

Comments on the Draft Providing Pharmacy Services for Animals Policy

Submitted by the Transition Council of the College of Veterinary Professionals
of Ontario
to the Ontario College of Pharmacists

October 26, 2026

Introduction

Transition Council of the College of Veterinary Professionals of Ontario (CVPO) 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, Transition Council wishes to thank the Board for its commitment to protecting the public interest in health services for animal care. Transition 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

Transition Council is a statutorily appointed board comprised of veterinarians, veterinary technicians, and members of the public who are tasked with helping to develop the regulations, by-laws, and standards required for the full implementation of the *Veterinary Professionals Act, 2024 (VPA)*. For context, in 2024 the provincial government passed the VPA, creating a modernized regulatory system for the practice of veterinary medicine in Ontario. As a multi-faceted piece of legislation, the VPA outlines many desired outcomes including those related to the licensing of veterinary technicians, the creation of an authorized activity model, and the development of a mandatory quality assurance program.

Though not currently in full effect, this historic legislation has been developed to facilitate Transition Council's creation of the pathways necessary to transition from the College of Veterinarians of Ontario (CVO) under the *Veterinarians Act* to the CVPO under the VPA.

Importance of Relationship

Veterinary and pharmacy professionals in Ontario have, for many years, been an excellent example of interprofessional collaboration ensuring the delivery of safe, accessible, and accountable care to the public and, in this case, their animals. In recognizing the importance of this collaboration, Transition Council wishes to maintain and continue the trusted working relationship that CVO and OCP have built between its policy teams and to further uphold this connection as an ongoing basis for clear and robust decision making.

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. Veterinary technicians have long supported veterinarians in the delivery of these services as part of the veterinary team.

Pharmacy professionals have also been dispensing, selling and/or compounding drugs for animals for many decades 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.

Basis for Comment

The *VPA* has three key legislative areas that form the framework in this intersected area of practice. First, Section 3 (1) of the *VPA* outlines the objectives of the CVPO. Subsection 11 states that it is an objective of the CVPO:

To work with other animal care providers to enhance interprofessional collaboration and access to animal health care in Ontario.

Second, Section 9 (5) of the *VPA* sets out the legislative framework for the development of regulation language related to the practice of authorized activities by pharmacy professionals. This section states:

Despite subsections (1) and (3) [only members may perform authorized activities] the following persons may, subject to and in accordance with any prescribed guidelines, processes, terms, conditions, limitations or prohibitions, carry out such authorized activities as may be prescribed:

[...]

2. A person who, under the *Pharmacy Act, 1991*, is a member of the Ontario College of Pharmacists.

Third, in outlining this process, the *VPA* further indicates the need for collaboration when it instructs that:

(6) When developing a proposal for regulations in relation to subsection (5), the College shall take reasonable steps to consult with such professions as would be addressed in those regulations and shall report to the Minister on the outcomes of the consultation.

These sections helped inform Transition Council's own regulatory concept development in this area, which resulted in recommendations submitted to the Ministry of Agriculture, Food, and Agribusiness in October 2025 that state:

Transition Council recommends the development of a regulatory exemption for pharmacy professionals (pharmacists and pharmacy technicians) who are duly registered members of the Ontario College of Pharmacists (OCP) in the Part A Class (subject to any terms, conditions or limitations that may exist on their certificate of registration). Transition Council also recommends that this regulatory exemption require pharmacy professionals to comply with all **current practice standards of the OCP including those specific to animal care.**

Transition Council recommends that any pharmacy professional who meets the above-mentioned criteria be permitted to perform the following authorized activity:

- Compounding, dispensing, or selling a drug based on a veterinary prescription.

The bolded language highlights the specific basis upon which Transition Council submits its comments.

Overall Support

Transition Council wishes, first and foremost, to forward its overall support for the development and implementation of the draft Providing Pharmacy Services for Animals Policy. Transition Council believes that with minor amendments the draft policy will serve as a strong reference for both pharmacy and veterinary professionals offering services to animals in Ontario.

Specific Areas of Potential Adaptation

In offering overall support, Transition Council forwards the following areas of comment and/or potential adaptation for the Board's consideration:

Definitions

Transition 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.

Transition Council commits that any future potential changes to this framework by the Council of the CVPO would be flagged for OCP's consideration and comment prior to implementation.

Selling or Dispensing to Clients

Transition 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 has been designed for veterinary use when prescribing drugs and does not apply to the professional activities of dispensing, compounding, or selling;
- 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; and
- The cascade as a tool is currently under review.

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

Transition 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. Transition Council also notes that it is currently considering a transition away from language associated with a veterinarian-client-patient relationship (VCPR) in favour of an under-the-care-of structure and encourages OCP's ongoing monitoring of the eventual adoption of this language in future drafts.

Compounding

Transition 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

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

Conclusion

Transition Council submits these comments with its ongoing acknowledgement of and appreciation for the important role that both the CVPO and OCP serve as profession-based regulatory organizations dedicated to maintaining and protecting the public interest under the VPA. The people and animals of Ontario are best served when those tasked with their well-being work together for the

common good and Transition Council is keen to continue the strong partnerships that exist in this area.

Should the Board have any questions related to this submission, Transition Council would be pleased to support further connection between the two Colleges to achieve best outcomes.

Sincerely,



Cathy Hecimovich
Chair, Transition Council