



May 30, 2023

Ontario Ministry of Agriculture, Food and Rural Affairs
Food Safety and Environmental Policy Branch
1 Stone Road, 2nd Floor SW
Guelph, ON N1G 4Y2
Email: vetact.omafra@ontario.ca

To whom it may concern,

Re: 23-OMAFRA001 A Proposal to Modernize the Veterinarians Act

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on 23-OMAFRA001 A *Proposal to Modernize the Veterinarians Act*. BFO represents the 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.

The lack of access to large animal veterinary care for producers in many areas of northern Ontario and some parts of eastern and southern Ontario has been a longstanding issue. BFO and many of our members have been seeking and examining solutions to address the challenges associated with accessing large animal veterinary care. BFO has worked with the College of Veterinarians of Ontario (CVO), the Ontario Association of Veterinary Technicians, the Ontario Veterinary Medical Association and the Ontario Veterinary College (OVC) to get a better understanding of how best to address this problem and have outlined a number of actions that need to be taken. One of the key actions identified to improve access to large animal veterinary care is the need to optimize the full utilization of the veterinary team and the increased role for veterinary technicians providing care on-farm.

We support OMAFRA's efforts to modernize the Act and improve the scope of practice provisions. We also applaud the government's commitments in the 2023 budget to increase the number of domestic student seats at OVC through a collaborative DVM program between OVC and Lakehead University and to support recently graduated veterinarians to practice in underserved areas through the Veterinarian Incentive Program.

We provided comments to OMAFRA's preliminary consultation on the *Modernization of the Regulation of the Veterinary Profession* in January. At that time, we stated our support for OMAFRA's efforts to modernize the Act and, more specifically, our support for OMAFRA to more clearly define the scope of practice for veterinary medicine and clarify what veterinary professionals are permitted to perform.

Please find BFO's responses to the discussion questions below. Our comments largely focus on the changes to the veterinary scope of practice within the Act.

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

In regards to the scope of practice proposals, we agree with the proposed changes that will clarify the authorized activities that can be performed by veterinarians, veterinary technicians and other relevant healthcare professionals. In particular, we support the creation of a list of proposed activities in a new statutory provision which would be legislatively authorized to veterinarians; a list of activities that are not permitted to be delegated by a veterinarian; a subset of authorized activities that may be performed by veterinarians or veterinary technicians; expanding title protection in the Act to include the titles of veterinary technician, Registered Veterinary Technician and veterinary technologist; and enabling the CVO Council to make regulations providing exemptions for some regulated health care professionals and other qualified practitioners to support veterinary professionals by applying their skills and expertise in animal care.

Many beef producers, especially those located in underserved areas of the province, are supportive of improving how veterinary teams are utilized and for having veterinary technicians 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.

As for the changes to improve oversight and authority, we support the proposal to have veterinary technicians and representatives from post-secondary educational programs represented on the CVO Council.

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

Recognizing that if the proposed amendments to the Act are passed, there will be changes required to the existing Regulation 1093 and potential for a future public consultation, we believe further consultation will be needed regarding Appendix B and the proposed authorized activities list for veterinarians and veterinary technicians. Although a list of authorized activities is provided for veterinarians and veterinary technicians within Appendix B, a list is not provided outlining the list of activities that are not permitted to be delegated by a veterinarian. The discussion paper notes Appendix B is presented for illustrative purposes only and that particulars for performing authorized activities, including conditions, exemptions and any restrictions on delegation are areas for potential future regulatory policy development. BFO is very interested in what the list of activities that cannot be delegated by a veterinarian will look like.

We understand high-risk activities should remain in the domain of veterinarians; however, we have advocated that the proposed changes should provide veterinarians with the flexibility and certainty to delegate activities to veterinary technicians that are deemed competent. In particular, we strongly believe pregnancy checking should be an activity that can be delegated by a veterinarian to a veterinary technician who is deemed competent.

It is also noted that current exemptions within the Act would continue to apply and that it is anticipated that it would continue to be the case that an animal owner (such as a farmer), a member of the animal owner's household, a herds person or other employee of a farm would continue to be able to treat an animal owned by the owner. It has been communicated through the Vet Act roundtable meetings and OMAFRA webinar sessions that the ability of farmers to treat their

livestock would not be impacted by these changes, but the language used in the discussion paper is not as clear and should be when exceptions and exemptions are being consulted on in any future regulatory consultation.

In regards to the proposal to improve oversight and authority by increasing the number of non-veterinarian public-interest appointees on the CVO Council from three to five to seven to nine, we believe OMAFRA should consider including a dedicated role for a representative from the large animal livestock sector or livestock commodity organizations 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.

As noted, we believe the proposed changes to the scope of practice will provide more clarity to veterinary teams in the provision of care and improve access to large animal care in underserved areas. Further, we support the efforts to streamline oversight and authority, introduce quality assurance programming, and improve the CVO's complaints and resolutions process.

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

As mentioned above, we are interested in better understanding what the proposed list of authorized activities that a veterinarian cannot delegate will look like and, more specifically, what activities will veterinarians be able to delegate to veterinary technicians that are deemed competent. In addition, assurances that farmers and farm workers maintain the ability to treat their own livestock is very important.

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

It is our hope that by better defining the scope of practice for veterinary medicine and through acknowledging the role veterinary technicians play in providing care, this will allow for more opportunities for veterinary technicians to support farmers on-farm. We view efforts to examine the scope of practice as an opportunity to better utilize the skills of veterinary technicians 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.

In addition to these proposed changes and the measures outlined in the provincial budget, we believe more can be done and other actions taken to improve access to large animal care. These include:

- Support changes through the CVO 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.
- Encourage the OVC to develop an admissions strategy that provides opportunities for applicants who have experience and/or interest in working with livestock, and/or are from or 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.

We appreciate the opportunity to comment on *the Proposal to Modernize the Veterinarians Act*, and would be happy to discuss further how to improve access to veterinary care for our livestock producers in underserved areas of the province.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Chaffe".

Jack Chaffe
BFO President

Cc: Hon. Lisa Thompson
Mr. Trevor Jones, Parliamentary Assistant (OMAFRA)
Mr. Rob Flack, Parliamentary Assistant (OMAFRA)