

Introduction

1. I am a 30 year veteran and former municipal engineer with a service dog.
2. I am also the Chairman of Courageous Companions, one of the largest service dog providers in Canada that provides services dogs to veterans and first responders.
www.courageouscompanions.ca .
3. We are one of the largest and longest standing charities for service dogs for veterans in Canada.
4. We are concerned that we were not invited to participate in your Service Dog discussions considering we are utilising a standard that has been approved by the Department of National Defence.
5. I also chair the “Canadian Association of Service Dog Trainers” Canadas only federally incorporated medical service dog trainers association whose mission is collaboratively bring together the best practices encompassing service dog training standards and methods within Canada. www.casdt.ca

After watching the last session I would like to offer the following clarification on a few things as I believe your committee has been misled by some of the organization sitting at your table involved in these discussions.

Why the CGSB Service Dog Study Failed

I participated in this study and can speak to it.

1. **Use of Existing Standards Not Accepted**
 - a. I can tell you a standard has been on the street for years but most organizations (ADI particularly) do not want to use it due to this standard being very high.
 - b. This standard was provided by MSAR Service Dogs to the CGSB as a seed document for the development of the national standard
 - c. It is crucial to point out that MSAR Service Dogs was the only organization to provide an actual standard to the CGSB which demonstrates how far ahead they are in this industry compared to most other organization in Canada and abroad.
 - d. It is also crucial to point out that ADI provided nothing to the CGSB board with regards to standards.
 - e. Most organizations do not want to utilize the MSAR standard for fear of their current program dogs will not pass it or the extra training (\$\$\$) required to meet the standard.
 - f. This is concerning when public safety should always remain at the forefront of a service dog standard.
2. **Unethical Behaviour**
 - a. Assistance Dogs International (ADI) had more votes on the CGSB board and were tilting the national standard in their favor.
 - b. This resulted in a lot of kick back from other organizations at the table (Courageous Companions included) that have been mistreated, misled by this organization in the past due to their being mentioned in most legislation.
 - c. The cost to ADI and IGDF to be removed from legislation and not recognized in Canada and abroad would cost them millions of dollars which is why they had such a vested interest in influencing the CGSB standard in their favour.

- d. The CGSB technical committee felt Guide dogs should be excluded as they had their own high standards of training which was separate from other types of service dog standards.
- e. It was ADI who asked, and voted on having guide dog standards added to the national standard. This vote passed.
- f. Proof of this can be found in the minutes from the CGSB meeting discussions.
- g. This is where things became interesting as an ADI representative then went out and initiated a campaign to kill the standard from the Guide Dog users knowing they would not support a national standard.

3. ADI Advantage

- a. A group on the CGSB Service Dog committee asked for an investigation into key CGSB Service Dog Study board members being affiliated with ADI and influencing the standard in their favour.
- b. Out of 30 Technical Committee Members, 12 were affiliated with ADI/IGDF including two members on the committee board.
- c. It is important to note that each organization when developing a standard is allowed to only have two representatives at the table (maximum) in accordance with CGSB policies.
- d. This is what the formal complaint was based on.
- e. The CGSB conducted an investigation (into itself) and ironically could not provide evidence that the tie between most individuals and ADI/IGDF was one-step removed as it should have been.
- f. This group advocated their interests including their persistent need to be recognized and exempt from this process as a united voice, not as individuals' without any affiliation to their organizations or membership with ADI or IGDF.
- g. This group had a large interest in making sure this standard failed (that is what they wanted as it would have minimal impact to their current operations in Canada).
- h. Shortly after this investigation was initiated the CGSB concluded the that there was insufficient evidence to support the complaint..... which was false
- i. By acknowledging the complaint was valid would be a strike against the CGSB.
- j. The Group then filed a formal complaint to Standards Council Canada (SCCC) based on the following.
 - i. The CGSB had not conformed to their own internal policy and procedures or other accepted international standards best practices derived from the following Canadian principles:
 1. Equal access and effective participation by concerned parties
 2. Respect for diverse interests
 3. Openness and transparency
 4. Clear development processes
 5. Best interest of Canadians
 6. Avoiding duplication of standards or overlap with the work of other SDOs or with the work of relevant international or regional SDOs
 7. This complaint also asked that SCC consider an immediate suspension (partial or full) of CGSB's accreditation on the grounds that one, or a number of major nonconformities, such as CGSB bringing SCC into disrepute have in fact been imposed, as outlined in the complaint and corresponding paper trail that was provided.

