, or only when formally accepting animals into ongoing care?



- Do I need to get an in-person signature?
- Do existing clients need to be retrospectively onboarded?
- What does a dispute and termination clause actually need to say?

The Council's response

The Council does not intend for this requirement to create unnecessary friction or bureaucracy at the point of client contact. The expectation is that veterinary businesses turn their minds to their service offering and communicate it clearly — not that they create complex legal documents for every walk-in consultation. To put some perspective to this, the agreement can be thought of as similar to those already in use (and expected) for registering with a human GP, engaging a lawyer or accountant and even becoming a member of a library.

With this in mind the Council has decided to change the expectation from a signed agreement to a record that the client accepts the veterinary businesses terms of service.

Key point

Implementation is prospective, not retrospective. Existing clients can be brought into compliance at the next reasonable opportunity — the next consultation, vaccination visit, or RVM review.

The Council recommends a practical, layered approach:

- Combine advance notice with implied acceptance — send terms when the client books, and include a clause that attendance constitutes acceptance of the Terms of Service.
- Display terms and conditions and the privacy policy on the clinic's website so clients can access them at any time.
- Utilise an electronic registration form with links to Terms of Service and a tick box for acceptance and/or electronic signature.
- Use a separate, procedure-specific consent form where clinical procedures require it — this does not need to be bundled into the general Terms of Service. Each consent form should however provide a reference or link to the practice's document on their website.
- For emergency presentations (such as a horse stitch-up called in out of hours), terms can be assumed accepted and the formal documentation completed following delivery of the service.

Templates

The Council is drafting template client agreements and Terms of Service documents. Clinics should expect these to be available shortly — contact the Council if you need them urgently ahead of June 2026 dairy RVM consultation cycles.



2. Client Ownership and Competitive Concerns

A number of smaller independent clinics have raised concerns that the new framework could be used by larger corporate veterinary groups to make complaints against them — using the new documentation requirements as a lever in what are effectively competitive disputes.

Some have also expressed concern that requiring clients to sign agreements could be interpreted as creating a form of client "ownership" that limits client choice.

The Council's position

The Council is aware of these concerns and takes them seriously. To be unambiguous: the new requirements apply equally to all veterinary businesses, regardless of size or ownership structure. The Council will actively identify and dismiss concerns that are frivolous, vexatious, or motivated by competitive rather than professional standards concerns.

Client choice

The "Under the Care" changes do not limit client choice. Clients retain the absolute right to use more than one veterinarian or to change their veterinarian at any time. The documented agreement creates transparency about what a particular clinic offers — it does not bind clients exclusively to that clinic.

Where a client uses two clinics simultaneously, there is no hierarchy of agreements — each clinic's terms apply to the services that clinic provides. The Code already addresses how multiple veterinarians sharing the care of an animal should cooperate and communicate.

3. RVM Authorisation: Farms, Second Properties, and Staff

Several production animal practitioners have raised questions about the practical application of the RVM authorisation rules, particularly in relation to farms with multiple properties, and the requirement to tie authorisations to named individuals rather than the farm entity as a whole.

Multiple properties

A dairy veterinarian asked specifically about providing RVMs to a second property owned by the same farmer, when they have not physically visited that farm. The Code is clear on this point: a veterinarian must only authorise RVMs following a veterinary consultation, which will usually involve seeing the animals. If not, the animals must have been seen recently or often enough for the veterinarian to have sufficient personal knowledge of their condition.

The same-owner relationship does not substitute for a clinical assessment of the animals at the second property. Veterinarians should not assume that knowledge of one property transfers to another.



Authorisation tied to individuals, not farm entities

The requirement to confirm that named individuals are competent to administer RVMs is not new. The ACVM Notice already requires veterinarians to confirm that any person who will administer an RVM understands and can competently carry out the authorising veterinarian's instructions. The Code changes make this explicit and require it to be documented.

Practical tip

Authorisations should specify the people on farm who are authorised to administer each product, with a note confirming their competence has been verified. This should be updated when there are staff changes in critical roles on the farm — the farm team must promptly notify the veterinary business in these circumstances.

4. The Six-Month Review Cycle for Dairy Cattle

The introduction of a maximum six-month period of review for RVMs authorised in anticipation of future use for dairy farms has generated questions about what this means in practice for busy dairy practices, particularly as the June 2026 RVM consultation cycle approaches.

