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Consultation on Proposed By-law

Final Report

Prepared for the Transition Council of the College of Veterinary Professionals of Ontario



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Introduction

With the new changes to legislation under the Veterinarians Act in Ontario, the Transition Council of the College of Veterinary Professionals of Ontario (**CVPO**) recently prepared new regulatory concepts for the Ontario Ministry of Agriculture, Food and Agribusiness to facilitate their preparation of regulations.

With the changes to the legislative framework and upcoming regulations, creation of new by-laws was necessary. The by-laws are fundamental rules that outline how the Council and its membership can respond to circumstances. It is important that they reflect the principles of the College and expectations of their membership as well as the public.

In early 2026, the Transition Council launched a public consultation to gather feedback on the proposed by-law articles. This consultation primarily took the form of a survey, supplemented by six written submissions from partners. This consultation aimed to communicate the proposed by-laws and collect feedback on how they align with the needs and expectations of partners.

This report provides an overview of the feedback received during the consultation period. It highlights areas of support and disagreement, and feedback from the written responses and letter submissions. Through this collaborative process, the Transition Council aims to ensure the new by-laws serve the College and consider the expectations of the profession and public.



Methods

Positionality

The analysis of survey data and the drafting of the present report that describes the synthesis of results was produced by ACER Consulting. As a multidisciplinary organization working at the intersection of agricultural research, epidemiology, and science communication, ACER Consulting engages closely with the veterinary sector but operates independently of it. We do not provide veterinary services, nor are we governed by veterinary regulatory frameworks. Our insights are informed by evidence-based research and field-level engagement in agriculture and animal health, yet our operations are not directly impacted by changes to veterinary regulation. This positions us to offer impartial and informed contributions to this consultation.

Survey Development

A survey collecting feedback on the proposed regulatory concepts was conducted from January 19th to March 23rd, 2026. An online questionnaire was developed using Qualtrics and made publicly available via www.cvo.org. The survey communicated the proposed by-laws and solicited Likert scale and open-ended responses to each article. Respondents were able to navigate to the articles they wished to provide feedback on from a central table of contents or advance through the survey page by page.

This 52-question survey (**Appendix A**) asked respondents to provide details on their relationship to veterinary medicine (e.g. veterinarian, veterinary technician, member of the public, etc.), their level of support for each article (using a 5-point Likert scale; from strongly agree to strongly disagree), and open-ended questions about the by-laws. None of the questions were mandatory to progress in the survey.

Other Feedback

Additional feedback was received in the form of letters from partner organizations and individuals. Partner organizations representing their members' interests submitted letters offering their feedback and responses to the proposed concepts. All partner letters received were reviewed and summarized to provide context and basic descriptions of the concerns and overall stance of each partner or individual. The specific letters received are enclosed in **Appendix B** of this report.

Analysis

Raw data was exported from Qualtrics as a .xlsx file and imported into Microsoft Excel for manual cleaning and analysis. Open-text, long-form answer responses were reviewed and summarized. A total of 545 responses were received. This includes complete responses that fully submitted the survey as well as responses that were incomplete at the time of the survey closure. However, 397 respondents did not

complete any question in the survey beyond the demographic question, and were removed as a result. The final dataset contained responses from 148 survey participants.

Limitations

It is important to acknowledge that, as participation in the survey was voluntary, the findings may not fully represent the views of all individuals within a given profession or group. However, this limitation does not undermine the overall value of the findings. The consultation incorporated inclusive design elements, and additional sources of input, such as letters submitted on behalf of key groups, to ensure a breadth of perspectives was captured.



Demographics

Respondents were only asked to answer one non-mandatory demographic question regarding their relationship to veterinary medicine (e.g. a member of the profession, member of the public, etc.), the results of which are presented in the table below

Relationship to Veterinary Medicine (n = 148)	Respondents# (%)
Veterinarian	84 (57%)
Registered Veterinary Technician (RVT)	50 (34%)
Member of the Veterinary Team (e.g. Veterinary Assistant, Practice Manager)	2 (1%)
Member of the Public	7 (5%)
Other (Please Specify) <i>Retired RVT</i> <i>RVT and DVM Student</i> <i>RVT and Veterinary Student</i> <i>Small Animal Hospital Manager/RVT</i> <i>Veterinary Technician Limited Membership</i>	5 (3%)

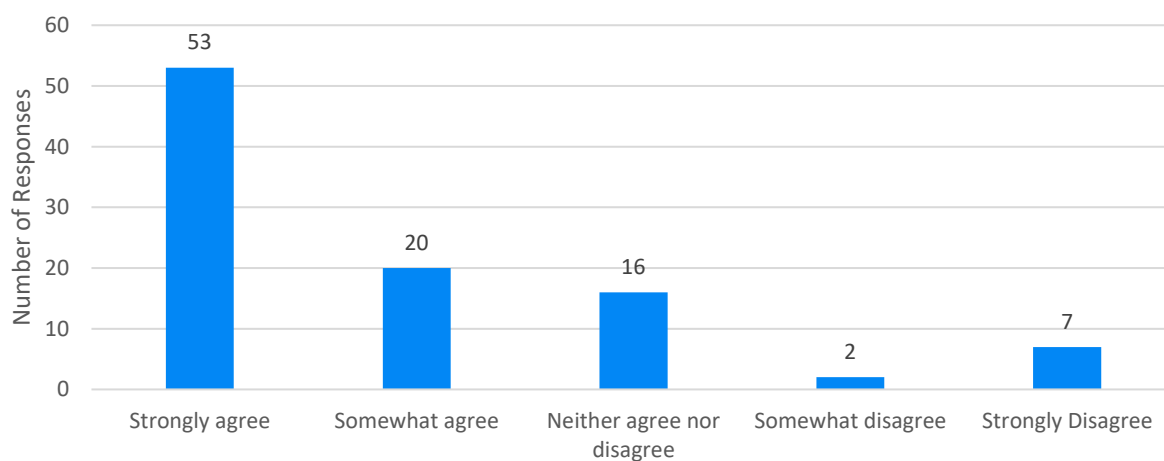


Survey Responses

Article 1 – Definitions and Interpretations

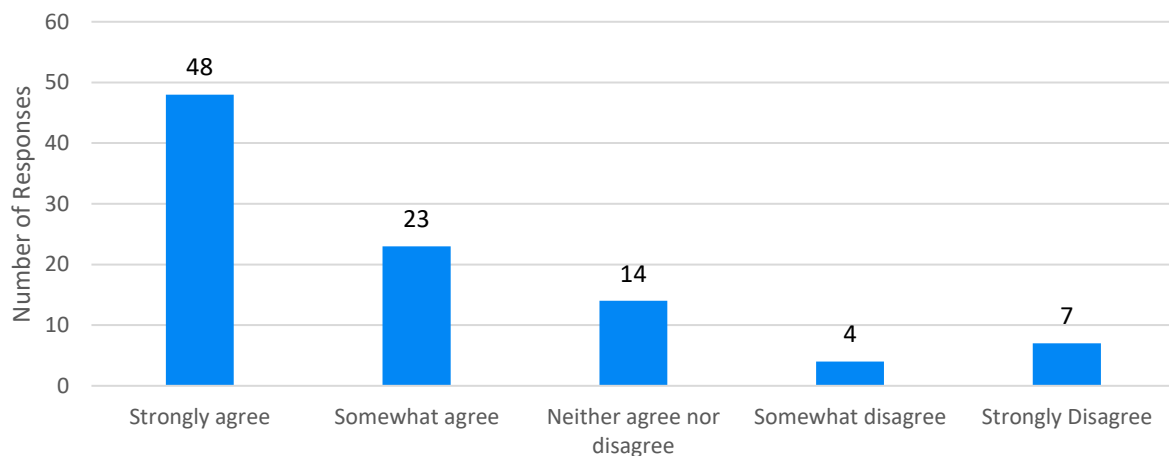
Agreement with Proposed By-Law Article

Survey respondents were asked to indicate their agreement with two statements about Article 1 – Definitions and Interpretations on a Likert scale of responses from “Strongly agree” to “Strongly disagree”. The figure below presents the results of 98 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 74% (73/98) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 96 responses to the statement *“I support the proposed by-law as written”*.



Approximately 74% (71/96) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

Long Answer Responses

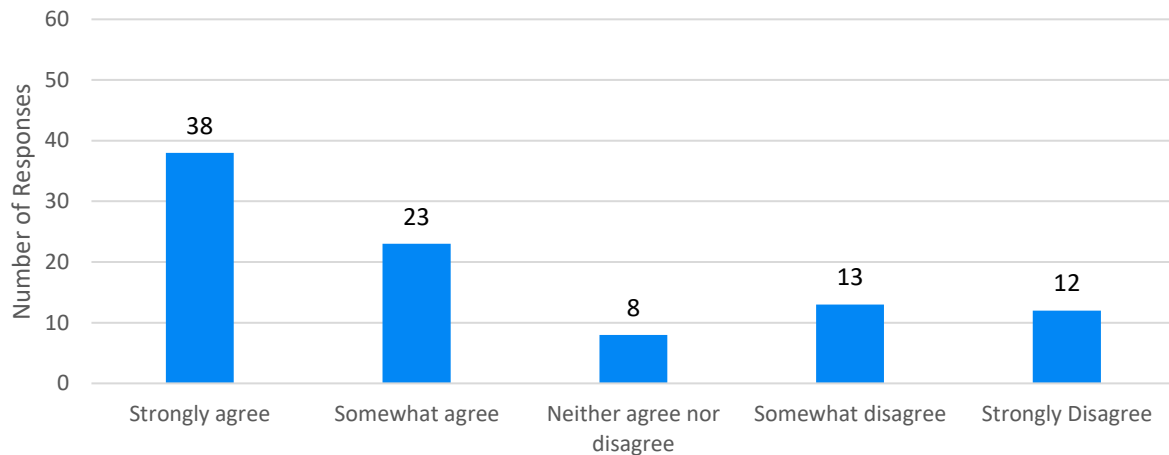
A total of 13 comments were received. Comments called for more inclusive terminology, specifically requesting that "Veterinarian member" be expanded to "Veterinarian member and/or Veterinary Technician member" throughout the by-laws. Several comments noted that key terms such as "Academic Council Member," "Professional Association," "appointed person," and "practice of veterinary medicine" are either too broadly or too vaguely defined, creating risks of inconsistent interpretation and reduced transparency. Respondents also questioned why terms like "public member" and "register/registry" were changed or removed and suggested that greater definitional clarity would improve consistency and fairness in application.

Article 2 - Council

Agreement with Proposed By-Law Article

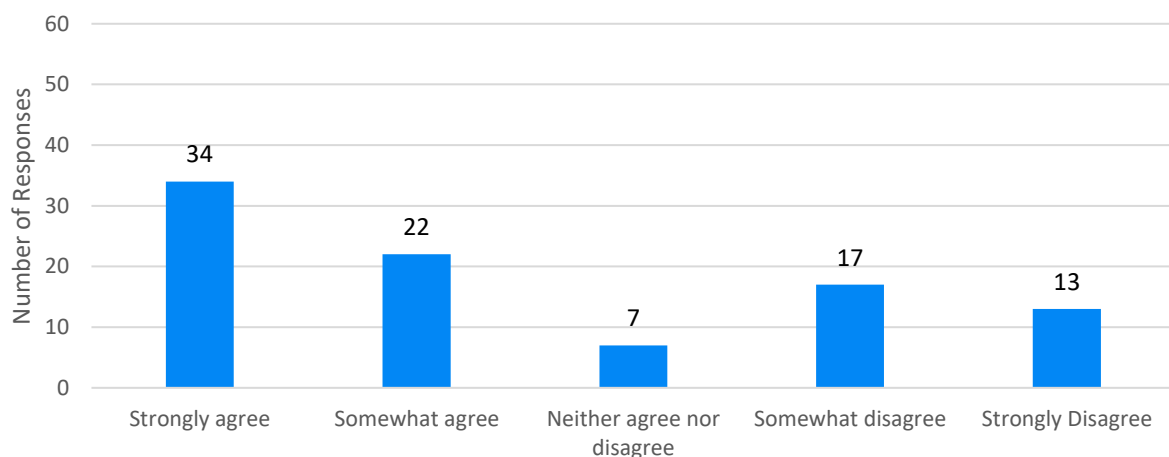
Survey respondents were asked to indicate their agreement with two statements about Article 2 - Council on a Likert scale of responses from "Strongly agree" to "Strongly disagree".

The figure below presents the results of 94 responses to the statement *“The proposed by-law article is appropriate”*.



Approximately 65% (61/94) of respondents were in agreement (somewhat agree/strongly agree) that the proposed article is appropriate.

The figure below presents the results of 93 responses to the statement *“I support the proposed by-law article as written.”*.



Approximately 71% (66/93) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

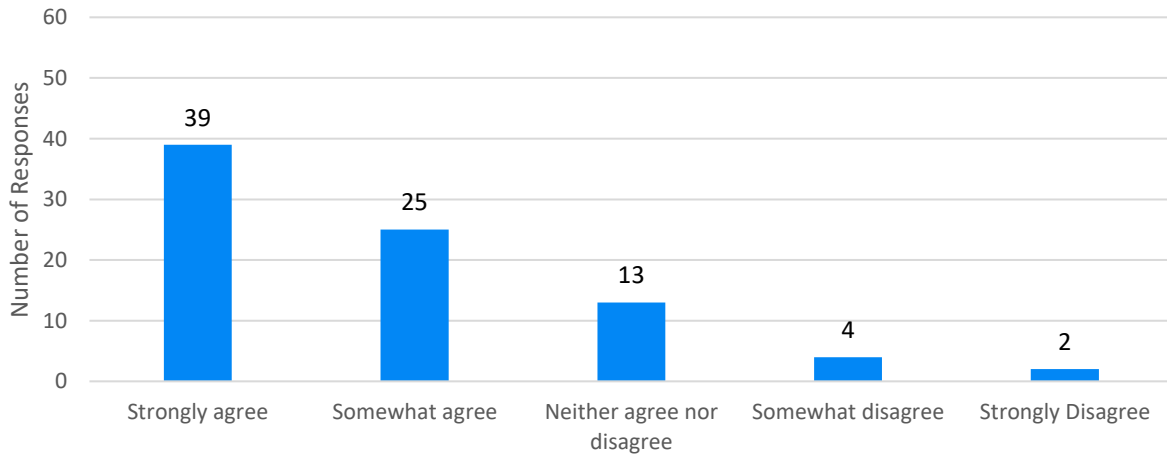
Long Answer Responses

A total of 37 comments were received. Respondents expressed concerns about the composition, size, and accountability of the Council. Some respondents questioned the fairness and transparency of how public and appointed members are selected. There were repeated calls for stronger geographic and demographic representation, and clearer term limits and conflict-of-interest rules. Better inclusion of veterinary technicians was widely called for with many responses specifically calling for additional RVT seats to be added to bring their representation closer to or in line with veterinarians.

Article 3 – Officers of Council

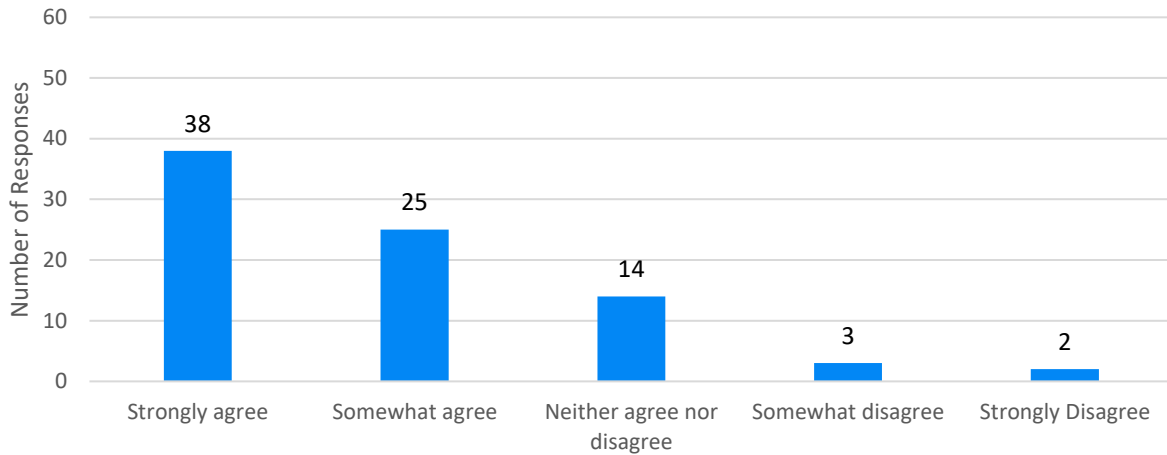
Agreement with Proposed By-Law Article

Survey respondents were asked to indicate their agreement with two statements about Article 3 – Officers of Council on a Likert scale of responses from “Strongly agree” to “Strongly disagree”. The figure below presents the results of 83 responses to the statement *“The proposed by-law article is appropriate”*.



Approximately 77% (64/83) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 82 responses to the statement *“I support the proposed by-law as written”*.



Approximately 77% (63/82) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

Long Answer Responses

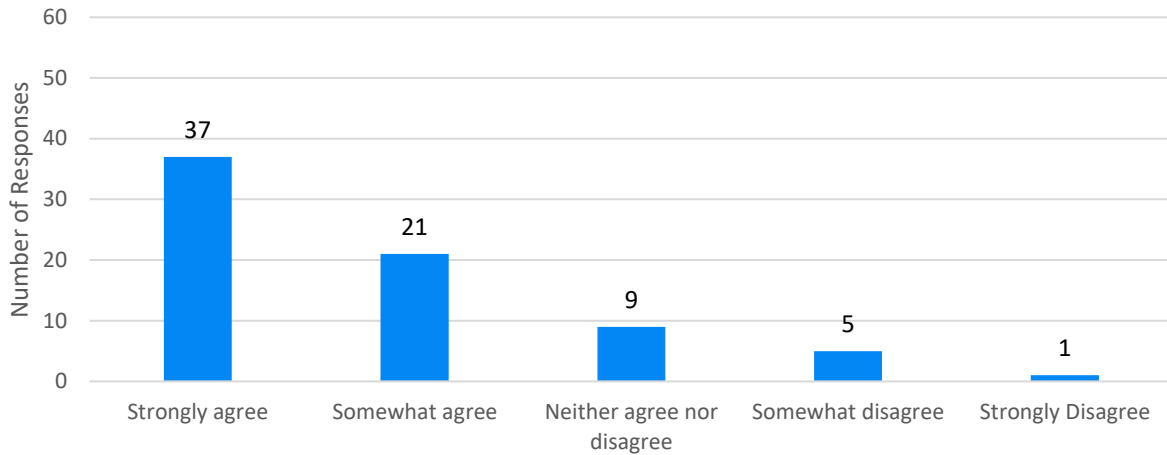
A total of 12 comments were received. Responses called for additional transparency and accountability safeguards in the selection of officers. Some comments noted confusion over who is allowed to vote for Chair or Vice-Chair positions. Finally, some comments noted disagreement with the term length, and lack of requirement that the Chair be member of the College.

