



**Canadian Physiotherapy Association**

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April 24, 2023

Ontario Ministry of Agriculture, Food and Rural Affairs  
Food Safety and Environmental Policy Branch  
1 Stone Road West, 2nd Floor S.W.  
Guelph, Ontario N1G 4Y2

Re: 23-OMAFRA001 Proposal to Modernize the Veterinarians Act

To Whom It May Concern:

The Animal Rehab Division (ARD) of the Canadian Physiotherapy Association would like to provide further commentary on the proposed modernization of the *Veterinarians Act* and to specifically address the questions proposed in the discussion paper provided by OMAFRA.

**Do you agree with the changes described in this proposal? Why or why not?**

The ARD agrees with several aspects of the proposal such as increasing delegation to veterinary technicians and greater transparency, however we do not agree with the list of authorized activities that only a veterinarian may perform. The restriction of a number of the activities within this list to be solely performed by veterinarians would have a negative impact on the businesses of animal physiotherapists in the province of Ontario. Should all of these exclusive authorizations become legislated, access to animal physiotherapists would become much more difficult and the ability of animal physiotherapists to use their skills and tools would be compromised. As well, an increase in workload would be shouldered by veterinarians having to complete additional paperwork or the redundant supervision of highly trained non-veterinarian professionals.

**Do you have any specific concerns with any of the items discussed in this proposal? Please explain/describe.**

Animal physiotherapists have been practicing in animal health care for nearly three decades now. We have become collaborators, second opinion experts, diagnosticians, and highly regarded resources for veterinarians and animal owners. The authorized activities that would have the most significant impact on our professionals are as follows:

### 1. Making a diagnosis

While only a veterinarian can make a medical diagnosis, animal physiotherapists are skilled in making a pathofunctional diagnosis (e.g. diagnosing the pathology in how a patient is functioning). It is not the goal of animal physiotherapists to make a medical diagnosis. Our practitioners make diagnoses that veterinarians do not make (e.g. a sacroiliac joint dysfunction, a weakness of the abdominal muscles that is contributing to back pain, strains of muscles, myofascial restrictions, etc.) These *ARE* diagnoses, and because they aren't 'medical diagnoses' taught in veterinary school, they are the types of diagnoses that many veterinarians look to animal physiotherapists to make. Additionally, they are the diagnoses that animal owners have come to rely upon animal physiotherapists to make, (just as people rely on human physiotherapists to make when medical doctors can't determine an exact soft tissue injury, how it affects function, and how to rehabilitate the specific problem from a 'whole person' point of view). We fear that this authorization will inhibit collaborative practice between veterinarians and animal physiotherapists and that the health and welfare of animals will be what suffers as an unintended consequence.

### 2. Performing a procedure below the dermis

This authorized activity would prevent animal physiotherapists from using acupuncture or dry needling as part of their treatment plan. Animal physiotherapists that are performing needling techniques have a degree in physical therapy, a certification in animal rehabilitation, a certification in dry needling and/or acupuncture, and an additional certification in animal needling / acupuncture. This amounts to hundreds of hours of education to acquire this skill set. It is surprising that an exemption was not provided for skilled non-veterinarians who use needling in their practice, especially when acupuncture and dry needling are not core competencies for veterinarians and the shortage of veterinarians in general, let alone veterinarians with acupuncture training would preclude many animal owners from being able to access this service.

### 3. Manipulation

This is not a core veterinary competency. While an exemption has been given to chiropractors, physiotherapists are also trained and competent in manual therapy – including manipulation as well. Why was an exemption not provided for animal physiotherapists as well?

### 4. Applying or ordering the application of a form of energy

When it comes to ordering or applying *diagnostic* imaging, this authorization is appropriate. When it comes to *therapeutic* forms of energy such as shockwave, laser therapy, ultrasound, electrical muscle stimulation, microcurrent, electromagnetic field therapy, etc., most veterinarians have no training in their ordering or application. If they do, it's because they have taken a rehabilitation course, most likely taught by a physiotherapist. Conversely, the safe use of electrotherapeutic modalities (the forms of energy in question) is a core competency of every physiotherapy degree program. Electrotherapeutic modalities are not restricted under the Regulated Health Professions Act (RHPA) for humans. This authorized activity has the appearance of regulatory overreach.

**Would the proposed changes reduce red tape or contribute to additional opportunities or other impacts for you or your business? Please explain.**

The authorized activities that we have commented on above have the potential to drastically alter the practice of animal physiotherapy, leading to a loss of income prohibiting business continuity. Stripping animal physiotherapists of their ability to make their own pathofunctional diagnoses (which

is what guides treatment), or to use acupuncture needles, manipulation techniques, or therapeutic modalities, while simultaneously making reference to owners demanding direct access to complementary and alternative health practices, seems disingenuous. So, owners can access an animal physiotherapist directly, but that same animal physiotherapist cannot use all of the tool in his/her professional tool box? How does one reconcile this dichotomy?

Not only would these authorizations have a negative impact on the business of animal physiotherapists, they would increase the work load for veterinarians, as there would be less practitioners providing acupuncture, manipulation, therapeutic modalities, or helping to diagnose cases where vets are stumped. It should be clear by now that non-veterinarian allied animal health practitioners such as animal physiotherapists are part of the solution to the struggling animal healthcare system, and that veterinarians currently use animal physiotherapists as collaborators.

**Do you feel any important areas for change have been left out of the proposal? Please describe.**

No. The document is very thorough.

**Do you feel these proposals will help make the practice of veterinary medicine become more accessible and accountable?**

There is nothing in the proposal that serves to make veterinary medicine more accessible. At a time when veterinary medicine is understaffed and underserved world-wide, it does not seem prudent to further restrict non-veterinarians from practicing in animal healthcare.

Thank you for allowing public commentary on this important matter. We would welcome further discussion on this topic.

Sincerely,



Laurie Edge-Hughes  
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