

April 16, 2025

Ms. Catherine Knipe
Chair, Transition Council
College of Veterinarians of Ontario
71 Hanlon Creek Boulevard #2
Guelph, ON N1C 0B1

Dear Catherine,

Re: Consultation on Proposed Veterinary Regulatory Concepts

The Ontario Federation of Agriculture (OFA) appreciates the opportunity to provide input on the College of Veterinarians of Ontario (CVO) Transition Council's **Consultation on Proposed Veterinary and Regulatory Concepts**. Our topline feedback is summarized below:

- **Regulation of Veterinary Medicine:** OFA supports the regulation of veterinary medicine through a 'one profession, two professionals' model.
- **Licensure:** OFA supports two classes of licensure for veterinarians and veterinary technicians, and the continuing limited licensure model.
- **Authorized Activities:** OFA supports the authorized activity model.
- **Delegation:** OFA believes that lower-risk activities exist that can be performed by trained and skilled individuals, or under delegation.
- **Risk-Based Assessment:** OFA recommends that activities routinely used in livestock and poultry production continue to be assessed and updated using a risk-based model.
- **Initiation:** OFA supports veterinary technician members independently performing certain activities without an order or delegation.
- **Non-Member Exemptions:** OFA supports regulatory exemptions for non-members.
- **Administrative:** OFA supports diverse perspectives on committees and panels.
- **Veterinary Shortage:** Regulations need to balance between protecting animal health and the practical realities of the veterinary shortage.

The 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 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.

Animal agriculture is vital to the economic health of Ontario's rural communities, and veterinarians are a key part of that foundation. They play an essential role in protecting animal health and welfare, while also ensuring a safe and secure food supply. Yet, many rural and remote areas continue to face serious barriers to accessing timely veterinary care for livestock. The ongoing shortage of veterinarians and veterinary professionals poses a growing barrier to the viability and

sustainability of Ontario's agrifood sector. Without access to timely and reliable veterinary services and care, rural communities, farm animals, and Ontario's food system are placed at considerable risk.

OFA supports the efforts to modernize the regulation of veterinary medicine through a "one profession, two professionals" model. Overall, OFA believes that the regulatory concepts outlined in the consultation do a good job of reflecting the evolving practice of veterinary medicine through team-based care.

Licensure

OFA supports the proposed licensure regulatory concepts, including the two classes of licensure for veterinarians and veterinary technicians. The concept does well to support that veterinary care is delivered utilizing a collaborative, team-based care model that recognizes the contributions of all veterinary professionals. OFA appreciates continuing the limited licensure model, allowing those individuals with a narrowed scope of practice to continue practicing. This flexible, inclusive licensure framework supports competency without creating unnecessary barriers to practice.

Authorized Activities

OFA acknowledges the need to define and regulate "restricted acts" to protect animal health and public safety. Certain activities carry with them a higher level of risk of harm or potential harm to animals and the public; We believe these activities should remain non-delegable and only be performed by veterinarian members. OFA understands that owners, their household members, and their employees retain the right to treat their animals, including performing authorized activities. This provision aligns with the realities of livestock production, where many producers perform certain activities on their animals, such as ultrasound, competently and safely.

OFA supports developing regulation language that outlines circumstances in which veterinarian members will be permitted to delegate the practice of clinical veterinary medicine, including authorized activities, to veterinary technician members, and auxiliaries. We also support continuing the three levels of supervision, immediate, direct, and indirect currently contained in Regulation 1093 under the *Veterinarians Act*. OFA continues to believe that certain lower-risk activities, such as pregnancy checking, should be able to be performed by trained and skilled individuals, or under delegation. OFA recommends that activities routinely used in livestock and poultry production continue to be assessed and updated using a risk-based model to ensure safe, effective, and timely care for animals.

OFA supports regulatory provisions that support utilizing the skillset possessed by veterinary technicians, including initiation, where veterinary technician members can independently perform certain activities without an order or delegation. This would provide for more timely care, especially in instances that are urgent or in the event of emergencies.

