



LONG-TERM THINKING FOR TODAY'S ISSUES

January 23, 2023

Attention: Comments on the Modernization of the Regulation of the Veterinary Profession
Ontario Ministry of Agriculture, Food and Rural Affairs
Food Safety and Environmental Policy Branch
1 Stone Road West, 2nd Floor S.W.
Guelph, ON
N1G 4Y2
Via email: vetact.omafra@ontario.ca

Re: Consultation on *Veterinarians Act* of Ontario

Dear Ministry,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The CFFO is concerned about access to veterinary care for livestock farmers in Ontario. Many farmers are already experiencing issues with access to necessary veterinary services. The long-term outlook indicates that this lack of access may increase into the future, rather than improve.

In modernizing the *Veterinarians Act*, the CFFO asks that the ministry specifically consider impacts to agriculture. In particular, the CFFO recommends that:

- **Updates ensure proper and fair recognition of international food animal veterinary training institutions and qualifications.**
- **Ontario Veterinary College increase focus on food animal veterinarian training.**
- **Independent lay technicians continue to be permitted to perform pregnancy ultrasound for food animals.**
- **Representation from the agricultural sector is included in the College of Veterinarians of Ontario governing council.**

Veterinarian Shortage

Internationally-trained veterinarians play a key role in ensuring we have enough food animal veterinarians practicing in Ontario to meet current and future needs. **As part of the modernization of the *Veterinarians Act*, the CFFO strongly encourages updates that will ensure proper and fair recognition of international food animal veterinary training institutions and qualifications.** The CFFO also encourages a streamlined approach to allow

internationally-trained veterinarians to demonstrate that they meet the necessary qualifications to practice in Ontario.

Beyond updates to the *Veterinarians Act*, the Ontario government should work with other levels of government, veterinary associations, local municipalities, and international veterinary training institutions to encourage more internationally-trained food veterinarians to successfully set up practice here in Ontario, especially in currently underserved rural areas.

Ontario Trained Veterinarians

Although this does not fall under the purview of the *Veterinarians Act*, we wish to voice here that the CFFO is also concerned about food animal veterinary training here in Ontario. **To ensure the future success of livestock farming, the CFFO wants to see more Ontario-trained food animal veterinarians graduate and successfully move into practice to serve Ontario farming communities.** Changes need to be made at the Ontario Veterinary College to the class size, recruitment, in-class training, field placement opportunities, and incentives upon graduation to help ensure we have more successful Ontario-trained food animal graduates.

Scope of Practice for Veterinary Medicine

The CFFO recommends that the current practice of allowing independent lay technicians to perform pregnancy ultrasound for food animals continue in the province.

The CFFO sees continued value in the current practice of having independent technicians provide pregnancy ultrasound service to farmers. Food animal veterinarians provide essential animal care for farmers, but are already strained to meet the needs of the industry across the province. Requiring food animal veterinarians to provide or oversee this service will burden them with significant costs of time and equipment. It will also restrict access to this service for many who already have limited access to a food animal veterinarian. In other jurisdictions, such as the United Kingdom, independent technicians commonly perform pregnancy ultrasounds for farm animals. We see it as a benefit for both farmers and veterinarians to have this pregnancy ultrasound service provided by independent technicians.

The independent technicians currently practicing in Ontario have proven to be highly skilled and effective at delivering this non-invasive scanning and are trusted by the farmers they serve. Independent technicians are best able to serve the farming community for several reasons. Because they specialize in this service alone, they have greater experience and expertise in this particular area, ensuring accurate information for farmers. Because they can make efficient use of the costly equipment required, they are able to provide quality service to a broader region at lower cost. Lower costs will ensure this service is broadly and consistently available to farmers, which is good for animal health, farm profitability, and industry growth and sustainability.

Oversight

The CFFO is supportive of the proposal to alter “the composition of the governing council to include a wider range of membership and voices.” The current composition of 13 veterinarians and up to five government appointed positions limits perspectives that may be of value. **In particular, the CFFO recommends including representation from the agricultural sector**

among those appointed to the governing council. This will ensure the needs and concerns of the farming sector are considered in the council's work. The CFFO also supports inclusion of representatives from academia and registered veterinary technicians in the council composition.

Conclusion

Modernizing the *Veterinarians Act* is an important aspect of working to address the ongoing issue of access to veterinary care for farmers across Ontario. In modernizing the *Veterinarians Act*, the CFFO recommends proper and fair recognition of international veterinary training institutions and qualifications, that independent lay technicians continue to be permitted to perform pregnancy ultrasound for food animals, and that representation from the agricultural sector be included in the College of Veterinarians of Ontario governing council.

Beyond the *Veterinarians Act*, there are other changes that will need to be made to address the many factors at play affecting current and future access to food animal veterinary care in Ontario. In particular, the CFFO wants to see more Ontario-trained food animal veterinarians graduate and successfully move into practice to serve Ontario farming communities.

We welcome future opportunities to offer further recommendations on changes that may improve veterinary access and quality of care for Ontario farmers. We appreciate this opportunity to provide input and thank you for your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario