

May 21, 2026

Ontario Ministry of Agriculture, Food and Agribusiness
Food Safety and Environmental Policy Branch
1 Stone Road West, 2nd Floor S.W.
Guelph, ON
N1G 4Y2

Submitted online via the Ontario Regulatory Registry

To Whom It May Concern,

RE: 26-OMAFRA006: Proposed Amendments to the Veterinary Professionals Act, 2024

The Ontario Federation of Agriculture (OFA) is pleased to provide comments on 26-OMAFRA006: Proposed Amendments to the Veterinary Professionals Act, 2024. Our topline feedback is summarized as follows:

- **Avoid unnecessary burden or inadvertent limitations:** Regulations and amendments should not burden or limit veterinary practices operating in unique rural, agricultural, mobile, or non-traditional practice circumstances.
- **Flexible accreditation approaches:** Accreditation should support pathways for mobile, on-farm, emergency, mixed-animal, and large-animal veterinary services.
- **Clear definition of ancillary services:** A clear definition of ancillary services is needed to avoid unintended administrative burden, increased costs, or reduced service availability for farm, mixed-animal, and food-animal practices;
- **Inspection powers:** Inspection and assessment powers should be applied in a risk-based, proportionate, and biosecurity-conscious manner, particularly where a veterinary facility is located on or integrated into a farm property;
- **Continued investment:** Pair regulatory modernization with concrete investments to expand veterinary access in rural and underserved areas, including support for large-animal veterinary education, rural recruitment, mobile practice models, the Veterinary Assistance Program, and pathways for foreign-trained veterinarians.

OFA supports continued modernization of Ontario's veterinary regulatory framework. Veterinarians and veterinary professionals play an essential role in protecting animal health and welfare, supporting the economic resilience of rural communities, and safeguarding Ontario's food supply. However, access to timely veterinary care remains a serious and growing challenge in

many rural, northern, and underserved regions of the province. The shortage of large-animal and livestock veterinarians and veterinary professionals continues to create risks for livestock producers, animal welfare, and the broader agri-food sector.

OFA applauds the Government of Ontario for the *Veterinary Professionals Act, 2024* (VPA) which better reflects the way veterinary medicine is delivered today. Recognizing the increasingly collaborative, team-based nature of veterinary care and the important roles played by veterinarians, veterinary technicians, and other trained professionals is critical in supporting animal health and welfare and ensuring the sustainability of Ontario's agri-food system.

OFA's comments on the amendments to the VPA under Schedule 9 of Bill 109, *Protecting Ontario's Food Independence Act, 2026* are guided by the need to ensure that regulations protect animal and public health while reflecting the practical realities of livestock production, mobile veterinary practice, and limited access to veterinary services in rural Ontario.

OFA is generally in support of Schedule 9's proposed amendments to the VPA, particularly where they provide flexibility for prescribed exemptions from accreditation requirements and clarify oversight of veterinary practice beyond traditional clinic settings.

OFA recommends that the provincial government and the College of Veterinary Professionals of Ontario ensure that implementation of the proposed amendments:

1. Support mobile, on-farm, emergency, and large-animal veterinary services;
2. Avoid unnecessary regulatory burden for mixed-animal and food-animal practices;
3. Apply inspection powers in a proportionate, risk-based, and biosecurity-conscious manner;
4. Maintain flexibility for team-based care and appropriate delegation; and
5. Is paired with investments to expand veterinary access in rural and underserved areas.

Accreditation Exemptions Must Support On-Farm and Mobile Veterinary Care

Schedule 9 would amend Section 21 of the VPA to create exceptions to the requirement to obtain a certificate of accreditation in certain prescribed circumstances, including where a member carries out authorized activities in or from a prescribed building, vehicle, or land. OFA supports this enabling approach.

Veterinary care for livestock is often delivered outside traditional clinic settings. Large-animal veterinarians routinely provide care in barns, pastures, livestock-handling facilities, mobile units, sale barns, fairs, and emergency settings. In many parts of Ontario, mobile and on-farm veterinary services are not simply convenient but essential.