Article 4 – Meetings of Council

Agreement with Proposed By-Law Article

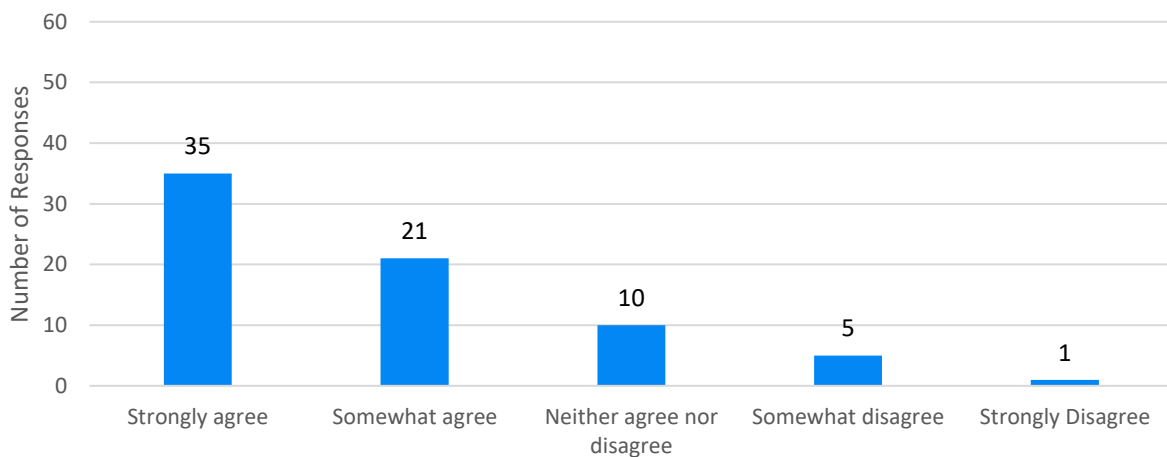
Survey respondents were asked to indicate their agreement with two statements about Article 4 – Meetings of Council on a Likert scale of responses from “Strongly agree” to “Strongly disagree”.

The figure below presents the results of 73 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 79% (58/73) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 72 responses to the statement *“I support the proposed by-law as written”*.



Approximately 78% (56/72) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

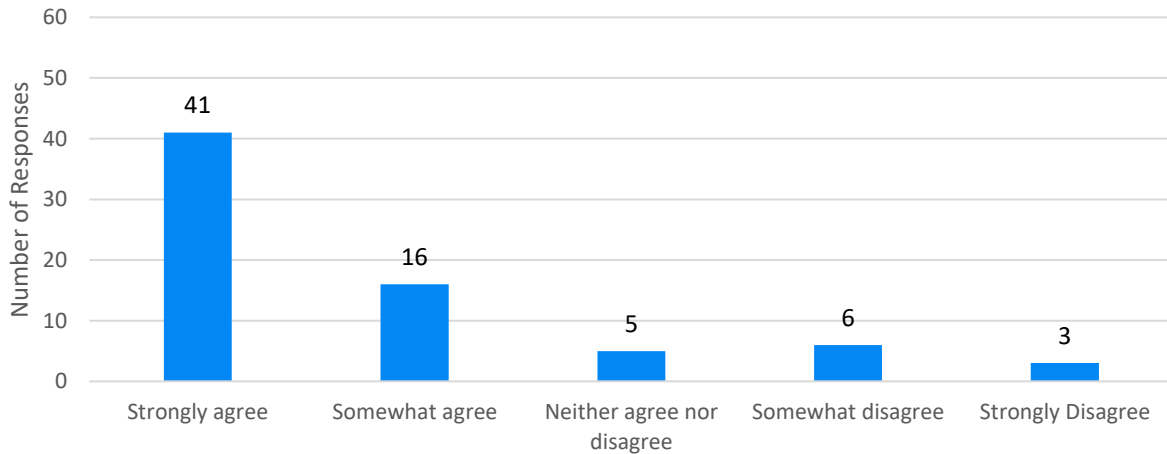
Long Answer Responses

A total of 10 comments were received. Respondents broadly called for greater transparency, accessibility, and public participation in Council meetings. Concerns included the adequacy of notice periods (with some feeling 14 days is insufficient), the ease with which notice requirements can be waived, and the broad discretion allowed for closing meetings to the public. Several respondents advocated for live-streaming or recording of meetings, earlier publication of agendas and minutes, and expanded opportunities for public input. There was also a call for closing meetings to the public and requiring registration for attendance.

Article 5 – Council and Committee Member Code of Conduct

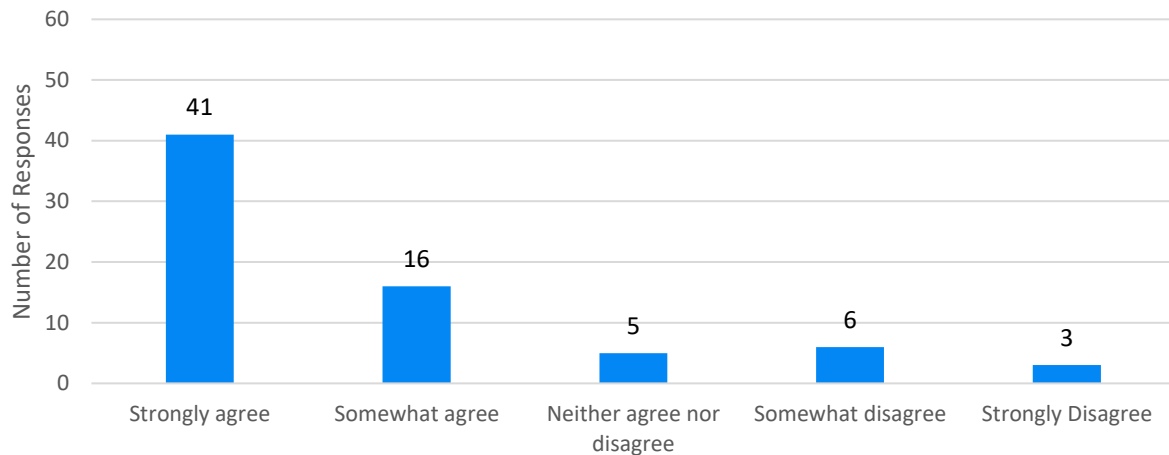
Agreement with Proposed Concepts

Survey respondents were asked to indicate their agreement with two statements about Article 5 – Council and Committee Member Code of Conduct on a Likert scale of responses from “Strongly agree” to “Strongly disagree”. The figure below presents the results of 71 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 80% (57/71) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 71 responses to the statement “*I support the proposed by-law as written*”.



Approximately 80% (57/71) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

Long Answer Responses

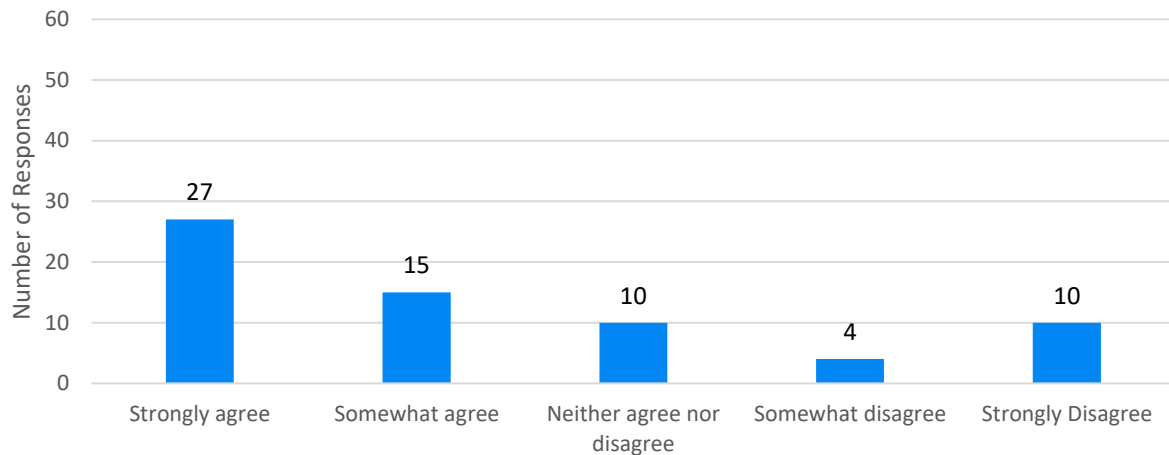
A total of 12 comments were received. A reoccurring theme in responses was the need to reinforce the commitment to public trust. Some responses noted the need to limit the scope of the article directly to conflicts so as not to suppress participation and expression of advocacy, commentary, and association. Ensuring proper notice of meetings is reinforced as a necessity for transparency. Independent and regular monitoring was called for to ensure accountability. Finally, step back thresholds were noted to be low, potentially silencing needed perspectives.

Article 6 - Committees

Agreement with Proposed By-Law Article

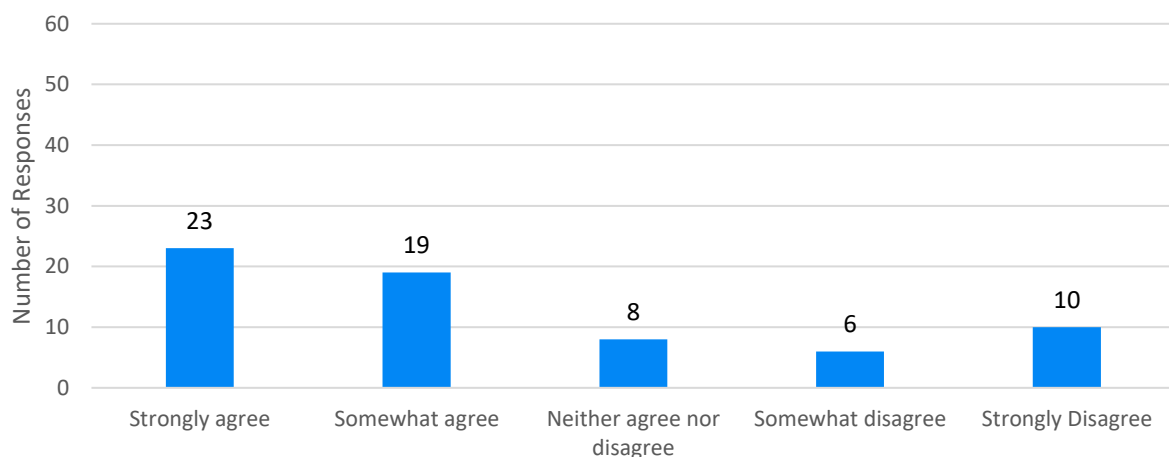
Survey respondents were asked to indicate their agreement with two statements about Article 3 – Committees on a Likert scale of responses from “Strongly agree” to “Strongly disagree”.

The figure below presents the results of 66 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 64% (42/66) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 66 responses to the statement *“I support the proposed by-law as written”*.



Approximately 64% (42/66) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

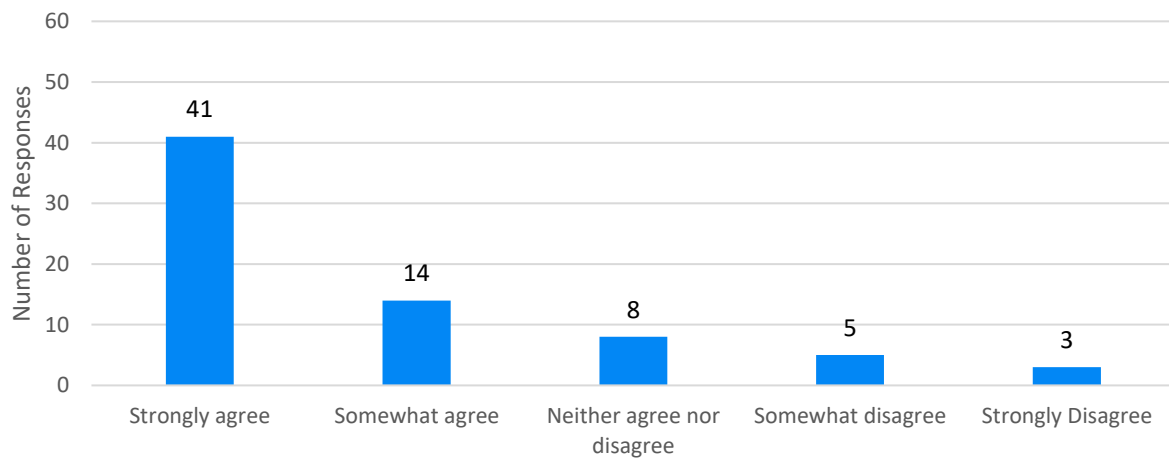
Long Answer Responses

A total of 22 comments were received. Several comments voiced that committees should have more veterinarian and veterinary technician members than members of the public and some calling for equal seats for veterinarians and veterinary technicians. Some comments noted the quorum number was low at 3 and recommended higher. Several comments noted that the override clause during transition was quite broad with no limits, oversight, or duration noted.

Article 7 – Conflict of Interest

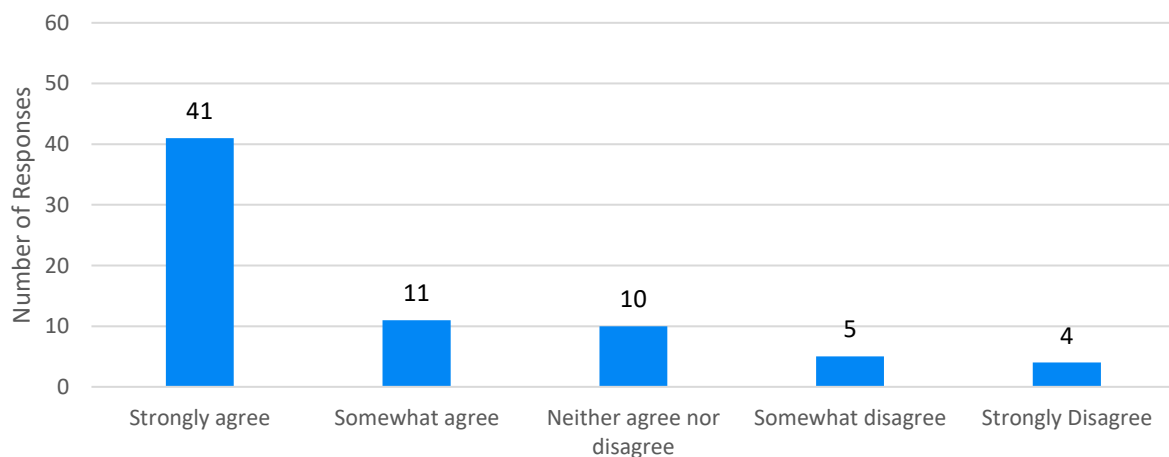
Agreement with Proposed By-Law Article

Survey respondents were asked to indicate their agreement with two statements about Article 7 – Conflict of Interest on a Likert scale of responses from “Strongly agree” to “Strongly disagree”. The figure below presents the results of 71 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 77% (55/71) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 71 responses to the statement “*I support the proposed by-law as written*”.



Approximately 73% (52/71) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

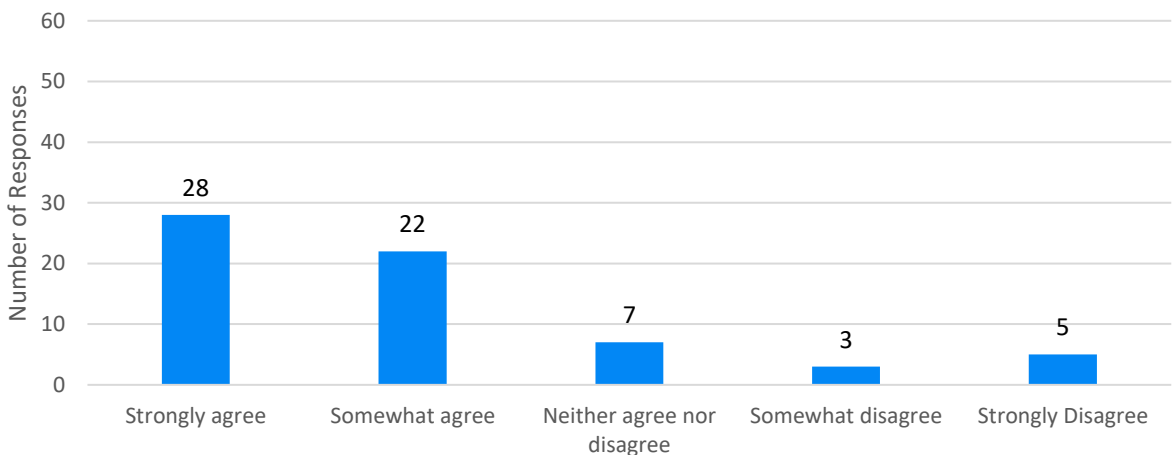
Long Answer Responses

A total of 9 comments were received. Some comments noted that greater clarity on thresholds of conflict were important both to avoid indirect influence and to ensure fairness and consistency when it comes to perceived and indirect conflicts. Some comments noted that exclusions would limit the experienced and needed perspectives.

