November 8, 2017

Submitted electronically to

Thank you for the opportunity to respond to the “Proposed Amendments made under the Health Protection and Promotion Act (tracking number: 17-HLTC042)”.

OVMA is the professional association representing Ontario’s veterinarians. The association’s mission is to advance and promote excellence in the veterinary profession in Ontario and to contribute to the betterment of animal health and the protection of human health. As such, OVMA has reviewed the proposed amendments and would like to provide the following feedback:

OVMA understands that the Ministry is proposing to add three new diseases to reporting requirements in Regulation 557: Avian influenza, strains of influenza not currently circulating in Ontario’s animal population, and echinococcus multilocularis. OVMA supports the addition of these proposed diseases. Veterinarians play a critical role in surveillance of zoonotic diseases and adding these three would improve protection of human health. In addition, adding these diseases to the regulation would support stronger engagement of the public by health units on threats posed by zoonotic diseases.

OVMA recommends that the new regulations be accompanied by a detailed guide that can be used by veterinarians with questions on how to implement the reporting requirements. The Ministry should also consider compensating veterinarians on complicated and time consuming cases. This would be consistent with the current practice at OMAFRA when veterinarians submit samples for rabies testing.

OVMA would also like to provide comments regarding the proposed changes to Regulation 567, which would require additional information to be included on a certificate issued by a veterinarian after a rabies immunization:

- OVMA recommends that the requirement to list permanent identifying information be no more detailed than any obvious features (such as a clipped ear in a feline) and the information listed in the medical record, which generally limited to an animal’s colour(s) only.
- There is concern within the profession that licence numbers should be kept as private as possible for privacy and fraud-protection reasons. Given this concern and that licence numbers are not currently available to the public, the requirement to include a veterinarian’s name and the veterinary clinic should be sufficient in order to determine the veterinarian that administered the vaccination.
- In an increasingly digital world, OVMA recommends clear and specific wording that would allow the use of both digital and hard-copy rabies certificates. The language used in the current regulation is ambiguous and could lead one to believe a hard copy is required.
Thank you again for the opportunity to respond to the Ministry’s proposed regulatory changes. We trust this input is helpful. If you have any questions, please do not hesitate to contact OVMA’s Manager of Government and External Relations, John Stevens at jstevens@ovma.org.

Sincerely,

Kathleen Norman, DVM
President