

May 30, 2023

Ontario Ministry of Agriculture, Food and Rural Affairs
Food Safety and Environmental Policy Branch
1 Stone Road West
Guelph ON
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Submitted online and via email: vetact.omafra@ontario.ca

To Whom It May Concern:

Re: Registry Posting 23-OMAFRA001: A Proposal to Modernize 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.

Animals and animal-related agriculture are crucial to the economic stability of Ontario's rural communities. Veterinarians play a critical role, promoting the health and welfare of animals, and playing a crucial role in maintaining a healthy and safe food supply. Rural and remote regions of the province continue to struggle with access to veterinary services for livestock, especially in a timely and efficient manner. The critical workforce shortage of veterinarians and veterinary professionals continues to present a major obstacle to the growth and sustainability of the agri-food sector across the province. Lack of veterinary services can be detrimental to rural communities, and leave farm animals, and ultimately the food system at risk.

OFA appreciates this opportunity to provide comments on registry posting 23-OMAFRA001: A Proposal to Modernize the *Veterinarians Act*. The practice of veterinary medicine has evolved significantly since the last update, and aspects of the Act and its corresponding regulations require modernization to reflect the true nature of today's veterinary practices. We support the government's efforts to modernize the *Veterinarians Act* by addressing key areas including the scope of practice, oversight and authority, quality assurance, and the complaints and resolutions process.

Discussion Paper Questions for Consultation

1. Do you agree with the changes described in this proposal? Why or why not?

Scope of Practice

OFA believes that the current legislation lacks clarity about what is and is not within the scope of practice of veterinarians. We support clarifying the scope of practice for veterinary medicine, including the procedures, services, and processes a licensed veterinarian, and other veterinary professionals, are permitted to perform in Ontario.

OFA appreciates the government recognizing that veterinary care is delivered utilizing a team-based approach, and formally acknowledging the roles of veterinary technicians and other veterinary professionals within the system. OFA supports bringing veterinary technicians within the scope of professional oversight and formally acknowledging and regulating them under the Act together with veterinarians. Veterinary technicians are highly trained professionals, and are integral to veterinary medicine teams. Expanding their scope of responsibilities better utilizes their knowledge and practical skills and is an important step in improving access to veterinary services in rural and northern areas of Ontario.

While the proposed list of authorized activities (Discussion Paper Appendix B) for veterinarians does well to support the new scope of practice for vets, OFA is interested in the list of tasks that will and will not be able to be delegated by a veterinarian, and the activities which may be carried out by non-veterinarian regulated health care practitioners and other qualified individuals who provide animal care. As previously mentioned, OFA believes that Registered Veterinary Technicians and other trained professionals possess the knowledge and skill to deliver a wide variety of services within their scope of training. OFA supports legislation that is enabling but requests further details on the future regulations as to the list of tasks that can and cannot be delegated, and other activities which can be carried out by non-veterinarian regulated health care professionals and other qualified practitioners in respect of animal care.

Oversight and Authority

The Act outlines the composition of the Council, including qualifications, composition, and membership. Currently, the Council is made up of licensed veterinarians (members) and non-members, which are non-veterinarian public-interest appointees. OFA supports having a more diverse membership on the Council, to better reflect the nature of the modern-day veterinary profession. We support including veterinary technicians within the Council, and in committee membership. OFA also supports including on Council members from an Ontario post-secondary institution involved in providing veterinary and veterinary technology education for the profession. It is OFA's belief that the process to become a member of the Council, including non-veterinarian public-interest appointees, needs to be transparent. OFA requests that the Council include large-animal or food-producing animal veterinarian representation as a mandatory requirement, to ensure the agricultural perspective is included in the decision-making process and in policy development.

Complaints and Resolutions Process

OFA supports a streamlined complaints process that is timely, efficient, and upholds public trust. We appreciate the creation of a new Screening Model to assess complaints that are deemed to be “frivolous and vexatious” at the outset, to focus on more serious claims and complaints against members and their practices.

OFA would also support the renaming of the College to better reflect its expanded role in regulating a broader range of veterinary practitioners once the Act is updated.

2. Do you have any specific concerns with any of the items discussed in this proposal? Please explain/describe.

Scope of Practice

As mentioned previously, OFA requests additional information to further understand how veterinarians, veterinary professionals, and other individuals who provide animal care will be included in the modernized Act and corresponding regulations. More details are needed as to the scope of practice and authorized activities for other veterinary professionals, such as Registered Veterinary Technicians, non-registered veterinary technicians, etc. This information is necessary to ensure that the modernization of the Act will work to increase timely access to veterinary services and care for livestock in rural and remote regions of the province.

