

Ontario Federation of Agriculture
Submission to Standing Committee
on
the Interior

Regarding Consideration of
Bill 171, *Enhancing Professional
Care for Animals Act*

April 23, 2024

April 22, 2024

Aris Babikian
Chair, Standing Committee on the Interior
Whitney Block
Room 1405
99 Wellesley Street W
Toronto, ON M7A 1A2

Submitted online and via sci@ola.org

Dear Standing Committee Chair and Members:

Re: Bill 171, Enhancing Professional Care for Animals Act

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are passionate and dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating nearly 750,000 jobs, and contributing over \$47 billion to Ontario's annual GDP. The province's agri-food strategy, Grow Ontario, aims to strengthen the agri-food sector, support economic growth, and ensure an efficient, reliable and responsible food supply. By removing barriers, unnecessary costs and red tape, Ontario farmers will be positioned to seize opportunities and rise to the challenge of an ambitious growth strategy, allowing the agri-food sector to drive the economy forward.

OFA appreciates the opportunity to provide input on Bill 171, Enhancing Professional Care for Animals Act.

Veterinarians are essential for the well-being of animals, the economic stability of rural communities, and the safety of Ontario's agri-food system. They not only care for livestock but also contribute to human and public health by addressing zoonotic diseases, food safety, and biosecurity concerns. Unfortunately, access to veterinary services is often limited in rural Ontario, posing risks to farm animals and the food system.

The shortage of veterinarians in rural areas is complex and influenced by various factors. OFA believes that a multi-faceted approach is needed to address this issue. The new Act, if passed, would work to improve access to veterinary care, and clarify the role of veterinarians, veterinary technicians, and other individuals in providing care to Ontario's livestock and poultry. OFA applauds the government for recognizing that modern-day veterinary care is delivered using a team-based approach. We believe the proposed Act does a commendable job of reflecting the true nature of today's veterinary practices. Explicitly acknowledging the role of veterinary technicians as part of the animal care team, in the delivery of veterinary medicine, and formally bringing them within the scope of professional oversight allows them to utilize their training and skills to their full potential. Livestock and poultry producers, especially those in rural and underserved areas of Ontario, will benefit from the updated utilization of veterinary professionals and expanded access to veterinary services across the province. OFA believes the proposed legislation is critical to addressing the longstanding issue of accessing timely veterinary care in Ontario.

OFA supports mandating continuing education, a formal quality assurance program, streamlining the complaints resolution process, and increasing penalties for actions that intentionally harm an animal. We believe these measures will improve public trust, transparency, and client satisfaction. OFA is pleased to provide the following additional comments on Bill 171, primarily focused on the scope of practice, delivery of care, and authorized activities:

Schedule 1: Veterinary Professionals Act, 2024

Part I: Interpretation

OFA supports adding *veterinary technician* under the definition of "member", and under the scope of practice of veterinary professionals. Veterinary technicians are highly trained professionals, integral to veterinary medicine teams. Expanding their scope of responsibilities better utilizes their knowledge and practical skills, and allows them to perform to the full extent of their training and expertise. OFA believes this will help to alleviate the workload of large animal veterinarians, especially in underserved areas of the province, and increase producer access.

Part II: Governance

Council

OFA supports increasing the number of members on the Council, and that the composition includes non-members and veterinarian and veterinary technician members. Increased public representation allows for more broad perspectives to be incorporated in overseeing veterinary professionals. OFA also supports including one licensed veterinarian and one veterinary technician faculty member from educational institutions from Ontario institutions authorized to grant degrees or diplomas in veterinary medicine and veterinary technology. OFA believes a diverse membership on the Council is important to reflect the nature of the modern veterinary profession and to provide a diverse perspective on a health and medical-based industry. OFA recommends including on the Council a large-animal or food-producing animal veterinarian, and a representative from an agricultural organization to ensure the agricultural perspective is included in the decision-making process and in policy development.

Part III: Authorized Activities, Risk of Harm and Restricted Titles

Authorized Activities and Risk of Harm

Part III of the Veterinary Professionals Act sets out the rules respecting authorized activities and provides limits on who can carry out authorized activities and the circumstances in which they can be carried out. OFA appreciates the two categories of exceptions applying to non-members through Schedule 1: Authorized Activities.

OFA is pleased to see the right of owners, their household members, and their employees to treat their animals is retained in the Bill. An additional exception exists for custodians of animals administering a treatment plan carried out at the direction of the owner. This exempts those treating their animals, or on behalf of the owner, from the authorized activities and risk of harm clauses outlined in sections 10 and 11 of the proposed legislation.

OFA is also pleased to see additional exemptions from section 10 of the proposed Act, such as the confirmation of pregnancy in domesticated sheep or goats through ultrasound conducted on the surface of the skin. OFA supports these exceptions and believes activities or procedures deemed high-risk should remain in the domain of veterinary professions and retained in their scope of practice. Exceptions from authorized activity and risk of harm clauses for lower-risk procedures and forms of treatment provide flexibility, and potentially increase access to veterinary services for livestock and poultry producers while decreasing the burden on veterinarians.

While the proposed list of authorized activities and exceptions does well to support the new scope of practice for veterinary professionals, OFA is interested in the tasks that can be delegated to competent veterinary technicians and other trained individuals, and those that cannot. Certain lower-risk procedures, such as complementary or non-invasive therapies, have the potential to be performed by trained and skilled individuals other than a veterinary professional, or under a veterinary delegation, with minimal risk. OFA believes that pregnancy checking in livestock other than small ruminants should be an activity that can be delegated by a veterinarian to a veterinary technician who is trained and deemed competent. Even under delegation, allowing these lower-risk procedures to be performed by other trained individuals would increase access to care in Ontario, and lessen the demand and burden on veterinarians. OFA understands that these provisions will be outlined in corresponding regulations, and requests that we be included in regulation discussions and development to ensure that regulations are appropriately aligned with livestock agricultural practices.