Article 8 – Remuneration and Indemnification for Council and College Business

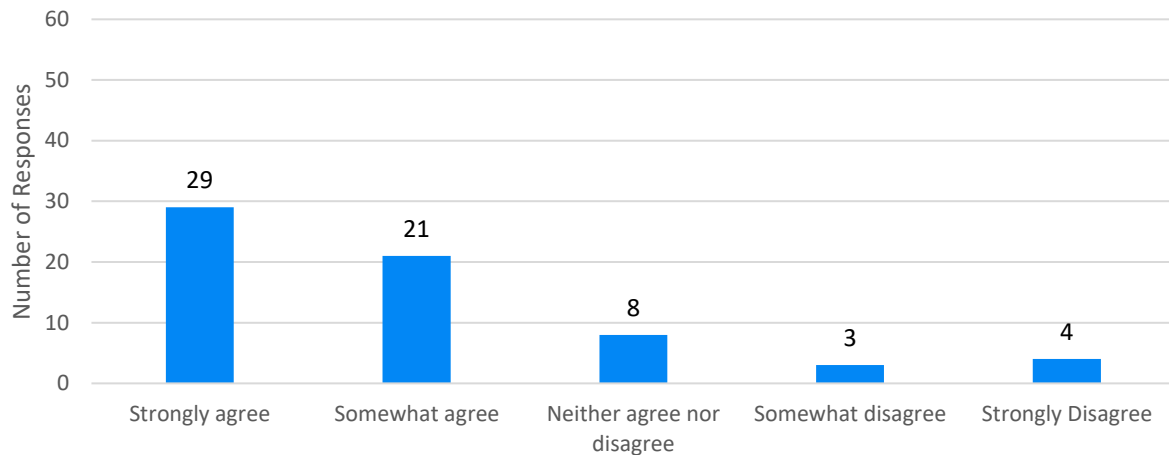
Agreement with Proposed By-Law Article

Survey respondents were asked to indicate their agreement with two statements about Article 8 – Remuneration and Indemnification for Council and College Business on a Likert scale of responses from “Strongly agree” to “Strongly disagree”. The figure below presents the results of 65 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 77% (50/65) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 65 responses to the statement “*I support the proposed by-law as written*”.



Approximately 77% (50/65) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

Long Answer Responses

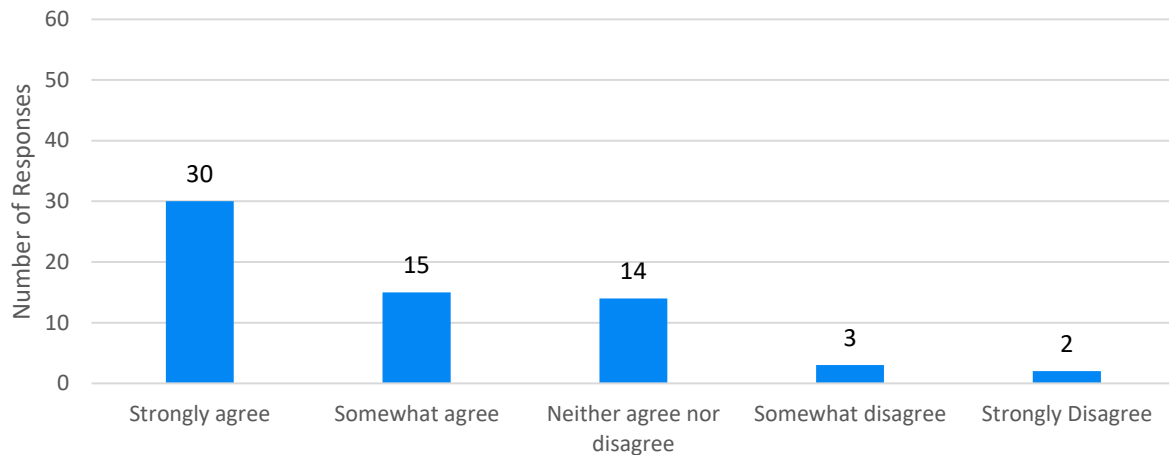
A total of 7 comments were received. Comments called for greater clarity for the phrase “willful neglect and default”, this phrase appears in the by-law in the context of exceptions to the indemnification bylaw. Comments also requested transparency about amounts paid out for remuneration or indemnities, and limits or oversight for indemnification. Some comments voiced disagreement about funds going to members of the public and appointed persons and about council determining their own remuneration policy.

Article 9 – Banking, Finance, and Administration

Agreement with Proposed By-Law Article

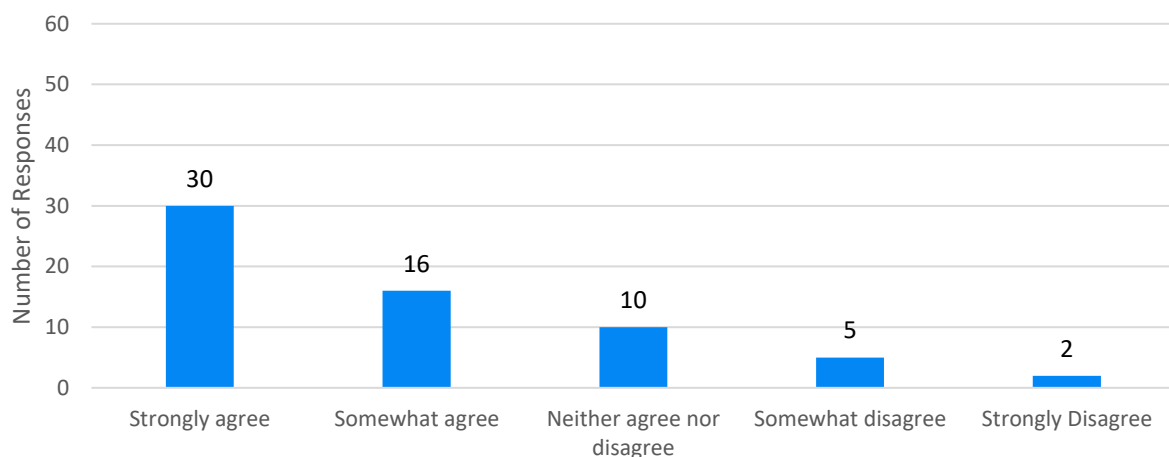
Survey respondents were asked to indicate their agreement with two statements about Article 9 – Banking, Finance, and Administration on a Likert scale of responses from “Strongly agree” to “Strongly disagree”.

The figure below presents the results of 64 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 70% (45/64) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 63 responses to the statement *“I support the proposed by-law as written”*.



Approximately 73% (46/63) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

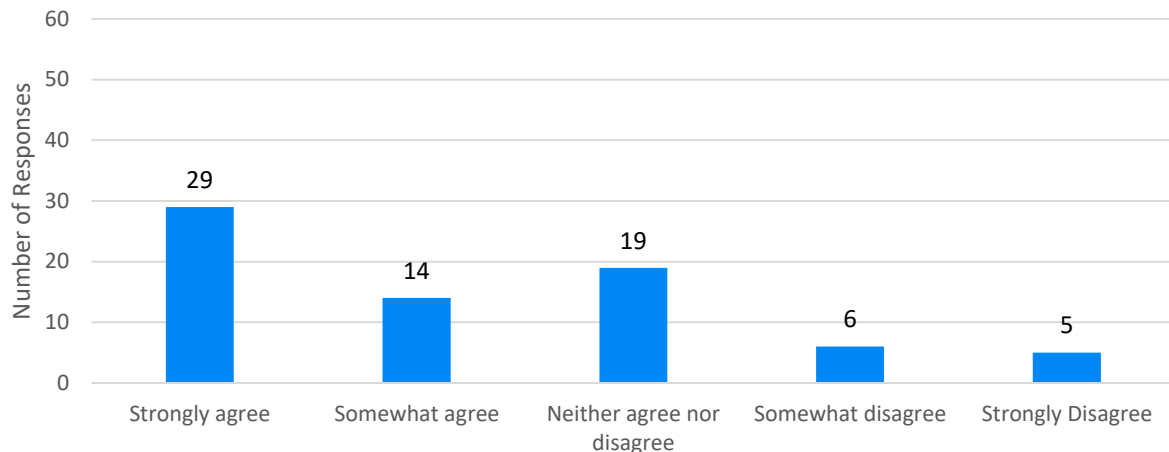
Long Answer Responses

A total of 7 comments were received. Comments broadly called for greater review and oversight to ensure accountability and transparency. There were several calls for better transparency through regular publication of statements / reporting, as well as the release of auditor findings. Some comments also noted that borrowing limits or a requirement for two authorized signatories on large purchases would reduce risk. Two comments noted the lack of provision for extraordinary or emergency decisions.

Article 10 – The Registrar

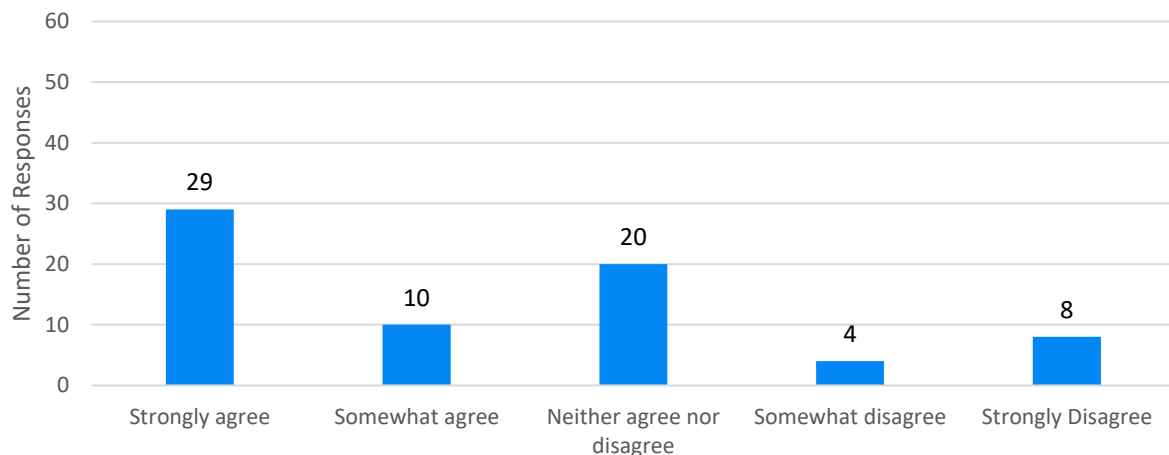
Agreement with Proposed By-Law Article

Survey respondents were asked to indicate their agreement with two statements about Article 10 – The Registrar on a Likert scale of responses from “Strongly agree” to “Strongly disagree”. The figure below presents the results of 73 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 59% (43/73) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 71 responses to the statement “*I support the proposed by-law as written*”.



Approximately 55% (39/71) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

Long Answer Responses

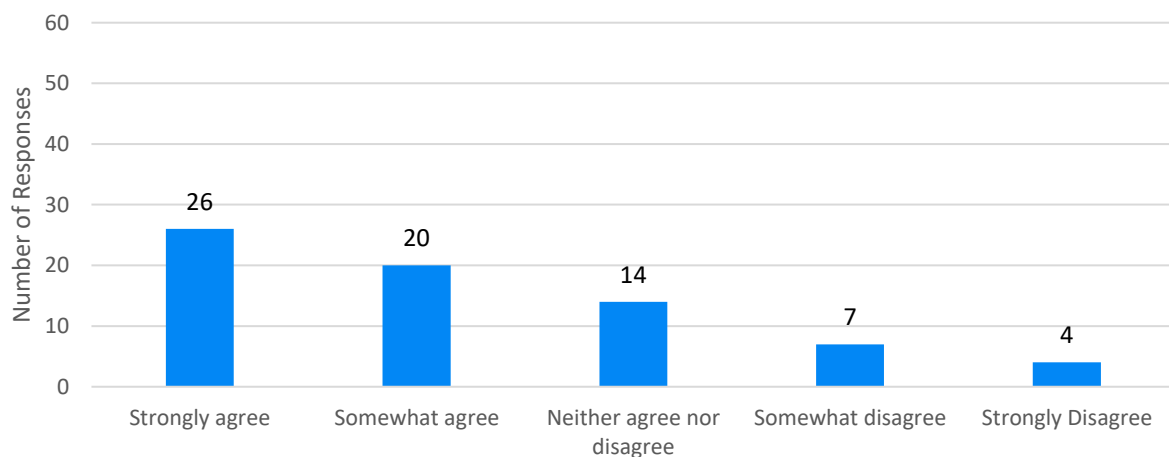
A total of 16 comments were received. Respondents broadly acknowledged that the draft by-laws represent an improvement in administrative clarity and internal structure, but expressed serious and

recurring concerns about the concentration of authority in the Registrar/CEO position without adequate independent oversight, removal provisions, or transparency mechanisms. Some noted that the by-law does not clearly lay out obligations to act quickly to address high-risk complaints and that absence of mandatory deadlines for investigations leaves the public exposed while practitioners continue to practice without restriction. Conflict-of-interest provisions also were criticized as relying too heavily on self-disclosure and internal management. Several respondents called for public input into Registrar appointments, and a requirement that the Registrar be a licensed veterinarian or veterinary technician.

Article 11 – Member Information to be Provided to the College

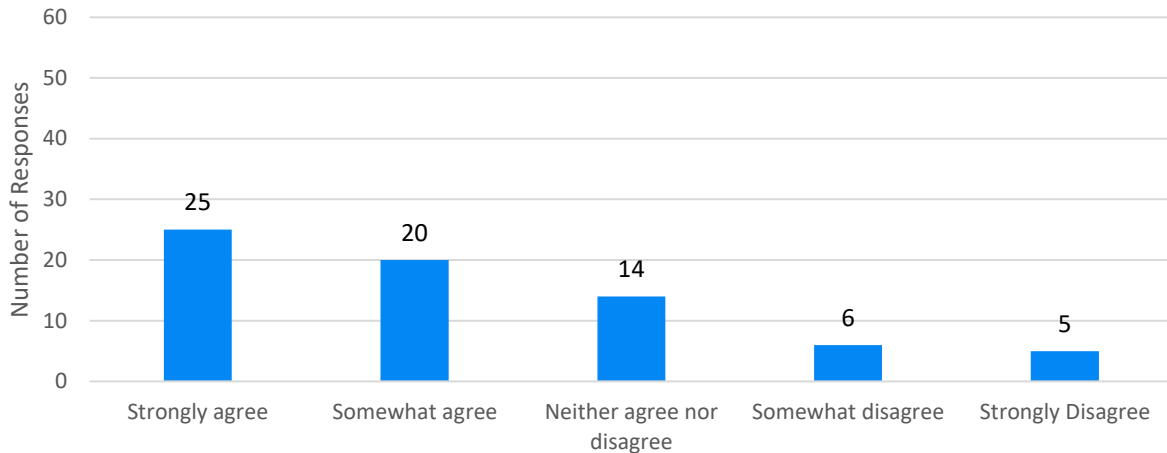
Agreement with Proposed By-Law Article

Survey respondents were asked to indicate their agreement with two statements about Article 11 – Member Information to be Provided to the College on a Likert scale of responses from “Strongly agree” to “Strongly disagree”. The figure below presents the results of 71 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 65% (46/71) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 70 responses to the statement “*I support the proposed by-law as written*”.



Approximately 64% (45/70) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

Long Answer Responses

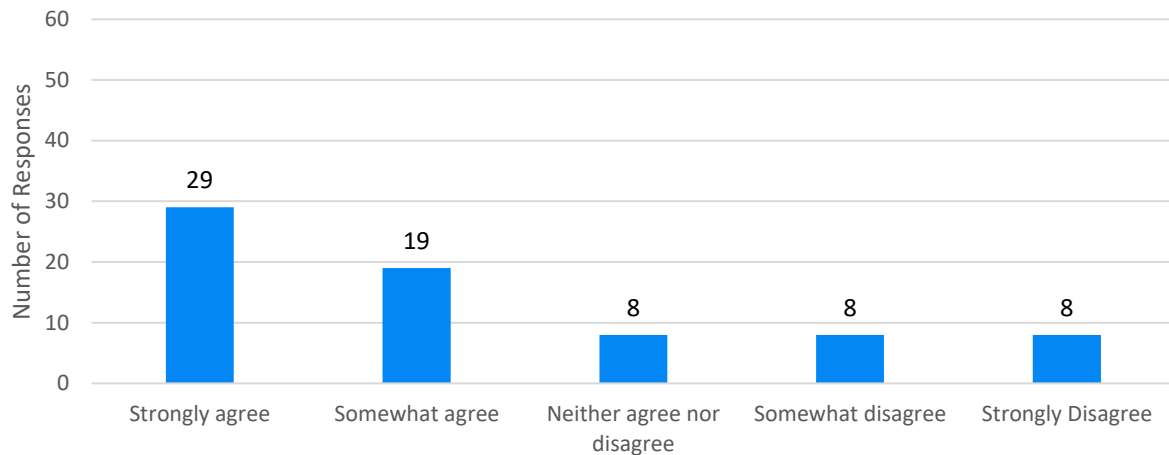
A total of 16 comments were received. Comments voiced disagreement about what information should be disclosed or made public, particularly information related to physical and mental conditions, disclosure of pending allegations that are not yet proven, and home address. Other comments mentioned the burden of updating this information was too high, especially in the case of locums who may work in multiple places in a short timeframe. Additionally, the rapid response provision of 5 days was flagged as potentially being difficult to meet. Place of practice definition was noted to be broad, furthering the potential for administrative burden. Some comments also noted the reliance on self-disclosure and the potential need for oversight. Finally, some comments noted a lack of clarity on insurance coverage as an individual versus coverage under a group policy.

