

**Comments on Bill 109 – *Protecting Ontario's Food Independence Act*,
2026**

Submitted by the Transition Council of the College of Veterinary Professionals of
Ontario
to the Standing Committee on the Interior

August 6, 2026



Introduction

The Transition Council of the College of Veterinary Professionals of Ontario (the College) is pleased to submit the following comments to the Standing Committee on the Interior (Standing Committee) related to Bill 109, most specifically the Schedule 9 changes proposed to the *Veterinary Professionals Act, 2024 (VPA)*. The Transition Council wishes to thank the Minister of Agriculture, Food and Agribusiness, the Hon. Trevor Jones, for his leadership, and the policy team at the Ministry of Agriculture, Food, and Agribusiness (OMAFRA) for their continuing collaboration.

Summary

Transition Council supports the regulatory system additions and amendments proposed in Bill 109 and believes the intent and substance of the proposals accurately reflect the needs of Transition Council to assure increased effectiveness in the implementation of the VPA. Bill 109 contributes to the work being done to improve access to veterinary care, promote animal welfare and food security, and continue a One Health approach to caring for Ontario's animals and people.

The Transition Council has been actively preparing for a final proclamation date of the VPA and its regulations. These minor amendments assist the regulation consultation period to proceed and the modernization of the oversight of the practice of veterinary medicine to begin. This progress is exciting for government, the public, and for the future of veterinary medicine.

Background

The College of Veterinarians of Ontario is the current regulatory body mandated provincially to regulate the delivery of veterinary medicine in Ontario. All veterinarians practising in Ontario

must hold a valid licence with the College. There are currently over 5,500 veterinarians and over 1,700 accredited veterinary facilities in the province. The existing *Veterinarians Act* provides the role and authority of the College, and the VPA will continue to do so for the College of Veterinary Professionals of Ontario (CVPO). The CVPO looks forward to also welcoming close to 5,000 veterinary technicians to the Register, supporting new models of practice that will strengthen the veterinary workforce.

On June 6, 2024, Bill 171 containing the VPA received Royal Assent. This marked a significant milestone in the modernization of the practice of veterinary medicine, and was much welcomed by the College, key partners, members of the veterinary profession, and the public. The VPA required the appointment of a Transition Council within two months of the commencement date, which led to its formation in August 2024. The Transition Council consists of veterinarians, veterinary technicians, and Government-appointed public members. In accordance with the Act, Transition Council's accountabilities include making any regulations, by-laws or standards required to fully implement the Act and to conduct elections of the first Council of the CVPO.

Transition Council has worked diligently on developing regulation concepts and put forward its recommendations to OMAFA in October 2025. These recommendations were developed following in-depth consultation and collaboration with over 45 key partners and direct feedback from over 1,075 individuals.

Transition Council and the profession more broadly remain excited about the upcoming implementation of the VPA. To continue this important work, it is recognized that minor amendments are required to ensure that matters better suited for regulation than policy are all clearly defined, along with clarifying terminology and role accountability. These necessary amendments are reflected in the current Bill 109.

Support for Bill 109:

Transition Council is pleased to offer its overall support for Bill 109, *Protecting Ontario's Food Independence Act, 2026*, and provides the following comments on the core themes of the proposed amendments found in Schedule 9.

1. Amendments to Section 21 and 93 of the VPA (Exemptions to the Requirement for a Certificate of Accreditation)

Transition Council is in support of the proposed amendments to Section 21 and 93 of the VPA and recognizes that they enable the regulatory exemptions for members Transition Council proposed in its October 2025 Recommendations. These exemptions are intended to reflect the current ways veterinary medicine is practised while also ensuring that the roles veterinarians and veterinary technicians have established outside of accredited veterinary facilities can continue with appropriate public safeguards.

2. Amendments to Sections 34, 47, and 93 of the VPA (Assessors or Inspectors' Ability to Enter Premises)

Transition Council is in support of the proposed amendments to Sections 34, 47, and 93 of the VPA and recognize they provide clarity for both assessor and inspector roles in entering premises where members practise. It is important that both assessors and inspectors can conduct their work where the member practises without limitation based on veterinary facilities alone.

3. Amendments to Sections 49 and 51 of the VPA (Procedure for False or Misleading Information)

Transition Council is in support of the proposed amendments to Sections 49 and 51 of the VPA and acknowledges the importance of including utmost clarity in the process for any scenario where false or misleading information may be provided at the time of licensure. These amendments ensure greater public protection and a more robust licensure process.

Conclusion

Transition Council again wishes to express its appreciation to both OMAFA and the Standing Committee for the opportunity to provide its support related to Bill 109. There is a desire to move forward quickly with setting a proclamation date for the VPA and in partnership and collaboration with the Ministry, Transition Council supports this Bill and an immediate regulation consultation period.

As the organization that will be legislatively mandated with the implementation of the VPA on behalf of the Ontario public, the College offers its ongoing availability to the Standing Committee should it have any further questions related to this submission. Full support is extended to the Standing Committee for the completion of this important work.

Yours truly,



Catherine Knipe
Chair, Transition Council
College of Veterinary Professionals of Ontario