



AGENDA ITEM 10.4

TOPIC: Proposed Regulatory Exemption for Farriers and Hoof Trimmers

History of Topic

Through conversations with both veterinary and agricultural communities, the College became aware of the need to consider the ability for certain non-animal veterinary care providers to perform farriery and/or hoof trimming services for animals.

Given this, a regulatory concept related to a regulatory exemption for farriers and hoof trimmers was developed.

Legislative Framework

Section 9 of the *Veterinary Professionals Act, 2024 (VPA)* establishes the legislative authority for the development of an authorized activity model for the practice of veterinary medicine in Ontario.

Section 9 (5) of the *VPA* permits persons (who are not members) to perform certain authorized activities subject to any prescribed guidelines, processes, terms, conditions, limitations, or prohibitions outlined in Regulation.

This ability is further confirmed in Section 93 (1) 7 of the *VPA* which allows for the development of regulation language permitting persons who are not members to carry out specified authorized activities and limiting and governing the carrying out of such activities.

Development of Regulatory Concept by Transition Council

Transition Council reviewed and forwarded for public consultation a regulatory concept related to a regulatory exemption for farriers and hoof trimmers in November 2024. This concept included:

1. Regulatory Exemption for Farriers and Hoof Trimmers

Transition Council proposed the development of regulation language to permit the performance of the following authorized activity by a person engaging in farriery or hoof trimming services:

- Performing a procedure below the dermis if it remains within or below the coronary band and within the structures of the hoof.

2. Additional Recommendations for Qualification under the Regulatory Exemption

Transition Council proposed that the development of regulation language related to farriers and hoof trimmers be further restricted to also require a person to adhere with the following guidelines, processes, terms, conditions, limitations, and/or prohibitions:

Recommendation	Reasoning
Has completed specific training in providing farrier or hoof trimming services which included practical experience.	The College's research related to farrier and hoof trimming services by persons who have received formal and specific training that included in-person, practical experience. This approach is consistent with recommendations proposed for other regulatory exemptions and is designed to serve the public interest.
Has the knowledge, skill, and judgement to: <ol style="list-style-type: none"> 1. Perform the authorized activity safely, effectively, and ethically; and 2. Determine the animal's condition warrants performance of the authorized activity based on the known risks and benefits. 	Recognition of the need for a person to reflect on their own knowledge, skills, and judgement when determining whether to proceed with offering an authorized activity is fundamental to ensuring public safety and reflects the core principles of professional regulation.

A person would not be required to provide proof of their eligibility related to these qualifications to the College of Veterinary Professionals of Ontario (CVPO). Instead, a person would be expected to review the regulatory exemption and determine whether they meet the requirements.

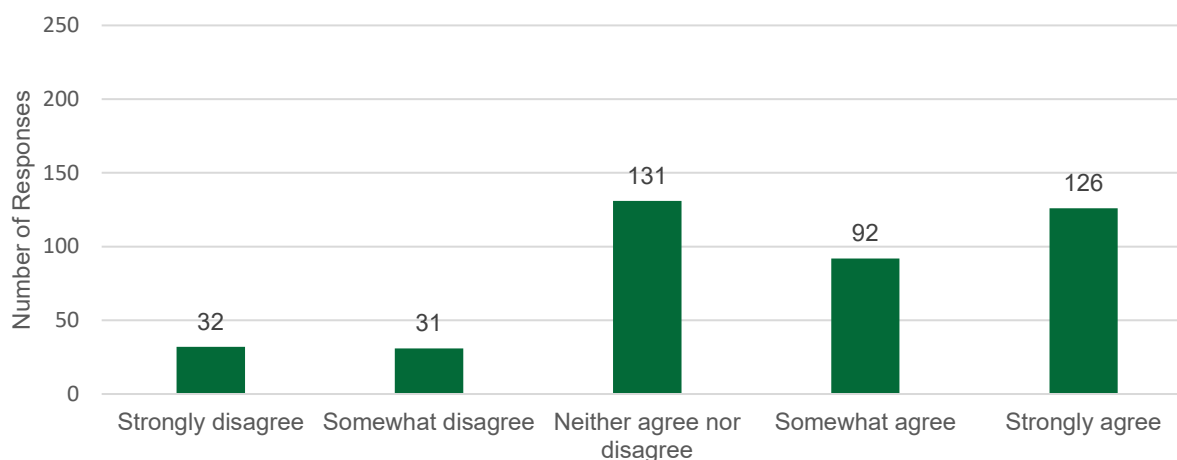
Should the CVPO become aware of a person who is providing farriery or hoof trimming services to the public who may not meet these requirements, the CVPO could investigate these concerns including requesting proof of eligibility and adherence, and pursue further action including the ability to investigate under either unauthorized practice and/or the risk of harm clause if warranted.

