



HOUSE OF COMMONS
STANDING COMMITTEE ON VETERANS AFFAIRS SERVICE DOGS

WITNESS BRIEF

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I have been watching this committee for the past few weeks and I must say I have some concerns. I am not here to defend nor promote any SD provider in this country, including the provider I received my SD from. My current provider is very aware of where I stand with regards to all providers. I am the only veteran called to testify who's only agenda is for the veteran not the SD producers. I am not an SD trainer, board member, poster child nor affiliated with any SD companies operations, "I AM AN END USER". During this committees work on Homeless Veterans, I asked myself what impact my voice will have on the decisions you all make. It turns out not very much. The recommendations made by this committee to the House on homeless veterans were tabled and then followed by a general Election and those recommendation have been sitting without resubmission to the House. So, what makes my testimony today, now, any different? With a possible election looming.

In 2013 I was diagnosed with Post Traumatic Stress Disorder (PTSD)/Occupational Stress Injury (OSI) by my CAF medical team. At that time, it was suggested to me by my CAF psychologist that a Service Dog may be a powerful Adjutant to my treatment. I called dozens of SD providers and researched their practices and interviewed other veterans on there use of SD. Every single provider I spoke with was eager to give me a dog, immediately. They all asked me when I wanted one, all bit one provider did this. That one single provider only asked me if I had a medical team in place and was, I actively working with that team, was I present and was I safe? They explained to me that a service dog is a big responsibility and without those team supports in place a SD could do more harm than good, this is the provider I decided to go with. I spent months working with them and my service dog. My SD was not trained by myself; it was trained specifically for me and my symptoms. My certification process was conducted over 3 full days to ensure that my SD was not only reacting to my symptoms it was trained for but that I was utilizing my SD to its full potential. At that time, I was being prescribed numerous SSRI anti-psychotic medications, and within the first year I was down to one (1) prescribed medication, today I am medication free and not on a marijuana maintenance program. Upon my release from the CAF in 2016 I relocated to British Columbia (BC) and this is when my difficulties began with other SD Providers, local businesses, government agencies, local civic and the BC Provincial Government. This is when the roadblocks to having a SD began and daily. At that time the BC Government was lobbied by a single SD provider ADI/IGDF and the new Service Dog Act was implemented exactly at the same time Alberta was. Both ALTA & BC have nearly identical acts. I was being excluded entry to public buildings, and most services because my SD was not from ADI/IGDF. These roadblocks and the stress from them caused numerous setbacks in my treatment and multiple hospitalizations. I was charged two Hundred (\$200.00) dollars to certify my SD again by the province, however in its own act it [states](#) " A person must not, must not interfere of the right

of entry or charge a fee, in respect to the right of entry” The BC test is an obedience test does not assess my SD ability to do what it was trained for. Those veterans or the public who get an SD from an ADI/IGDF member provider are not required to pay this fee. The former speaker of the BC Legislature MLA Linda Reid was the President of the BC/Alberta Guide Dogs and was on the committee that made these changes to the Act. Former MLA Scott Hamilton was also on the Board of Directors for Pacific Assistance Dogs (PADS) and was also involved with this committee making sweeping changes to the Act in BC subsequently these two providers were the only approved providers of SD in BC there are now Three (3). The Director of Corporate Policy for BC, Toby Louie who steered and wrote the Act also wrote policy for PADS, as you can see there is a huge conflict of interest as no one involved with these SD providers recused themselves from any debates or work on the act, and how a SD organization inserts itself into government policy. All this information is available in HANSARD. The Department of Public Safety and the Minister responsible, MLA Mike Farnsworth has stated that the Service dog Act in BC is voluntary, however if one wishes to be afforded all the benefits of the program, we need to have a Service Dog ID card. On the back of this card, it states, “possession of a certified guide dog or service dog and is granted access rights to public places and tenancy rights under [sections 2 and 3 of the Guide Dog and Service Dog Act](#)” (see attachment). The Canadian Charter already affords all these rights. On the 8th of June 2021 two (2) service dog teams from out of province were denied service at Whistler Blackcomb because they did not have a BC service dog ID card, the RCMP quickly sorted this breach of the Charter out, however this happens regularly in BC. The province also states it does not certify SD’s however on the front of the card it says, “Certified by the Province of BC” (see attachment). This past Christmas my SD suddenly became ill and died, currently I am second guessing weather or not to get another SD because of the predatory behaviour of SD providers and the restrictions in BC, as well as the constant harassment, denial of services and blatant breach of my Charter Rights as a person with a disability because my SD will not be from a sole source preferred provider. Many, SD providers in this country are predatory to some degree and are only looking to advance their agendas. If the veteran is the purpose for these psychiatric dogs, it is the veterans that are consistently stuck in the middle of the fight between providers. Ten (10) years ago there were about 8 SD providers there are now about 132 in the country.