Article 12 - Register

Agreement with Proposed By-Law Article

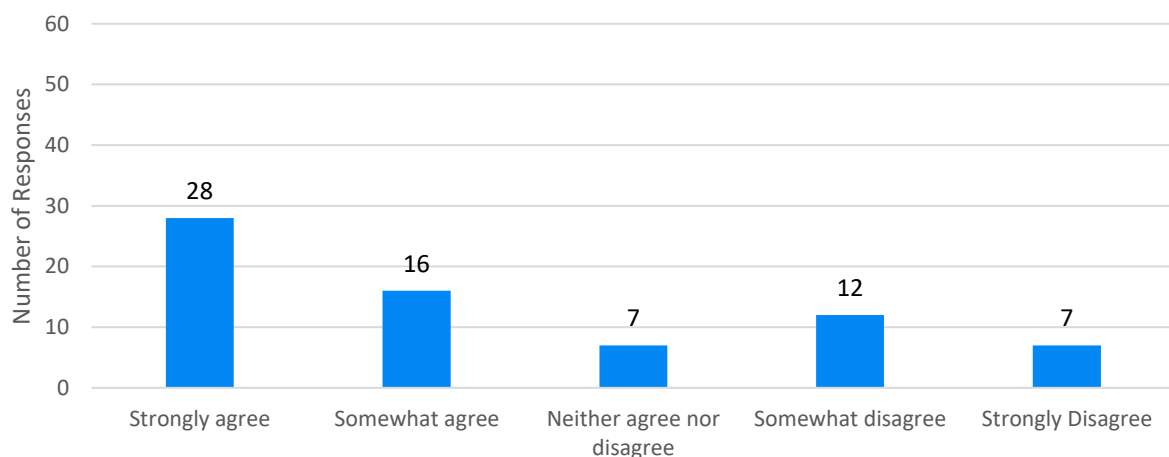
Survey respondents were asked to indicate their agreement with two statements about Article 12 – Register on a Likert scale of responses from “Strongly agree” to “Strongly disagree”.

The figure below presents the results of 72 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 67% (48/72) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 70 responses to the statement *“I support the proposed by-law as written”*.



Approximately 63% (44/70) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

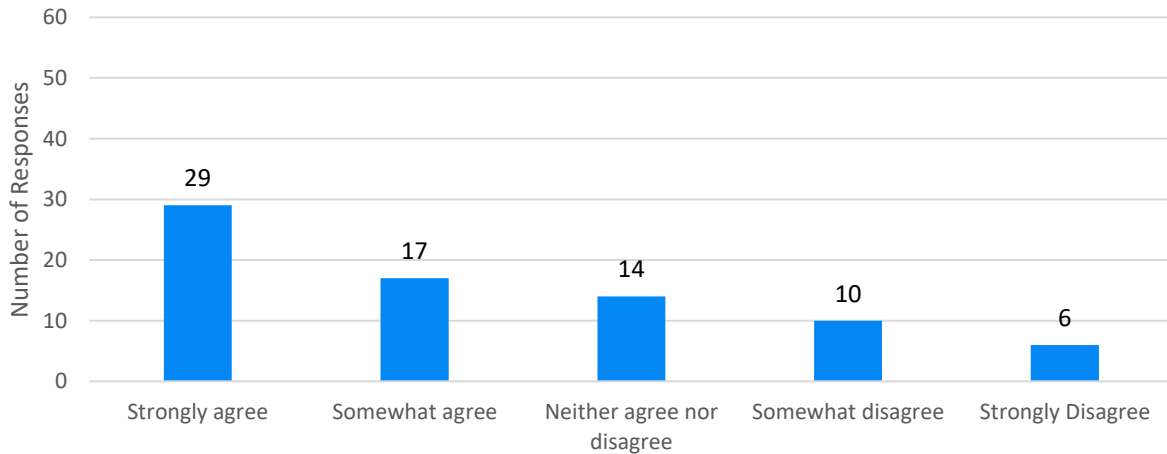
Long Answer Responses

A total of 23 comments were received. Responses disagreed with the publication of license numbers in the register citing concerns of prescription fraud. The publication of information on charges, reprimands, and complaints that are unproven or under appeal was seen as unduly punitive before official adjudication. The requirement to publicly disclose all past names was also seen as unnecessary and potentially harmful to members who have sought legal name changes for gender transition and domestic abuse.

Article 13 – Professional Liability Insurance

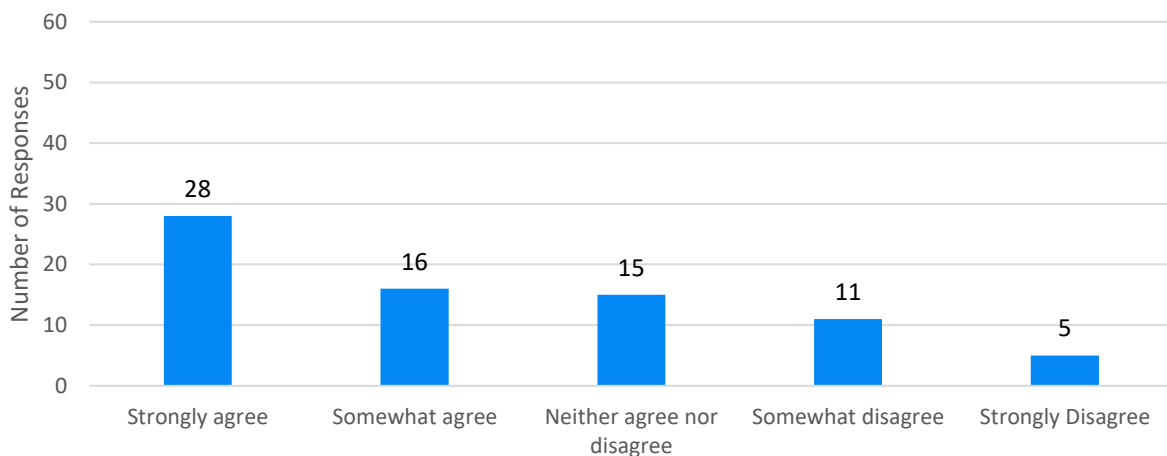
Agreement with Proposed By-Law Article

Survey respondents were asked to indicate their agreement with two statements about Article 13 – Professional Liability Insurance on a Likert scale of responses from “Strongly agree” to “Strongly disagree”. The figure below presents the results of 76 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 61% (46/76) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 75 responses to the statement “*I support the proposed by-law as written*”.



Approximately 59% (44/75) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

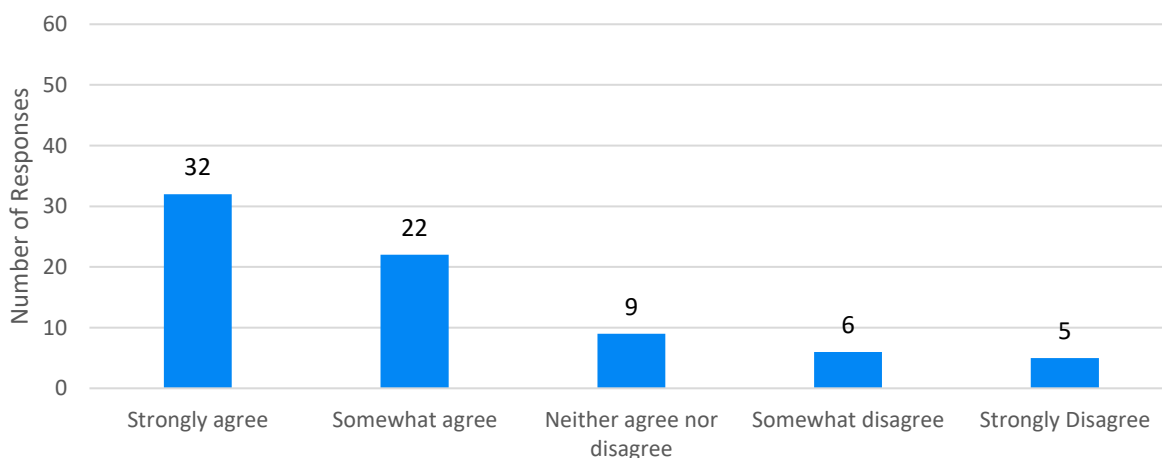
Long Answer Responses

A total of 26 comments were received. Several comments questioned whether the insurance requirement applies to RVTs and flagged that this required clarification and communication. Some comments also requested clarity regarding whether group policies covering veterinarians under a clinic remains compliant or if the policy must be for individual practitioners. Several respondents felt the cost of liability insurance is a financial burden, especially for RVTs, locums, part-time workers, and those early in their careers. There were also questions about who enforces the requirement, how the College polices compliance, and what constitutes "satisfactory proof" of coverage. The two-year post-retirement tail coverage requirement was questioned, with some noting there is no equivalent complaint period after retirement currently defined. Respondents also questioned how the minimum coverage standard was determined and whether that amount is realistic, adequate, and affordable.

Article 14 - Fees

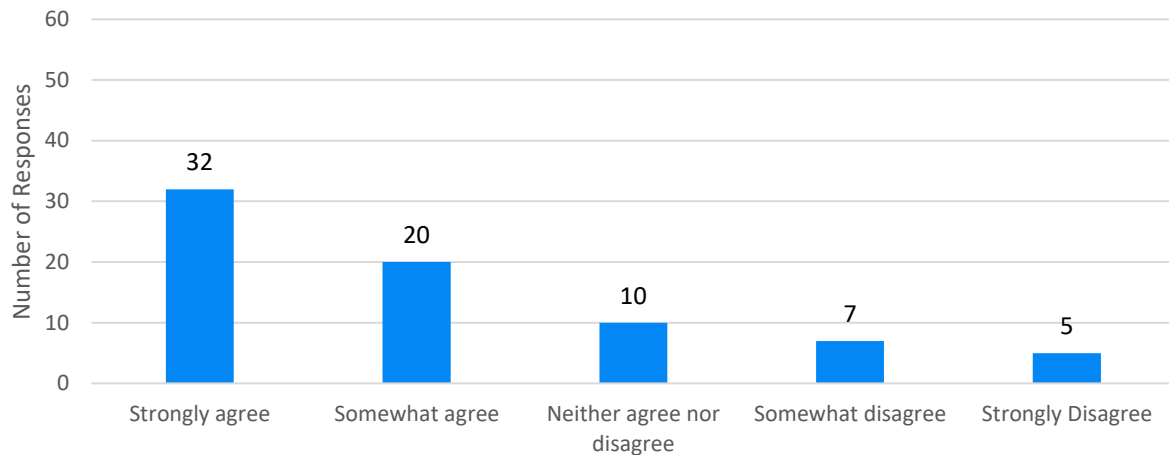
Agreement with Proposed By-Law Article

Survey respondents were asked to indicate their agreement with two statements about Article 14 – Fees on a Likert scale of responses from “Strongly agree” to “Strongly disagree”. The figure below presents the results of 74 responses to the statement *“The proposed by-law article is appropriate”*.



Approximately 73% (54/74) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 74 responses to the statement *“I support the proposed by-law as written”*.



Approximately 70% (52/74) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

Long Answer Responses

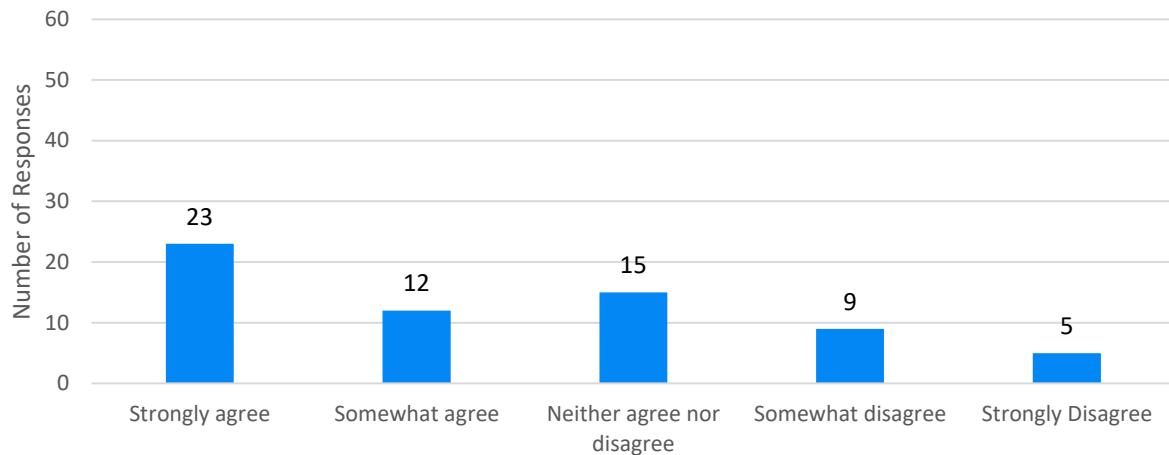
A total of 19 comments were received. Respondents expressed concern about the concentration of fee-setting authority in the Registrar, with many objecting to the lack of member consultation, Council approval, or transparency around how fees are determined and spent. Several respondents questioned whether fee increases reflect regulatory necessity and requested additional financial transparency. Other concerns were also raised, including the lack of a hardship provision, the punitive nature of holding members responsible for fees even when the Registrar fails to provide proper notice, and the absence of an appeal mechanism for denied waivers. Some comments suggested included tiered or sliding-scale fees, formal hardship application processes, minimum 60-day renewal notice, member input on fee increases, published financial reports, and moving fee-setting authority to a committee or vote-based process rather than leaving it solely with the Registrar.

Article 15 – Professional Corporations

Agreement with Proposed By-Law Article

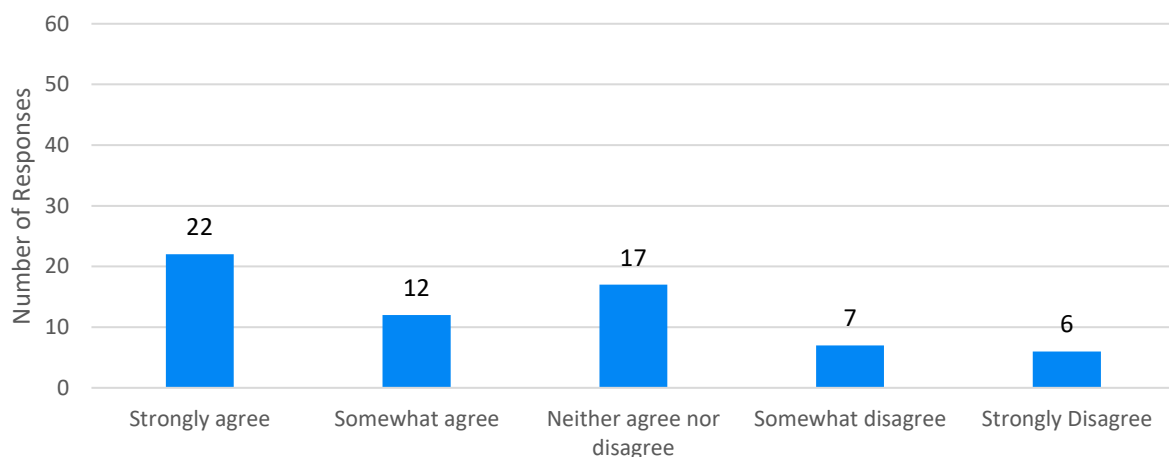
Survey respondents were asked to indicate their agreement with two statements about Article 15 – Professional Corporations on a Likert scale of responses from “Strongly agree” to “Strongly disagree”.

The figure below presents the results of 64 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 55% (35/64) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 64 responses to the statement *“I support the proposed by-law as written”*.



Approximately 53% (34/64) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

Long Answer Responses

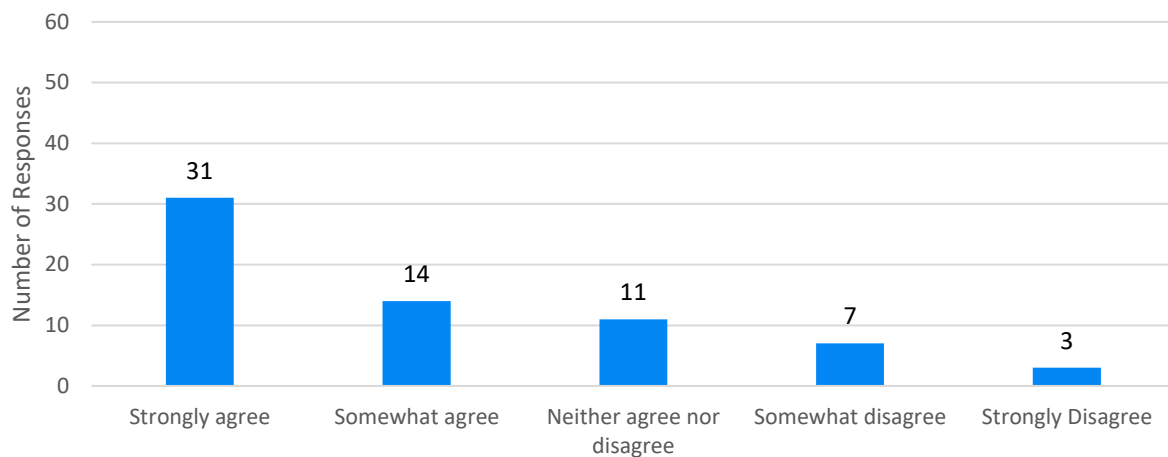
A total of 18 comments were received. Respondents raised broad concerns about the administrative burden. The renewal and initial application processes were criticized as excessively onerous, requiring extensive documentation and reapplication annually. The naming requirements, which mandate inclusion of shareholder surnames, were seen as unnecessarily restrictive and impractical given name changes, privacy concerns, and marketing considerations. The rigid refusal and revocation provisions were seen as punitive, particularly since even minor administrative lapses can trigger revocation and force full reapplication. Some comments questioned why the framework relies so heavily on self-

reporting and managing director declarations with no independent verification. Corporate ownership by non-members, particularly American chains, was called out as a regulatory gap that the College fails to address. Some respondents advocated for expanded shareholder eligibility to include RVTs, practice managers, and other staff. One respondent also proposed a separate voluntary grooming certification framework.