OFA would like to reiterate that access to veterinarians in many rural areas of the province is extremely limited. Routine and emergency farm procedures are often time-sensitive and essential for animal welfare; Delays due to veterinarian availability can result in greater harm than if a trained producer or technician acted promptly. Given limited veterinary access in many rural areas, OFA believes flexible regulations are essential to support timely, appropriate care from trained, competent individuals.

Regulatory Exemptions for Non-Members

OFA strongly supports regulatory exemptions for non-veterinary members performing low-risk, essential procedures, especially where these practices are guided by veterinary protocols. We support exemptions for practitioners such as pharmacists, farriers, hoof trimmers, and those involved in mass culls or embryo implantation, acknowledging their competency and expertise in low-risk, essential procedures. Excluding these practitioners would not reflect the reality of modern farm management and risks undermining effective care.

Quality Team-Based Care

OFA approves of a team-based approach that leverages the complementary skills of veterinarians, veterinary technicians, and trained individuals. OFA supports the regulatory concepts surrounding veterinarian-client-patient-relationships, informed client consent, after-hour veterinary care, and provision of drugs in veterinary practices.

Administrative

OFA supports regulatory concepts that improve clarity and transparency, and streamline dispute resolution processes. OFA appreciates the inclusion of “diverse voices” on future committees and panels of the College of Veterinary Professionals, including general members of the public. This aligns with OFA’s belief that a varied membership on committees and panels is important to provide a diverse perspective on a health- and medical-based industry. OFA would like to reiterate our previous recommendation that a large-animal or food-producing animal veterinarian, and a representative from agricultural organizations be included on committees and panels to ensure the rural and agricultural perspective is included.

Additional Considerations

Importance of Access to Care

OFA remains concerned about the growing lack of access to timely veterinary care in many parts of rural and northern Ontario. In many of these areas, producers are often the first responders to animal health issues and rely on training and experience to deliver appropriate care when veterinary services are not immediately available. Future regulations must strike a balance between protecting animal health and welfare and recognizing the practical realities of Ontario’s veterinary shortage. Rigid regulations could inadvertently reduce positive animal welfare outcomes by delaying necessary interventions or creating regulatory ambiguity for producers trying to act in good faith. Future regulations must be flexible and consider the realities of rural livestock production to ensure timely and appropriate care is available and that animal health and welfare are protected.

Clarity and Practicality of Authorized Activities and Restricted Acts

OFA recommends that future regulations regarding authorized activities and restricted acts continue to be based on clear risk assessments and allow for exemptions in low-risk or well-established practices.

Emergency and Crisis Situations

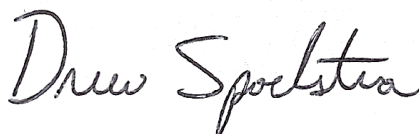
OFA would like to emphasize the importance of an effective and timely response when responding to animal health emergencies, disease outbreaks, or other crises in protecting the health of humans and animals, and the food supply chain. Future regulations should continue to consider emergency exemptions to ensure flexibility in crisis situations.

Collaborative Regulation and Stakeholder Engagement

OFA appreciates the collaborative process to date in the development of the regulatory concepts. We encourage CVO and the government to continue working with the agricultural sector to ensure that future regulations are practical, proportionate, and reflect the shared commitment of veterinarians and farmers to high standards of animal health and welfare. We recommend that any new or revised regulatory provisions be accompanied by sector-specific guidance and education, and pathways for formal training or certification where appropriate.

OFA appreciates the opportunity to provide feedback on the CVO's **Consultation on Proposed Veterinary Regulatory Concepts**. We welcome continued dialogue with CVO and the government to ensure future regulations under the *Veterinary Professionals Act* support both animal health and welfare, and the sustainability of Ontario's veterinary and agricultural sectors.

Sincerely,



Drew Spoelstra
President

cc: OFA Board of Directors

This submission has been approved by OFA's Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources>.