



**Summary and Survey re:**  
**Proposed new *Veterinary Medical Act***

January 20, 2026

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## INTRODUCTION AND OVERVIEW

The *Nova Scotia Veterinary Medical Act*, S.N.S. 2001 c.13 (the “**Act**”) was enacted in 2001 and came into force in 2007. In 2014, amendments to the regulations expanded the authority of the Nova Scotia Veterinary Medical Association (“NSVMA” or the “Association”) to include the regulation of Registered Veterinary Technologists (“RVTs”), in addition to veterinarians. Today, the NSVMA regulates approximately 520 veterinarians and 400 RVTs.

Given the length of time that has passed since a comprehensive review of the Act, and in light of significant developments in both the practice of veterinary medicine and the broader landscape of professional regulation, the NSVMA has determined that a full review of the Act is both timely and necessary. Key factors driving this decision include:

- **Public Interest and Government Expectations:** There is increasing emphasis from government and the public on ensuring that regulators prioritize the public interest. This includes a shift away from advocacy-based roles and toward greater public representation on governing bodies such as Boards, Councils, and regulatory committees.
- **Removing Barriers and Broadening the Scope of Practice:** The ongoing shortage of veterinary professionals highlights the need to enable veterinarians and RVTs to work to their full scope of practice. This requires reviewing and, where appropriate, removing legislative and administrative barriers, while also supporting professional mobility, streamlined registration, and multi-jurisdictional licensure.
- **Alignment with Modern Regulatory Frameworks within Canada:** Recent legislation, *including the Fair Registration Practices Act and the Free Trade and Mobility within Canada Act*, has introduced new standards for registration and licensure. Regulators are expected to align with these frameworks to ensure consistency and fairness across jurisdictions, and to enhance mobility across Canada for qualified veterinarians and RVTs.
- **Recent Modernization of Health Profession Regulation:** The Nova Scotia Department of Health and Wellness recently introduced the *Regulated Health Professions Act* (RHPA), which applies to all licensed health professionals under its purview. The RHPA reflects contemporary best practices in regulation, emphasizing transparency, accountability, and quality care.

In response, the NSVMA is preparing a formal submission to the Nova Scotia Department of Agriculture (NSDA), recommending the introduction of a new *Veterinary Profession Act* to modernize the governance of the veterinary profession in the province.

To support this effort, the NSVMA has brought together a Legislation Team composed of NSVMA staff, current and former Council members, veterinarians from diverse practice areas, legal counsel, and a representative from the Nova Scotia Department of Agriculture (“NSDA”). Over the past four years, this team has worked diligently to develop key legislative concepts, consulting with Committee Chairs and drawing on their expertise.

The NSVMA’s submission to the NSDA will request a repeal of the current Act and the introduction of new legislation to reflect the above factors. While the final legislative language will be reviewed and refined by the NSDA and its legal advisors, the draft language provided in this document is intended to illustrate the proposed changes.

To inform its recommendations, the Legislation Team conducted a jurisdictional scan of veterinary legislation across Canada, incorporating best practices, particularly recent reforms in Ontario and Prince Edward Island, into the proposed framework. These concepts have been approved by the NSVMA Council and will now be shared with stakeholders for feedback.

## **NEXT STEPS**

The NSVMA is seeking your feedback on the proposed amendments summarized in this document. In the Comments section of the Survey, please indicate whether the changes effectively address key issues, identify any potential gaps or unintended consequences, and share any suggestions for improvement or clarification.

**Please provide your input through this link: <https://forms.office.com/r/XpRpp8YBJd>**

**The survey will remain open until February 9<sup>th</sup>, 2025.**

The NSVMA is committed to working collaboratively with its members and stakeholders to ensure the development of modern, forward-looking legislation that supports excellence in veterinary care across Nova Scotia.

We look forward to your valuable insights.

## QUICK GUIDE TO KEY CHANGES: EXECUTIVE SUMMARY

### Objects of the NSVMA

The NSVMA is proposing that the new legislation explicitly prioritize the protection of the public interest in the regulation of veterinary medicine. This reflects a growing expectation from both government and the public that regulatory bodies place public safety and trust at the core of their mandate.

### Scope of Practice and Exemptions

The NSVMA is proposing to provide clearer definitions of what constitutes the “practice of veterinary medicine” and the “practice of veterinary technology.” This will help the public and professionals better understand which activities are restricted to licensed individuals and which may be delegated.

In addition, the NSVMA proposes introducing specific exemptions that would allow non-licensed individuals to perform certain tasks, including:

- Hoof trimming
- Shoeing
- Applying corrective devices for gait or stance
- Dehorning or disbudding cattle, sheep, and goats
- Other activities as may be approved by the Minister

These changes aim to clarify professional scopes of practice while recognizing practical realities in animal care.

### Governance

In alignment with modern governance practices that emphasize public representation, the NSVMA is proposing a revised Council structure under the new Act. The proposed Council will consist of a minimum of 7 and maximum of 11 persons, with the composition of the first Council as follows:

- 5 licensed veterinarians
- 2 Registered Veterinary Technologists (RVTs)
- 4 public representatives appointed by Cabinet

This structure supports balanced representation across the profession and the public.

### Registration and Licensing

The NSVMA is proposing the following key changes to registration and licensing:

- Streamlining the decision-making process:

- Authorize the Registrar to make initial registration and licensing decisions for applicants who meet all required criteria. If there are concerns about eligibility, the application will be referred to a Registration and Licensing Committee. Applicants who disagree with the Committee's decision may appeal to a separate Registration and Licensing Review Committee. The NSVMA Council will no longer have any role in registration or licensing decisions.
- Increasing flexibility for applicants:
  - Allow for more efficient registration of internationally educated applicants and those already licensed in other Canadian jurisdictions.
- Separating from membership organizations:
  - For RVTs, the requirement to be a member of the Eastern Veterinary Technologists Association (EVTA) will be removed, in keeping with the principle that regulatory bodies should remain independent from professional associations.
- Allowing for discretion to waive criteria in specific cases:
  - The Registrar will have the authority to waive registration and licensing requirements where required by law (e.g., under labour mobility legislation) or where doing so aligns with the NSVMA's public interest mandate. This provides flexibility to accommodate unique or exceptional circumstances.

### **Corporations and Partnerships**

The NSVMA is proposing a new corporate permit framework to reflect the diverse business models through which veterinarians operate and to allow greater flexibility in ownership structures. Under the proposed legislation, partnerships and other entities, including those structured through trusts, would be eligible to hold corporate permits and engage in veterinary practice.

This framework would permit voting control to be held directly or indirectly by licensed veterinarians, ensuring professional oversight while accommodating modern ownership arrangements.

### **Duties of members**

The NSVMA is proposing the introduction of a new section in the Act that consolidates members' professional duties into a single, clearly defined list with legislative authority. This will improve clarity, accessibility, and accountability for both members and the public.

Key duties would include:

- Cooperating with the NSVMA
- Maintaining current personal and professional information
- Complying with all applicable legislation
- Reporting any criminal charges or disciplinary actions from other jurisdictions

- Practicing only from an accredited facility (unless exempt)

This consolidated approach ensures members are fully informed of their responsibilities and supports consistent enforcement across the profession.

