



January 24, 2023

Ontario Ministry of Agriculture and Rural Affairs  
Food Safety and Environmental Policy Branch  
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Guelph, Ontario  
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Via email: [vetact.omafra@ontario.ca](mailto:vetact.omafra@ontario.ca)

To whom it may concern,

*Re: Veterinarians Act: Modernization of the Regulation of the Veterinary Profession*

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Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on the proposed modernization of the *Veterinarians Act* and the regulatory framework for veterinary professionals. BFO represents 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

BFO supports OMAFRA's efforts to modernize the *Veterinarians Act* by better defining animal care activities provided by veterinary professionals and by improving accountability and transparency. In regards to the overarching areas OMAFRA is seeking feedback on, our comments will largely focus on clarifying the scope of practice for veterinary medicine, such as the procedures, services and processes a licensed veterinarian or other veterinary professional, such as a veterinary technician, is permitted to perform in Ontario. We believe there is value in more clearly defining the scope of practice for veterinary medicine and clarifying what veterinary professionals are permitted to perform. We are in support of OMAFRA's decision to examine this further.

Lack of access to veterinary care for producers in many areas of northern Ontario and some parts of eastern and southern Ontario has been a longstanding issue. We view efforts to examine the scope of practice within the *Veterinarians Act* as an opportunity to better utilize the skills of registered veterinary technicians (RVT) to perform veterinary activities on-farm, either under the supervision of a veterinarian or on their own, and to potentially alleviate the workload of large animal veterinarians who practice in underserved areas of the province. Many beef producers, especially those located in underserved areas of the province, are supportive of improving how veterinary teams are utilized and for having RVTs on-farm to provide care to their cattle. We believe modernizing the scope of practice for veterinary professionals in Ontario will go a long way in improving how veterinary teams are utilized and we view this as a step in the right direction to address the longstanding issues around accessing large animal veterinary care in Ontario.

In reviewing the scope of practice for veterinary medicine, a veterinary medical procedure we strongly believe should be able to be delegated by a veterinarian to another professional who is deemed

competent, such as an RVT, is pregnancy checking. The Act currently outlines procedures that are diagnostic in nature, such as pregnancy checking, as a procedure only to be performed by a veterinarian and cannot be delegated. Many beef farmers, especially those in northern Ontario, are faced with many challenges due to a lack of access to veterinary services and in accessing preventative care for their livestock, such as pregnancy checking services and manual pregnancy checks. BFO understands that high-risk activities should remain in the domain of veterinarians, but we believe OMAFRA should strongly consider allowing the practice of pregnancy checking on livestock, whether through ultrasound or rectal palpation, to be a practice that could be delegated by a veterinarian. Again, this would be a step in the right direction in improving access to large animal veterinary care in Ontario.

Beyond reviewing and clarifying the scope of practice for veterinary medicine, we have included further recommendations below that will support the province's Grow Ontario strategy and allow the province to continue to take actions that will improve access to large animal veterinary care in underserved areas. Our recommendations include:

- Support changes that will ensure that the skills of internationally educated veterinarians who come to Ontario can work as veterinarians and support the development of new assessment tools that assure the competence of veterinarians wishing to practice large food animal medicine.
- Support for opportunities to expand domestic training for DVM and RVT training that would target recruitment from northern and rural areas in an effort to grow the number of rural mixed animal veterinary professionals who have a strong connection to underserved areas.
  - Support for expanding collaborative program partnerships, such as the University of Guelph and Lakehead University Collaborative DVM in Rural and Northern Community Practice Program.
  - Encourage the Ontario Veterinary College to develop an admission strategy that provides opportunities for applicants who have experience working with livestock, come from underserved areas or are wishing to work in an underserved area upon graduation.
- Continued support for large food animal clinics in rural and remote regions to ensure clinics are sustainable and able to serve existing and future farmers.
  - Continued funding support for technology to expand the use of telemedicine, enhancements to mobile veterinary clinics and locum assistance are welcomed. Consider funding support for haul-in facilities at clinics for large animals.
- We believe OMAFRA should be an active participant in the review of the Veterinary Assistance Program, which is administered by the Ministry of Northern Development. The program is viewed as valuable and necessary for veterinarians and livestock farmers in northern Ontario and the other jurisdictions where the program operates, but the program is underfunded and, therefore, is unable to achieve what it is set out to do, which is to promote the viability of the livestock industry by supporting the provision of veterinary services to livestock producers.
  - Increase the program budget to better reflect the number of participating veterinary clinics and associated expenses, and to allow for new veterinary clinics to join the program.
  - Increase in the program mileage rate, which has remained stagnant for many years.

We greatly support OMAFRA's proposed Veterinary Incentive Program to increase Ontario's veterinary capacity and incentivize recently graduated large animal veterinarians to underserved areas.

We appreciate the opportunity to provide our comments and recommendations on OMAFRA's consultation to modernize the *Veterinarians Act* and to provide additional recommendations that will improve access to large animal veterinary care in underserved areas of Ontario. We look forward to participating further in OMAFRA's subsequent consultation on modernizing the *Veterinarians Act*.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Chaffe". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

Jack Chaffe  
President