Article 16 – Making, Amending, and Revoking By-Laws

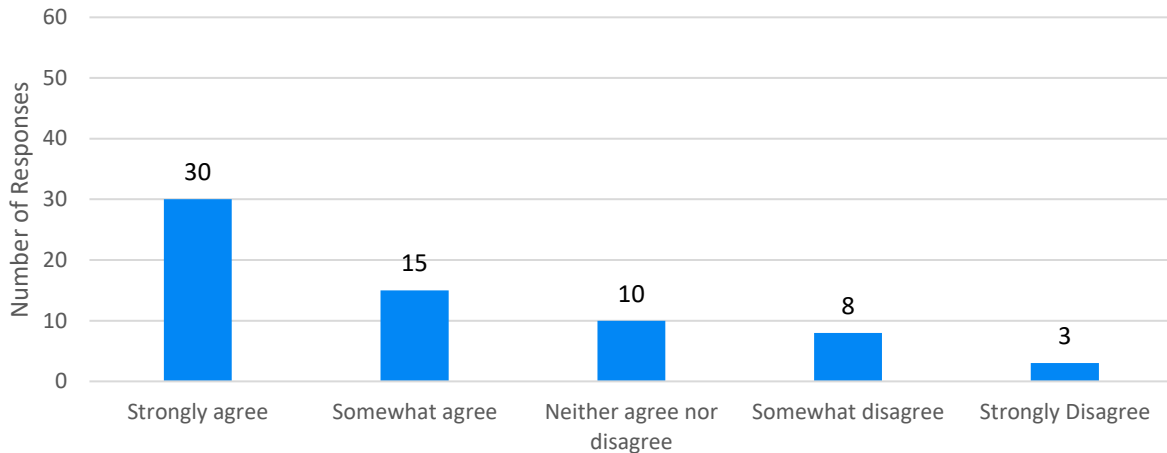
Agreement with Proposed By-Law Article

Survey respondents were asked to indicate their agreement with two statements about Article 16 – Making, Amending, and Revoking By-Laws on a Likert scale of responses from “Strongly agree” to “Strongly disagree”. The figure below presents the results of 66 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 68% (45/66) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 66 responses to the statement “*I support the proposed by-law as written*”.



Approximately 68% (45/66) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

Long Answer Responses

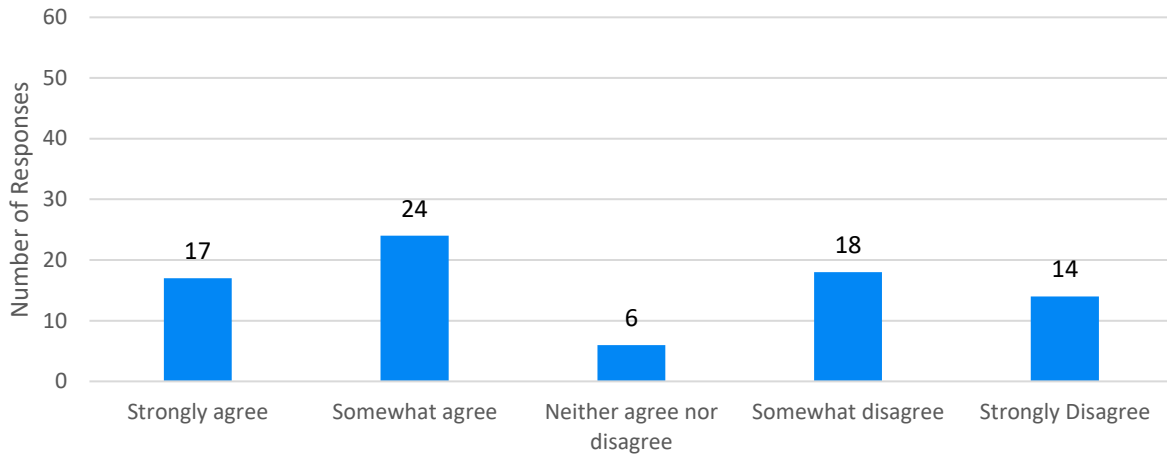
A total of 10 comments were received. Some respondents were supportive of the by-law article and felt the two-thirds majority requirement for by-law amendments promotes stability and prevents unilateral changes. A recurring concern in responses was the lack of any requirement for member or public consultation before by-laws are amended or revoked and requests for stronger consultation and transparency requirements. Some respondents noted that a small number of Council members present at any given meeting could make large changes, with no advance notice, impact analysis, or external oversight required. One commenter noted RVT representation concerns since veterinary technicians may constitute roughly one-third of Council, a unified veterinarian majority could pass amendments over unanimous RVT opposition. Several respondents called for mandatory member ratification of by-law changes before they take effect.

Schedule 1 - Fees

Agreement with Proposed By-Law Schedule

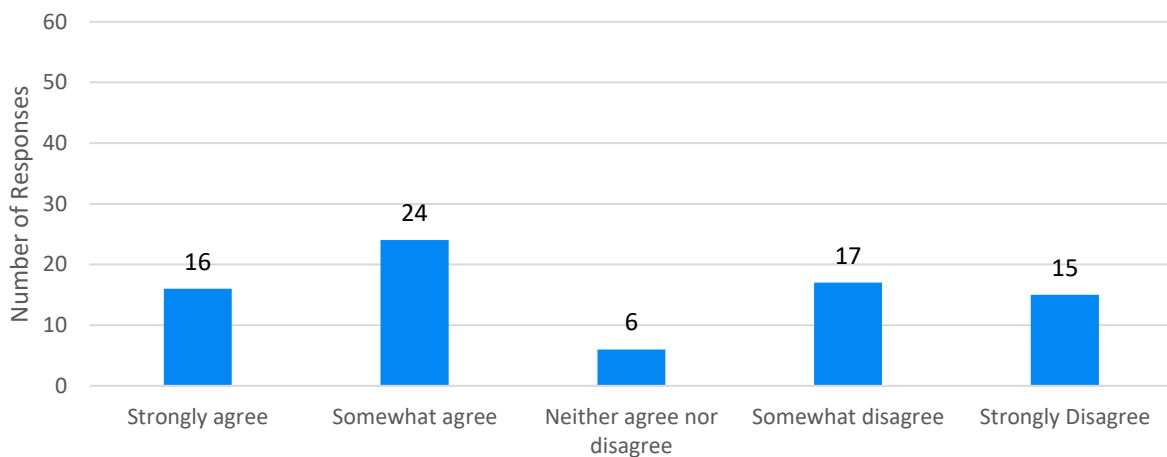
Survey respondents were asked to indicate their agreement with two statements about Schedule 1 – Fees on a Likert scale of responses from “Strongly agree” to “Strongly disagree”.

The figure below presents the results of 79 responses to the statement “*The proposed by-law article is appropriate*”.



Approximately 52% (41/79) of respondents were in agreement (somewhat agree/strongly agree) that the proposed by-law article was appropriate.

The figure below presents the results of 78 responses to the statement *“I support the proposed by-law as written”*.



Approximately 51% (40/78) of respondents were in agreement (somewhat agree/strongly agree) that they supported the proposed by-law as written.

Long Answer Responses

Respondents were asked to share any comments they felt were not fully addressed in the proposed by-laws. A total of 34 comments were received. Respondents were broadly critical of the proposed fee schedule, with concerns spanning affordability, fairness, complexity, and the lack of transparent rationale for how fees are set. The RVT fee drew the most sustained criticism, comments noted it would be among the highest veterinary technician fees in Canada, while RVT wages remain low, and the new fee would no longer include the liability insurance coverage previously bundled with OAVT membership. Solo practitioners and small independent clinic owners objected to a fee structure they feel

disproportionately burdens them relative to corporate and multi-veterinarian practices. The lack of prorated fees for mid-cycle applicants was also criticized as unfair. Respondents called for sliding-scale or tiered fees based on income and practice type, hardship provisions, a more equitable veterinarian-to-RVT fee ratio (with some suggesting 3:1 rather than 4:1), and greater transparency linking fee levels to actual regulatory costs.

Partner Letters

Six letters from partners and individuals were received providing feedback on the proposed by-law articles. The primary themes outlined in the letters are summarized here; the full letters are available in **Appendix B**.

Large Animal Associations

Three of the submissions were from large animal practitioner organizations. These groups representing swine, bovine, and equine practitioners in Ontario all advocated for greater representation from food and large animal practitioners on the new Council. These responses point out that ensuring representation that truly represents the diversity of veterinary practice is essential to informed regulation.

Ontario Association of Veterinary Technicians

The Ontario Association of Veterinary Technicians (**OAVT**) also submitted feedback offering broad support while recommending a few changes. Suggestions include reducing the cooling-off period for former board members from three years to one, requiring that at least one Officer position (Chair or Vice-Chair) be held by a veterinary technician, establishing a formal process to protect sensitive member information on the public register, and coordinating fee schedules to avoid financial hardship from overlapping dues during the transition. The OAVT also raised concerns about professional corporation restrictions, which currently prevent RVTs from accessing the same business ownership benefits as veterinarians, and urged the Transition Council to pursue legislative amendments to address this inequity.

Ontario Veterinary Medical Association

The Ontario Veterinary Medical Association (**OVMA**) submitted a letter of feedback on behalf of their membership listing numerous points of feedback. Most prominently, the OVMA strongly advocates for veterinarians to hold a clear majority on Council and firmly opposes the inclusion of non-government appointed public members on committees. The association also raised concerns about the competency-based Nominations Committee process, calling for transparent policies, robust recruitment, diversity commitments, and an appeals process to prevent bias. Additional feedback addressed the public register, opposing the publication of unproven allegations before a discipline decision is rendered; fee structures, encouraging inflation-aligned annual increases and parental leave accommodations; Registrar accountability, urging clearer Council oversight mechanisms; and member privacy, cautioning against public disclosure of personal addresses and health information. Throughout, the OVMA emphasized the need to streamline administrative burdens and safeguard the profession's self-regulatory integrity during this significant transition. The full letter, including all article-by-article recommendations, is available in the appendix for complete review.

Individual Letter

A final letter of feedback from an individual offered several areas of disagreement. First, with the public register displaying unproven charges and investigations, arguing it amounts to a "guilty until proven innocent" approach that can harm reputations before any case is resolved. Additionally, the Nominations Committee's broad discretion over candidate eligibility is a concern for its potential to undermine elections. Further concerns were raised about Council composition, noting that veterinarians would be outnumbered by public appointees and RVTs combined. The letter also flags a lack of accountability mechanisms for the Registrar and lack of oversight provisions such as term limits or a formal removal process. The author also notes that several articles allow council members to be removed, potentially unfairly, based on unproven allegations without independent hearings or appeal rights. Finally, broad conflict-of-interest and conduct rules are seen as a threat to legitimate advocacy and professional speech.



Conclusions

This consultation aimed to communicate the proposed by-laws and capture public feedback through the created survey as well as through directly submitted letters of feedback. Key takeaways from the survey and partner letters can be summarized into the following findings. The majority of respondents were in agreement with the appropriateness and language, as-written, of the proposed by-laws. All Likert scale questions received greater than 50% agreement (strongly agree + somewhat agree) from respondents. In the open-ended responses (survey responses and partner letters) Article 2, pertaining to Council, received the greatest number of comments, mainly concerned with the composition of the council. This article also received the greatest number of comments from the partner letters with 3 of the 6 letters concerned solely about this article. The Fee Schedule and Article 13, Professional Liability Insurance, received the second- and third-most write in responses respectively. For both, the comments largely concerned the implications of these by-laws for RVTs. Overall, this report provides an overview of the feedback received to assist the Transition Council in ensuring the new by-laws allow for the administration of the College while considering the expectations of the profession and the public.



Appendices

Appendix A – Survey Questions

CVO By-Law Consultation

Start of Block: Introduction

By-Law Consultation The Transition Council continues to make progress, one step at a time, towards the implementation of the *Veterinary Professionals Act (VPA)*. The VPA modernizes the regulation of veterinary medicine through a ‘one profession, two professionals’ model. You may have already taken the opportunity to provide feedback on the regulation concepts, which are now with the Ontario government for consultation and implementation. The next step for the College is the development of its by-laws, another term for administrative rules needed to support and implement this new regulatory framework. By-laws provide a structure which supports the running of the new College and its Council. The most likely areas of interest for veterinarians and veterinary technicians in the by-laws include: How Council elections are conducted; Key issues on how the Council functions such as declaring a conflict of interest, how the Chair and Vice Chair are elected from among Council, and the Code of Conduct expected of Council and Committee members; The information collected from licensed members, and the posting of a subset of this information on the public register; and of course, finances, including fees for applicants, licensed members, facilities, and professional corporations which are in Schedule 1 to the by-laws. Over the last year, the Transition Council of the College of Veterinary Professionals of Ontario has developed these draft by-laws, and is now seeking your feedback prior to finalizing this work.

How to Provide Input The consultation is open from January 19, 2026 to March 20, 2026. The consultation provides the opportunity to comment on each section of the by-laws. A short summary of each section is provided, along with a link to the by-law language included in that section. All input provided will be kept **anonymous** and will be compiled by an independent third party. The survey may be started and resumed throughout the consultation period. When submitting on a shared device it is recommended to complete the survey in one sitting. Thank you for taking the time to provide your feedback.

End of Block: Introduction

Start of Block: Demographics

RelationshipVet Med How would you describe your relationship to veterinary medicine?

- ☐ Veterinarian (1)
 - ☐ Registered Veterinary Technician (3)
 - ☐ Member of the Veterinary Team (e.g. Veterinary Assistant, Practice Manager) (6)
 - ☐ Member of the public (4)
 - ☐ Other (please specify) (5)
-

End of Block: Demographics

Start of Block: By-Law Review

Q119 This is an overview of the by-laws covered in this consultation. Proposed By-laws

The full set of by-laws can be found here. **Article 1 - Definitions and Interpretation** This section of the by-laws provides definitions for terms used in the by-laws. There is also a section that assists in understanding how to interpret the by-laws. This section will assist you in better understanding the by-laws and the intended meaning of the terminology used throughout these by-laws. The article can be read here. **Article 2 – Council** This section of the by-laws provides information about Council elections. The Council of the College is made up of elected members, selected academic members and public members appointed by the Ontario Government. The Council sets the strategic direction for the organization and ensures the organization meets its mandate of protecting and serving the public interest. The article can be read here. **Article 3 – Officers of Council** The members of the Executive Committee act as the officers of the College. This section proposes the election process and the duties of the Chair and Vice Chair. These important roles lead the Council. A process for removal of the Chair or Vice Chair and management of vacancies is also defined in the by-laws. The article can be read here. **Article 4- Meetings of Council** This section of the by-laws set the parameters for how and why Council meets. These by-laws provide rules for the location and frequency of Council meetings, notice of meetings, the types of business that may be conducted at Council meetings, that meetings are public with defined exclusions, special meetings, electronic meetings, and the need to maintain minutes of Council meetings. The article can be read here. **Article 5 – Council and Committee Member Code of Conduct** This section of the by-laws lays out the obligations for Council and Committee members, which include accountability, adaptability, competence, diversity, independence, integrity, and transparency requirements. The Code of Conduct allows Council to set specific requirements for how Council and Committees will conduct the work of the College. The article can be read here. **Article 6 –**

Committees This section of the by-laws is focused on the Committees of the College. It provides for the appointment of Committees, including transition clauses for the appointment of Committees by the Transition Council and the First Council, how many individuals must be on Committees, and the functioning of these Committees. Committees have authorities independent of Council and manage member specific areas, like licensure, investigations, quality assurance, and discipline. The article can be read here. **Article 7 – Conflict of**

Interest This section of the by-laws defines conflict of interest for Council and Committee members. This is an area of risk that is mitigated by defining what constitutes a conflict of interest and how it is managed by Council or Committees. A duty to avoid conflicts is outlined and annual declarations from Council and Committee members are required. A process to prevent and address conflicts of interest is included in the by-laws. The article can be read here.

Article 8 – Remuneration and Indemnification for Council and College Business This section of the by-laws outlines that a policy will be set for remuneration for College business. An indemnification section outlines when those working on behalf of the College are indemnified for their actions. This section of the by-laws is important to ensure that those that volunteer on College Council and Committees are remunerated for their time and expenses, and protected from legal action when carrying out the duties of the College. The article can be read here.

Article 9 – Banking, Finance, and Administration This section provides structure for the College's administration and finances. This section is not substantively different than the existing by-laws of the College of Veterinarians of Ontario. It is important that the by-laws set clear rules related to management and administration of the College's finances. The article can be read here. **Article 10 – The Registrar** This section outlines that the Registrar of the

College is appointed by Council, duties of the Registrar, and the appointment of an Acting Registrar. This section of the by-laws is important to ensure that the operational management of the College is run by the Registrar and that oversight continues if there is not a current Registrar in place. The article can be read here. **Article 11 – Member Information to be Provided to**

the College This section of the by-laws outlines the information required to be submitted by licensed members each year. This section includes information needed to administer the Act and statistical information which may be necessary for the purposes of workforce planning which is a required object of the College. The article can be read here. **Article 12 – Register**

The College is required to maintain a register of information about licensed members. The Veterinary Professionals Act provides for information that shall be collected and made publicly available. This section of the by-laws outlines additional information which shall be included in the register and defines which information will be on the public register. The article can be read here. **Article 13 – Professional Liability Insurance** This section of the by-laws will require

licensed members who provide patient care to maintain liability insurance coverage, including a minimum amount of coverage and the need to ensure that coverage will exist for at least two years beyond the covered period as claims may arise later. Transition Council discussed that it is in the public interest to have licensed members maintain liability insurance. The article can be read here. **Article 14 – Fees** This section outlines the annual renewal period and that fee

amounts will be set in Schedule 1 of the College by-laws. It is proposed that the renewal period continue as it currently exists with licences and accredited facilities being renewed by November 30th each year. The article can be read here. **Article 15 – Professional Corporations** This section sets out the requirements for eligibility to hold a certificate of authorization for a

professional corporation, the issuance of a certificate of authorization, renewal of a certificate of authorization, and revocation of a certificate of authorization. The professional corporation register information and duty to provide information about a corporation are also included in this section. The article can be read here. **Article 16 – Making, Amending and Revoking By-Laws** This section of the by-laws is about Council’s ability to make or change by-laws. It is proposed that a two-thirds of majority vote of Council are required to make, amend, or revoke by-laws. This proposal highlights the importance that Transition Council places on having broad Council support, beyond a majority vote, for by-law amendments. The article can be read here. **Schedule 1 – Fees** This section of the by-laws proposes the fees for licences, facility accreditation and other areas where fees are charged by the College. The schedule can be read here. **Proceed to the survey by clicking the next button.**

End of Block: By-Law Review

Start of Block: Article 1 - Definitions and Interpretation

Definitions Intro **Article 1 - Definitions and Interpretation** This section of the by-laws provides definitions for terms used in the by-laws. There is also a section that assists in understanding how to interpret the by-laws. This section will assist you in better understanding the by-laws and the intended meaning of the terminology used throughout these by-laws. The article can be read here.