### **Title and Practice Protection**

The NSVMA is proposing new provisions to protect professional titles and clarify who may legally use them. Under the current Act, there are no restrictions preventing non-members from using titles such as “Veterinarian” or “RVT,” including in advertising, which can mislead the public.

The proposed legislation would restrict the use of protected titles, such as “Veterinarian,” “Registered Veterinary Technologist,” and their abbreviations and variations, to individuals who are licensed or otherwise authorized under the Act. It also reinforces that only those who are licensed or exempt may engage in the practice of veterinary medicine.

These changes aim to safeguard professional integrity, prevent public confusion, and ensure that veterinary services are delivered by qualified individuals.

### **Complaints, Investigations and Hearings**

To align with modern regulatory standards across Canada, the NSVMA is proposing several legislative updates to strengthen its professional conduct framework. These changes aim to enhance fairness, transparency, and public protection. Key proposals include:

- Authority to address “conduct unbecoming”, defined as personal behaviour outside the profession that may bring discredit to the veterinary profession;
- Investigating conduct of former members, where the actions occurred while they were licensed;
- Enabling Registrar-led investigations, allowing for early resolution before referral to the Complaints Committee;
- Enhancing confidentiality protections, to safeguard sensitive information throughout the conduct process;
- Expanding sanctioning options, giving regulatory committees greater flexibility in determining appropriate outcomes;
- Authorizing medical examinations, when there are reasonable grounds to support such action; and
- Clarifying publication guidelines, to ensure transparency in how and when disciplinary decisions are made public.

### **Confidentiality and Privilege**

The NSVMA is proposing new confidentiality and privilege provisions to strengthen trust in its regulatory processes and align with standards used by other professional regulators in Nova

Scotia. The current Act does not explicitly protect information obtained through investigations, hearings, or other regulatory activities.

The proposed legislation would:

- Introduce explicit duties of confidentiality, ensuring that sensitive information is protected throughout the regulatory process.
- Establish statutory privilege over NSVMA materials, preventing their use in court or other legal proceedings outside the Association's processes.

These changes ensure that information gathered through regulatory activities is used solely for NSVMA purposes, promoting fairness, privacy, and public confidence.

### **Accreditation and Veterinary Practice Entities**

The NSVMA is recommending the following key updates to the accreditation process:

- Recognizing the evolving nature of veterinary practice, which now occurs in diverse settings beyond traditional buildings. As such, the terminology will shift from accrediting "facilities" to accrediting "Veterinary Practice Entities" (VPEs).
- Designating a responsible veterinarian for each VPE to serve as the primary point of contact with the NSVMA.
- Streamlining the accreditation process by empowering the Chair of the Accreditation Committee to grant early approvals when all requirements are met, without needing full committee involvement.
- Including public representatives on the Accreditation Committee to enhance transparency and accountability.
- Establishing an independent Accreditation Appeal Committee, composed of members and public representatives, and removing Council from the appeals process.
- Eliminating the Emergency Clinic category, allowing all VPEs to offer emergency services as appropriate.
- Permitting small animal house call services to be conducted at the client's residence or wherever the animals are located.
- Removing the requirement for vehicle ownership in large animal mobile services, allowing vehicles to be operated independently of the hospital or clinic that provides the service.

**Please review the remaining content of this Summary document for further detail on each of the above matters**

## **Summary of Key Proposed Changes:**

### **1. Structure of the Act, Regulations and By-laws**

The Legislation Team seeks the placement of the key regulatory and governance matters in the Act, with supplemental details to be largely left to profession-specific regulations or by-laws. This has been the template used most recently in the passage of the [Regulated Health Professions Act](#), SNS 2023 c 15 (“RHPA”) and its associated regulations and by-laws.

Because a statute requires government approval to enact changes, and subordinate legislation such as regulations and bylaws require approval by Cabinet and some combination of the Minister of Agriculture and the NSVMA Council, we are asking government to place as much of the content of the proposed concepts into regulations and bylaws as possible, with a particular emphasis on the use of bylaws. This approach enables flexibility for the future, by allowing changes to be made in a more agile and responsive way. In addition, the NSVMA will continue to use Standards and policies to expand on the matters outlined in each of the Act, Regulations, and By-Laws.

At this time, in advance of direction from the Department respecting its views on the format of the legislation, it is premature to finalize which of the concepts discussed in this Summary will find a place in the Act, Regulations, By-Laws, or potentially policies. With the *RHPA* as a guide, however, the general direction we will be seeking from government will be to lean more heavily toward content in the by-laws, for greatest flexibility, while ensuring the key public protection pieces remain in the Act.

### **PLEASE COMPLETE SURVEY QUESTIONS 5-6: REQUEST FOR FEEDBACK ON STRUCTURE OF ACT, REGULATIONS AND BYLAWS**

### **2. Objects of the NSVMA**

An “objects clause” is the portion of the legislation that sets out the organization’s purposes. It provides a high-level summary of what the organization is empowered by government to do. If there is any doubt about the meaning of other provisions in the legislation, the objects clause is often used as a reference/interpretive tool to determine the legislative intent of other sections.

The current Act provides a limited description of the NSVMA’s role. Below is a comparison of the existing and proposed Objects clauses:

<b>Current</b>	<b>Proposed Amendments</b>
<ul style="list-style-type: none"><li>• The objects of the Association are to serve and protect the public interest by:<ul style="list-style-type: none"><li>○ regulating the practice of veterinary medicine through the establishment of registration, professional-conduct and facilities-inspection processes as set out in this Act, the regulations and the by-laws;</li><li>○ establishing and promoting standards of professional practice and a Code of Ethics; and</li></ul></li></ul>	<ul style="list-style-type: none"><li>• The objects of the Association are to:<ul style="list-style-type: none"><li>• serve and protect the public interest in the practice of the profession;</li><li>• subject to the public interest,</li><li>○ preserve the integrity of the profession;</li><li>○ maintain the public's confidence in the ability of the Association to regulate the profession, and</li></ul></li></ul>

<ul style="list-style-type: none"><li>○ subject to the above clauses, advancing and promoting the practice of veterinary medicine.</li></ul>	<ul style="list-style-type: none"><li>○ advance and promote the practice of veterinary medicine and the provision of veterinary medical services.</li><li>● In order to effectively carry out the objects of the Association, the Association shall:<ul style="list-style-type: none"><li>○ regulate the provision of veterinary services and govern its members through<ul style="list-style-type: none"><li>▪ the registration, licensing, professional conduct, accreditation, and other processes set out in the Act, regulations, and bylaws;</li><li>▪ the approval or adoption of a Code of Ethics;</li><li>▪ the establishment and promotion of standards of practice for the provision of veterinary services, and continuing-competence programs;</li></ul></li><li>○ be accountable to the Minister and the public.</li></ul></li><li>● The Association shall do all such other lawful acts and things as are incidental to the attainment of the objects of the Association and the regulation of the practice of veterinary medicine.</li></ul>
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The proposed objects are intended to clearly reinforce the NSVMA's commitment to serving the public interest, ensuring it remains the primary focus in all matters. This approach aligns with the regulatory frameworks adopted by professional regulators across Canada and beyond, ensuring that in any instance of conflict between the public interest and the interests of members, the public interest will take precedence.

