

Comments on the Draft Providing Pharmacy Services for Animals Policy

Submitted by the Legacy Council of the College of Veterinarians of Ontario
to the Ontario College of Pharmacists

October 26, 2026

Introduction

Legacy Council of the College of Veterinarians of Ontario (CVO) is pleased to submit the following comments to the Board of the Ontario College of Pharmacists (OCP) related to its public consultation on the proposed Providing Pharmacy Services for Animals Policy.

In submitting these comments, Legacy Council wishes to thank the Board for its commitment to protecting the public interest in health services for animal care. Legacy Council acknowledges the Board's work in this specific and nuanced area of practice for pharmacy professionals and expresses its appreciation for the Board's consideration of, and attention to, the differences that exist between the systems that regulate human and animal health care.

General Background

The CVO is the current governing body mandated with regulating the practice of veterinary medicine in Ontario.

As the largest veterinary regulator in Canada, the CVO licenses more than 6000 veterinarians and accredits over 1800 veterinary facilities. The CVO's role and authority are currently set out in the *Veterinarians Act* (VA) and its associated Regulation 1093. The VA is currently still in effect, and the CVO continues to be overseen by a Council composed of veterinarians and public members known in this transition time as the Legacy Council.

Importance of Relationship

Veterinary and pharmacy professionals in Ontario have, for many years, been an excellent example of the importance of interprofessional collaboration ensuring the delivery of safe, accessible, and accountable care to the public and, in this case, their animals. In supporting this collaboration, the CVO and OCP have built and maintained a trusted working relationship between our policy teams that serves as the basis for clear and robust decision making. Legacy Council commends this relationship and looks forward to this relationship continuing.

The History of Provision of Drugs for Use in the Treatment of Animals in Ontario

Veterinarians have historically been the primary providers of drugs for animals and remain the only professionals in Ontario permitted to prescribe drugs for animal care.

Pharmacy professionals have been dispensing, selling, and/or compounding drugs for animals for many decades. The CVO has long been supportive of this area of practice including when:

- Veterinarians write prescriptions for clients to have filled at pharmacies, especially when the prescription is for extra-label use of a human drug;

- Pharmacy professionals compound and dispense to clients based on a veterinarian's prescription;
- Veterinary facilities work with compounding pharmacies to procure compounded drugs for in-office use, for example, for use in small mammals, avians, exotics, etc.; and
- Pharmacy professionals provide direct animal care support in large veterinary facilities such as through the pharmacy at the Ontario Veterinary College.

Questions and conversations between CVO and OCP about the differences between the practice of human pharmacology and veterinary pharmacology have arisen several times over this period. These interactions have been welcomed and productive and have resulted in the strengthening of both public education and professional understanding.

Opportunity for Current Implementation

Legacy Council recognizes that the draft policy has been developed based on the framework outlined in the pending *Veterinary Professionals Act, 2024* and that the Transition Council of the College of Veterinary Professionals of Ontario is best positioned to provide commentary to this consultation. Though Legacy Council does not oversee nor administer this Act, it does wish to acknowledge that pharmacy professionals are currently permitted to dispense, sell, and compound drugs for animals in the system established by the VA. Given this, Legacy Council has reviewed the draft policy and determined that there may be an opportunity for the Board to implement this important document for immediate use and reference by both its members and the public in an area that currently does not have formal guidance.

Potential Introduction under the VA

In acknowledgement that the draft policy outlines professional expectations that are currently applicable under the VA, Legacy Council wishes to forward a series of straightforward potential amendments to the draft policy that would facilitate present-day implementation. Legacy Council believes that this approach could be beneficial in:

- Providing an easily accessed and referenced framework to pharmacy professionals who are already or considering operating in animal care under the VA;
- Providing clarity to veterinarians who have already or are considering forming working relationships with pharmacy professionals;
- Highlighting the current existence and ongoing importance of interprofessional collaboration between pharmacy and veterinary professionals in Ontario; and
- Aiding the public in understanding their animal care options.

Specific Areas of Potential Adaptation

Should the Board be open to this suggested approach, Legacy Council wishes to put forward the following areas of comment and/or potential adaptation:

Definitions

Legacy Council wishes to acknowledge its appreciation for the consistency in the draft policy's proposed definition of drug with the CVO's current standards, in particular the requirement for all drugs in Schedule "U" to be associated with veterinary prescriptions when used in animals.

Relevant Legislation

Legacy Council suggests that this section and all related references be amended to also refer to the VA to allow for the policy to be implemented under the current system.

Selling or Dispensing to Clients

Legacy Council proposes the removal of the reference to the extra-label drug use decision cascade contained in Lines 57-64 for the following reasons:

- The cascade is not a codified rule, and is instead a practice tool for veterinarians developed by the Canadian Veterinary Medical Association and the Canadian Council of Veterinary Registrars that is subject to change;
- The cascade as a tool is currently under review; and
- The cascade has been designed for veterinary use when prescribing drugs and does not apply to the professional activities of dispensing, compounding, or selling.

Further, the inclusion of the cascade in the draft policy may inadvertently create confusion around which professionals are expected to use it.

Selling to Veterinarians

Legacy Council acknowledges the importance of this ongoing practice and wishes to confirm that the reasonability of the prescription would first be determined by the veterinarian but that pharmacy professionals would remain able to decline to sell should they feel the request is unreasonable.

Compounding

Legacy Council acknowledges the ongoing importance of compounding services provided by pharmacy professionals to veterinary professionals and the public and wishes to encourage current conversations between the two professions and their regulators related to this practice.

Additional Area of Consideration

Legacy Council recommends that the draft policy overtly state in its expectations that pharmacy professionals be required to report any suspected adverse reactions to a drug dispensed by a pharmacist directly to the veterinarian who provided the prescription to allow for the veterinarian to

provide the necessary care. Legacy Council acknowledges that this information is contained in the draft supplementary guidance, however, given its importance to both public and animal health and welfare, Legacy Council wishes to stress the importance of its inclusion directly in the policy.

Conclusion

Legacy Council submits these comments with its ongoing acknowledgement of and appreciation for the important role that both the CVO and OCP serve as profession-based regulatory organizations dedicated to maintaining and protecting the public interest. The people and animals of Ontario are best served when those tasked with their well-being work together for the common good and Legacy Council is thankful for the strong partnership that exists in this area.

Should the Board have any questions related to this submission, Legacy Council would be pleased to support further connection between the CVO and the OCP to achieve best outcomes.

Sincerely,

A handwritten signature in dark ink, appearing to read "Louise Kelly". The signature is fluid and cursive, with the first name "Louise" written in a larger, more prominent script than the last name "Kelly".

Dr. Louise Kelly
President, Legacy Council