One of the biggest difficulties facing veterans is the misuse, misinformation, and down-right dishonesty in the terminology used by this unregulated industry in Canada and the United States. Phil Ralph of Wounded Warriors Canada (WWC) stated in his testimony “that their Standard falls in line with ADI which is Accredited” Ms. Forbes also stated that National Service Dogs were accredited. I would like

to point out [Imagine Canada](#) which only accredits charitable organizations operations not the production, standards, or training of SD's. Sheila O'Brien was asked about ADI accreditation and stated "ADI is peer to peer reviewed, not by a independent third body", There are no, I'll say this again, THERE ARE NO "ACCREDITED" providers anywhere in North America, this in not only misleading to the public but to governments and when MPs or MLAs use this language it only reinforces this misinformation. Accreditation by ADI/IGDF organizations is "SELF-ACCREDITED" THE SD providers in Canada have inserted themselves into all levels of government to press their agendas and some MPs and many MLAs/MPPs have aligned themselves with certain SD providers through a constituent or through advocacy weather directly of indirectly they are not doing the veteran a service, on the contrary it's a disservice. Phil Ralph also referred to the ADI Standard so does the BC & AB Government SD Act and the Justice Institute of BC (JIBC) websites. No where on these websites is there a Standard, in fact the only standard available on the ADI site is a code of conduct for members of the organization. The ADI/IGDF standard is proprietary, and they Do not release this publicly. When asked for a copy of the standard both the BC Gov and ADI/IGDF refused and only pointed me to the websites. The insertion of SD providers is rampant this is not only demonstrated in BC, AB, and NS but at the VAC study with CGSB that failed because the participants could not come to consensus as stated by The Director General of Policy Research Ms. Baird. I would have to disagree with this assessment. Most Board members of that committee were aligned with or affiliated with ADI/IGDF. When the few non-ADI providers took issue with this they withdrew. That is why there was no consensus, that is why this study will fail again. The industry can not be relied upon to make a National SD Standard. There is too much animosity between providers to play nice in the sandbox, and to much money to be lost and with these personalities the veteran will continue to suffer. Currently the [Human Research Standards Organization \(HRSO\)](#) is working on the development of a National Standard. VAC was invited to participate and stated they were not able to participate. This leads me to believe that VAC has plans to do something different. Currently there is only one SD provider in Canada in a 3rd party accreditation process by Accreditation Canada. MP Wagantall asked Mr. Cousineau "where did WWC get the professional ability to determine weather or not they comply with the standards, and how are WWC qualified to do that?" this question was not answered by Mr. Cousineau, so I will answer it now. WWC is not qualified to determine compliance of standards. WWC is not a SD provider they have no trainers or Master Dog Trainers; they only provide funding for third (3rd) party providers.

I would like to thank the member from North Island Powell River for bringing up my difficulties at being homeless with my SD at the May 12th committee meeting. On January 1, 2016 when the BC

Legislature put into force the [BC Guide and Service Dog Act](#)ⁱ. This act does not recognize any service dog teams or providers that were or are trained outside of BC who are not affiliated with ADI/IGDF and is in complete violation of the veterans [Charter rights](#)ⁱⁱ [Canadian Human Rights Act](#)ⁱⁱⁱ and [UN Convention on the Rights of Persons with Disabilities \(CRPD\)](#)^{iv}. This act prevented me from obtaining housing in BC and continues to be a huge barrier for veterans housing as well as public access; I am not allowed access to any Provincial offices or travel onboard passenger decks of BC Ferries with my service dog. This was one of the main driving forces that forced me in May of 2018 onto the streets to live in my trailer outside of the local Walmart Because I do not fit the criteria for the BC SD Act. Mr. Cousineau stated that the BC Act has been upheld by the BC Human Rights Commission, when in fact it has failed several times with HR complaints against BC Ferries, Residential tenancy, Denial of Access at Costco including my own denial of public access but because the BC Commission makes everyone sign NDAs none of these cases can be discussed. The act is law, but the Public Safety Minister and the Director of Corporate Policy have stated this program is voluntary. In the BC Act it states that the Human Rights Code will prevail over the SD Act and it has on a several occasions.

In BC, anyone can have a service dog, because the BC Certification is only an obedience test, and a note from your Family Doctor or Nurse Practitioner is all that is required, there is no oversight. According to the Canadian Medical and Canadian Psychological Association, the only qualified people to diagnose someone with a psychological disorder is a licenced psychiatrist or psychologist according to the Diagnostic and Statistical Manual of Mental Disorders 5th Edition, DSM-5. If you have an obedient dog it will pass the BC test, a squirrel can pass the test.

Few people are aware that the psychiatric service dog program was initiated in the late 1990's and just after 9/11 by the Hon. Elijah Harper. Not National Service Dogs as stated by Ms. O'Brien. Elijah was instrumental as a senior member and elder of the Red Sucker Lake Band and the Manitoba Southern and Northern Chiefs Councils. It was Elijah's foresight and vision that saw the coming storm, the need and the suffering of veterans coming back from the first rotations in the former Yugoslavia. Why this committee has not invited the SD provider that initiated the psychiatric SD program in Canada back in the late 1990s by providing dogs to veterans from the 1st Gulf War, Former Yugoslavia the RCMP and UN torture survivors to name only a few is baffling.

There currently is a published [National Standard](#) for SDs in Canada. This standard was developed and written by the Former Director of Standards for the Standards Council of Canada (SCC), and Canadian Representative for the International Standards Organization ISO/IEC Michel M. Bourassa. It was drafted IAW the rules of the Canadian and International Organization for Standardization and International Electrotechnical Commission, ISO/IEC Directives, Part 2, Rules for the structure and drafting of International Standards. It is written to present performance requirements to the greatest extent possible. This standard was prepared in the expectation it will be used for the certification of SD according to the principals in ISO/IEC 17024, Conformity assessment. Mr. Bourassa conducted an industry analysis and developed a standard with input from SD companies, SD trainers, Veterinarians, Psychologists. This standard has been published and for all intents and purposes is a Canadian Standard.

In 2019 a group of Canadian Service Dog Trainers formed the Canadian Association of Service Dog Trainers ([CASDT](#)). This group has a [Benchmark Interim Standard](#) and works to advance a made in Canada approach within the Canadian-Service-Dog Industry.

In closing I ask the committee to take the information from all service dog providers with a grain of salt do not rely on the infighting within this multi-million-dollar unregulated industry. Yes, veterans get dogs for free, however someone must be paid to rear, feed, kennel and train these dogs. There are two camps in the Canadian Service Dog world that is ADI/IGDF and the MSAR Standard.

Recommendations for working Group.

- Allow the process at the HRSO be allowed to play out without interference from the Federal Government or Veterans Affairs Canada.
- Have an independent third party write standards IAW, SCC, IOC/IEC regulations. Do not leave it to the providers.
- Request all Canadian SD providers as well as the American Based ADI/IGDF submit their Standards of Training and Standards of Assessment to the VAC Committee and HRSO.
- Do not allow Wounded Warriors to run standards group they are too closely tied and aligned with providers and have been lobbying hard inside VAC for their standard.
- Have clearly defined definitions for Service Dog, Emotional Support Dog, Therapy Dog. Example:
 - Service Dogs are task trained for the individuals; Therapy Dogs are not.
- Clear use of Terminology. Example:

- Accreditation contractual or governmental accreditation through regulatory requirements use of this term needs to be clearly defined. Disclaimers for self-accreditation must be clearly identified.
- Flexibility within a national standard however strong
- Set Clear benchmarks for Service Dog Training and Handling
- Set Clear Trainer competencies

Attachments 5

Industry Analysis of SD Standards ADI vs MSAR

MSAR Service Dog Study

CASDT Benchmark Interim Standard

MSAR Elite Service Dog Certification (Bill Webb-K9 Jessie)

Mehgan Search & Rescue (MSAR) Standard in Support of Accessibility (Bill Webb-K9 Jessie)

Webb, BC Service Dog ID

Footnotes:

ⁱ Guide and Service Dog Act (SBC 2015) Chapter 17.

<http://www.bclaws.ca/civix/document/id/complete/statreg/15017>

ⁱⁱ Constitution Act, 1982. <https://laws-lois.justice.gc.ca/eng/Const/page-15.html>

ⁱⁱⁱ Canadian Human Rights Act, R.S.C., 1985, c. H-6. <https://laws-lois.justice.gc.ca/eng/acts/h-6/FullText.html>

^{iv} UN-CRPD. <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html>

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