**PLEASE COMPLETE SURVEY QUESTIONS 7-8: REQUEST FOR FEEDBACK ON OBJECTS OF THE NSVMA**

**3. Governance**

The current Act requires at least one public representative on the NSVMA Council but otherwise leaves Council composition to the By-laws. It does not address the inclusion of Registered Veterinary Technicians (RVTs). While this flexibility has benefits, the NSVMA is proposing that the new legislation establish a minimum number of Council members to ensure sufficient representation for effective governance.

In line with the Nova Scotia Government's Policy on Self-Regulation, which requires at least one-third public representation to enhance accountability and prioritize the public interest, the NSVMA is proposing that public members comprise no less than one-third and no more than one-half of the Council. This approach maintains a professional majority while aligning with practices in other

jurisdictions such as the United Kingdom, Alberta, British Columbia, and Ontario, where public representation often meets or exceeds 50%.

Under the proposed legislation, the initial Council would be the existing NSVMA Council at the time the new Act comes into force. Future members would be elected or appointed according to the process outlined in the By-laws, allowing time to develop By-laws that reflect the updated Council composition.

To further align with governance best practices, the NSVMA is proposing to include a requirement that the Council be accountable to both the public and the Minister.

Additionally, the current legislation requires one Council member to be a representative of the Canadian Veterinary Medical Association (CVMA). As regulatory bodies increasingly move away from including association representatives, the NSVMA is proposing to remove this requirement. The Council will continue to liaise with the CVMA as appropriate.

The table below outlines the current and proposed changes with respect to the Council:

Current	Proposed Amendments
<ul style="list-style-type: none"><li>The Act specifies the Association shall be governed by a Council composed of such number of persons as determined by the by-laws.</li><li>The bylaws set out Council composition as follows:<ul style="list-style-type: none"><li>4 officers</li><li>4 members -at-large, 1 of whom is a RVT, and 3 who are veterinarians</li><li>1 public representative and</li><li>1 CVMA respective</li></ul></li><li>The Registrar, as a non-voting member of Council Notwithstanding subsection (1), at least one position on the Council shall be held by a non-veterinarian who shall be appointed by the Governor in Council.</li><li>Members of the Council shall be elected or appointed in the manner prescribed by the by-laws.</li></ul>	<ul style="list-style-type: none"><li>Council shall consist of such number as set out in the by-laws, which shall include a minimum of 7 persons and a maximum of 11 persons, with such combination of veterinarian and registered veterinary technologist members as set out in the bylaws, and at least one third and not more than one half will be public representatives appointed by the Governor-in Council (Cabinet);</li><li>The bylaws will provide the breakdown as follows:<ul style="list-style-type: none"><li>2 RVTs</li><li>5 veterinarians</li><li>4 public representatives appointed by Cabinet</li></ul></li><li>The persons on Council immediately before the coming into force of this Act and the officers of the Council in office immediately before the coming into force of this Act continue in office until their successors are elected or appointed pursuant to the by-laws.</li><li>Members of Council shall be elected or appointed as set out in the by-laws</li></ul>

The current Act does not outline the key responsibilities of Council. It is proposed that the revised legislation provide clearer direction regarding Council's core roles, as outlined below:

- setting the strategic plan for the Association and approving an annual business plan;
- appointing the Registrar;

- monitoring organizational risks and performance and monitoring the performance of all regulatory functions;
- setting fees payable by applicants and members and minimum amounts of professional liability insurance;
- setting Council renumeration and reimbursement policies;
- approving processes for setting and monitoring the NSVMA's annual budget; and
- establishing governance policies.

**PLEASE COMPLETE SURVEY QUESTIONS 9-13: REQUEST FOR FEEDBACK ON COMPOSITION AND FUNCTIONS OF COUNCIL**

**4. Scope of Practice/Exemptions**

The current Act defines “the practice of veterinary medicine” as follows:

*the practice of veterinary medicine, surgery and dentistry, including the examining, diagnosing, manipulating and treating of patients for the prevention, alleviation or correction of a disease, injury, condition, deformity, defect or lesion in an animal with or without the use of any instrument, appliance, drug or biologics, and includes prescribing and dispensing medications, research, teaching and the giving of advice by electronic or any means, with respect to any of the foregoing.*

The definition then provides for various exemptions not considered to fall under the practice of veterinary medicine, such as providing first aid, certain activities taking place in agricultural settings, and the dispensing of medicines to animals by pharmacists.

The NSVMA is proposing a shift toward a more detailed and flexible model for defining the “practice of veterinary medicine.” This model would include a broad definition of veterinary practice, accompanied by a list of “authorized acts” that veterinarians may perform or delegate to others—such as Registered Veterinary Technicians (RVTs) or other practice personnel. Delegated activities and the conditions under which they may be performed (e.g., supervision requirements) would be set out in By-laws approved by the Minister. This approach allows the list of authorized acts and delegation rules to evolve over time. The proposed By-laws would include acts such as conducting assessments, communicating diagnoses, prescribing and dispensing drugs, performing invasive procedures, setting fractures, administering substances, and applying specific forms of energy. Delegation of these acts would be permitted under direct, indirect, or immediate supervision, as appropriate. This model closely mirrors Ontario’s approach under its *Veterinary Professionals Act, 2024* (S.O. 2024, c. 15), and is intended to provide clarity while allowing flexibility in how clinical responsibilities are shared within veterinary teams. It supports the evolution of the profession and ensures that delegation occurs in a safe and regulated manner.

**4A. Scope of Practice for Veterinarians**

The language below outlines the NSVMA’s proposed changes to the “Scope of Practice for Veterinarians”:

1. The "practice of veterinary medicine" means

- (a) the practice of medicine, surgery and dentistry on animals, including
  - (i) the examination, diagnosis, treatment, prevention, or control of any condition, disease, disorder or dysfunction of animals, and
  - (ii) the prescribing of medications for animals;
- and
- (b) non-clinical veterinary activities<sup>1</sup> relevant to the activities described in subsection (a).

2. Without limiting the generality of section (1), the practice of veterinary medicine includes the authorized acts set out in bylaws approved by the Minister.

#### **4B. Exemptions**

In addition, the NSVMA is proposing an "Exemptions" section to outline activities that may be performed by non-members. These exemptions would be subject to a general "catch-all" provision in a separate section, which prohibits non-members from performing any activity on an animal if it is reasonably foreseeable that serious harm to the animal or a human could result.

The proposed list of exemptions includes:

- students fulfilling requirements to become a member, where the activities are performed under supervision as approved by the Registrar;
- applicants pursuing alternative pathways for registration, as approved by Council, where the activities are performed under supervision as approved by the Registrar;
- persons providing first aid or temporary assistance in an emergency;
- the performance of delegated acts by RVTs and others under such supervision as set out in a policy approved by Council
- other delegated acts in accordance with a policy approved by Council;
- the artificial insemination of any species of animal;

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<sup>1</sup> "non-clinical veterinary activities" includes such matters as research, education, management, administration, regulation, the giving of advice, consultation, system development, interdisciplinary collaboration focused on the interaction of animal health, public health, and ecosystem health, and such other non-clinical activities as set out in by-laws approved by the Council. By including such a definition, those persons engaged in non-clinical veterinary activities are still deemed to be engaging in practice and qualify for annual licensing.

