



THE COLLEGE OF
VETERINARIANS
OF ONTARIO

October 31, 2017

Ms. Nancy Lum-Wilson, Registrar and CEO
Ontario College of Pharmacists
483 Huron Street
Toronto, ON M5R 2R4

Dear Ms. Lum-Wilson:

On behalf of the Council of the College of Veterinarians of Ontario, I am writing to explore your College's perspective on changes that we are proposing to the *Veterinarians Act*.

Our professions enjoy a solid history of strong collaboration and collegiality. This exists at the regulatory level as well as I understand our senior staff share information and discuss important areas of common policy concern on a regular basis. We are fortunate and the public benefits from our mutual respect. In fact, our College benefitted greatly from having one of your staff participate in our working group on Quality Assurance related to the Modernizing the Act agenda.

The *Veterinarians Act* was proclaimed in 1990 and has had little modification since that time. Our efforts to move forward to modernize the Act are many, and I am sure you can identify with several – the need for a mandatory quality assurance program, the need for a streamlined investigations and resolutions process, increased transparency of our information and processes, and a rethink of our exclusive scope of practice model towards an authorized activities framework based on risks in veterinary practice. It is the latter area where we of course recognize our overlapping scopes of practice in the areas of the dispensing, compounding and selling of pharmaceuticals for animals.

In the review and subsequent recommendations related to shifting veterinary practice in the province from an exclusive scope model to an authorized acts model, it has always been clear that an exemption is necessary for the pharmacy profession in the area of the dispensing, compounding and selling of drugs. Pharmacists dispensing medications to animal owners is a longstanding practice in Ontario. Our reason for writing to you, however, is that while we recognize and support this traditional context of the role of a pharmacist with animals and their owners, we also need to appropriately acknowledge and manage the expanding role of pharmacists with human patient care.

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Instilling public confidence in veterinary regulation.

Our College applauds the expanding role of pharmacists and appreciates their important role in human medicine. As we seek to move to an authorized activities model we do, however, have concerns that the expanding scope of practice of pharmacists in human health care does not equally apply to animals. For that reason we want to assure that the language in our proposed new Act maintains the current role of pharmacists with animals and appropriately clarifies where boundaries exist. These boundaries of course are based on knowledge, competency, and risk to animals. More specifically we understand that pharmacists receive and fill a veterinary prescription, inclusive of drug interchangeability as necessary. We do not, however, support pharmacists, regardless of training, prescribing any drug, adapting a veterinary prescription, or administering any drug or substance by injection, ingestion, or inhalation, to or for an animal.

Further, to assist with clarification, a drug used in an animal that is not specifically labelled for use in animals, must be dispensed with a veterinary prescription as it is considered off label drug use and, in animal medicine, requires specific interpretation and recommendation by the prescribing veterinarian. Toxicity in animals related to dosage or to species peculiarities is a real and present risk, and can result in the death of the animal.

Both of our organizations are dedicated to public safety and to risk reduction in patient care delivery. To that end, we are suggesting that within our Act we propose the following wording:

Interpretation

“adapt” means to change a prescription respecting,

- (a) the dose of the prescribed drug,
- (b) the dosage form of the prescribed drug,
- (c) the directions for use of the prescribed drug, or
- (d) the route of administration for taking the prescribed drug,

but does not include therapeutic substitution;

“client” means, with respect to a member, the owner of an animal that the member is treating, an authorized representative of the owner or an individual who the member reasonably determines is acting in the interest of the animal;

“controlled substance” means a controlled substance as defined in subsection 2 (1) of the *Controlled Drugs and Substances Act* (Canada);

“dispense” means, with respect to a drug or substance, to distribute or provide the drug or substance and includes to sell or to give away the drug or substance but does not include the administration of the drug or substance, by injection, inhalation, ingestion or by any other means, to the body of an animal;

“drug” means a drug as defined in subsection 1 (1) of the *Drug and Pharmacies Regulation Act* (Ontario);

“pharmacist” means a member of the Ontario College of Pharmacists;

“prescription” means a direction from a member authorizing the dispensing of a drug or mixture of drugs to a client for a specified animal or group of animals;

“renew” means to provide a client with a prescription that repeats a prescription previously provided to that client;

“therapeutic substitution” means the substitution of a drug that contains chemically different active ingredients that are considered to be therapeutically equivalent.

Application

- (1) Nothing in this Act prevents a pharmacist from compounding a drug to treat an animal or group of animals upon the prescription of a member;
- (2) Nothing in this Act prevents a pharmacist from selling or dispensing a drug to treat an animal or group of animals to a client upon the prescription of a member;
- (3) Nothing in this Act permits a pharmacist to prescribe or administer a drug to an animal;
- (4) Nothing in this Act permits a pharmacist to perform a procedure on tissue below the dermis of an animal;
- (5) Nothing in this Act permits a pharmacist to adapt or renew a prescription;
- (6) Nothing in this Act permits a pharmacist to make a therapeutic substitution of a drug.

In our continuing spirit of collaboration, we are writing to begin a productive dialogue with your College in early 2018.

Sincerely,
COLLEGE OF VETERINARIANS OF ONTARIO



Jan Robinson
Registrar and CEO