

OntarioSheep FARMERS

May 30, 2023

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
Letter sent by email: vetact.omafra@ontario.ca

Subject: Ontario Sheep Farmers Response to the Veterinarians Act Discussion Paper

Dear Sir/Madam;

Ontario Sheep Farmers (OSF) has appreciated the opportunity to participate in this consultation and thank you to Parliamentary Assistant Rob Flack for taking the time to deliver in-person consultations across Ontario.

OSF is a producer-run organization established in 1985 that represents the province's 3,000 sheep farmers who contribute over \$530 million to Ontario's economy. Ontario is home to the country's largest sheep flock and processes over 50% of the sheep and lambs born in Canada. We believe passionately that sheep farming is an agricultural business sector that contributes to the well-being of our communities and our province and offers unique opportunities to develop new markets, provide needed environmental benefits and grow both our domestic and international markets.

Our organization consulted with our members through a survey on the questions posed in your consultation document and we received 44 responses. Many of the responses are summarized below.

Responses to Consultation Questions:

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

Overall, our reaction to the proposed changes in the discussion paper is positive but more detail is required to fully understand the impact of the changes on sheep farmers. We also appreciate the recognition that veterinary care is delivered using a team-based approach and the formal recognition of Registered Veterinary Technicians in the document.



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While we appreciate the focus on updating the Act, our organization would like to acknowledge that there is no indication that the changes will improve access to veterinary care in rural and remote regions of Ontario.

In our consultation with members, OSF focused mainly on the roles of veterinarians and support staff within the proposed changes outlined in Appendix B.

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

Scope of Practice

We are requesting clarification on the authorized activities: Are veterinarians the *only* ones able to perform these activities, or are there others who can as well?

Page 5 of the discussion paper states: *“this means that only a veterinarian can perform these activities, or in some cases, delegate them to someone (a regulated or unregulated veterinary professional) who is not authorized but is deemed competent by the veterinarian to perform them, as long as the delegation is not prohibited in the legislation or the regulations.”* For clarity, OSF is requesting that the list of activities that cannot be delegated by a veterinarian.

Farmers are requesting a list and guarantee of exemptions for person(s) who are able to provide certain specific activities as part of animal care without veterinary oversight (reference to page 6, last paragraph). *“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, or a person employed for general agricultural or domestic work by the owner of the animal would continue to be able to treat an animal owned by the owner”.* **The regulations must ensure that farmers and others identified continue to retain the ability to perform procedures, under exceptions and exemptions in future regulations.**

Additionally, there are many activities on the farm that do not require the expertise or oversight of a veterinarian and would be done very well by an experienced specialist at a manageable cost in rural and northern Ontario.

Proposed List of Authorized Activities to be Performed by Veterinarians

Today, veterinarians are required to apply or order the application of a form of energy as prescribed by the regulations under this Act. Our members want to ensure that trans-abdominal ultrasound of sheep by non-vets continues to be available and would request that the government consider the option of certified independent pregnancy scanning technicians for small ruminant animals as the cost of a supervising vet or an RVT is prohibitive in some geographic areas.



Our members are requesting that prescription medications be obtained (dispensed and sold) through other means, such as Livestock Medicine Outlets or pharmacies, not just by veterinarians. This ensures competitiveness, and timely access to medicines for farmers in remote or underserved regions of the province.

When it comes to performing a procedure on tissue on or below the dermis, dehorning, castration and tail-docking are all procedures commonly done by non-veterinarians, which would fall under this category. Farmers (and their employees) must retain the ability to perform these procedures, when following appropriate standards of care. We also need to ensure that professionals that specialize in these procedures can continue their work under the regulations without the oversight of a veterinarian.

Language refers to putting an instrument, arm, hand, or finger: beyond the labia majora, beyond the anus or cloaca, or into any other natural or artificial opening into the body. This potentially limits the use of artificial insemination technicians for some sheep farmers and may inadvertently limit the use of fistulated animals for teaching purposes (for example, fistulated cattle at the University of Guelph are used in animal nutrition courses, as well as for research purposes). This also potentially prevents farmers from assisting a ewe during the birthing process.

