



Honourable Lana Popham
Minister of Agriculture
PO Box 9043 Stn Prov Govt
Victoria, BC
V8W 9E2

Mar 23, 2021

Dear Minister Popham,

I am writing to urge you to update B.C.'s Sled Dog Standards of Care Regulation to conform to the Canadian Veterinary Medical Association's Code of Practice for Canadian Kennel Operations ("Kennel Code").

As you will be aware, our recent petition calling for this change received significant support, collecting more than 2,700 signatures. We believe there is considerable public concern about the conditions dogs are currently kept in by sled dog tour operators in the province.

These conditions include tethering dogs for more than 23 hours a day, to the point that they demonstrate stereotypic behaviour. Recently released video footage taken by concerned members of the public, alleged to be from a Whistler-based sled dog tour operation, graphically illustrated these conditions. Dogs were seen pacing back and forth in cages and repetitively circling around posts they were chained to.

The CVMA's [Kennel Code](#) states that: "Tethering of dogs (i.e., chains or ropes used to tie the dog to an immovable object such as a stake or building) **is not allowable as a method of confining a dog to a primary enclosure, nor as the only means of containment.**" (1.2.1, Requirement 5.) The Code also requires that: "Dogs are housed in such a way as to allow them to display natural behaviours, to socialize with or without other species of animals and humans, as appropriate, and to protect public safety." (4.4, Requirement 4.) Tethering of sled dogs denies their engagement in these behaviours. The Kennel Code, an updated set of standards, applies to all dogs kept in a kennel environment, including working dogs, and is grounded in the latest science on dog behaviour and psychological suffering.

Another concern identified regarding the well-being of dogs is euthanasia by firearms. Under the Sled Dog Standards of Care, a sled dog operator can shoot a dog if the operator "reasonably believes that the sled dog is in critical distress" or "has made reasonable efforts to rehome the sled dog, but those efforts

have been unsuccessful.” The Kennel Code puts stricter limitations on when euthanasia by firearms (by a non-vet) can take place: “If situations prevent a veterinarian from performing euthanasia in a timely fashion (i.e., inclement weather, geographic location, sudden or rapidly progressing medical condition), euthanasia by firearms is acceptable...” The Kennel Code requirement provides a greater degree of protection for unwanted sled dogs, as euthanasia by firearms has a greater likelihood of causing suffering.

Updating the Sled Dog Standards of Care Regulation to conform to these requirements of the Kennel Code would substantially improve the welfare of dogs kept by sled dog tour companies in B.C. and would set a significant precedent for sled dog operations across Canada. It would potentially improve the lives of thousands of dogs and meet public expectations that dog tourism operations are held to standards reflecting the current science of dog behaviour and related distress.

I would be grateful for the opportunity to meet with you and ministry officials to discuss this issue in more detail. I look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Morris". The signature is fluid and cursive, with the first name "Amy" and last name "Morris" clearly distinguishable.

Amy Morris
Executive Director

March 22, 2022

Dear Minister Popham,

I'm following up on my earlier email from February 14, 2022 in regards to a review of B.C.'s Sled Dog Standards of Care Regulation, as well as a recent W5 investigation – "[Dogs in Distress](#)". Our recommendations are that the regulations be updated to conform to the Canadian Veterinary Medical Association's Code of Practice for Canadian Kennel Operations.

It's worth reiterating that the Vancouver Humane Society echoes the concerns shared in W5's coverage by the BC SPCA's Chief Prevention and Enforcement Officer, regarding the **need for proactive enforcement and inspections, rather than relying on the current complaint-based system**. In this complaint-based system, dogs in distress can slip through the cracks, unless a concerned member of the public or whistleblower witnesses a problem and files a complaint.

These concerns by the BC SPCA are significant, considering that the organization was part of the sled dog task force that assisted with the sled dog standards. This presents a crucial opportunity for the ministry to implement improvements in the standards and proactive enforcement of them.

I look forward to any update you can provide on this matter and welcome the opportunity to discuss further.

Sincerely,



Amy Morris
Executive Director
Vancouver Humane Society



April 22, 2022

File: 0280-30

Ref: 197293

Amy Morris
Executive Director
Vancouver Humane Society
303-8623 Granville St
Vancouver, BC V6P 5A2
Email: amy@vancouverhumanesociety.bc.ca

Dear Amy Morris:

Thank you for your February 14, 2022, email to follow up as to the status of updating the Sled Dog Standards of Care Regulation (Regulation). I am pleased to respond.

The Sled Dog Code of Practice (Code) and the Regulation, which was derived from the Code, were jointly developed by a Sled Dog Standards of Care Working Group (Working Group). The Working Group consisted of sled dog industry representatives, veterinarians, the British Columbia Society for the Prevention of Cruelty to Animals (BC SPCA), academics with expertise in the field of animal welfare, and provincial staff. The Code and the Regulation provide some of the best guidance and legislation for the care and welfare of sled dogs in North America.

Sled dogs are unique, and changes to the Code and Regulation require careful review to avoid unintended consequences and ensure appropriate animal welfare outcomes. Your input will be a valuable contribution when the Ministry undertakes this review.

Although the BC SPCA generally conducts inspections on a compliance basis, s. 15.1 of the *Prevention of Cruelty to Animals Act (PCAA)* gives authorized agents, appointed by the BC SPCA, the authority to enter any premises during regular business hours to determine whether the *PCAA* or its regulations are being complied with. The BC SPCA must determine whether to invoke its current authority to conduct proactive inspections.

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Thank you for writing.

Sincerely,

A handwritten signature in blue ink that reads "Lana Popham". The signature is written in a cursive, flowing style.

Lana Popham
Minister