- the trimming of hooves, shoeing and applying or using corrective procedures or devices specifically for gait and stance modifications in animals;
- in a farm setting:
  - the castration of calves, piglets and lambs,
  - the caponizing of poultry,
  - the dehorning or disbudding of cattle, sheep and goats, and
  - such other activities as are set out in bylaws approved by the Minister that are performed by:
    - an animal's owner;
    - a member of the owner's household; or
    - a person regularly employed by or engaged by an owner within an ongoing and established working relationship,

provided such activities are performed in accordance with any applicable Codes of Practice approved by Council, or relevant standards of practice approved by Council;

- the non-surgical implantation of an embryo, but not including
  - the synchronization of donor and recipient animals,
  - superovulation, and
  - the collection, evaluation and processing of embryos,
- the drawing of blood from animals by trained technical personnel employed by the Government of the Province or the Government of Canada,
- the use of an animal in research that is carried out using acceptable veterinary procedures if the use of the animal has been approved by an animal care committee acting in accordance with the guidelines of the Canadian Council of Animal Care or such other entity as may be approved by Council, at least one member of which is a licensed veterinarian,
- the dispensing of medicines by pharmacists licensed under the Pharmacists Regulations under the *Regulated Health Professions Act*, based on a prescription issued by a veterinarian;
- the provision of animal chiropractic by chiropractors licensed under the Chiropractor Regulations under the *Regulated Health Professions Act* who are authorized to engage in animal chiropractic as set out in the policy on animal chiropractic approved by Council.

**PLEASE COMPLETE SURVEY QUESTIONS 14-17: REQUEST FOR FEEDBACK ON SCOPE OF PRACTICE OF VETERINARIANS AND EXEMPTIONS**

#### **4C. Scope of Practice for RVTs**

The current RVT scope of practice is set out in the *Veterinary Technologists Regulations*, NS Reg 160/2014 (“**RVT Regulations**”) which were passed in 2014. Since that time, the number of RVTs has more than doubled, increasing RVT capacity to provide support within veterinary practices. In light of this, the NSVMA is proposing the following amendments:

- Revise the definition of to allow greater flexibility:
  - Current definition: *“Practice of veterinary technology” means the performance of any of the veterinary services set out in Sections 14 to 16 on an animal, and includes related educational, managerial, research, administrative and commercial sales practices.”*
  - Proposed definition: *“Practice of veterinary technology” means the performance of such aspects of the practice of veterinary medicine as delegated by a veterinarian to a registered veterinary technologist in accordance with bylaws approved by Council, and includes related educational, managerial, research, administrative and commercial sales practices.”*
- Clarify that RVTs may only engage in the practice of veterinary medicine:
  - Under the supervision of a veterinarian, as set out in policy approved by Council.
  - Where the services fall within the individual scope of practice of the RVT.
  - Subject to any limitations, restrictions, or conditions that may modify a member’s permitted activities or scope of practice.
- Define “individual scope of practice” in legislation to mean:
  - The services for which an RVT is educated, competent, and authorized to perform within their practice setting.

#### **PLEASE COMPLETE SURVEY QUESTIONS 18-19: REQUEST FOR FEEDBACK ON SCOPE OF PRACTICE FOR RVTs**

#### **5. Registration and Licensing**

The current Act provides for a registration and licensing system in which members must qualify for initial registration in order to apply for an annual licence to practice. Registration is a one-time initial event and signifies that the member has met the qualifications for entry into the profession.

Once registered, a member must then annually meet the criteria for one of the categories of licence, and must renew their licence each year to continue in practice. There is no need to produce proof of graduation, for example, during the annual renewal process, but there is a need to determine that a registrant meets the ongoing requirements for licensure, such as proof of practice hours and professional liability insurance requirements. As a result, the criteria for registration and licensing differ.

## **5A. Registers and Licensing Categories**

The NSVMA is proposing that the current structure for registers and licensing categories be retained under the new legislation. However, several amendments are recommended to enhance clarity, flexibility, and alignment with modern practice needs:

- Establish multiple Registers to reflect the various types of registration enabled by the new legislative framework, rather than continuing with a single Register:
  - Veterinarians Register
  - Limited Register (Veterinarian)
    - Includes individuals whose practice is subject to conditions or restrictions, such as those resulting from disciplinary proceedings.
  - RVT Register
  - Limited Register (RVT)
  - Corporate Permit Register
- Include authority in the Act to create additional Registers through the By-laws, allowing the NSVMA to respond efficiently to changes in the practice environment without requiring legislative amendments.
- Eliminate the Non-Practicing Licence, as a license should signify authorization to practice.
- Remove the Public Service Licence, recognizing that all veterinarians practicing in Nova Scotia should be held to the same professional standards and granted equal rights and responsibilities, including eligibility to vote and serve on Council and committees.
- Introduce a Limited Practice license category for veterinarians and RVTs. This would cover licenses with restrictions—whether time-based (replacing the current Temporary Licence) or arising from disciplinary, registration, or mutual agreement processes.
- Align license categories with the proposed registration structure, as follows (note: corporate permit holders do not require a separate licence, as the permit itself authorizes practice):
  - General Practice Veterinarian Licence
  - Limited Practice Veterinarian Licence
  - General Practice RVT Licence
  - Limited Practice RVT Licence

**PLEASE COMPLETE SURVEY QUESTIONS 20-23: REQUEST FOR FEEDBACK ON THE TYPES OF REGISTERS AND CATEGORIES OF LICENCES**

## 5B. Registration Criteria (Veterinarian Register)

The criteria for registration of veterinarians will largely remain the same as under the proposed Act. However, the proposed revisions recognize that there are more internationally educated applicants, and the language must be flexible enough to accommodate this, while at the same time ensuring those admitted to the profession have the appropriate competencies to practice.

Further, in light of recent developments requiring the recognition of licences across provincial and territorial borders, we propose adding a provision that explicitly states that if an applicant is deemed eligible for registration under the *Canada Free Trade Agreement* or Nova Scotia's *Free Trade and Mobility within Canada Act*, then they must be granted registration in Nova Scotia.

The table below outlines the current and proposed changes with respect to registration criteria for veterinarians:

Current Criteria	Proposed Criteria(criteria can be waived if required under mobility legislation)
<ul style="list-style-type: none"><li>• Pay prescribed fee and completes application form</li><li>• proof of education:</li><li>• is a graduate in veterinary medicine from a university, college or school recognized by the Canadian Veterinary Medical Association and meets one of the following qualifications:<ul style="list-style-type: none"><li>○ holds a Certificate of Qualification from the National Examining Board of the Canadian Veterinary Medical Association,</li><li>○ is a member in good standing of a veterinary medical association of another jurisdiction with comparable registration criteria as determined by Council, and is licensed or entitled to practise veterinary medicine under the law of that jurisdiction,</li><li>○ is a member in good standing of a veterinary medical association of another province or territory that is a signatory to any agreement under the Agreement on Internal Trade that is signed by the Association and that mandates registration of the applicant in Nova Scotia,</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Pays the prescribed fee and completes application form;</li><li>• proof of education:<ul style="list-style-type: none"><li>○ is a graduate of a program in veterinary medicine accredited by such organization as Council approves; or</li><li>○ holds a professional degree in veterinary medicine (Doctor of Veterinary Medicine or recognized equivalent) from a college, school or faculty of a university recognized by the government of the jurisdiction in which the college, school or faculty is located, and is approved by Council; has been accepted by the National Examining Board for purposes of authorizing graduates to write the examinations leading to a Certificate of Qualification or successor credential approved by the Council;</li><li>○ holds a Certificate of Qualification, or successor credential approved by the Council, from the National Examining Board of the Canadian Veterinary Medical Association or its successor, or holds another credential as set out in a policy approved by Council that tests similar knowledge as tested through the National Examining Board;</li></ul></li></ul>

Current Criteria	Proposed Criteria(criteria can be waived if required under mobility legislation)
<ul style="list-style-type: none"> <li>• is not subject to a disciplinary finding that prohibits the applicant from engaging in the practice of veterinary medicine,</li> <li>• has completed the examinations approved by Council, including an examination demonstrating knowledge of the Act, regulations and by-laws,</li> <li>• is competent and of such character to safely and ethically engage in the practice of veterinary medicine, and</li> <li>• if their first language is other than English, has passed the Test of English as a Foreign Language or another test that Council determines, with a score determined by Council.</li> </ul>	<ul style="list-style-type: none"> <li>• proof satisfactory to the Registrar that the applicant:</li> <li>• has successfully completed any examinations required for registration as are set out in a policy approved by Council;</li> <li>• has demonstrated proficiency in the English language in the manner prescribed by the Registrar;</li> <li>• has the capacity, competence, and character to safely and ethically engage in the practice of veterinary medicine;</li> <li>• has no outstanding complaints, findings, prohibitions, conditions, agreements or restrictions from any registration or licensing authority that preclude registration on the Veterinarians Register ;</li> <li>• is a Canadian Citizen or legally able to work in Canada;</li> <li>• is the person named in the documentation submitted in support of this application;</li> <li>• is eligible for a licence under this Act,</li> <li>• any additional information required by the regulations or bylaws.</li> </ul>

**PLEASE COMPLETE SURVEY QUESTIONS 24-25: REQUEST FOR FEEDBACK ON CRITERIA FOR REGISTRATION ON VETERINARIANS REGISTER**

**5C. Registration Criteria (RVT Register)**

The criteria for registration of RVTs will largely remain the same under the proposed legislation. The proposed changes are intended to offer more open and enabling language. The proposed changes also include removing the requirement to be a member in good standing of the Eastern Veterinary Technicians Association, as membership in a professional advocacy association should not be a precondition for licensure as a regulated professional.

The table below outlines the current and proposed changes with respect to registration criteria for RVTs:

Current Requirements for RVT registration	Proposed Requirements for RVT registration
<ul style="list-style-type: none"> <li>•Payment of applicable fee;</li> <li>•Graduated from accredited veterinary technology program;</li> <li>•has successfully passed the national examination;</li> <li>•proof person is not the subject of any existing or pending complaint or disciplinary finding under the Act or in any other licensing jurisdiction,</li> <li>•is competent, capable and of such character to safely and ethically practise veterinary technology, and is a member in good standing of the EVTA.</li> </ul>	<ul style="list-style-type: none"> <li>•payment of the applicable fee, within the time determined by the Registrar and in a method acceptable to the Registrar;</li> <li>•proof of graduation from an accredited veterinary technology program;</li> <li>•has successfully completed any examinations that may be required as set out in a resolution approved by Council;</li> <li>•has demonstrated proficiency in the English language in the manner prescribed by the Registrar;</li> <li>•has the capacity, competence, and character to safely and ethically engage in the practice of veterinary technology;</li> <li>•has no outstanding complaints, findings, prohibitions, conditions, agreements or restrictions from any registration or licensing authority that preclude registration;</li> <li>•is a Canadian Citizen or legally able to work in Canada;</li> <li>•is the person named in the documentation submitted in support of this application;</li> <li>•is eligible for a licence under the Regulations, any additional information required by the regulations or bylaws.</li> </ul>

**PLEASE COMPLETE SURVEY QUESTIONS 26-28: REQUEST FOR FEEDBACK ON CRITERIA FOR REGISTRATION ON RVT REGISTER**

**5D. Licensing Criteria for all types of licences**

The principal change to the licensing criteria for both a Veterinarian and RVT General Practice Licence is the removal of specific currency requirements from the Act and their placement in a policy approved by Council. For example, the current Act spells out that veterinarians require proof on an annual basis that they have either engaged in practice for at least 300 hours in the previous 12 months, or have met one of the following criteria in the previous 5 years:

- They have graduated from a school recognized by the CVMA;

- They have obtained their Certificate of Qualification;
- They have engaged in practice for at least 1000 hours;

For RVTs, the currency of practice requirements in the existing regulations are slightly different, requiring graduation in the previous 3 years, practice of at least 1000 hours in the previous 5 years, or successful completion of an educational or training program approved by the RVT Credentials Committee.

Currency of practice requirements vary across the country and are continuously subject to review. In the hope of achieving as much consistency as possible across the country, we propose removing these criteria that are subject to such change from the Act, and including the criteria instead, in a policy approved by Council. This will allow flexibility to change more readily in the future.

With respect to criteria for a Limited Practice Licence either as a veterinarian or as a RVT, the NSVMA is proposing the following criteria:

- the member does not meet the criteria for a General Practice Licence but the person or committee considering the application believes it is in the public interest to issue a licence limited as to scope, location, time or such other limitation as the decision maker determines; or
- conditions or restrictions have been agreed upon or imposed by the licensing decision maker, or by another regulatory committee such as a Complaints Committee.

**PLEASE COMPLETE SURVEY QUESTIONS 28-30: REQUEST FOR FEEDBACK ON LICENSING CRITERIA**

**5E. Waiver of Criteria for Registration or Licensing**

The NSVMA is proposing a provision to allow the waiver of registration or licensing criteria in cases where applicants are unable to provide the required proof due to unforeseen circumstances. For instance, a labour mobility applicant may have met different criteria in another Canadian province but still be entitled to registration in Nova Scotia under the *Canadian Free Trade Agreement* or the *Free Trade and Mobility Within Canada Act*. To support compliance with legal obligations and inter-jurisdictional agreements, the NSVMA recommends including authority in the Act to waive specific criteria when required by law or agreement.

Additionally, the NSVMA is proposing a permissive provision that would allow specific registration or licensing criteria to be waived when it serves the public interest. For example, during the pandemic, a retired veterinarian may not have met the required practice hours to be considered current, yet could still contribute meaningfully in a restricted role due to workforce shortages. If the decision-maker is satisfied that the individual is competent and safe to practice, this provision would enable their registration or licensing in alignment with the Association's objectives.

**PLEASE COMPLETE SURVEY QUESTIONS 31-32: REQUEST FOR FEEDBACK ON WAIVER CRITERIA**

**5F. Registration and Licensing Process**

The NSVMA is proposing a governance-focused reform to the registration and licensing process to ensure Council remains at a strategic oversight level. Currently, the Registrar reviews

applications, and Council hears appeals of denials—placing Council in an operational role that involves decisions about individual applicants, which is not appropriate for a governance body.

To address this, the NSVMA proposes establishing a separate *Registration and Licensing Committee* and a *Registration and Licensing Review Committee*, both composed of members and public representatives. These bodies would handle individual decisions and appeals, allowing Council to focus on policy and oversight.

Under the proposed framework:

- The Registrar, supported by staff, would approve applications when all criteria are met, impose conditions or restrictions as needed, or deny applications when criteria are not met.
- If uncertain about an applicant's eligibility, the Registrar may refer the application to the Registration and Licensing Committee.
- Applicants dissatisfied with a decision—whether from the Registrar or the Committee—would have the right to request a review by the Registration and Licensing Review Committee.

This structure ensures fairness, transparency, and a consistent right of review, while removing Council from operational involvement in individual registration and licensing decisions.

**PLEASE COMPLETE SURVEY QUESTIONS 33-34: REQUEST FOR FEEDBACK ON REGISTRATION AND LICENSING PROCESS**

**5G. Removal of Life and Non-Active categories of membership**

The existence of licensing categories and categories of membership in the current Act, including persons who are not authorized to practice, creates confusion. We propose removing the "Life" and "Non-Active" categories of membership, and instead creating similar Affiliate titles, rather than membership categories, that may be used by persons who meet the criteria for such use.

The proposed Affiliate titles are:

- Retired;
- Non-practising; and
- Life

The NSVMA is proposing that the specific criteria to qualify for an Affiliate title will be set out in a policy approved by Council.

**PLEASE COMPLETE SURVEY QUESTIONS 35-36: REQUEST FOR FEEDBACK ON CREATION OF AFFILIATE TITLES**

**6. Corporate Entities and Corporate Practice**

In order to recognize the various types of business structures through which veterinarians practice, and to allow maximum flexibility in ownership structures, a new corporate permit structure is proposed that allows for the following:

- Corporate entities and partnerships are authorized to practice through a corporate permit
- For corporations, shares representing a majority of the voting control must be legally and beneficially owned, directly or indirectly by one or more licensed veterinarian members, and a majority of the directors and officers must be licensed veterinarians
- For partnerships, a majority of the partners who have the ability to direct and control the operations of the partnership must each hold a general practice licence or be corporate entities which are directly or indirectly legally and beneficially owned and controlled by one or more individuals who hold a general practice licence
- For trusts, ownership and control must rest with licensed veterinarian members. All trustees must be veterinarians who hold general practice licences and all beneficiaries of the trust must be licensed veterinarians or their spouses or children.

To improve communication and accountability, each corporate entity would be required to designate a licensed veterinarian as the primary contact with the NSVMA.

Additionally, a review process would be established for corporate entities whose permit applications are denied, mirroring the structure used for registration and licensing reviews.

**PLEASE COMPLETE SURVEY QUESTIONS 37-42: REQUEST FOR FEEDBACK ON CORPORATIONS AND PARTNERSHIPS**

**7. Duties of Members**

The NSVMA is proposing to consolidate key professional duties and obligations of members into a single, clearly defined section of the Act. Currently, the legislation contains very few explicit member responsibilities and lacks a dedicated provision outlining the expectations of NSVMA membership. To address this gap, the NSVMA recommends including a comprehensive list of core duties, such as:

- Cooperating with the NSVMA;
- Maintaining up-to-date contact information;
- Keeping a record of practice hours;
- Complying with the Act and By-Laws;
- Practicing within one's individual scope of practice; and
- Reporting concerns to the Registrar regarding professional misconduct, incapacity, or unsafe practice by another member.

Additionally, members would be required to self-report any ongoing investigations or disciplinary findings from other jurisdictions, as well as any criminal charges.

These duties would be clearly outlined in the Act to promote accountability, transparency, and public trust in the profession. Please find these duties in more detail below for your consideration:

A member shall

- (a) comply with this Act, the regulations, by-laws, code of ethics, standards of practice established by Council;
- (b) co-operate with the Association, the Registrar and any committees of the Association with respect to any regulatory process or requirements under the Act, the regulations and the by-laws;
- (c) maintain current contact information with the Association;
- (d) maintain a record of practice hours, when the member is engaging in practice;
- (e) maintain such professional liability insurance or other form of malpractice coverage or liability protection as required by the Council, when holding a practising licence;
- (f) practise only within
  - (i) the member's individual scope of practice, the scope of practice of the member's designation,
  - (ii) any terms, conditions or restrictions of the member's licence, and
  - (iii) any restrictions arising from the accreditation category in which the member is practising;
- (g) practice only from an accredited facility unless employed by the Public Service of Canada or otherwise granted an exemption by the Registrar;
- (h) report to the Registrar if the member has reasonable grounds to believe that another member
  - (i) has engaged in professional misconduct, incompetence or conduct unbecoming the profession,
  - (ii) is incapacitated, or
  - (iii) is practising in a manner that otherwise constitutes a danger to the public;
- (i) report to the Registrar if the member
  - (i) has been charged with, pleaded guilty to, been convicted of any offence in or out of Canada that is inconsistent with the proper professional behaviour of a member, including a conviction under
    - (A) the Criminal Code (Canada),
    - (B) the Controlled Drugs and Substances Act (Canada), or
    - (C) such other legislation as may be prescribed in the regulations;
  - (ii) has been found guilty of a disciplinary finding in another jurisdiction;

- (iii) has had a licensing sanction imposed by another jurisdiction;
- (iv) is the subject of a civil proceeding alleging deficiencies in competence, capacity, or conduct; or
- (v) is the subject of an investigation or disciplinary process in any jurisdiction.

**PLEASE COMPLETE SURVEY QUESTIONS 43-44: REQUEST FOR FEEDBACK ON DUTIES OF MEMBERS**

**8. Virtual Practice**

The NSVMA is proposing a flexible approach to regulating virtual veterinary practice, recognizing the evolving nature of technology and interjurisdictional mobility. The current legislation does not address virtual care, creating uncertainty around where a veterinarian must be licensed—whether in the jurisdiction of the provider or the location of the animal receiving care.

Rather than embedding prescriptive licensing requirements in the Act, the NSVMA is proposing that the legislation empower regulators to define what constitutes the "practice of veterinary medicine," including virtual and electronic care, both within and outside Nova Scotia. This would be addressed through Council-approved policy, allowing for adaptability as legal standards and interprovincial agreements evolve.

This approach enables the NSVMA to collaborate with other jurisdictions over time to develop consistent registration criteria for virtual practice, while maintaining clarity and flexibility for members.

**PLEASE COMPLETE SURVEY QUESTIONS 45-46: REQUEST FOR FEEDBACK ON VIRTUAL PRACTICE**

**9. Title and Practice Protection**

The current Act does not provide protection for specific titles, and therefore does not clearly prohibit non-members from using words such as "veterinarian" or "RVT" to describe themselves or their activities, including in advertising.

The NSVMA is proposing adding language that provides both title protection (restricting the persons authorized to use titles like "veterinarian" or "RVT" or any derivation or abbreviation thereof, to those registered and licensed under the Act) and practice protection (restricting the ability to engage in the practice of veterinary medicine only to those authorized by the Act or to those who are exempt from the Act).

**PLEASE COMPLETE SURVEY QUESTIONS 47-48: REQUEST FOR FEEDBACK ON TITLE AND PRACTICE PROTECTION**

**10. Complaints, Investigations, and Hearings**

**10A. Investigations and Hearing Process**

The NSVMA is proposing a comprehensive update to the complaints, investigations, and hearings process under the *Veterinary Medical Act* to align with best practices and the approach

taken by other professional regulatory bodies in Nova Scotia, such as those under the RHPA. The goal is to ensure fairness, transparency, flexibility, and consistency for both members and the public.

Key proposed changes include:

- providing interpretative guidance regarding the purpose of the professional conduct process: to address professional misconduct, conduct unbecoming the profession, incompetence, and incapacity in accordance with the objects of the Association. Further, the guidance states that except where considered prejudicial to the attainment of the objects of the Association, the process must take into account the potential for the rehabilitation of the respondent;
- Introducing a definition of “conduct unbecoming the profession” and clearly providing for the Association’s authority to address conduct unbecoming. This term is defined to mean: *“conduct in a member’s personal or private capacity that tends to bring discredit upon members of the profession.”* Most other self-governing professions have this authority and it is important for the preservation of the reputation of the profession that the Association can step in to address private conduct when it impacts the reputation of the profession;
- preserving the Association’s ability to investigate and proceed with complaints against former members if the conduct occurred while they were members;
- introducing the ability of the Registrar (through NSVMA staff), to commence an investigation without the involvement of the Complaints Committee and to informally resolve or dismiss complaints that meet specified criteria, such as being frivolous or vexatious or outside of NSVMA jurisdiction, without referral to a Committee. If a complaint is dismissed by the Registrar without the involvement of a committee, the complainant has the right to seek review of the Registrar’s decision by a panel of the Complaints Committee. The Registrar also has the authority to require a member to be subject to medical review, to have an audit of their practice, or to complete a competence assessment, as part of the investigation – but only with the member’s consent. If the member does not consent, the matter would be referred to the Complaints Committee which has the authority to order such matters where there are reasonable and probable grounds for doing so;
- introducing protection over confidential and privileged information gathered during the course of the professional conduct process, to encourage complainants to come forward without fear that their confidential information will be published in court or otherwise;
- introducing the ability for the Complaints Committee to impose interim conditions or restrictions on a member to protect the public, prior to a hearing taking place, where the circumstances warrant such interim action. At present, the Complaints Committee has the authority to issue an interim suspension, but not the ability to impose interim conditions or restrictions while the investigation continues;
- introducing the ability for the Complaints Committee to impose specified remedial educational requirements on a member that are not considered to be licensing sanctions. This emphasizes the need for a remedial approach whenever possible and supports the interpretive guidance set out above ;

- clearly establishing that the NSVMA has jurisdiction over the following matters, each of which will have a definition in the Act:
  - professional misconduct
  - conduct unbecoming
  - incompetence
  - incapacity
- empowering the Registrar, investigator, and Complaints Committee with the same investigatory and subpoena powers and privileges that the Professional Conduct Committee presently has (those of a Commissioner under Nova Scotia's *Public Inquiries Act*, and specific power to summon witnesses and subpoena documents). These powers are key to regulatory investigations, and would bring the NSVMA into line with the powers currently possessed by the registrars and committees of other professional regulators in the Province;
- enabling the Professional Conduct Committee to order a respondent to submit to a mental or physical examination when the Committee has reasonable and probable grounds to do so, which is often necessary to determine the "culpability" of a member, or the impact of an intended sanction. In many instances, the cause of a complaint is believed to be rooted in an addiction, or a mental or physical illness;
- introducing the ability for the Registrar to impose a fine to those practicing without a valid licence (the amount of which will be set by Council), and to impose a fine for issues of misconduct and conduct unbecoming that does not exceed \$50,000 in 2026 dollars (such fines are generally imposed only in circumstances where a member has gained financially as a result of the conduct or has engaged in serious and intentional wrong-going); and
- introducing a definition of "costs" to increase transparency about the types of costs a member may be responsible for paying the NSVMA after investigating and deciding a matter (examples: fees for expert witnesses, costs of competence assessments, court reporting and legal fees, committee honoraria, etc).

**PLEASE COMPLETE SURVEY QUESTIONS 49-64: REQUEST FOR FEEDBACK ON THE PROFESSIONAL CONDUCT PROCESS**

**10B. Settlement Proposals and Agreements**

The NSVMA is proposing updates to the settlement process following investigations to align with best practices used by other professional regulators in Nova Scotia, such as those under the RHPA. Currently, the Act requires settlement proposals to be negotiated between the member and the Complaints Committee. However, this structure compromises the Committee's neutrality.

To address this, the NSVMA proposes that once a matter is referred to the Professional Conduct Committee, either the Registrar (on behalf of the NSVMA) or the respondent may submit a settlement proposal to the other party. If both parties agree to the terms, the Registrar would then refer the proposal to the Complaints Committee for review. Only after a positive recommendation from the Complaints Committee would the Professional Conduct Committee consider the

proposal—ensuring that the Committee with the most direct knowledge of the complaint informs the process.

Additionally, the NSVMA proposes adding guidance to the Act to clarify the criteria the Professional Conduct Committee must consider when deciding whether to approve a settlement. These include:

- Protection of the public;
- Whether the respondent's conduct or its causes can be, or have been, successfully addressed;
- Whether the settlement is in the best interests of the public and the profession.

These changes aim to preserve procedural fairness, reinforce the neutrality of decision-making bodies, and support resolution-focused approaches to professional conduct matters.

**PLEASE COMPLETE SURVEY QUESTIONS 65-68: REQUEST FOR FEEDBACK ON THE SETTLEMENT AGREEMENT PROCESS**

**10C. Consent Revocation Process**

The NSVMA is proposing a new early Consent Revocation Process that would allow a member to consent to license revocation prior to a formal hearing, in cases where the outcome is likely to be revocation due to the seriousness of the conduct and strength of the evidence. If the member is prepared to admit the allegations and accept revocation, this process would allow them to avoid the time and cost of a contested hearing.

Use of this process would require the Registrar's consent, following a review of all relevant factors. It would only be available in limited circumstances and is intended to support public protection while offering an efficient resolution pathway. Similar processes exist in other regulated professions and, while rarely used, they have proven effective in appropriate cases by saving significant time and resources for both the regulator and the member.

**PLEASE COMPLETE SURVEY QUESTIONS 69-70: REQUEST FOR FEEDBACK ON THE CONSENT REVOCATION PROCESS**

**10D. Reinstate**

The NSVMA is proposing enhancements to the reinstatement process to improve clarity, consistency, and fairness. While the current Act provides for reinstatement following licence revocation, it lacks clear guidance on the factors decision-makers must consider. Currently, reinstatement applications are heard by a separate Reinstatement Committee, but the NSVMA proposes that these applications instead be reviewed by a panel of the Hearing Committee, which is better suited for this role.

Reinstatement is rare, as it only applies when a member's licence has been revoked by the Professional Conduct Committee. To strengthen the process, the NSVMA proposes adding clear criteria and procedural guidance to ensure decisions are transparent, consistent, and aligned with public interest. The NSVMA is proposing the following additions to the reinstatement process to:

- clarify that parties to a reinstatement hearing are the applicant for reinstatement and the Association, as represented by the Registrar;
- outline the rights of a party to the reinstatement process, ensuring they have all the rights of procedural fairness required for such hearings ;
- require that the Registrar issue a public notice of hearing;
- empower the Committee with the specific authority to appoint an investigator to produce a report for Committee;
- require the Registrar to prepare a written report for the Committee outlining the Association's position regarding the reinstatement application;
- require that an applicant meet the criteria for registration and licensing under the Act to be eligible for reinstatement;
- outline the circumstances in which an individual may reapply for reinstatement following the rejection of an application for reinstatement; and
- provide that any decision of the Reinstatement Committee is final.