Definitions Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Definitions Comment What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 1 - Definitions and Interpretation

Start of Block: Article 2 - Council

Council Intro **Article 2 - Council** This section of the by-laws provides information about Council elections. The Council of the College is made up of elected members, selected academic members and public members appointed by the Ontario Government. The Council sets the strategic direction for the organization and ensures the organization meets its mandate of protecting and serving the public interest. A few areas of interest are highlighted below.

Number of Elected Council Members The Veterinary Professionals Act defines a range of elected members to Council for veterinarians and veterinary technician members; the by-laws set a specific number of members. Transition Council is seeking to increase the diversity of voices at the table, while recognizing that smaller sizes of Councils are a more modern approach. The Transition Council recommendation sets the number of elected veterinarians at ten and the number of elected veterinary technicians at five. **Qualifications of Elected and**

Academic Council Members This section sets the necessary qualifications to run for election or be selected as an Academic Council member. These qualifications include licensure requirements, residency requirements, and conduct requirements. **Establishment of a**

Council Profile and Nominations Committee A change to Council elections is proposed. A Council Profile will be established which outlines the skills, expertise, and diverse attributes that the Council needs. Each year, Council will assess areas of need and identify these when asking for nominations to run for election. The needed skills may include experience working with a specific patient population, or work in a rural or remote area of Ontario as examples, dependent upon the composition and skills of the Council as a whole. A non-statutory Nominations Committee will be established in the by-laws to oversee the election process and appoint Academic Members to Council and licensed members to Committees. Policies and procedures will be developed to support the nominations process. **Election Procedure**

The procedures for the election process are outlined in the proposed by-laws. A key change in this area is the move away from geographic electoral districts. Any veterinarian and veterinary technician who meets the qualifications requirements will be eligible to put their name forward for an open veterinarian Council member seat or a veterinary technician Council member seat as the case may be. All licensed members are able to vote for all positions up for election.

Selection Procedure for Academic Members The selection procedure for Academic Members is outlined in the by-laws. **Term of Office** The term of office for Council members is proposed as three years in length. There are rules related to first elections which include shorter terms, which will lead to the staggering of election terms so that only a few Council seats are up for election each year. **Disqualification and Removal of Council Members** There is a section that outlines what would lead to automatic disqualification from Council and what may lead to disqualification or sanctions. The disqualifications and sanctions process is outlined in the by-laws. A process for managing vacancies is also included. The article can be read [here](#).

Council Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Council Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 2 - Council

Start of Block: Article 3 - Officers of Council

Officers Intro Officers of Council The members of the Executive Committee act as the officers of the College. This section proposes the election process and the duties of the Chair and Vice Chair. These important roles lead the Council. A process for removal of the Chair or Vice Chair and management of vacancies is also defined in the by-laws. Veterinarians and veterinary technicians who are interested in better understanding the oversight of Council will be interested in this section. The article can be read [here](#).

Officers Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by-law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by-law article as written. (2)	☐	☐	☐	☐	☐

Officers Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 3 - Officers of Council

Start of Block: Article 4 - Meetings of Council

Meetings Intro Article 4 - Meetings of Council This section of the by-laws set the parameters for how and why Council meets. These by-laws provide rules for the location and frequency of Council meetings, notice of meetings, the types of business that may be conducted

at Council meetings, that meetings are public with defined exclusions, special meetings, electronic meetings, and the need to maintain minutes of Council meetings. Veterinarians and veterinary technicians who wish to understand how Council meets and does it work will be interested in this section of the by-laws. The article can be read [here](#).

Meetings Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Meetings Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 4 - Meetings of Council

Start of Block: Article 5 - Council and Committee Member Code of Conduct

Code of Conduct Intr **Article 5 - Council and Committee Member Code of Conduct** This section of the by-laws lays out the obligations for Council and Committee members, which include accountability, adaptability, competence, diversity, independence, integrity, and transparency requirements. The Code of Conduct allows Council to set specific requirements for

how Council and Committees will conduct the work of the College. Veterinarians and veterinary technicians who are interested in the values supported by Council and Committee will be interested in reviewing this section of the by-laws. The article can be read [here](#).

Conduct Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Conduct Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 5 - Council and Committee Member Code of Conduct

Start of Block: Article 6 - Committees

Committees Intro **Article 6 - Committees** This section of the by-laws is focused on the Committees of the College. It provides for the appointment of Committees, including transition clauses for the appointment of Committees by the Transition Council and the First Council, how many individuals must be on Committees, and the functioning of these Committees. Committees have authorities independent of Council and manage member specific areas, like

licensure, investigations, quality assurance, and discipline. Veterinarians and veterinary technicians who may be interested in serving on College Committees will be particularly interested in this section of the by-laws. **Qualification of Committee Members** There is a part of this section focused on the required qualifications to sit on a College Committee.

Appointments to Committees This section indicates that all Committee members are appointed, with the exception of the Chair and Vice-Chair of Council who are elected and will serve on the Executive Committee. The Nominations Committee will make a recommendation to Council with the proposed Committee slates. The Executive Committee will propose the slate for the members of the Nominations Committee. **Term of Office** Committee terms are proposed to be one year in length and will be renewable up to six times. **Disqualification and**

Removal of a Committee Member A Committee member may be automatically disqualified from serving on a Committee or may be disqualified or sanctioned. This section outlines when each of these would apply. **Standing Committees** The by-laws propose the inclusion of a non-statutory standing committee, the Nominations Committee. Council may set new standing committees, working groups, task forces or advisory groups in the future. **Composition of**

Committees The proposed composition of each Committee is defined in the by-laws. **Quorum and Panels** Committee quorums for the purpose of decision making are defined as three Committee members. Committees that address member matters may meet in panels to make decisions. Specific panel requirements are defined, which includes the requirements to have a veterinarian involved in a decision that involves another veterinarian and a veterinary technician involved in a decision that involves a veterinary technician. The article can be read [here](#).

Committees Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Committees Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 6 - Committees

Start of Block: Article 7 - Conflict of Interest

C of I Intro **Article 7 - Conflict of Interest** This section of the by-laws defines conflict of interest for Council and Committee members. This is an area of risk that is mitigated by defining what constitutes a conflict of interest and how it is managed by Council or Committees. A duty to avoid conflicts is outlined and annual declarations from Council and Committee members are required. A process to prevent and address conflicts of interest is included in the by-laws. Veterinarians and veterinary technicians who are interested in the functioning of Council and Committees may be interested in this section of the by-laws. The article can be read [here](#).

C of I Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

C of I Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 7 - Conflict of Interest

Start of Block: Article 8 - Remuneration and Indemnification for Council and College Business

Remuneration Intro **Article 8 - Remuneration and Indemnification for Council and College Business** This section of the by-laws outlines that a policy will be set for remuneration for College business. An indemnification section outlines when those working on behalf of the College are indemnified for their actions. This section of the by-laws is important to ensure that those that volunteer on College Council and Committees are remunerated for their time and expenses, and protected from legal action when carrying out the duties of the College. The article can be read here.

Remuneration Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Remuneration Comment What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 8 - Remuneration and Indemnification for Council and College Business

Start of Block: Article 9 - Banking, Finance and Administration

Banking Intro **Article 9 - Banking, Finance and Administration** This section provides structure for the College's administration and finances. This section is not substantively different than the existing by-laws of the College of Veterinarians of Ontario. It is important that the by-laws set clear rules related to management and administration of the College's finances. The article can be read here.

Banking Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Banking Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 9 - Banking, Finance and Administration

Start of Block: Article 10 - The Registrar

Registrar Intro **Article 10 - The Registrar** This section outlines that the Registrar of the College is appointed by Council, duties of the Registrar, and the appointment of an Acting Registrar. This section of the by-laws is important to ensure that the operational management of the College is run by the Registrar and that oversight continues if there is not a current Registrar in place. The article can be read [here](#).

Registrar Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Registrar Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 10 - The Registrar

Start of Block: Article 11 - Member Information to be Provided to the College

Member Info Intro **Article 11 - Member Information to be Provided to the College** This section of the by-laws outlines the information required to be submitted by licensed members each year. This section includes information needed to administer the Act and statistical information which may be necessary for the purposes of workforce planning which is a required object of the College. Veterinarians and veterinary technicians will be interested in what information is under consideration for collection by the College. The article can be read here.

Member Info Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by-law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by-law article as written. (2)	☐	☐	☐	☐	☐

Member Info Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 11 - Member Information to be Provided to the College

Start of Block: Article 12 - Register

Register Intro Article 12 - Register The College is required to maintain a register of information about licensed members. The Veterinary Professionals Act provides for information that shall be collected and made publicly available. This section of the by-laws outlines additional information which shall be included in the register and defines which information will be on the public register. This section is proposed to provide enhanced transparency in the areas of misconduct findings from other jurisdictions, cautions, remediation programs, charges and findings under the Criminal Code (Canada) and the Controlled Drugs and Substances Act (Canada). These changes will align the College with other regulatory bodies in Ontario and meet public expectations related to transparency. Increased transparency in the area of accredited facility ownership is also proposed. Veterinarians and veterinary technicians will want to consider the proposed list of public register information as there will be additional information included on the register that has not been public in the past. The article can be read here.

Register Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Register Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 12 - Register

Start of Block: Article 13 - Professional Liability Insurance Coverage

Insurance Intro **Article 13 - Professional Liability Insurance Coverage** This section of the by-laws will require licensed members who provide patient care to maintain liability insurance coverage, including a minimum amount of coverage and the need to ensure that coverage will exist for at least two years beyond the covered period as claims may arise later. Transition Council discussed that it is in the public interest to have licensed members maintain liability insurance. Veterinarians and veterinary technicians involved in patient care will want to understand the proposed liability insurance requirements as it will impact them directly if the new by-laws are passed. The article can be read [here](#).

Insurance Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Insurance Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 13 - Professional Liability Insurance Coverage

Start of Block: Article 14 - Fees

Fees Intro **Article 14 - Fees** This section outlines the annual renewal period and that fee amounts will be set in Schedule 1 of the College by-laws. It is proposed that the renewal period continue as it currently exists with licences and accredited facilities being renewed by November 30th each year. Veterinarians and veterinary technicians will be interested in confirming their understanding of when and how the College charges fees. The article can be read here.

Fee Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Fee Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 14 - Fees

Start of Block: Article 15 - Professional Corporations

Pro. Corp. Intro **Article 15 - Professional Corporations** This section sets out the requirements for eligibility to hold a certificate of authorization for a professional corporation, the issuance of a certificate of authorization, renewal of a certificate of authorization, and revocation of a certificate of authorization. The professional corporation register information and duty to provide information about a corporation are also included in this section. Most of this section is unchanged from the existing College of Veterinarians of Ontario by-laws. Veterinarians interested in having a professional corporation will be interested in reviewing this section of the by-laws. The most important change in this section is that renewal periods for a certificate of authorization will move to a fixed date of May 31st each year. The article can be read [here](#).

Pro. Corp. Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Pro. Corp. Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 15 - Professional Corporations

Start of Block: Article 16 - Making, Amending and Revoking By-laws

Making By-law Intro **Article 16 - Making, Amending and Revoking By-laws** This section of the by-laws is about Council's ability to make or change by-laws. It is proposed that a two-thirds of majority vote of Council are required to make, amend, or revoke by-laws. This proposal highlights the importance that Transition Council places on having broad Council support, beyond a majority vote, for by-law amendments. The by-laws would become effective on the Transition Date, as defined by the Veterinary Professionals Act. The article can be read here.

Making Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed by- law article is appropriate. (1)	☐	☐	☐	☐	☐
I support the proposed by- law article as written. (2)	☐	☐	☐	☐	☐

Making Comments What comments, if any, do you have regarding the proposed by-law article?

End of Block: Article 16 - Making, Amending and Revoking By-laws

Start of Block: Schedule 1: Fees

Fee Schedule Intro **Schedule 1 - Fees** This section of the by-laws proposes the fees for licences, facility accreditation and other areas where fees are charged by the College. The Transition Council carefully considered the fees needed to run the College of Veterinary Professionals of Ontario. The Transition Council undertook a careful review of proposed budgets for three-years post transition to determine appropriate fees. This review considered estimates for the number of licensed members, that per diem rates for serving on Council and Committees would remain unchanged, inflation, future staffing needs, the development of a new Quality Assurance Program as required by the Act, and the need to maintain sufficient reserves to manage if the College was ever ordered to close by the Ontario government, lengthy or numerous disciplinary hearings which are unpredictable, crisis and disaster management, and other capital projects. The Transition Council reviewed areas where costs would increase and discussed the opportunity for increased efficiencies in some areas. New licensing fees are proposed for veterinarians and veterinary technicians. Veterinary technician licensing fees are proposed at 25% of veterinarian fees as recognition of varying earning capacity and of varying decision risk responsibility. A few other changes from existing fees are proposed for review by veterinarians and veterinary technicians. Key areas are highlighted below. A first-time (initial) licensing fee has been proposed for new graduates and international applicants who have just completed the assessment and examination process who hold their first licence with the College. This reduced fee is intended to recognize the financial challenges of seeking licensure (examinations, student loans, etc.). Pro-rated fees have not been proposed in the new fee schedule as the costs of licensing are not based on the length of the licence validity. A program review identified that accreditation fees were not covering the costs to run the accreditation program. An increased focus on accreditation compliance due to serious risk issues like controlled drug management and understanding of the new accreditation model has led to the need for cost revision in this area to cover the costs of the program, which now includes veterinarian inspectors, a facility director newsletter and other educational tools to support compliance. The schedule can be read [here](#).

Fee Schedule Likert Please indicate your level of agreement with the following statements:

	Strongly Disagree (1)	Somewhat disagree (2)	Neither agree nor disagree (3)	Somewhat agree (4)	Strongly agree (5)
The proposed schedule of fees is appropriate. (1)	☐	☐	☐	☐	☐
I support the schedule of fees as written. (2)	☐	☐	☐	☐	☐

Fee Schedule Comment What comments, if any, do you have regarding the proposed fee schedule?

End of Block: Schedule 1: Fees

Start of Block: End of Survey

Q120 Click "Next" to see a summary of your responses and submit your feedback. Make sure you have responded to each section you wish to provide feedback on, **you will not be able to go back and edit your responses past this point.**

End of Block: End of Survey

Appendix B – Partner Feedback Letters



March 20th, 2026

Re: Large Animal Veterinarian Representation on the CVPO Council

Dear College of Veterinary Professionals of Ontario,

The OASV writes to respectfully raise a concern regarding Council composition under the CVPO By-Laws.

As structured under Article 2, the Council's 10 elected Veterinarian Member seats carry no provisions ensuring representation from large animal veterinarians. Because the general membership is predominantly composed of companion animal practitioners, large animal veterinarians face a structural disadvantage in the election process. Given the distinct regulatory considerations of large animal practice — including food safety, biosecurity, antimicrobial stewardship, and rural service delivery — this gap risks leaving critical expertise underrepresented in Council decisions.

The OASV requests that the College consider amending the By-Laws to reserve a minimum number of Council seats for large animal practitioners — consistent with the College's mandate to serve the public interest across all sectors of Ontario.

We appreciate that the College is in an important transitional period and welcome any opportunity for further dialogue on this matter. We would be grateful for acknowledgement of this letter and advice on upcoming stakeholder engagement opportunities.

Sincerely

A handwritten signature in dark ink, appearing to read "Conor Voth", written in a cursive style.

Conor Voth
President
Ontario Association of Swine Veterinarians (OASV)



March 20 2026

To Ms. Jan Robinson and the Transition Council of the CVO,

Re the new CVO proposed Bylaws,

The Ontario Association of Bovine Practitioners calls for the proposed CVO Council profile to include meaningful and sustained representation from all food and large animal commodities. This diversity of expertise is essential to informed regulation, animal health and welfare, and responsible veterinary practice in Ontario.

Respectfully submitted

Drs. Daniella Rizzo and Kalie Bernardo

Presidents OABP

PO Box 3024 Elora ON N0B1S0

Info.oabp@gmail.com

From: Chris Grossenbacher <chris@grossenbacherequine.ca>
Sent: Friday, March 20, 2026 5:29 PM
To: Kali Pieters <kpieters@cvo.org>
Subject: Regulatory concept consultation

Good afternoon,

I am writing you in my role as OAEP president for 2026. The OAEP is concerned about the lack of detail regarding large animal and equine representation on the new council.

As an important part of the veterinary profession and rural life in Ontario we feel like permanent representation is essential to a council that truly represents the entirety of the veterinary profession in this province.

Regards,

Christoph Grossenbacher, DVM, med. vet.
Grossenbacher Equine Services
5356 6th Line RR#1
Rockwood, Ontario
N0B 2K0

Submitted via email

March 19, 2026

Catherine Knipe
Transition Council Chair
TransitionCouncil@cvo.org

Re: Proposed by-laws for the College of Veterinary Professionals of Ontario

On behalf of the Ontario Association of Veterinary Technicians (OAVT) and our Board of Directors, I am pleased to share our submission for consideration in the development of the by-laws that will govern the veterinary profession in Ontario and the operation of the new College of Veterinary Professionals of Ontario (CVPO). These by-laws represent a critical next step in advancing the goals under the *Veterinary Professionals Act, 2024* (the Act), and we commend the Transition Council for its continued leadership in advancing this work.

The OAVT sincerely appreciates the opportunity to contribute input and acknowledges the efforts made by the Transition Council to engage stakeholders throughout this process.

In reviewing the proposed by-laws we have identified several items that warrant further consideration to ensure alignment with the goals and intended outcomes of the Act.

The recommendations outlined in this submission align with the Act's strategic vision for the profession to move towards a "one profession, two professionals" model while maintaining and enhancing public protection and expanding access to veterinary care across the province.

We look forward to continued collaboration with the Transition Council and, in time, the Council of the College of Veterinary Professionals of Ontario, to finalize a by-law framework that delivers on the full premise of the new legislation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jen Cote', with a stylized flourish at the end.

Jen Cote, RVT
Vice President
Ontario Association of Veterinary Technicians

OAVT Feedback on the Proposed By-Laws

The OAVT is broadly supportive of the by-laws proposed for development under section 98(1) of the Act. To ensure alignment with legislative and regulatory intent, and to foster the consistent, equitable inclusion of veterinary technicians within the College's governance and operations, we respectfully suggest that several provisions could benefit from clarification or specific additions.

ARTICLE 2 - Council

2.3(m) is not and has not been for a period of at least three years a director, officer or employee of a Professional Association or other organization whose interests may conflict with the mandate of the College.