General Consultation Feedback

The regulatory exemption for farriers and hoof trimmers was included in the list of regulatory concepts that were circulated for public consultation from February 11 to April 16, 2025.

The following quantitative responses were received related to the proposed regulatory exemption:

Survey respondents were asked to indicate their agreement with a statement about Farriers and Hoof Trimmers on a Likert scale of responses from “Strongly disagree” to “Strongly agree”. The figure below presents the results of 412 responses to the statement “*The proposed conditions and permitted authorized activities for farriers and hoof trimmers are appropriate to protect the public.*”.



In addition to the quantitative data, the following qualitative trends were noted:

- Suggestions to include a requirement for proof of eligibility;
- Suggestions to include a requirement for interprofessional collaboration; and
- Requests for clarity around the term “below the dermis”.

For more information on this consultation feedback, please refer to pages 45-47 of the full consultation report.

Consultation Feedback from Key Partners

Ontario Veterinary Medical Association (OVMA)

In its April 15, 2025, submission the OVMA shared:

- Suggestion to include a requirement for interprofessional collaboration between farriers /hoof trimmers and veterinarians; and
- Suggestion to require veterinarian involvement when farrier and hoof trimmer services extend below the dermis or require drawing blood.

Ontario Association of Veterinary Technicians (OAVT)

In its April 16, 2025, submission the OAVT shared:

- Suggestion that the regulatory concept be revised to specify that performing a procedure below the dermis if it remains within or below the coronary band and within the structure of the hoof only be done by a farrier or hoof trimmer with veterinarian oversight; and

- Question of whether this exemption grants greater autonomy for unlicensed individuals to perform authorized activities than veterinary technician members given veterinary technician members would not be permitted to perform the procedures if they verge on major surgery.

Other Submissions

- Questions about how training models will be considered
 - o Ontario Hoof Trimmers Guild
- Interest in expanding the definition described in the regulatory concept to include allowances for procedures within the perioplic segment
 - o Ontario Hoof Trimmers Guild
- Suggestion to create a two-class concept – maintenance and therapeutic
 - o Ontario Hoof Trimmers Guild
- Suggestion that the regulatory concept include a requirement for collaboration or consultation with a veterinarian
 - o Ontario Association of Bovine Practitioners
- Suggestion that any procedures including exposure of the corium require veterinarian supervision
 - o Ontario Association of Equine Practitioners
- Overall support for the regulatory concept
 - o ProVet Alliance

For more information on this consultation feedback, please refer to the beginning of page 131 of the full consultation report.

Further Information Gathered Based on Consultation Feedback

1. Maintenance vs. Therapeutic Procedures

Comments related to the differences between maintenance vs. therapeutic procedures done on the hoof of an animal raised the opportunity for additional research and consideration of whether further distinction between these two types of services was required. In reviewing the submissions provided, as well as in further conversation with a trusted veterinarian working in this area of practice, it was determined that there was a defensible and evidentially sound desire to create a clearer divide between maintenance versus therapeutic farriery and/or hoof trimming to ensure that the performance of higher risk activities (i.e., therapeutic) remained directly connected to the veterinary profession.