What the rule requires

Where a veterinarian has authorised RVMs for a specified person to hold in anticipation of use, they must review the circumstances, the choice of RVM, and the treatment regime at least once every six months. This review will usually involve an in-person clinical assessment.

The review is not simply an administrative sign-off. It requires the veterinarian to satisfy themselves that the health status of the animals, the choice of RVMs, and the treatment regime remain appropriate — and to adjust the authorisation if they do not. For most dairy practices, this will reflect existing practice — regular farm visits are already part of good herd health management

Dairy practices and June 2026

Practices are encouraged to use the June 2026 RVM consultation cycle as an opportunity to bring their authorisation documentation into alignment with the new requirements. Where a practice has existing authorisations that pre-date the Code changes, these can be updated at the next scheduled review rather than requiring immediate retrospective action.

Important

Disease control programmes for dairy cattle must each be overseen by a single veterinarian or veterinary practice. Fragmentation — where multiple practices are authorising RVMs for the same disease control programme on the same farm without visibility of RVMs provided by other veterinarians — is not appropriate and does not meet the continuity of care requirements under the Code. The team must review



information from the client about what authorisations and stocks of products are already on farm, and the expiry dates of that stock.

5. How the New Framework Applies in Common Scenarios

Feedback has highlighted uncertainty about how the new requirements apply in a range of everyday situations. The following provides the Council's guidance on the most commonly raised scenarios.

A new client brings a dog in for a vaccination to try out the clinic but has not decided whether to remain with them permanently

The Terms of Service and privacy policy apply to all clients from the first interaction. The clinic acts as the animal's veterinarian for that consultation and should follow the existing Code expectations about seeking consent to share records if there is a known previous veterinarian. If the client is not necessarily seeking to remain, the agreement can reflect a single-consultation basis — the interaction does however constitute an obligation on the veterinarian to be available for ongoing and emergency care if the client was to seek that — including emergency care. Veterinarians should be aware of this when accepting animals on a single-consultation basis.

A dairy client asks a vet to treat seven lame cows as a "trial" before deciding whether to register

The usual rules apply. The clinic acts as the GVP for that consultation and should follow the existing Code expectations around seeking consent to share records, contacting the existing GVP with client permission, and documenting the arrangement. The vet is not prevented from providing the service — but should do so in a way that is transparent and compliant with the Code.

A clinic receives an emergency horse call from an unknown client

Emergency presentations can be treated with implied consent, and formal documentation including the acceptance of the terms of service can be completed following the delivery of the emergency care. The emergency care obligation exists regardless of whether the animal has previously registered as a client.

A farm vet wants to vaccinate farm dogs for a client whose dogs are not usually treated at the practice

The Council has published specific guidance on veterinary care for farm dogs, which addresses the obligations and practical considerations for farm veterinarians treating companion animals. This guidance is available at hub.vetcouncil.org.nz.



6. Implementation Timeframes and Support

The Council recognises that embedding these changes into practice systems takes time. The expectation is that implementation is a progressive process, expected to take up to twelve months from the April 2026 Code changes coming into effect.

What the Council is doing to help

- Template client agreements and Terms of Service documents are being drafted and will be made available to any clinic that does not have its own compliant documentation.
- Technical advice is available from the Council for practices that are uncertain about how the changes apply to their specific service model.
- The Council will publish worked examples and FAQs addressing common scenarios as these are identified through the feedback process.

What we ask of the profession

- Begin applying the new requirements prospectively once you have the appropriate documentation, starting with new clients and the next RVM consultation or patient visit for existing clients.
- Raise questions and concerns early — directly with the Council or through your representative bodies.
- Do not wait for a complaint to discover a gap in your documentation. Review your current Terms of Service, privacy policy, and RVM authorisation documents now.

A Final Word

The changes the Council has introduced are designed to support public trust in the profession — where the responsibilities of every veterinarian involved with an animal's care are clear, where emergency care obligations are understood and met, and where clients are informed about the service they are receiving.

The Council's first priority is support, not enforcement. We understand that most veterinarians are already practising in a way that is consistent with these expectations. The changes make that consistency visible and verifiable — for the profession's benefit as much as the public's.

We welcome continued feedback. If your practice or representative body has questions or concerns that are not addressed here, please contact the Council directly.