

December 16, 2021

Laura Milani Orlando  
Food Safety and Environmental Policy Branch, Policy Division  
1 Stone Road West, 2<sup>nd</sup> Floor S.W.  
Guelph, ON N1G 4Y2

Sent via email: [laura.milaniolando@ontario.ca](mailto:laura.milaniolando@ontario.ca);  
And submitted online through Ontario's Regulatory Registry

Dear Laura Milani Orlando,

**Re: 21-OMAFRA020: Proposed Changes to the College of Veterinarians of Ontario (CVO) Accreditation Model in Regulation 1093 under the *Veterinarians Act***

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA appreciates this opportunity to comment on 21-OMAFRA020: Proposed Changes to the College of Veterinarians of Ontario (CVO) Accreditation Model in Regulation 1093 under the *Veterinarians Act*. OFA is supportive of the intent of the proposed changes: reducing administrative burden, increasing flexibility, and encouraging expansion and innovation in the services veterinarians offer to the public, while continuing to protect the public interest and instilling confidence in veterinary regulation and the quality and safety of veterinary care.

OFA would like to express our concern regarding a shortage of veterinarians in remote regions of Ontario. Animals and animal-related agriculture are crucial to the economic stability of Ontario's rural communities. Veterinarians play a critical role in promoting the health and welfare of animals, and in maintaining a healthy and safe food supply.

Currently, the prescriptive list of facility categories in O. Reg. 1903: General under the *Veterinarians Act* limits the veterinary services allowed to be provided to clients. The proposed changes would permit veterinarians to define the scope of practice and species associated with the facility. This would provide veterinarians and their practices more flexibility to treat different types of animals and provide additional care and services without attaining and maintaining

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additional certificates of accreditation. Reducing burden, and removing barriers is a good start in addressing the shortage of veterinarians in the province and helping to balance the demand and capacity for veterinary services, especially in underserved areas of rural Ontario.

To further improve access to veterinary services, OFA recommends that registered veterinary technicians (RVTs) are formally recognized under the Act, and that their use and responsibilities in veterinary practices is expanded. RVTs are highly trained professionals working under the supervision of a licensed veterinarian and are integral to veterinary medicine teams. Expanding the scope of their responsibilities would better utilize their knowledge and practical skills in animal health and welfare, and could help to improve access to veterinarians and services in rural and Northern areas of the province.

OFA appreciates this opportunity to comment on 21-OMAFRA020: Proposed Changes to the College of Veterinarians of Ontario (CVO) Accreditation Model in Regulation 1093 under the Veterinarians Act and looks forward to additional details on the Proposed Accreditation Model as it progresses.

Sincerely,

A handwritten signature in black ink that reads "Peggy Brekveld". The signature is written in a cursive, flowing style.

Peggy Brekveld  
President

cc: Dr. Cathy Furness, Chief Veterinarian for Ontario  
OFA Board of Directors