OFA believes that activities or procedures deemed high-risk should remain in the domain of veterinarians and should be retained in their scope of practice. However, there is the potential for certain lower-risk procedures to be performed by trained and competent individuals, other than veterinarians, or under a veterinary delegation. Many individuals possess the required competence, skills, knowledge, and judgment to perform certain activities, or some aspects, which are currently authorized only to veterinarians. Some of these procedures, with respect to livestock, include:

- Pregnancy checking
- Ultrasound
- Non-surgical artificial insemination
- Dental
- Chiropractic
- Complementary/non-invasive therapies, such as:
 - o Acupuncture
 - o Physiotherapy
 - o Certain forms of therapeutic energy (shockwave, laser therapy, etc.)

Many complementary or non-invasive therapies, such as chiropractic and acupuncture, are used most frequently in the equine sector. There is potential for these therapies to be performed by trained individuals other than veterinarians, or under a veterinary delegation, to increase access to care in Ontario, and lessen the demand and burden on veterinarians. Complementary or non-invasive therapies should not be used in lieu of seeking veterinary care, but rather as supportive care alongside a proper working veterinary relationship.

OFA supports utilizing trained individuals to perform low-risk tasks, if the practice does not delay a proper medical diagnosis by a veterinarian, to ensure animal welfare is protected.

Right to Treat

Under the current Act, section 11(2)(b) states:

- (2) *Subsection (1) does not apply to prevent a person,...*
- (b) *from treating an animal if the person is the owner of the animal, is a member of the household of the owner of the animal or is employed for general agricultural or domestic work by the owner of the animal;*

The Discussion Paper states that “it is anticipated that it would continue to be the case that an animal owner (such as a farmer)... would continue to be able to treat an animal owned by the owner”. Farmers already practice many procedures on farm in the course of normal farm practices, following recognized codes of practice. OFA strongly believes that the right to treat their animals for farmers, their family members, and their employees needs to be retained under the amended legislation. OFA requests assurance that this right would continue to apply under the modernized Act and its corresponding regulations.

Euthanasia

An effective and timely response is critical when responding to animal health emergencies or disease outbreaks to ensure humans, animals, and the provincial food supply chain remain protected. Foreign animal diseases such as Highly Pathogenic Avian Influenza or African Swine Fever require the ability to perform euthanasia in livestock in a timely, effective, and compassionate manner without a veterinarian present to mitigate the potential negative effects posed to human and animal health. OFA believes the ability to perform euthanasia on livestock should be allowed by trained individuals under existing standards of care, and not be limited to veterinarians.

Council of the College

As mentioned above, OFA believes that equine and food-animal veterinarian representation is necessary on the Council to ensure the agricultural perspective is included in decision-making processes and in policy development, and to reflect the public interest. It is also important to ensure that the ratio of non-veterinarian public-interest appointees does not outweigh the number of members (veterinarians) represented on the Council.

3. Would the proposed changes reduce red tape or contribute to additional opportunities or other impacts for you or your business? Please explain.

OFA supports government efforts to reduce red tape and regulatory burden for businesses. Legislation that is enabling can help to achieve this. OFA is hopeful that the proposed changes to the scope of practice will streamline care, and add opportunities for other trained individuals, other than veterinarians, to provide healthcare services to animals. As previously mentioned, OFA requests additional information under the scope of practice, and activities which can or cannot be delegated to ensure that producers,

including those in rural and underserved areas of the province, receive timely care for their animals.

OFA believes that streamlining the complaints, investigations, and resolutions process will ensure that complaints will be reviewed and addressed in a timely manner, and will help to improve public trust, transparency, and improve client satisfaction.

To further reduce regulatory burden and ensure that service fees do not increase for members of the College, OFA would like to suggest that the regulatory body be focused on regulation, and not on areas that would be considered the responsibility of professional associations. Ensuring focus is centered on regulation of the veterinary profession will reduce regulatory burden, and ensure that resources such as people, staff, time, and finances are utilized appropriately.

4. Do you feel any important areas for change have been left out of the proposal? Please describe.

As mentioned previously, OFA believes further exploration or discussion is needed surrounding trained individuals who can perform low-risk procedures, with or without veterinary delegation, to lessen the burden and demand placed on veterinarians.

OFA would like to recommend that the amended legislation does not hinder the ability to adopt technologies, current and in development, which could aid in accessing veterinary services, such as the use of telemedicine platforms in the future.