Farmers must retain the ability to perform euthanasia as long as it is performed under the existing standards of care (i.e. NFACC Codes). It is especially important when considering animal health and welfare, or in the event of an animal health emergency.

Proposed List of Authorized Activities to be Performed by Veterinary Technicians

The practice of placing an esophageal or endotracheal tube is used on farms to administer colostrum in a timely manner as well as medicine. It is important that farmers retain the ability to utilize this animal health tool without the oversight of an RVT.

Testing for Maedi Visna and other diseases in flocks requires blood to be drawn. As the collection and testing of blood is a necessary but already expensive procedure when done on a whole flock, OSF is requesting the ability to draw blood for testing to be added to the list of activities to be performed by an RVT or a producer with the skills and training.

Farmers are not regulated health professionals, but already practice many of these procedures on their farm, following standard codes of practice. It is important that farmers retain the ability to perform these procedures now and through exceptions and exemptions in future regulations.

Oversight and Authority

Ontario Sheep Farmers believes that the process to become a member of the Council of the College, especially those non-vet public-interest appointees, needs to be transparent.



OSF requests that commodity groups are made aware of any changes to those individuals, to ensure that there are no groups with ulterior agendas appointed.

OSF recommends that the Council include an appointee who represents large animal livestock/food production. Our organization offers the government support to find an appropriate individual.

3. Would the proposed changes reduce red tape or contribute to additional opportunities or other impacts for you or your business? Please explain.

Ontario Sheep Farmers commends the government for its efforts in reducing red tape for businesses and its efforts to update the Veterinarians Act and regulations. We hope to ensure that 'scope of practice' changes result in more streamlined care to ensure that producers, including those in underserved areas, receive timely care for their animals.

Our members have shared that the change to limit access to prescription veterinary pharmaceuticals only through a veterinarian has added costly red tape. Our members would like prescription medications to be available (dispensed and sold) through other means, such as Livestock Medicine Outlets or pharmacies, not just by veterinarians.

OSF also supports the streamlining of the veterinary college complaints, investigations, and resolutions process to increase transparency and public trust, and to ensure that complaints can be reviewed and addressed in a timely and efficient manner.

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

Our members would also like to comment on the availability of small ruminant animal veterinary care in Ontario and the crisis point we have reached. By industry estimates, we are short 1,000 veterinarians in rural and northern Ontario. This deficit is continuously growing as large animal veterinarians retire without replacements. Many of our members have vets further than 100 kms away from their farm and in northern Ontario it is even further. Farmers also contact OSF monthly to share the news of clinics closing or ending services for small ruminant clients. There is great concern among our members that emergency care will not be available when it is needed for livestock farmers as a result of the increasing veterinarian shortage and the wide geographic coverage area of most large animal clinics.

The government has announced the addition of 20 new veterinarians per year through a northern school that we hope will focus their career on large animals. The reaction from OSF's members to the addition of this new school in the north and the money announced for graduates that choose to practice in rural Ontario is positive. Here is a quote from one of our members: "this is a positive move to assist with attracting more service providers in these underserved areas."



It is important to increase the number of veterinarians that practice in rural and northern Ontario to avoid overstretched practitioners without support. In addition to the programs the government has announced, OSF proposes an increase to mental health supports for veterinarians as there is a very high suicide rate in the profession.

We also think it is important to increase the number of small ruminant specialists in Ontario. Our members have shared that even though they have a large animal vet, that vet predominantly serves cattle farms and does not have small ruminant expertise.

Additional suggestions from our members to address the veterinary shortages and other issues related to veterinary care include:

- prioritizing farm or large animal experience and a desire to return to practice in rural Ontario for entrance to the Veterinary College;
- delegating even more tasks to RVT's;
- grants to expand virtual medicine options;
- increased access to laboratory services to reduce the costs of testing; and
- making it easier for foreign trained veterinarians to practice in Canada.

On behalf of Ontario's sheep farmers, thank you again for the opportunity to participate in this important consultation.

Sincerely,



John Hemsted
Chair, Ontario Sheep Farmers