In the spirit of permitting individuals who fit the Council Profile to serve on the Council of the new College, we recommend that Article 2 – Council 2.3(m) permit past OAVT Board members and Legacy Council members of the College of Veterinarians of Ontario to stand for election for the Council of the CVPO. These individuals present an equal risk of their past roles' interests conflicting with the College's mandate; it is appropriate that both be subject to the same cooling-off period to ensure fair and consistent application of the by-law. We recommend reducing the restriction period of at least three-years, to one year, aligning the CVPO with modern governance approaches and other health regulatory colleges, including the College of Psychologists and Behaviour Analysts of Ontario, the College of Dental Hygienists of Ontario, and the College of Physicians and Surgeons of Ontario. A one-year cooling-off period provides appropriate separation without excluding experienced candidates longer than necessary.

ARTICLE 3 - Officers of Council

Under Article 3, the OAVT recommends the inclusion of language requiring that Officer positions be equitably shared. Specifically, this provision would require that at least one of the Officer positions, either Chair or Vice-Chair, be held by a veterinary technician member.

This requirement is crucial for the College's governance structure to genuinely reflect the collaborative relationship between both regulated members. Guaranteeing a veterinary technician's perspective at the highest level of leadership will foster mutual respect and ensure executive discussions and deliberations are informed by the expertise and experience of veterinarians and veterinary technicians.

ARTICLE 12 - Register

In support of Section 82(5) of the Act, the OAVT recommends the College adopt a by-law under Article 12 establishing a process for protecting member information on its register, particularly when public disclosure could pose a risk of discrimination, harassment or to personal safety. This by-law would create a clear and accessible pathway for members to request that personal information, such as past name or home addresses, be withheld from the public-facing register. Establishing a formal process would ensure a proactive mechanism to address legitimate concerns.

ARTICLE 13 - Professional Liability Insurance Coverage

The OAVT supports by-law 13.1, which requires that members obtain and maintain professional liability insurance. This provision is essential for public protection and is consistent with other regulated health professions in the province.

ARTICLE 14 - Fees

Regarding the implementation of fees under Article 14, the OAVT encourages the College to prioritize a highly participatory transition and minimize the risk of creating gaps in oversight of veterinary technicians.

It is anticipated that the timing of initial licensure with the new College could result in a period of overlapping dues, requiring OAVT members to pay fees to both the OAVT and the CVPO concurrently within a single membership year. The financial burden of overlapping dues for veterinary technicians may result in delayed licensure or discourage licensure in its entirety, thereby creating a gap in regulatory oversight. This risk can be mitigated by coordinating a renewal schedule with the OAVT or implementing other measures, such as a pro-rated initial fee.

ARTICLE 15 - Professional Corporations

The professional corporation provisions outlined in Section 70(1) of the Act imposes unintended barriers on RVT business owners and, as a result, Article 15 directly prevents them from benefitting from the taxation advantages and protections associated with professional corporation structures. This severely limits the emergence of much-needed new and financially viable service delivery models at a time when access to veterinary care in Ontario communities is acutely strained.

The OAVT advocates for a forward-thinking regulatory environment that empowers new businesses to thrive and allows all licensed professionals to contribute fully within their authorized scope of practice. Expanding professional corporation ownership to encompass all licensed members would not only better align with the Act's core principle of one profession, two professionals, but also robustly foster innovation, entrepreneurship, and significantly improve access to services province-wide.

The OAVT urges the Transition Council to pursue practical pathways to address this barrier, acknowledging that the by-laws are constrained by the Act. Specifically, we ask the Council to:

1. Engage the Ontario Ministry of Agriculture, Food and Agribusiness to seek legislative amendments to Section 70(1) to include veterinary technician members among those permitted to apply for a certificate of authorization to establish a professional corporation for the purpose of practising veterinary medicine.
2. Consult with the Ministry of Public and Business Service Delivery and the Ministry of Red Tape Reduction to identify regulatory and administrative mechanisms that would permit veterinary technician members to hold professional corporate ownership.

Resolving this barrier would recognize RVTs on equal footing with veterinarians, stimulate entrepreneurship and economic development, and strengthen access to care.

SCHEDULE 1: FEES

The OAVT has reviewed the proposed fee schedule and considers the annual licensure fee of \$300 for veterinary technicians to be reasonable. We do, however, encourage providing additional information that clarifies the rationale for, and application of the \$180 "Initial general or provisional licence issued – veterinary technician" fee.

Lastly, it is imperative that financial barriers for veterinary technicians are minimized where possible, and the earlier recommendation of a pro-rated fee would address this issue.

Conclusion

The Ontario Association of Veterinary Technicians continues its commitment to working collaboratively with the Transition Council and the College of Veterinarians of Ontario as the profession transitions into a new regulatory era. We see the proposed by-laws as a significant opportunity to establish a governance foundation that is equitable, inclusive, and forward-looking.

We respectfully encourage the Transition Council to view the recommendations provided in this submission as constructive enhancements designed to further the spirit of the Act and its supporting regulations. Implementing these will enable the College to effectively embody the shared governance model outlined in the legislation, uphold its core mandate of public protection, and simultaneously foster innovation and excellence across the veterinary profession.



March 19, 2026

Ms. Catherine Knipe
Chair of the Transitional Council
College of Veterinarians of Ontario
2-71 Hanlon Creek Blvd.
Guelph, Ontario N1C 0B1

Dear Ms. Knipe,

On behalf of the Ontario Veterinary Medical Association (OVMA) and the 5,500 veterinarians represented, we thank the College for its collaboration toward the shared goal of developing the *Veterinary Professionals Act*. The association appreciates the continued working relationship and being included in innovative discussions to better the future of the veterinary profession.

OVMA is committed to supporting growth and excellence within the profession and appreciates the opportunity to review the Transition Council's *Proposed by-laws for the College of Veterinary Professionals of Ontario (CVPO)*. The association's Board of Directors has reviewed the proposed by-laws, and we would like to offer our feedback for consideration. Please find our full response and recommendations attached to this letter. In summary, the association's main areas of concern are:

- **Council Composition** - Council composition has been under discussion for several years. OVMA strongly believes that, for the profession to remain self-regulated and representative of the profession, licensed veterinarians must constitute a majority of Council members. Veterinarians are the primary owners of clinics, serve as facility directors, and assume the majority of the responsibility and risk within the profession. This has been reflected in decisions made by the Transition Council and in the rationale provided during Transitional Council discussions during the development of the by-laws. Also, with the proposed inclusion of public members on committees with decision-making authority, it is even more critical that final decisions affecting the delivery of veterinary medicine reflect current clinical practice, which requires veterinarians to maintain majority representation on Council.

As a key stakeholder in this project, OVMA has collaborated with the College and other partners over the past twelve years. During those discussions on Council composition, the parties agreed on ranges rather than fixed numbers. While no specific number of veterinarian members was formally committed to, those discussions reflected a clear and shared understanding that veterinarians would

maintain meaningful representation on Council. In light of the additional governance changes being introduced, including the addition of public members on decision-making committees and the shift to a competency-based Council, maintaining strong veterinarian representation will be critical to sustaining member confidence in the new structure and continuing to support public safety in the delivery of veterinary medicine. To ensure the profession embraces these significant changes, the association strongly encourages the Transitional Council to honour the spirit and intent of the commitments made to all parties.

- **Non-Government Appointed Public Members** – The association does not support the inclusion of non-government appointed public members on committees. While general members of the public provide value on panels to provide perspectives, individuals serving on committees that provide recommendations to Council should be members of the veterinary profession and possess relevant professional expertise. It is worth noting that no other Canadian regulatory veterinary college includes non-government appointed public members on their committees. Harmonizing this practice across Canada would ensure consistency while upholding high standards of veterinary care nationwide. A unified approach to governance structures would also facilitate better collaboration of best practices among provincial veterinary regulators, ultimately benefiting the profession, animal welfare, and public safety.

As mentioned above, the inclusion of public members on committees, especially with decision-making authority, is extremely concerning, particularly as some proposed by-laws would allow public members to constitute a majority of the committee or panel. This is especially significant in the context of Investigations and Resolutions, as well as Discipline and Fitness to Practice matters. Quorum and/or panels responsible for assessing a professional's conduct or practice should not be composed solely of public members. Professional representation is essential to ensure procedural fairness, an informed understanding of current practice standards, and a balanced evaluation of the member under review.

While it is understood that additional capacity is needed to advance the College's work, the inclusion of public members also raises concerns including, but not limited to, the need for rigorous screening of applicants, comprehensive training, and safeguard objective and unbiased decision-making. These measures are imperative to ensure that public members remain appropriately focused on the College's mandate of public protection and effective regulation rather than pre-conceived notions of the profession. Any processes need to be transparent and made publicly available to ensure clear communication in the selection and participation of public members on committees.

- **Competency-Based Council and the Nomination Committee** - The shift to a competency-based Council selection process is understood, but there are significant

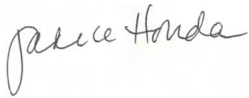
concerns that, without clear policies and transparency, it could lead to a narrowing of viewpoints and a lack of diversity among Council members. Without proper oversight and policies, the selection process may become biased, favouring a narrow group or philosophies, undermining efforts to ensure a broad range of perspectives and representation of the profession. Therefore, it is critical that the College implement a robust recruitment strategy that extends beyond traditional methods and really engages with the profession to ensure a diverse list of candidates.

It is paramount that policies include both core competencies expected of all Council members and additional competencies required to ensure a well-rounded and complementary Council composition, including technical and soft skills. A strong commitment to diversity, equity, and inclusion is essential, ensuring representation from various geographic locations, genders, ethnicities, disabilities, ages, specialties, and lived experiences. In addition, there needs to be an inquiry and/or appeals process for individuals who feel they were unfairly excluded, and avenues for the profession to address concerns about bias candidate selection by the Committee.

- **Fees** - As previously recommended, the College is encouraged to incorporate into its by-laws language providing that annual fee increases be aligned with inflation. This approach would help mitigate the shock and dissatisfaction experienced by members when significant increases occur infrequently. In addition, establishing a transparent fee schedule once the new CVPO corporation is in place would enable members to budget more effectively and better anticipate increases in overall expenses.
- **Streamline and Low Burden Processes** - While the College is required to create by-laws in accordance with multiple pieces of legislation, it is essential that, throughout finalization of the document and transition into the CVPO, careful consideration be given to streamlining processes and requirements to minimize administrative burden on the profession. Clear guidance, realistic timelines, efficient information gathering processes, and appropriate digital solutions will be critical in supporting not only a smooth transition but also long-term success under the CVPO. Without these considerations, the College risks continuing to place unnecessary strain on the profession and negatively impacting its overall well-being.
- **Safeguarding governance of the profession** - It is unique for a regulatory College to have demonstrated the level of transparency and positive engagement it has tried to maintain not only with the association, but also with the profession. However, change is inevitable, and to ensure that future College leadership upholds this philosophy, the recommendations included in this submission are intended to help safeguard the governance of the profession and protect against the misuse of authority.

Thank you very much for your consideration, and we look forward to further discussions on the transition to CVPO. If you have any questions regarding OVMA's comments on any of the feedback, please contact OVMA's Manager of Government and External Relations, Brandi Deimling at bdeimling@ovma.org or 1-800-670-1702, ext. 224.

Sincerely,

A handwritten signature in cursive script that reads "Janice Honda". The signature is written in dark ink on a light background.

Dr. Janice Honda
President



**ONTARIO
VETERINARY
MEDICAL
ASSOCIATION**

Proposed by-laws for the College of Veterinary Professionals of Ontario

OVMA's Response

March 19, 2026

Article 1 – Definitions

No feedback at this time.

Article 2 – Council

2.2 - Council composition has been a discussion that has extended over several years. OVMA strongly believes that for the profession to remain truly self-regulated, licensed veterinarians must constitute a majority of Council members as they are primary owners of clinics and facility directors and bear the majority of accountability and risk. With this proposal there may be some instances where Council may not be comprised of a majority of veterinarians. With the proposed inclusion of public members being added to committees, it is even more imperative that final decisions about the delivery of veterinary medicine be reflective of current practices and that veterinarians maintain a majority representation. OVMA strongly advocates for:

- 10 veterinarians
- 1 veterinarian academic appointment
- 4 veterinary technicians
- 1 veterinary technician academic appointment
- 6 appointed persons

Furthermore, there have been instances where the College was at risk of being unable to operate due to a lack of public appointees. Limiting the number of appointed members helps to mitigate this risk due to the government's, sometimes long, appointment processes.

2.3(h) - In comparison to other regulated professions in human healthcare, five years seems to be at the lower end, with six years being the common standard. It is recommended that to ensure all affairs are concluded, that this be adjusted to six years.

2.3(j) - Considerations should be given for rulings on veterinarians in other jurisdictions. In some jurisdictions law and professional standards can greatly differ from those in Ontario and Canada. It would be prudent for the College to do an independent review to ensure that the member would receive a similar ruling under Ontario and Canadian law. For example, in Canada, cannabis is legal for recreational consumption and possession. In the United States, cannabis is illegal for consumption and possession. If a veterinarian is charged with the possession of cannabis in the United States, this should have no impact on their ability to deliver veterinary medicine in Ontario.

2.3(k) - In comparison to other regulated professions in human healthcare, five years seems to be at the lower end, with six years being the common standard. It is recommended that to ensure all affairs are concluded, that this be adjusted to six years.

2.3(m) - This could impact those involved in smaller associations focused solely on continuing education rather than regulatory or advocacy work, where risk is lower. It is recommended, as seen in most organizations, that a one-year period is considered sufficient to address conflict-of-interest concerns while still keeping governance accessible. Considerations could also be given for the inclusion of Executive or C-suite members of industry organizations.

2.3(n) - To ensure consistency with provision (o), it should be changed to the last five years.

2.3 (q) - In comparison to other regulated professions in human healthcare, five years seems to be at the lower end, with six years being the common standard. This allows for a greater time to ensure there are no other violations or regulatory concerns connected to offenses and ensure that individuals are eligible and competent to participate on Council.

Considerations should be given regarding rulings on veterinarians in other jurisdictions under the Criminal Code. In some jurisdictions law can greatly differ from that in Canada. It would be prudent for the College to do an independent review to ensure that the member would receive a similar ruling under Canadian law. For example, in some countries being 2SLGBTQIA+ is illegal and criminalized, whereas in Canada, it is not considered a criminal offense, and individuals have the right to live openly.

2.3(v) - Depending on the caution or investigation, there may be consideration to raise this to 6 years.

2.5(1) - As seen with regulators of human healthcare professions and across many non-profit Boards, a shift toward competency-based council selection is becoming the standard. This approach allows the College to ensure the profession is well represented while incorporating a range of diverse perspectives. However, before the association can support this model, it

is critical that the College and Committee formalize and publicly consult on policies related to the Nomination Committee and the election process. Without clear policies and transparency, it could lead to a narrowing of viewpoints and a lack of diversity among Council members. It is imperative that the College's recruitment process for candidates be robust and broadened beyond traditional pathways and methods of advertising. A more intentional approach is needed to ensure awareness and equal opportunity for the profession to apply for nominations.

It is paramount that policies include both core competencies expected of all Council members and additional competencies required to ensure a well-rounded and complementary Council composition. There needs to be a strong commitment to diversity, equity and inclusion, ensuring representation across geographic locations, gender, ethnicity, disability, age, specialties, and lived experience. Technical and soft skills should be included in any skill matrix including ethical decision-making, change management, collaboration, and communication.

There should also be an inquiry, or appeals process available to applicants who believe they have been overlooked or unfairly excluded from consideration by the Committee. There should also be pathways for the profession to raise concerns if they believe there is bias or if the committee is not putting forward appropriate candidates for election to Council.

The association also strongly encourages the Council Profile being posted on the College's website. This will provide assurances to members that Council appointments and elections are guided by a transparent and competency-based framework. The provision could be strengthened by including a timeframe in which the matrix would be posted ensuring full transparency prior to elections.

2.5(7) - To ensure fairness and prevent conflict of interest, it is recommended that the Registrar's role is limited to administrative affairs and not include any involvement in the selection or approval of candidates for Council elections.

2.6(1)(b)- This provision requires further clarification, specifically regarding the exact procedures and deadlines, whether outlined in the by-law or in a separate policy. To ensure transparency, these procedures should be developed in consultation with the Nomination Committee and made publicly available. Additionally, a clear framework for accountability should be established to ensure consistency and fairness in the election process.

2.6(7) - Provided election timeframes are not shortened in a way that compromises due process.

2.6(8) - While seen in other regulated human healthcare professions' by-laws in Ontario, the responsibility for breaking a tie should not be left with the Registrar to avoid any perceived bias. It is recommended that the Nomination Committee designate a person to break the tie by lot. This approach would still allow the Registrar to break a tie, if selected, while enabling the Committee to ensure that the most impartial individual has been identified to make the tie-breaking decision. This individual should be identified before the first round of voting.

2.11(1)(k) - Considerations should be given for rulings on veterinarians in other jurisdictions. In some jurisdictions law and professional standards can greatly differ from those in Ontario and in Canada. It would be prudent for the College to do an independent review to ensure that the member would receive a similar ruling under Ontario and/or Canadian law. Another example of this is that criticizing the monarchy in Thailand is considered a criminal offense under Thai law, but such actions are considered a democratic right in Canada.

2.11(3)(b) - To strengthen this provision, it is recommended that a removal of a Council member be done after three absences without a valid reason, rather than a more arbitrary sounding 2 or more. Unforeseen life circumstances can happen, and by-laws should be fair and inclusive. It is proposed that this be amended to allow up to two absences, after which a formal warning is given. If a third absence happens, then removal from the position could occur. This is seen as the best practice in various industries and still ensures that the College's work continues to move forward in a timely manner.

2.12(7)(c) - While this is seen and allowed in Ontario by-laws, a procedure should be detailed to ensure that this does not infringe on Ontario Human Rights.

2.13(1)(a) - As long as there is no impact to quorum, should this happen to multiple seats at the same time.

Article 3 – Officers of Council

3.1(2) - While this provision is already in practice, it would be beneficial to include language that aligns the term of office with the timing of the annual council meeting and the subsequent meeting that follows. This would provide greater clarity and ensure consistency with the College's established meeting schedule.