5. Do you feel these proposals will help make the practice of veterinary medicine become more accessible and accountable?

OFA believes additional details are needed to ensure that veterinary medicine becomes more accessible, especially in underserved areas of Ontario. The development of regulations under the Act will be critical in this respect, and OFA wishes to be a part of this future process and discussions.

Additional Considerations

OFA recognizes the importance of veterinarians and veterinary services in maintaining a sustainable and robust rural and northern Ontario agri-food sector. The shortage of veterinarians in rural communities can be due to a variety of factors; For this reason, OFA believes a multi-faceted approach is needed to increase capacity, opportunities, programs, and incentives to address the shortage of farm-animal veterinarians in rural Ontario.

OFA applauds the government on the newly announced partnership between the Ontario Veterinary College at the University of Guelph and Lakehead University in Thunder Bay to expand its Doctor of Veterinary Medicine program to train more veterinarians, with a focus on rural, northern, and Indigenous communities. We further appreciate the government's new provincial grant program, the Veterinary Incentive Program, for new veterinary graduates which will serve

to encourage recent vet grads to work or establish practices in underserved areas of the province.

Ontario's Grow Ontario strategy identifies efforts to increase veterinary capacity in underserved areas of the province as a key priority. OFA recommends investigating the following recommendations to help improve access to large animal veterinary care in rural and remote regions of the province:

Veterinary Assistance Program

OFA supports the Veterinary Assistance Program (VAP), administered through the Ministry of Energy, Northern Development and Mines, which helps participating producer and veterinarian representatives. The VAP is designed to help promote the viability of the livestock industry by providing financial assistance to designated large animal veterinarians for travel to the producer, continuing education costs, and locum assistance. While the goal of the program is laudable, the gap in veterinary capacity remains in designated areas, suggesting that the program does not go far enough to maintain or increase capacity in these areas. OFA believes that the VAP is essential, but requires a thorough review to ensure it is meeting its goal of promoting the viability of the livestock industry in designated underserved areas of the province. OFA recommends that the Ontario Ministry of Agriculture, Food and Rural Affairs be involved in the review to ensure the agricultural perspective is included throughout the process.

Placement and Experience Programs

It is critical that students get exposure to farm animals and livestock at a young age to encourage employment in agricultural fields, including veterinary medicine. OFA believes examining programs which allow for hands-on experience and placement on farms, in veterinary clinics, etc. through the elementary and high-school years would help to encourage careers in ag-centric fields. Furthermore, programs should be investigated which place early-year veterinary students in mixed-animal and farm-animal practices to develop their veterinary skills, and to create ties to rural areas where there are shortages of mixed animal practitioners.

Internationally Trained Veterinarians

OFA recommends the government support changes that ensure the recruitment and retention of internationally trained veterinarians. OFA recommends further exploring opportunities for accelerating the accreditation process for foreign trained veterinarians and assessing the competency of training of internationally trained veterinarians.

Support for Large-Animal/Food-Producing Animal Clinics

Support for large animal and food-producing animal clinics should be continued and further options be investigated. OFA believes that strategies and programs, such as government-supported veterinary clinics and services, should be examined, to ensure clinics remain viable and sustainable for farmers and livestock owners. Other jurisdictions employ models where local municipalities make financial contributions and have representation on government-built clinic boards, and the provincial government provides annual monies to help operate and maintain clinic buildings. Other areas provide government-funded veterinary service programs, where

veterinarians are hired and paid through the program. Farm-animal veterinarians are located in specific rural regions across the province to provide veterinary care to livestock, and are governed and financed by municipal or regional governments in which they are located.

Distributed Economic Development

OFA continues to advocate the importance of focusing on distributed economic development to help rural communities attract and retain qualified medical professionals, including veterinary professionals, and to grow the agri-food sector.

Ensuring good animal health is crucial; Mismanagement of animal health has the potential to create much broader social and economic repercussions. OFA believes timely access to appropriate veterinary care in rural and remote areas of Ontario is critical to the health and welfare of livestock, and contributes to food security, income generation, job creation, and economic growth. OFA welcomes this opportunity to present its perspectives on 23-OMAFRA001: A Proposal to Modernize the *Veterinarians Act*. We look forward to participating further during the process and in regulation development to ensure timely access to appropriate veterinary care in rural and remote areas of Ontario.

Sincerely,



Peggy Brekveld
President

cc: The Honourable Lisa Thompson, Minister of Agriculture, Food and Rural Affairs
Rob Flack, Parliamentary Assistant to the Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors