

Volume 18, December 2020, Special Edition

The Blind Canadian

A publication of the Canadian Federation of the Blind (CFB)

CNIB:

Canada's 100-Year Monopoly

~ Report ~



CFB

The Canadian Federation of the Blind is not an organization speaking for the blind — it is the blind speaking for themselves.

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CFB

The Canadian Federation of the Blind is a non-profit, grassroots organization created by and for blind Canadians. Its mandate is to improve the lives of blind people across the country through:

- a fresh, positive, empowering approach to blindness;
- blind people mentoring blind people to gain knowledge, skills and self- confidence;
- public education about blindness and the abilities of blind people;
- advocacy to create better opportunities and to strengthen rights of blind Canadians.
- raising expectations, because low expectations create obstacles between blind people and our goals and dreams.

The long white cane is a symbol of empowerment and a tool for independence.

With proper training, opportunity and a positive attitude, blindness is nothing more than a characteristic. Blind people can do almost everything sighted people can do; sometimes they just use alternative techniques to get the job done.

We are educated. We have skills. We are independent. We are parents. We are teachers. We have wisdom. We represent the same range of human diversity, strengths and weaknesses as any other sector of the population.

The CFB would like to realize a positive future for all people who are blind. A future where blind people can find employment; a future where blind people are valued for their contributions; a future where blind people are treated like anyone else.

This future involves you. No matter who you are, blind or sighted, you can work with us to realize this dream.

Together, we can create change in our social landscape, for the real barriers blind people face are erected by ignorance and misunderstanding. Help us achieve what we all want: to be treated with dignity and respect. Join us today and be a part of the solution.

Our Philosophy

We are not an organization speaking on behalf of blind people; rather we are an organization of blind people speaking for ourselves.

We believe it is respectable to be blind.

We believe that with proper training and opportunity, blind people can compete on terms of equality with their sighted peers.

We believe the real problem of blindness is not the lack of eyesight. The real problem is the lack of positive information about blindness and the achievements of blind people.

The **Canadian Federation of the Blind (CFB)** is a not-for-profit, entirely volunteer, grassroots organization, incorporated on June 2nd, 1999.

The Blind Canadian is the leading publication of the Canadian Federation of the Blind (CFB). It covers events and activities of the CFB, addresses issues we face as blind people, and highlights our members. The Blind Canadian:

- Offers a positive philosophy about blindness to both blind readers and the public at large
- Serves as a vehicle for advocacy and protection of human rights
- Addresses social concerns affecting the blind
- Discusses issues related to employment, education, legislation and rehabilitation
- Provides news about products and technology used by the blind
- Tells the stories of blind people

The Blind Canadian is published twice annually and comes in print and on CFB's website at www.cfb.ca in both web and pdf versions.

EDITOR: Doris Belusic

ASSISTANT EDITOR: Kerry Kijewski

PREPRESS, COPYEDITING & WEB DESIGN: Sam Margolis

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The Blind Canadian welcomes articles, resources and letters to the editor for possible publication. For further details, subscription requests or to make a submission, contact us at:

Canadian Federation of the Blind

Mary Ellen Gabias, President

PO Box 8007

Victoria, BC V8W 3R7

Phone: (250) 598-7154 Toll Free: 1-800-619-8789

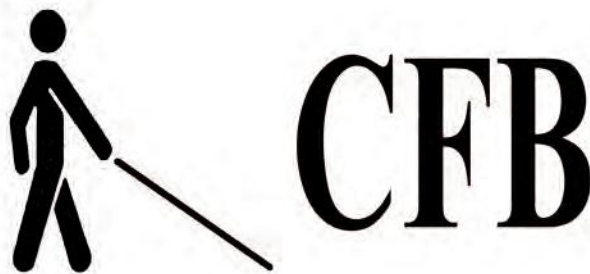
Email: editor@cfb.ca / info@cfb.ca

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Cover Letter to Competition Bureau Canada

May 14, 2020

Matthew Boswell
Commissioner of Competition
Competition Bureau Canada
Place du Portage I
50 Victoria Street, Room C-114
Gatineau, Quebec
K1A 0C9

Dear Mr. Boswell,
Re: CNIB

My name is Mary Ellen Gabias and I am the President of the Canadian Federation of the Blind (CFB). The CFB is an advocacy group that fights for the human rights of blind Canadians. We are not an organization speaking on behalf of the blind; we are an organization of blind Canadians speaking for ourselves.

As outlined in the attached report, for the past 100 years a single non-profit company, the Canadian National Institute for the Blind (CNIB), has dominated and controlled the blindness business in Canada. In fact, by anyone's definition, the CNIB and its affiliates currently hold national monopolies when it comes to fundraising and providing services to the blind and the deafblind.

