



April 16, 2025

Ms. Catherine Knipe  
Chair, Transition Council  
College of Veterinarians of Ontario

Dear Catherine,

**Re: Ontario Sheep Farmers contribution to the regulatory concept discussion**

Ontario Sheep Farmers (OSF) appreciates the opportunity to participate in this consultation.

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.

This submission is based both on the results of our consultation with members in 2023 when the Act was under review, and the organization's review of the proposed regulation documents from CVO.

Overall, our organization does not have direct issues with the high-level regulatory language that has been shared but more detail is required to fully understand the impact of the future regulations 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 your documents.

Ontario Sheep Farmers would also like to thank the College and the Ministry again for the inclusion of pregnancy ultrasound for sheep in list of activities exempted from the authorized activities under the Act.



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As the regulations are further developed, there are points Ontario Sheep Farmers will be looking to be addressed:

#### Authorized Activity Model

- Overall, the largest concerns our members have are the cost of and access to veterinary care. OSF supports the non-delegable activities listed in the proposal. Our members encourage the college to actively encourage veterinarians to fully utilize veterinary technicians on their teams to address the ongoing issues of cost and access to veterinary care in rural and remote communities. OSF recommends that delegable activities routinely used in sheep production continue to be assessed and updated using a risk-based model to ensure safe, effective, and timely care for animals.
- OSF likes the concept of Initiation proposed in the regulations and encourages the college to consider all possible farm emergencies under which a veterinary technician may be required to act to save the life of an animal when developing the list of authorized activities. In the case of farm animals, there are life saving activities not currently listed and, in some rural and remote regions, a veterinary technician may be geographically closer than the veterinarian in an emergency. Given limited veterinary access in many rural areas, OSF believes flexible regulations are essential to support timely, appropriate care from trained, competent individuals.

#### Regulatory Exemptions for Non-Members

- Ontario Sheep Farmers is supportive of the recommendation to allow pharmacists to compound, dispense and sell veterinary pharmaceuticals based on a veterinary prescription. OSF requests that regulations not prescribe delivery procedures to allow for flexibility and cost management.
- OSF is concerned that the requirements for persons providing Animal Rehabilitation services to receive instruction and training may increase already high Animal Welfare Services (AWS) rehabilitation costs or reduce the number of sites available to AWS for housing livestock if they are seized. A vet will already have been assigned to directly care for livestock under AWS, so training requirements may increase costs with no clear enhancement of animal care.

#### Quality-Team Based Care

- OSF recognizes the importance of a veterinarian-client-patient relationship. We request that the regulations acknowledge that farmers in rural and remote communities may not have regular contact with their veterinarian. We request that the regulations remain open to all definitions of a relationship and request that the lack of a veterinarian-client-patient relationship not inhibit treatment, at least in the short term, before a relationship can be established or re-established.



### Committee and Panel Composition

- OSF supports the Council of the CVPO's intent to increase the number of public voices at the table and encourages the appointment of agricultural leaders from commodity organizations and general farm organizations to represent large animal farmers.
- Ontario Sheep Farmers believes that the process to become a member of the Council, 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.

### General Comments

- Ontario Sheep Farmers is 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. **The regulations must ensure that farmers and others identified continue to retain the ability to perform procedures, under exceptions and exemptions in future regulations.**
- 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.
- 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.
- 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.



Thank you for the opportunity to comment on the regulatory recommendations proposed by the Transition Council.

Although we are discussing the regulations, we would be remiss if we did not mention our members' largest concern – the availability of small ruminant veterinarians in Ontario. There is a serious shortage of large animal veterinarians in rural and northern Ontario and the 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.

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.

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

Sincerely,

A handwritten signature in dark ink, appearing to read 'Art Alblas', with a stylized, flowing script.

Art Alblas  
Chair, Ontario Sheep Farmers