OFA would like to emphasize the importance of an effective and timely response when responding to animal health emergencies or disease outbreaks in protecting the health of humans and animals, and the provincial food supply chain. Foreign animal diseases such as Highly Pathogenic Avian Influenza or African Swine Fever require the ability to perform euthanasia in livestock and poultry in a timely, effective, and humane manner with or without a veterinarian present. OFA believes the ability to perform euthanasia on livestock and poultry should be allowed by trained and competent individuals or teams under existing standards of care, and not be limited to

veterinary professionals to mitigate the potential negative effects posed to human and animal health in the event of an animal health emergency.

Part XV- Regulations, Standards, and By-Laws

By-Laws

OFA appreciates the ability of the Council to make by-laws establishing requirements for the maintenance of professional liability insurance coverage for members and former members. OFA has previously advocated that malpractice insurance should be mandatory for livestock veterinarians; These policies work to prevent potentially significant implications to veterinary professions, practices, and clients in the event of professional negligence.

Additional Considerations

In addition to the steps currently being undertaken by the provincial government, OFA believes further work can be done to improve access to veterinary care for Ontario's livestock and poultry producers. We support a comprehensive approach, including regulatory changes, educational programs, incentives, and support initiatives to ensure the availability of veterinary care in rural areas. This is crucial for the health of animals, food safety, public health, and the economic stability of rural communities.

OFA recommends investigating additional short- and long-term strategies to address the lack of veterinary capacity in Ontario. Further solutions could include:

- *Placement and Experience Programs*
 - Increase opportunities for veterinary students to interact and become familiar with farm animals during their education, including secondary, graduate, and Doctor of Veterinary Medicine programs.
 - Place 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.
 - Offer veterinary students experience programs to spend time in farm-animal or mixed-animal practices.
- *Financial Incentives*
 - Identify and make it easier for veterinarians and their businesses to access funds, including creating a resource listing incentives and funding available to veterinary practices.
 - Non-repayable return service bursaries, offering a sum of money per year for the four years of a student's large animal or mixed-animal veterinary program.
 - Internship programs for small rural businesses which help offset costs associated with the attraction and retention of new staff.

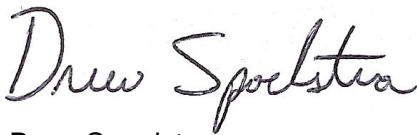
- Grants which improve the hands-on experience for production-animal students, to provide continuing education for rural vets.
 - Scholarships which are open to veterinary students interested in food-animal veterinary medicine.
 - Financial aid for farmers to help pay for the cost of veterinary services.
- *Government-Supported Veterinary Clinics and Services*
 - Government-built veterinary clinics in certain areas of the province would ensure all livestock producers have access to veterinary care. Local municipalities would make financial contributions and have representation on the clinic boards. The provincial government would provide annual monies to help operate and maintain clinic buildings.
 - Government-funded veterinary service program, where veterinarians are hired and paid through the program. Farm-animal veterinarians would be in specific rural regions across the province to provide veterinary care to livestock. Veterinary services would be governed and financed by municipal or regional governments in which they are located.
 - *Supporting Internationally Trained Veterinarians*
 - Review and revise existing pathways, assessment tools, and support programs to accelerate the accreditation process for internationally trained veterinarians interested in food animal medicine.
 - Explore licenses with limitations: Allow internationally trained veterinarians to practice with a limited scope of practice while navigating the accreditation process in Ontario.
 - *Revision of Academic Strategies*
 - Develop complementary programs and education strategies that expose and motivate individuals to explore veterinary medicine and work in rural communities.
 - Review and revise current admission strategies for Doctor of Veterinary Medicine programs which encourage and incentivize those individuals with an interest in working with livestock, or those wishing to work in rural or underserved communities after completion of their degree.
 - Increase exposure to large animals earlier in the Doctor of Veterinary Medicine curriculum, including courses focused on large animal medicine, field visits, and externships in rural areas.
 - *Mental Health Strategies and Programs*
 - Build mental health strategies, programs, and resources to support veterinary professionals facing work stressors unique to their profession.
 - *Distributed Economic Development*
 - To attract and retain qualified medical professionals, support the growth of rural communities by investing in rural Ontario, including access to affordable natural gas energy, improved roads, bridges, and drainage, and reliable internet access.

- *Continued support for livestock and poultry in rural regions of the province to ensure veterinary businesses are sustainable and viable to serve existing and future producers.*
 - The Veterinary Assistance Program, Veterinary Incentive Program, and other programs are essential to the sustainability and viability of rural veterinary clinics.

OFA would like to emphasize the importance of veterinarians in rural Ontario. We support a comprehensive approach, including regulatory changes, educational programs, incentives, and support initiatives, to ensure the availability of veterinary care in rural areas. This is crucial for the health of animals, food safety, public health, and the economic stability of rural communities.

Bill 171, *Enhancing Professional Care for Animals Act*, complements work currently underway by the Ontario government in improving access to veterinary care in Ontario. OFA appreciates the opportunity to provide our agricultural perspective and believes that clarifying the scope of practice of veterinary medicine and formalizing the role of veterinary technicians will allow for greater support for Ontario's livestock and poultry producers in providing care for their animals. OFA is committed to working with the Ministry of Agriculture, Food and Rural Affairs, and other stakeholders in the development of regulations under the proposed Act, to ensure Ontario's producers receive access to timely veterinary care for their livestock and poultry.

Sincerely,



Drew Spoelstra
President