- k. After this formal complaint was sent to Standards Council Canada, CGSB walked away from the table.
- l. Not because there was no consensus, but because the standard was being influenced in the favour of ADI and they did not want to admit they let this happen which contradicted their own policies and procedures.
- m. This is a fact and not hearsay.

Accredited Organizations

1. As for using an organization like Assistance Dogs International (ADI) to develop a standard I would again caution your team against this.
2. Most Government organizations outlines Assistance Dogs International (ADI) and the International Guide Dog Federation (IGDF) in their legislation.
3. This implies to the public and businesses that any other service dog organization or service dog trainer that is not affiliated with ADI or IGDF is not credible or competent.
4. ADI/IGDF is a membership-based American organization that uses the term 'accreditation' in relation to its member organizations not the entire service dog industry.
5. This term is used to permit their members to be associated with their brand, use their in-house private company standards and logo.
6. ADI and its counterpart IGDF are self-governing organizations consisting of producers approving other producers. In other words, they are self accredited.
7. For example, their governing directors are all fellow producers.
8. Leading people to believe otherwise is misleading especially when doing so gives them an unfair advantage in the marketplace.
9. There are three accrediting bodies in Canada,
 - a. Accreditation Canada
 - b. Standards Council of Canada
 - c. Accreditation Council Canada
10. I have called all three and none have heard of Assistance Dogs international (ADI).
11. This tells me they have never been through a formal accreditation by a neutral third party yet all the legislation refers to them as being accredited which is false.
12. The fact is, there are no third party or government regulated service dog trainers or service dog training organizations in Canada or abroad.
13. Canada's National Standards System (Network) is designed to establish a credibility chains as well as to prevent conflict of interest such as those who develop standards are not the same people organizations that certify people or accredit organizations.
14. These practices are recognized within Canada and globally to promote quality assurance.
15. As such, most current government legislation does not honour either of these principles or practices because the government (particularly provinces) do not certify service dog trainers or accredit service dog training organizations. .
16. Furthermore, ADI/IGDF's private company standards are carefully guarded rather than being readily available to the public, businesses, etc.
17. Your last session it was discussed by one of your committee members that they have high standards that Veterans Affairs Canada should be using.
18. If you have seen this standard please share it, as to date I have never seen an actual standard provided by these organizations even though they have been asked by several organizations in the past to provide it.
19. They are really good at advertising high standards but to date have failed to produce anything.

20. With regards to Accreditation, neither organization has ever provided evidence of any sort that demonstrates that they are accredited by a third party or by the government in the USA or elsewhere.
21. As mentioned earlier, this evolving industry is comprised of organizations that self-declare; therefore, it is crucial that all producers be transparent in this regard.
22. The cost to ADI and IGDF to be removed from legislation and not recognized in Canada and abroad would cost them millions of dollars which is why they have such a vested interest in influencing a standard in their favour to support their current operations with minimal financial impact.
23. These are but a few of the reasons why Courageous Companions, as a charity is not interested in becoming a member of ADI.
24. It is also important to note that only charities can become members of ADI or its counterpart IGDF.
25. Again, this is part of their brand not an industrywide position or practice.
26. Our charity places 8-10 trained dogs a year yet we field 5-8 requests for dogs a week.
27. Charities cannot meet this demand..... which is why the private sector must be engaged and play such a crucial role in supporting our veterans.

Wounded Warriors

1. I would also caution your team from using this organization to develop a national standard.
2. Wounded Warriors does not produce service dogs.
3. They manage a program that hires others to produce service dogs.
4. They are too far removed from any position to develop a standard.
5. Also, our involvement with them in the past has uncovered a lot of unethical behaviour and poor and dishonest management of their funds.
6. Particularly using other organizations names for Wounded Warriors shared fundraising activities and failing to provide the promised funding to the organizations afterwards.
7. We are in fact one of these organizations that was left in massive financial debt after they sent us numerous veterans to train dogs for, yet failed to provide what they promised with regards to the funding they raised using our name.
8. We suspect the funding was used to cover the cost of their executive staffs salaries or went towards other programs.
9. I would simply ask that given the tremendous amount of funds they have in fact received from Veterans Affairs for their service dog program you simply ask them how many dogs have they have actually produced.
10. I would use the basis of \$20,000 a dog divided into the total funding they have received to date for their service dog program.
11. Any service dog organization should be able to easily answer this question and provide actual proof of the financial transactions of purchasing service dogs from their sub contractors.
12. I doubt they will tell you.

John Dugas (K9 Bailey)

Chairman - Courageous Companions – www.courageouscompanions.ca

Chairman – Canadian Association of Service Dog Trainers – www.casdt.ca