Not only does the CNIB have a national monopoly over critical services such as training and rehabilitation, it is also a self-appointed advocate for the blind and reportedly speaks on behalf of the blind. The CFB is not aware of another instance where one organization has ever had the dual roles of being a monopolistic supplier and consumer advocate for the same group of citizens. I think it is important to point out that advocacy is the only area where the CFB competes with CNIB. We are not in the business of training and rehabilitation nor do we have any business ambitions.

Despite having a 100-year monopoly, the CNIB continues to expand its vertical integration and domination of blindness-related businesses. For example, in 2018 the CNIB entered into the guide dog business, with the goal of establishing a national program, while in 2019 the CNIB acquired Frontier Computing, a leading provider of accessible products and services.

As you know, monopolies focus on protecting their market share and generally make for an inefficient and unresponsive organization. I can assure you that the CNIB is no exception. The young and the working-age blind suffer the most from the lack of training and lack of training options available in Canada. Many blind Canadians lack the basic skills necessary to find gainful employment, or to live independently, or to participate in community events and activities. The end result is that the vast majority of working-age blind Canadians live in poverty on disability assistance. Most adult blind have given up hope of ever finding gainful employment and are not even included in the government's unemployment statistics.

Their lives do not need to be this way. Blind-skills training is much more advanced in other countries, such as the United States, where both government and non-profit companies operate training centres. Competition leads to innovation and improved services. It also gives visually-impaired consumers the ability to choose a training program that best suits their specific needs.

I am writing to you with two hopes. The first is that you and your staff will keep open minds as you read the attached discussion paper. I say this, because after 100 years of corporate branding, many sighted Canadians have put the charity on a pedestal and tend to dismiss criticisms as simply a consequence of "they cannot please everyone." My second hope is that, as Canada's Competition Commissioner, you will investigate our complaints and will issue a public report encouraging Canadian governments to:

1. Take a more active role in providing training and rehabilitation services for the blind;
2. Promote competition and decrease governments' reliance on CNIB in supplying of goods and services to visually-impaired Canadians; and
3. Prevent further business acquisitions or expansions by CNIB or its affiliated companies into the blindness business.

The report was completed last December but we delayed forwarding it because everyone's focus has been on COVID-19. We have opted to proceed, as it appears that the virus will be a long-term problem.

I will be happy to discuss the attached report or any of the related issues with you or your staff. I can be contacted at 250 598-7154 and by email at: president@cfb.ca.

Thank you for your time and consideration.

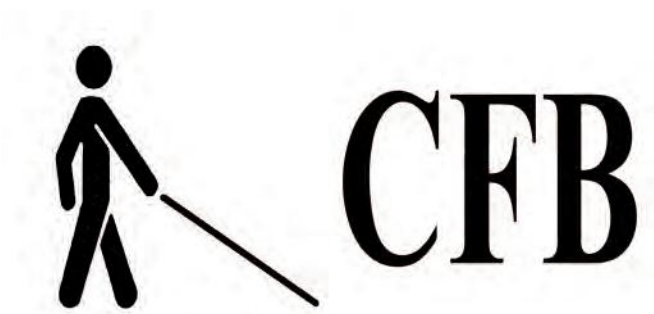
Yours truly,

A handwritten signature in black ink, appearing to read "Mary Ellen Gabias". The signature is written in a cursive, somewhat stylized font.

Mary Ellen Gabias
President
Canadian Federation of the Blind

CNIB: Canada's 100-Year Monopoly – Report

**A discussion paper written by Daryl Jones in support of
the Canadian Federation of the Blind's complaint to the
Competition Bureau Canada**



Background

The Canadian National Institute for the Blind (CNIB) was created in 1918 to help victims of the Halifax Explosion and soldiers who lost their eyesight during the First World War. Over the past hundred years, the CNIB has grown into a corporate behemoth, with a highly paid executive, a full-time staff of 646, a part-time staff of 306, and over 10,000 volunteers.¹ According to CNIB's T3010 Charity Return, the company's total expenditure on staff compensation in fiscal 2018 was \$48.4 million.²

By anyone's definition, the CNIB and its affiliated organizations hold national monopolies when it comes to fundraising and providing services for blind and visually-impaired Canadians.

Large monopolies are known for being inefficient and unresponsive to their customers' needs and the CNIB is no exception to this long-established rule. Blind Canadians have suffered, and continue to suffer, from the lack of training and the lack of training options available in Canada. What is most disheartening is that there is no end in sight to CNIB's 100-year monopoly over the blind.