OFA recommends that the VPA ensure facility accreditation requirements do not create unnecessary burdens or inadvertently limit veterinarians' ability to provide care in unique practice circumstances, including mobile, on-farm, ambulatory, emergency, and large-animal veterinary services. While appropriate standards for animal health, public safety, biosecurity, recordkeeping, and professional accountability must be maintained, accreditation requirements should be flexible enough to reflect the practical realities of veterinary service delivery outside of a traditional clinic or hospital setting. This is particularly important in rural and agricultural regions already facing critical veterinary shortages, where additional administrative, infrastructure, or compliance burdens could further reduce access to timely veterinary care.

OFA recommends that any exemptions, alternative accreditation pathways, or modified requirements for these practice circumstances be clear, practical, and developed in consultation with large-animal veterinarians, veterinary technicians, livestock producers, commodity organizations, and agricultural stakeholders.

Ancillary Services Should Be Clearly Defined and Practical

Schedule 9 proposes to add a definition of "ancillary services" to the VPA, including services provided in respect of animals by a member as part of, or separate from, their practice of veterinary medicine. Examples include boarding, grooming, funeral services, and the sale of food, supplies, and other goods or services.

OFA understands the need for appropriate oversight of services connected to veterinary practice where those services may affect animal health, client protection, or public trust. However, OFA recommends that the definition and regulation of ancillary services be applied carefully to avoid unintended consequences for farm, mixed-animal, and food-animal practices.

Many large-animal and mixed veterinary practices provide or facilitate access to animal health products, herd health tools, nutrition-related goods, and other supplies that support farm animal care. These services are often connected to an established veterinary-client-patient relationship and are important to timely herd and flock health management.

The regulatory framework should not discourage veterinary professionals from providing these services, particularly in rural areas where farmers may have limited access to alternatives.

OFA recommends that any prescribed ancillary services be clearly defined and limited to areas where oversight is necessary and proportionate. Regulations should avoid capturing ordinary farm-service interactions in ways that increase administrative costs, reduce service availability, or make it more difficult for producers to access timely animal care.

Inspection Powers Must Respect Farm Realities, Biosecurity, and Private Property

Schedule 9 proposes amendments related to entry and inspection of veterinary facilities and other prescribed buildings, vehicles, and land where a member practices veterinary medicine or provides prescribed ancillary services.

OFA supports appropriate oversight to ensure that professional standards are maintained. However, some veterinary facilities may be located on farms or integrated into farm properties. In these circumstances, inspections must remain focused on the regulated veterinary facility or prescribed veterinary activity, and should not extend into broader farm operations, private dwellings, or areas unrelated to veterinary services.

Farms are unique workplaces and biosecure environments that may include livestock housing, production areas, equipment storage, employee spaces, and family residences. Entry onto farm property can create disease-transmission risks, disrupt animal care, and raise privacy and safety concerns if not properly managed.

OFA recommends that regulations include clear safeguards for inspections involving veterinary facilities located on farms, in vehicles, or in other non-clinic settings, including rules around notice, identification, scope of inspection, biosecurity expectations, and respect for private property.

Inspection and assessment activities should be risk-based, proportionate, and limited to the regulated veterinary facility, prescribed location, service, or prescribed ancillary services being regulated.

Accountability and Procedural Fairness

Schedule 9 would amend provisions related to licence applications where a member or former member knew, or ought to have known, that information provided in an application was false or misleading.

OFA supports strong accountability in the licensing system. Public confidence in veterinary professionals depends on assurance that licensed individuals are properly qualified and have provided accurate information during the licensing process.

At the same time, any decision to suspend, cancel, or impose terms, conditions, or limitations on a licence must be procedurally fair and proportionate. OFA supports these amendments provided that members and former members have access to clear processes, notice, reasons, and appropriate review or appeal mechanisms.

Information Disclosure Must Protect Farm Business Information

Schedule 9 would authorize prescribed persons to disclose prescribed information in accordance with the regulations.

