



CHRISTIAN FARMERS FEDERATION OF ONTARIO

ACCREDITED FARM ORGANIZATION

May 30, 2023

Attention: Comments on the Modernization of the Veterinarians Act
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
Delivered via email: vetact.omafra@ontario.ca

Re: A Proposal to Modernize the Veterinarians Act

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:

- Animal owners continue to be allowed to treat their own animals.
- The definition of veterinary medicine will ensure appropriate control while also allowing those trained in specific aspects of animal care, who may not be regulated by the College, to provide services.
- Independent technicians continue to be permitted to perform pregnancy ultrasound for food animals including small ruminants.
- Representation with an agricultural perspective be included in the College of Veterinarians of Ontario governing council.
- Updates ensure proper and fair recognition of international food animal veterinary training institutions and qualifications.
- Ontario needs to successfully graduate more food animal veterinarians.

REPRESENTING FARMERS SINCE 1954

231 Shearson Crescent, Unit 101, Box 2, Cambridge, ON, N1T 1J5
1-855-800-0306 or 519-837-1620 info@christianfarmers.org www.christianfarmers.org

- The Ontario Veterinary College should increase focus on food animal veterinarian training.
- The Veterinary Access Program (VAP) requires review.

Scope of Practice for Veterinary Medicine

It is important that exemptions in the Act continue to clearly permit animal owners to treat their own animals. This exemption should also include members of the animal owner’s household, and farm employees who should also be permitted to treat the animals on behalf of the owner.

The proposed revised definition of veterinary medicine could have significant implications for farmers’ access to key services currently commonly provided by those who are neither veterinarians, or registered veterinary technicians. The proposed definition is extremely broad and will rely on regulations to specifically outline what is the exclusive scope of practice for veterinarians, what can be delegated to registered veterinary technicians, and what exemptions may apply for other practitioners.

The CFFO would like to see a restricted definition which would ensure appropriate control while also allowing others trained in specific aspects of animal care, who may not be regulated by the College, to provide necessary services as part of overall animal care in the province, as is currently the practice across Ontario.

Specifically, the definition including determination of pregnancy as a “diagnosis of a condition” which would fall exclusively to veterinarians, and not able to be delegated to either a registered veterinary technician or a non-regulated technician, is problematic and does not reflect current practice in Ontario.

Pregnancy Ultrasound by Lay Technicians

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 pregnancy ultrasound 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 Ontario, specialist technicians have provided pregnancy ultrasound services for food animals for decades. In other jurisdictions, such as the United Kingdom, independent technicians commonly perform pregnancy ultrasounds for farm animals. We see it as a

REPRESENTING FARMERS SINCE 1954

231 Shearson Crescent, Unit 101, Box 2, Cambridge, ON, N1T 1J5
 1-855-800-0306 or 519-837-1620 info@christianfarmers.org www.christianfarmers.org

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, ensuring accurate information for farmers. Because they do not require veterinary oversight or delegation, this reduces the cost of the service, and ensures they can serve farmers in a broader region, making this service more accessible and affordable. Lower costs ensure pregnancy ultrasound is broadly available to farm businesses of all sizes, which is good for animal health, farm profitability, and industry growth and competitiveness.

Oversight and Authority

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. The CFFO supports inclusion of representatives from academia and registered veterinary technicians in the council composition.

In particular, the CFFO recommends including representation with an agricultural perspective among those serving on the governing council. This may be achieved by ensuring that some of the elected veterinarians are practicing food animal veterinarians. This could also be accomplished by ensuring that appointed representatives include expertise from the farming sector. The CFFO recommends that at least one of these methods should be spelled out in future by-laws to ensure the needs and concerns of the livestock sector and the broader public interest in veterinary roles in the food system are considered in the council’s work.

Veterinarian Shortage

Internationally-trained veterinarians play a key role in increasing the number of 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 modernization of the *Veterinarians Act*, we wish to voice here that the CFFO remains 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.**

The CFFO is pleased to see government announcements on the new Collaborative Doctor of Veterinary Medicine program between the University of Guelph and Lakehead University, as well as the new incentive grant program for underserved areas of the province.

The Collaborative Doctor of Veterinary Medicine program will increase the intake class size by adding 20 new students each year, with recruitment focused on northern, rural, and Indigenous communities. Having at least part of the studies for this program take place on the Lakehead campus will also increase opportunities for students to study and train in underserved and remote areas of the province, hopefully also encouraging them to set up practice in the region after graduation. **We still strongly recommend in-class training and field placement opportunities that may encourage greater focus on food animal veterinary practice for all OVC students.**

We are pleased also to see the new incentive grants to encourage Ontario-trained veterinary graduates to work in underserved areas of the province. We hope this incentive program will start to show immediate results in helping underserved communities to secure veterinarians to fill vacancies that have been highly detrimental to farmers.

It is clear more veterinarians will need to graduate each year to keep pace with retirements and to meet increasing demand. In a report in 2020, the Canadian Veterinary Medical Association recommended a long-term goal of 3.5 to 4% annual increase in the veterinarian population. In Ontario, that would require between 180 – 200 new veterinarians annually, through new Ontario graduates and internationally trained veterinarians coming to work in the province. Clearly even more seats are necessary to train both veterinarians and registered veterinarian technicians in the province. The CFFO would also like to see greater emphasis on training Ontario students compared to foreign students training here who are likely to work elsewhere.

VAP Program Review

Veterinary practices are businesses just as farm operations are. Both have different interests that ensure their businesses can continue to operate efficiently and sustain the livelihoods of those working in the business. Some of the market factors governing

REPRESENTING FARMERS SINCE 1954

231 Shearson Crescent, Unit 101, Box 2, Cambridge, ON, N1T 1J5
1-855-800-0306 or 519-837-1620 info@christianfarmers.org www.christianfarmers.org

veterinary practices have significantly contributed to the shortage of rural and large animal veterinarians we are currently experiencing. Beyond market forces, practical aspects of the differences between work in large animal rural practices compared to small animal urban practices also make it more challenging to ensure mixed or large animal rural practices continue to be viable businesses.

The Veterinary Access Program (VAP) was created to help ensure veterinarians are in place as part of vital infrastructure to support livestock farming in underserved and remote areas. In practical terms, a key aspect of this program includes funding to help cover the travel costs incurred by large animal practitioners serving within the program. The level of this funding has not been adjusted to keep up with significant inflation in costs.

The CFFO recommends that the Veterinary Access Program also requires review.

It is important that all parties involved in overseeing, delivering, and accessing the program (OMAFRA, MND, vets, and farmers) have an opportunity to contribute to the review. It is vital to discuss how to make this program more effective in ensuring these farming communities have the veterinary services they need, and that veterinary practices serving these areas continue to be viable businesses.

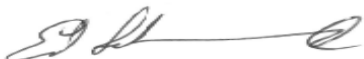
Conclusion

In modernizing the *Veterinarians Act*, the CFFO recommends that animal owners continue to be allowed to treat their own animals. The definition of veterinary medicine needs to ensure appropriate control while also allowing those trained in specific aspects of animal care, who may not be regulated by the College, to provide services, including independent lay technicians who perform pregnancy ultrasound for food animals. We also recommend that representation with an agricultural perspective be included in the College of Veterinarians of Ontario governing council and that updates ensure recognition of international food animal veterinary training institutions and qualifications.

Beyond the *Veterinarians Act*, there are other changes that will need to be made to ensure current and future access to food animal veterinary care. Ontario needs to successfully graduate more food animal veterinarians. The CFFO also wants to see a review of the Veterinary Access Program (VAP).

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

REPRESENTING FARMERS SINCE 1954