Additional Context to Assist with Decision-Making

Based on this work, Transition Council is asked to consider the following amendment to the regulatory concept on a regulation exemption for farriers and hoof trimmers:

- That persons who meet the qualifications outlined above be permitted to perform a maintenance procedure below the dermis if it remains below the coronary band and within the structures of the hoof; and

- That persons who meet the qualifications outlined above be permitted to perform a therapeutic procedure below the dermis if it remains within or below the coronary band and within the structures of the hoof only if they do so in cooperation and collaboration with a veterinarian member.

For a review of the proposed amendments within the full regulatory concept, please see the chart attached as Appendix A.

Transition Council Discussion

The information contained in this cover sheet is being presented to Transition Council for its review and discussion related to next steps. To aid in this discussion, Transition Council is encouraged to consider if any further clarification or additional information is necessary prior to providing its direction.

Potential Direction

Based on this review and discussion, Transition Council may direct:

1. That the regulatory concept be approved for submission to OMAFA as presented or amended;
2. That the regulatory concept be returned to College staff for further work and consideration; or
3. Any other direction as determined by Transition Council.

Attachments

1. Appendix A – Regulatory Concept (as amended related to maintenance vs. therapeutic procedures)

Concept Chart – Farriers and Hoof Trimmers

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
This column outlines the specific section of regulation.	This column provides a description of the objectives sought and the associated reasoning.	This column provides any additional specific information required to ensure clarity.	This column outlines when Transition Council confirmed the concept as well as any additional questions raised.
Farriers and Hoof Trimmers	<p>General</p> <p>Section 9 (5) 3 of the <i>Veterinary Professionals Act, 2024</i> (VPA) states that regulation language may be developed for allow for “a person who belongs to or practises a prescribed profession or such other persons as may be prescribed” to carry out any such authorized activities as may be prescribed in accordance with any prescribed guidelines, processes, terms, conditions, limitations, or prohibitions.</p> <p>Overview</p> <p>Certain persons who have received instruction in either farriery or hoof trimming possess a specific set of skills, knowledge and training that allows them to safely perform some authorized activities.</p> <p>Regulatory Exemption for Farriers and Hoof Trimmers</p> <p>Transition Council proposes a regulatory exemption for persons trained in farriery or hoof trimming who adhere to</p>	<p>Persons under this regulatory exemption will not be required to provide proof of their eligibility under the regulatory exemption to the College of Veterinary Professionals of Ontario (CVPO). Instead, these persons will be expected to review the regulatory exemption and determine whether they meet the requirements.</p> <p>Should the CVPO become aware of a person who is offering authorized activities to the public who may not meet requirements, the CVPO</p>	Transition Council confirmed the proposed regulatory exemption for farriers and hoof trimmers in November 2024.

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<p>the following guidelines, processes, terms, conditions, limitations, and/or prohibitions:</p> <ul style="list-style-type: none"> • The person must have specific training in providing farrier or hoof trimming services which includes practical experience; and • The person must have the knowledge, skill, and judgement to: <ul style="list-style-type: none"> ○ Perform the authorized activity safely, effectively, and ethically; and ○ Determine the animal's condition warrants performance of the authorized activity based on the known risks and benefits. <p>Authorized Activities Permitted to be Performed by Persons Providing Farriery or Hoof Trimming Services</p> <p>Transition Council proposes that any person who meets the above-mentioned criteria be permitted to perform the following authorized activities:</p> <ul style="list-style-type: none"> • Performing a maintenance procedure below the dermis if it remains within or below the coronary band and within the structure of the hoof; and • Performing a therapeutic procedure below the dermis if it remains within or below the coronary band and within the structures of the hoof only if they do so in cooperation and collaboration with a veterinarian member. 	<p>will have the ability to investigate these concerns including requirement proof of eligibility and adherence. and will be able to pursue its own investigation under either unauthorized practice and/or the risk of harm clause if warranted.</p>	