OFA supports information-sharing where it improves transparency, animal health protection, public safety, emergency response, disease management, or regulatory effectiveness. However, in agricultural contexts, information may include farm business records, herd health information, premises information, production data, and other commercially sensitive details.

OFA recommends that any regulations governing disclosure clearly define who may disclose information, what information may be disclosed, for what purpose, and to whom. Appropriate safeguards must be included to protect privacy, confidentiality, and commercially sensitive farm information.

Information-sharing provisions should be designed to support animal and public health objectives without creating unnecessary risk for farm businesses.

Additional Comments

Regulations Must Improve Access to Veterinary Care

OFA has consistently supported modernization of veterinary regulation through a framework that recognizes the contributions of veterinarians, veterinary technicians, and other trained individuals involved in animal care.

Veterinary care is increasingly delivered through a team-based model. Registered veterinary technicians, auxiliaries, trained producers, and other qualified individuals can play an important role in supporting animal health, particularly in rural and underserved areas where veterinary availability is limited.

OFA supports a risk-based approach to authorized activities, delegation, supervision, and exemptions. High-risk activities should remain subject to appropriate veterinary oversight. However, lower-risk and commonly used livestock procedures should be assessed in light of practical farm realities, available training, animal welfare needs, and the shortage of veterinary professionals. OFA recommends that future regulations under the VPA continue to enable team-based care, appropriate delegation, and practical exemptions for trained and competent individuals performing low-risk or essential animal care activities.

Investment to Improve Veterinary Workforce Shortages

Regulatory modernization alone will not solve Ontario's veterinary access challenges. OFA has repeatedly emphasized the need for concrete investments to address shortages of large-animal veterinarians and veterinary professionals across the province. This includes support for

veterinary education and training, rural and northern recruitment, mobile and large-animal practice models, foreign-trained veterinarian pathways, and programs that improve access to veterinary services in underserved areas.

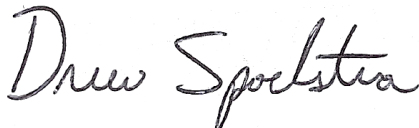
In February 2026, OFA welcomed the provincial government's action to strengthen farm-animal veterinary access across Northern Ontario through the modernization of the Veterinary Assistance Program (VAP). However, limited access to veterinary services is no longer confined to Northern Ontario. Veterinary capacity gaps now exist in many rural areas of the province, creating challenges for livestock producers, animal health, emergency response, and food system resilience.

OFA continues to recommend increased investment in, and expansion of, the VAP to improve access to veterinary services in more rural and agricultural areas of Ontario. OFA also recommends that the provincial government examine opportunities for provincial and municipal veterinary clinic models, expand veterinary college capacity, and improve pathways for foreign-trained veterinarians to help address the shortage of large-animal veterinarians.

OFA supports the intent of Schedule 9 to refine and modernize the VPA. The proposed amendments can help create a more flexible and practical regulatory framework, particularly if exemptions from accreditation requirements are used to support mobile, on-farm, emergency, and large-animal veterinary practice. OFA encourages the Government of Ontario to view Schedule 9 as one part of a broader strategy to strengthen veterinary access. Regulatory flexibility, expanded training capacity, recruitment and retention supports, improved pathways for internationally trained veterinarians, and investments in service delivery are all necessary to protect animal welfare, farm viability, and Ontario's food supply.

Timely access to appropriate veterinary care is essential to animal health and welfare, food safety, rural economic resilience, and Ontario's food security. OFA looks forward to continuing to work with the Government of Ontario, the College, veterinary professionals, and agricultural partners to ensure that Ontario's veterinary regulatory framework supports both public confidence and the practical needs of farmers.

Sincerely,



Drew Spoelstra
President

cc: The Honourable Trevor Jones, Minister of Agriculture, Food and Agribusiness
Jan Robinson, Registrar and CEO, College of Veterinary Professionals of Ontario
OFA Board of Directors

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