3.4(5) - Again, the responsibility for breaking a tie should not be left with the Registrar to avoid any perceived bias. It is recommended that the Nomination Committee designate a person to break the tie by lot. This approach would still allow the Registrar to break a tie, if selected, while enabling the Committee to ensure that the most impartial individual has been identified to make the tie-breaking decision. This individual should be identified before the first round of voting.

Article 4 – Meetings of Council

4.4(2)(f) - Considerations for making the meeting confidential if the discussion risks the safety of an animal or group of animals.

Article 5 – Council and Committee Member Code of Conduct

5.2(6)(a)(v) - While the sentiment is understood, the provision should be reworded to avoid the perception that the College is restricting Council members from engaging with the profession and sharing opinions of the Council. Clear guidelines need to be included to differentiate between personal opinions and official College statements, ensuring that open dialogue can continue but without undermining the College's work and decisions made at the Council table.

5.2(7)(a)(ii) - Council members are expected to represent the College in a manner that supports the integrity of the profession, which includes avoiding roles or activities that place them in direct opposition to the College's statutory mandate. OVMA appreciates the College holding Council to this standard to preserve the legitimacy of decision-making as a governing body. To safeguard due process, transparency, and fairness, the College should also consider including language prohibiting Council or Committee members from contacting

one another outside of Council and/or Committee Meetings to influence voting or deliberations.

Article 6 – Committees

6.3(1)(e) - In comparison to other regulated professions in human healthcare, and for consistency with recommendations made for Council above, five years seems to be at the lower end, with six years being the common standard.

6.3(1)(g) - Considerations should be given for rulings on veterinarians in other jurisdictions. In some jurisdictions law and professional standards can greatly differ from those in Ontario and in Canada. It would be prudent for the College to do an independent review to ensure that the member would receive a similar ruling under Ontario and/or Canadian law.

6.3(1)(h) - For consistency with above recommendations on Council, five years seems to be at the lower end, with six years being the common standard.

6.3(1)(j) - This could impact those involved in smaller associations focused solely on continuing education rather than regulatory or advocacy work, where risk is lower. It is recommended, as seen in most organizations, that a one-year period is considered sufficient to address conflict-of-interest concerns while keeping governance accessible.

6.3(1)(k) - To ensure consistency with provision (l), it should be changed to the last five years.

6.3(1)(n) - For consistency with the above recommendations on Council, five years seems to be at the lower end, with six years being the common standard. It is recommended that, to ensure all affairs are concluded, this be adjusted to six years. Again, it would be prudent for the College to do an independent review to ensure that the member would receive a similar ruling under Ontario and/or Canadian law.

6.3(1)(s) - For consistency with the above recommendations on Council, five years seems to be at the lower end, with six years being the common standard.

6.4(2) - OVMA has expressed serious concern during the College's consultation on *Modernizing the Regulation of Veterinary Medicine* over the inclusion of non-government appointed public members on committees. The full response is enclosed in Appendix A. Concerns include, but are not limited to, ensuring diligent screening of applicants, thorough training, and unbiased objectivity, so that public members remain focused on the College's mandate of public safety and regulation.

There should also be consideration for rules on public member applicants not having any current or past personal relationship with a staff or Council member that could be perceived as a conflict of interest. As well, the makeup of the Council and Committees should ensure that there are not multiple individuals from the same veterinary practice, organization, or animal health organization.

6.6(1)(l) - While the section is for the Disqualification of a Committee Member, the provisions seem to be focused on members (veterinarians and veterinary technicians) rather than all committee members, including public members. Clarification or, preferred, inclusion of provisions as to when a public member may be considered for disqualification from a committee is required. Other considerations for disqualification could be conflict of interest, breach of confidentiality (especially relating to investigations), or failure to perform committee duties.

6.6(3)(a) - Similar to Council members, it is recommended that a removal of a committee member is done after three absences without a valid reason, rather than the more vague wording of two or more. Unforeseen life circumstances can happen, and by-laws should be fair and inclusive. It is proposed that this be amended to allow for up to two absences, after which a formal warning is used. If a third absence happens, then removal from the position could occur. This is seen more as a best practice in various industries and still ensures that the College's work continues to move forward in a timely manner.

6.10(1)(b)(iii) - There is concern regarding the number of public members on this committee. While it is acknowledged that capacity is needed for the committee to effectively complete its work and meet the College's objectives, the majority of committee members should be

veterinarians. Under the Act, only veterinarians may serve as facility directors. These individuals are directly involved in the day-to-day operations and delivery of veterinary medicine. Public members play an important role in providing transparency and accountability but should not comprise a majority of the committee. Public members do not possess the same level of technical or operational experience and, if present in the maximum number, could potentially override the profession's knowledge and expertise.

6.10(a)(c)(iv) - Again, there is concern regarding the number of public members on this committee. The majority of committee members should consist of veterinarians or veterinary technicians, especially when reviewing a profession's ability to hold a license or evaluate special requests on a candidate's education, skills, and competencies to practice in the province.

6.10(d)(iv) - Again, there is concern regarding the number of public members on this committee. The majority of committee members should be veterinarians or veterinary technicians when reviewing a professional from the same field. This is necessary to ensure that any investigations involving a member of the College are assessed with appropriate professionals' knowledge, context, and understanding of standards of practice. Public members should not comprise a majority of the committee. There needs to be assurances that cases will be considered fairly and evaluated based on current practices, which each professional member can provide.

6.10(e)(iv) - Again, there is concern regarding the number of public members on this committee. While it is recognized that there is a need to ensure capacity for the committee to complete its work and achieve the College's objectives, the majority of committee members should consist of veterinarians or veterinary technicians.

6.10(f)(iv) - Again, there is concern regarding the number of public members on this committee. The majority of committee members should be veterinarians or veterinary technicians when reviewing a professional from the same field. This is necessary to ensure that any investigations involving a member of the College are assessed with appropriate professional knowledge, context, and understanding of standards of practice. Public members should not comprise a majority of the committee. There needs to be assurances that cases will be considered fairly and be evaluated based on current practices which each professional member can provide, particularly as fitness to practise will now be evaluated.

6.13(1) - The College should be cautious regarding the requirement for three committee members for quorum. If quorum is met only by public members, the committee may not receive the perspective of the actual membership (veterinarians or technicians), which is particularly important given the committees listed and the associated work.

6.14(1)(e) - While the Act allows Committees to meet in panels to advance the College's work, it is important to recognize that these panels will be exercising decision-making authority. This is particularly significant for Investigations and Resolutions, as well as Discipline and Fitness to Practise matters. Panels must not be composed solely of public members when assessing a professional's conduct or practice. Professional representation is essential to ensure fairness, an informed understanding of current practice standards, and a balanced evaluation of the member in question.

6.14(4) - The College should be cautious regarding the requirement for three committee members for quorum. If quorum is met only by public members, the committee may not receive the perspective of the actual members (veterinarians or technicians), which is particularly important given the committees listed and the associated work, especially in regard to investigations.

6.14(5)(b) - Given the significance of the decisions being made, especially in Investigations and Resolutions, Discipline, and Fitness to Practice. A minimum of two perspectives from the same profession is required when reviewing cases involving members of that profession. Public members will also need to understand and respect the opinions of the professional members, knowing that they have the expertise, experience and understanding of standards of practice.

Article 7 – Conflict of Interest

7.1(4) - It is important for the College to provide a clear plan and public policy in place on how it will manage situations where there may be perceived conflicts of interest. This includes cases where a member's actions, relationships, or affiliations create the appearance of compromised impartiality or integrity, even if no actual conflict exists. Addressing these

perceptions is important to maintain public trust and uphold the profession's high ethical standards, while providing transparency on College's expectations.

Article 8 – Remuneration and Indemnification for Council and College Business

No feedback at this time.

Article 9 – Banking, Finance and Administration

No feedback at this time.

Article 10 – The Registrar

10.3(2) - It is recommended that reference be made to relevant sections in the Act, pending regulations, and/or other policies that direct the appointment and removal of the Registrar. This would provide further clarity for members on the framework surrounding these decisions. Furthermore, it should also be clearer that the Council has the authority to remove the Registrar, if necessary, and provide an evaluation on their performance.

Article 11 – Member Information to be Provided to the College

11.1 - There is concern with the amount of information required in Article 11. The processes and requirements for providing member information to the College must be as streamlined and low-burden as possible. Efforts should be made to ensure that these requirements are efficient and have minimal impact on members' time, while still meeting the College's regulatory and operational needs.

11.1(1)(d) - To protect members' privacy, the principal place of residence and personal telephone number should not be publicly posted or disclosed.

11.1(1)(e) - Same as above, to protect members' privacy, the principal place of residence and personal telephone number should not be publicly posted or disclosed.

11.1(1)(k) - The association has significant concerns about the potential impact of this disclosure requirement on help-seeking behaviour. While there is an understanding of the intent to ensure public safety, requiring members to disclose information about a mental or physical condition, including impairments related to alcohol or substance use, could inadvertently discourage individuals from seeking help when needed. This may create an environment of fear or mistrust, ultimately undermining the well-being of members and the profession as a whole. OVMA urges careful consideration of this provision to avoid unintended consequences and encourages further consultation to ensure that the College supports, rather than hinders, members' access to necessary care and support.

11.1(2) - It is recommended that consideration be given to increasing the timelines to sixty (60) days with at least two notification attempts.

11.1(4) - It is recommended that consideration be given to increasing the timelines to ten (10) days.

Article 12 – Register

12.3(1)(t) - OVMA agrees that to ensure transparency and promote trust in the College, it is important that the public be made aware of concerns regarding a veterinarian's conduct through due diligence, fair investigations, and objective review. However, the association opposes any publication of names or allegations as part of the public registry until a discipline decision has been rendered.

As shared in its original submission on Bill 171, a recording in the register should not be made until such time as the matter has been resolved and the time to appeal has lapsed. This is otherwise problematic as it risks publishing untested accusations without due process. This can lead to reputational damage, business risk, negative impacts on revenue, and lead to mental health issues. Furthermore, information is struck from the registry if the result of a discipline proceeding was that no finding of professional misconduct or incompetence was made against the member, and more than 90 days have passed since the information was prepared or last updated. The timing is concerning as reputational damage may have already

occurred by the previous notation having been recorded prior to the conclusion of the matter.

Article 13 – Professional Liability Insurance Coverage

13.2 - Professional liability insurance is standard among regulated professions. To ensure effective risk mitigation and financial protection for members, it is important that professional liability insurance be required. The association also supports run-off coverage, which is also standard in regulated professions. This coverage protects the member in situations where claims arise after discontinuing their license.

As a future consideration, OVMA also recognizes that reliance on employer-provided insurance may carry risks, as coverage can be modified or cancelled without the employee's knowledge, including in circumstances of workplace disputes or employment changes. Considerations of individual professional liability coverage would help ensure further protection for the profession.

Article 14 – Fees

14.1(2) - OVMA recommends that greater consideration be given for timelines to be increased to sixty (60) days with at least two notification attempts.

14.1(4) - OVMA recommends that greater consideration be given for timelines to be increased to sixty (60) days with at least two notification attempts.

14.3(2) - OVMA strongly encourages the College to consider in its by-laws incorporating wording that fee increases match inflation each year. This would mitigate the shock and dismay when members see the significant increase on infrequent occasions. Additionally, having a transparent fee schedule once the new corporation of CVPO is established will allow members to budget more accurately and anticipate an increase in overall expenses. At the same time, the College must ensure strong financial accountability and oversight so members are protected from unnecessary and unexpected significant increases.

There could also be consideration to apply a reduced fee for members taking parental leave during the membership year for which the annual fee applies because the holder is pregnant, has recently given birth, or will be caring for their newborn or newly adopted child. This

would help to alleviate financial pressures individuals may face during this time and contribute positively to the well-being of the profession.

Article 15 – Professional Corporations

15.5(2)(c) - OVMA supports that greater consideration be given for timelines to be increased to sixty (60) days with at least two notification attempts.

Article 16 – Making, Amending and Revoking By-laws

No feedback at this time.

Appendix A

Committee and Panel Composition

Given the challenges experienced under the original *Veterinarians Act* and the limited resources available to committees in addressing increased workloads, the association supports enhancing capacity at the committee and panel level. To ensure continuity, it is recommended that a council member continue to serve as Chair for committees and panels. As the discussions at these levels are significant, work-objective driven, and detailed, it is essential to have someone who can properly facilitate the discussions and align closely with the mandates of the college and work of the council. Furthermore, as veterinarians remain responsible for delegation, the overall responsibility to patients, and that discussions at the committee level will ultimately lead to recommendations to Council, it is important that they have representation on every committee.

Additionally, it is essential to provide training and orientation for all committee members, especially for public members who may lack prior regulatory experience. This training will clarify the standards and objectives of their roles, ensuring they effectively uphold the College's mandate. As well, clear expectations are important to prevent frustration among members who may have differing views on their influence in the decision-making process. Reflecting best practices, committee and panel members should have term limits. The implementation of term limits for members serving on a committee will promote new perspectives, ideas, and diversity of thought. Setting term limits also aligns practices related to committees and panels with other industries. Finally, to ensure the effectiveness of all committee members and committees and panels, it is important to have an evaluation process. This will help to maintain transparency and accountability of the College to the professions and the public.

With regard to non-government appointed public members, the association opposes these individuals on committees. While general members of the public provide value on panels to provide perspectives, members on committees that ultimately provide recommendations to Council should be educated and part of the veterinary profession. It is worth noting that no other Canadian regulatory veterinary college includes non-government appointed public members on their committees. Harmonizing this practice across Canada would ensure consistency while upholding high standards of veterinary care nationwide. A unified approach to governance structures would also facilitate better collaboration of best practices among provincial veterinary regulators, ultimately benefiting the profession, animal welfare, and public safety.

Furthermore, including non-government appointed general members of the public in committee work without ensuring they possess the necessary competencies to advance the College's mandate can lead to potential harm at the expense of policy that impacts the delivery of veterinary medicine. While the intention of involving public members is to enhance transparency and incorporate diverse perspectives, it is important to recognize that

committee work requires specialized knowledge and skills. Without possessing minimum core competencies, public members may struggle to effectively contribute to discussions, make informed decisions, or understand the complexities of veterinary practice.

It has been mentioned that there has been very little marketing for the recruitment of veterinarians to participate in committees at the college. CVPO should make more of a concerted effort to attract, engage, and work with the profession as it pertains to committees, which should help to increase capacity.

While the association opposes the concept of non-government appointed public members serving on committees, should this concept be implemented, the following must be considered:

- Non-government appointed public members should only serve on panels,
- An enhanced recruitment process should be implemented to ensure non-government appointed public members uphold the high standards of veterinary care,
- Extensive training should be provided to non-government appointed public members to ensure they are abreast of events impacting the veterinary industry.

From: wilmot veterinary clinic <wilmotveterinaryclinic@gmail.com>
Sent: Monday, January 26, 2026 3:47 PM
To: President president <President@cvo.org>
Subject: CVPO By Law Consultation

I'm writing to share some thoughts on the Draft By-laws currently out for consultation, and I believe that some changes may actually degrade member confidence and democratic oversight at the CVPO. Right now, the draft puts a lot of power in the hands of the Council, the Nominations Committee, and the Registrar. I think several parts of this framework go too far and lack fairness. Below are some of the concerns I have with the proposed By-Laws.

The Public Register (Article 12.3)

Posting criminal charges and unproven investigations or cautions on the public Register has always been a major concern of mine. It's a "guilty until proven innocent" approach that can permanently damage a professional's reputation before a case is even heard. The Register should only show finalized, proven outcomes. The OVMA has continually voiced its opposition to this proposal, and during the consultation process long ago, the majority of members were also against this (*see attachment*).

Candidate Eligibility and Elections (Article 2)

Giving the Nominations Committee so much say over who is "eligible" to run seems more like hand-picking candidates based on an undefined "council profile" than a real open election. As such, if an open election is off the table, the by-laws should include defined accessible criteria for candidates, not unknown goalposts. If the Nominations Committee only box checks as many candidates as seats available, elections are cancelled and replaced by acclamation. So ultimately, why bother with elections at all? On the other hand, it is very clear who cannot serve on Council, like disqualifying someone just because of an ongoing investigation or caution, which contradicts basic administrative fairness

Composition of Council (Article 2)

During the consultation process, members always felt that veterinarians should exceed the total number of public and registered veterinary technicians (*see attached*). As proposed, the appointed public members (6-8) and RVTs (6) will out number veterinary (11) expertise.

Registrar Oversight (Article 10)

The Registrar's role is expanding significantly under these by-laws, yet there's almost no mention of how that role is held accountable, like the code of conduct for council members in Article 5. There are no term limits, no clear performance review process, and no formal path for removal (like Articles 2.11 and 2.12 for members of council). If the Registrar is going to have

this much authority, the bylaws need to balance it with clear oversight from the elected Council. We may not always have a capable Registrar like Jan Robinson. Including provisions like those in the [College of Nurses of Ontario](#) in our by-laws would help improve governance. What would happen if the Registrar is charged or convicted of a criminal offence?

Due Process (Articles 2.11, 2.12, 6.6)

Several articles allow for members to be removed from Council or committees without a clear, independent hearing or a way to appeal. Allowing the Council to essentially "fire" its own "elected" members. Examples include: Becoming subject to an investigation, being charged (not convicted) with a criminal offence, having terms or conditions imposed, and stepping into certain professional roles. Removal of a council member before anything is even proven again contradicts basic administrative fairness.

Freedom of Speech and Advocacy (Articles 2.3(m), 5.2(6)(v), 2.3(s))

Many of the conflict-of-interest rules will limit how members can advocate for their profession. Council members are restricted from engaging in social media commentary, must not have held advocacy roles or association leadership for the past 3 years, and must not participate in litigation against the College. This will discourage whistleblowing, transparency and healthy disagreement.

Please include my comments as part of the consultation process.

Sadly, I feel the "[opportunity to shape the by-laws](#)" is simply lip service to our members. These topics have been out for consultation many times before, and each time, the feedback from our members and our association has been ignored.

Sincerely

Dr. Lofsky BSc DVM

(former OVMA Board Member and OVMA Small Animal Issues Committee Member)

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Response to council composition
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