**PLEASE COMPLETE SURVEY QUESTIONS 71-72: REQUEST FOR FEEDBACK ON THE REINSTATEMENT PROCESS**

**10E. Publication**

While the current legislation addresses the publication of various disciplinary outcomes, it could benefit from clearer language surrounding which types of publications are mandatory, and the particulars that the publication should contain.

The NSVMA is proposing the addition of publication provisions that distinguish between licensing sanctions that are imposed through a hearing process, and those agreed upon by the member. These proposed provisions largely mirror those in the *RHPA*.

In a hearing process, unless there is a publication ban, the full decision is generally published. In an agreed upon resolution, there is discretion to publish either the full decision or a summary of the decision. In many instances, a summary provides the public with sufficient information to understand the nature of the conduct and the rationale for the outcome. It can be helpful in negotiating agreed upon outcomes to reflect that a summary, rather than the full decision, will be published. Of course, the public interest remains paramount, and all information necessary to protect the public interest will be included in any summary.

Additionally, the NSVMA is proposing that publication only take place when a "*licensing sanction*" has been imposed. Licensing Sanctions would include:

- (a) the imposition of conditions or restrictions on a licence by the Complaints Committee or the Professional Conduct Committee or an equivalent body from another jurisdiction, but does not include conditions or restrictions that are of an administrative nature;

- (b) a consent reprimand issued by the Complaints Committee or an equivalent body from another jurisdiction;
- (c) a reprimand issued by the Professional Conduct Committee or an equivalent body from another jurisdiction;
- (d) a fine ordered by the Professional Conduct Committee;
- (e) a suspension of a licence by the Professional Conduct Committee or an equivalent body from another jurisdiction; or
- (f) a revocation of registration or licence by the Professional Conduct Committee or an equivalent body from another jurisdiction;

but do not include a caution or an informal resolution.

**PLEASE COMPLETE SURVEY QUESTIONS 73-75: REQUEST FOR FEEDACK ON THE PUBLICATION OF PROFESSIONAL CONDUCT MATTERS**

**11. Confidentiality and Privilege**

The NSVMA is proposing new confidentiality and privilege provisions to strengthen trust in its regulatory processes and align with other professional legislation in Nova Scotia. Currently, the Act does not address the protection of sensitive information obtained through investigations, hearings, or other regulatory proceedings. To address this gap, the proposed legislation would:

- Introduce confidentiality protections to ensure that information shared during regulatory processes remains private, unless disclosure is required—for example, following a hearing, when licence conditions are imposed, or when information is requested by another regulator.
- Establish statutory privilege over all documents and information obtained or produced during regulatory proceedings. This would prevent individuals from using NSVMA materials in unrelated legal or administrative processes (e.g., court cases or Human Rights Commission matters), and prohibit witnesses from testifying about NSVMA proceedings in external forums.

These changes would protect the integrity of the NSVMA's processes, encourage participation, and ensure that regulatory matters are handled within the appropriate context.

**PLEASE COMPLETE SURVEY QUESTIONS 76-77: REQUEST FOR FEEDBACK ON CONFIDENTIALITY AND PRIVILEGE**

**12. Accreditation and Veterinary Practice Entities**

**12A. General**

The NSVMA is proposing a shift from accrediting physical "facilities" to accrediting broader "Veterinary Practice Entities" (VPEs) to reflect the reality that veterinary care often occurs outside traditional buildings. This change aims to reduce exemptions and ensure that all VPEs where

veterinarians engage in clinical practice (except federally operated ones), are subject to accreditation and inspection.

Under the proposed framework, only the following would be exempt from accreditation requirements:

- Members not engaged in clinical practice;
- Members working in approved educational institution animal care facilities;
- Veterinarians employed by the Government of Canada who are not required to be provincially registered.

To improve accountability, each VPE would be required to designate a “responsible veterinarian” as the primary contact with the NSVMA before receiving an Accreditation Certificate. The “responsible veterinarian” is intended to be a veterinarian who is actively engaged in practice within the VPE, as opposed to a purely corporate owner who may not be involved in or apprised of a VPE’s day-to-day practice activities.

To streamline decision-making, the Chair of the Accreditation Committee would be authorized to grant accreditation when criteria are clearly met, with complex cases referred to the full committee.

In support of transparency and public interest, the NSVMA is also proposing:

- Including public representatives on the Accreditation Committee;
- Prohibiting inspectors from serving on the Committee to maintain a clear separation between inspection and decision-making;
- Revising the Accreditation Appeal Committee to include at least one public representative and exclude Council members, preserving Council’s governance role and neutrality.

These changes aim to modernize the accreditation process, improve oversight, and ensure consistent standards across all veterinary practice settings.

## **12B. Veterinary Practice Entities**

The NSVMA is proposing to relocate the list of approved Veterinary Practice Entity (VPE) types from the Regulations to the By-Laws to allow for greater flexibility. VPE classifications evolve regularly, and placing them in the By-Laws will make it easier to adapt to changes without requiring formal regulatory amendments.

Additional proposed changes include:

- Removing the “Emergency Clinic” category, allowing other VPEs to offer emergency services;
- Permitting small animal house call services to operate at the client’s residence or wherever the animals are located;

- Eliminating the requirement that large animal mobile service vehicles be owned by the same hospital or clinic operating them.

These updates reflect the evolving nature of veterinary practice and aim to modernize the framework to better support current service models.

**PLEASE COMPLETE SURVEY QUESTIONS 78-91: REQUEST FOR FEEDBACK ON THE ACCREDITATION PROCESS**

**13. General**

Beyond the proposed revisions noted in previous sections, the NSVMA is proposing the following general additions to the legislation:

- creating authority for the Association to act as the custodian of records or property that may be committed to the care of the NSVMA in the event that a member passes away, or can no longer care or control the records or property in their possession;
- providing the authority for the Registrar to suspend a members' licence for failure to pay a fee, file a document or meet other administrative requirements of the Act or By-Laws until they comply. Such suspension is not considered a *licensing sanction*;

**PLEASE COMPLETE SURVEY QUESTIONS 92-93: REQUEST FOR FEEDBACK ON CUSTODIANS**

**PLEASE COMPLETE SURVEY QUESTIONS 94-95: REQUEST FOR FEEDBACK ON SUSPENSIONS FOR ADMINISTRATIVE MATTERS**

**PLEASE COMPLETE SURVEY QUESTION 96: REQUEST FOR FEEDBACK ON ANY GENERAL MATTERS NOT OTHERWISE ADDRESSED**

**Conclusion**

The proposed legislation presents a generational opportunity to set the regulatory framework for the veterinary profession in Nova Scotia in alignment with best practices across the country.

As the draft works its way through the consultation process, we hope that all who review it will give careful consideration to the concepts that are included, and will provide relevant feedback.

The NSVMA looks forward to receiving your input and working together to strengthen the future of veterinary regulation in Nova Scotia.