The Canadian Federation of the Blind (CFB) is a blind advocacy group and has worked closely with the author in preparing the following discussion paper. The paper's purpose is to form the basis of an official complaint with Canada's Competition Bureau regarding the CNIB monopolies that currently dominate fundraising and services for blind and visually-impaired Canadians.

Organizational structure

In 2014 the CNIB created the Centre for Equitable Library Access (CELA) to take over responsibility for lending its historic library and to act as a central hub for the national distribution of accessible material to print-disabled Canadians. CELA has its own Board of Directors but maintains a close business relationship with the CNIB, including using the CNIB for its IT and production services.³

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- 1 Staffing comes from CNIB's Foundation's T3010 Charity return, 2018 <https://apps.cra-arc.gc.ca/ebci/hacc/srch/pub/t3010/v23/t3010ovrvw> Over 10,000 volunteers comes from Wikipedia: CNIB Foundation--- https://en.wikipedia.org/wiki/CNIB_Foundation
 - 2 CNIB's Foundation's T3010 Charity return, 2018 <https://apps.cra-arc.gc.ca/ebci/hacc/srch/pub/t3010/v23/t3010ovrvw>
 - 3 CELA website : <https://celalibrary.ca/about-us>

The CNIB created CELA even though this model had been strongly opposed by user groups, provincial librarians, and provincial governments: the primary funders of the country's library systems. The establishment of CELA is an instance where CNIB used its monopoly power to advance its own interests over those of the public and taxpayers. This issue will be examined in more detail later in this report.

In 2017 CNIB engaged in some further restructuring by establishing two controlled not-for-profit corporations: Vision Loss Rehabilitation Canada (VLRC) and Deafblind Community Services (DBCS). VLRC serves as CNIB's agent and provides rehabilitation services in accordance with contracts established with provincial governments. DBCS is funded by the Province of Ontario and provides deafblind services for its residents.

These controlled corporations have their own boards of directors but deliver government-funded programs as agents of the CNIB. They receive management and administrative services from the CNIB, which monitors their programs and is contingently liable for their activities.⁴

Fundraising

With the exception of the Province of Quebec, virtually all money allocated by Canadian governments to provide training and assistance to the visually impaired is given to the CNIB in the form of grants. This includes money from all levels of government: federal, provincial, territorial, and municipal. In fact, whenever individuals or other organizations approach a government requesting improved training or additional support for the blind, they are inevitably told: "the Government of X supports the blind through annual grants to the CNIB."

Although it is only an educated guess on our part, we believe that the CNIB and its affiliated organizations likely receive more than 95% of the funding earmarked to help the blind and the deafblind outside of the Province of Quebec.⁵ According to CNIB's 2018 financial statements, the charity received \$88 million in that year.⁶ The breakdown of this revenue by source was as follows:

4 Note 19: CNIB fiscal 2018/19 financial statements: https://cnib.ca/sites/default/files/2019-09/CNIB_Final_Word_FS_FINAL-s_980269.pdf

5 We are not aware of any statistics on fundraising for the blind in Canada. However, given CNIB's domination of the blindness business outside of the Province of Quebec. We believe that 95% is not an unreasonable estimate.

6 The figures that follow come from CNIB's fiscal 2017/18 financial statements: https://cnib.ca/sites/default/files/2018-09/CNIB_2018_FS_-_English_FINAL-s.pdf

- \$25 million in donations from the general public;
- \$32 million from governments;
- \$10 million from retail lottery and gaming;
- \$1 million in fees for its services;
- \$4 million from the sale of consumer products and assistive technologies;
- \$10 million from investments and other activities; and
- \$10 million gain from the sale of capital assets.

According to Charity Intelligence Canada (Ci), a non-profit rating service, in 2018 the CNIB spent \$10.2 million on fundraising and \$2.8 million on administration. This constituted approximately 44% of that year's donations.⁷ The following quotes are from Charity Intelligence Canada regarding CNIB's finances:

*Canadian National Institute for the Blind is a Major 100 charity, meaning it is one of Canada's largest in terms of donations. It received \$26.1m in donations in F2018. Administrative costs are 4% of revenues (excluding investment income) and fundraising costs are 39% of donations. Per dollar donated, 56 cents go to the cause, **which is not within Ci's reasonable range for overhead spending.** [Emphasis added]*

...CNIB reported using external fundraisers as part of its fundraising activities in its F2018 T3010 CRA filing. The charity paid external fundraisers \$1.3m, who raised \$925k for the charity. This means CNIB spent \$1.42 per dollar raised.⁸

It should be noted that in 2015, 2016 and 2017, CNIB spent approximately 40% of its public donations on fundraising.⁹ Therefore the 2018 expenditures are the norm, not an exception. CNIB's focus on fundraising serves two key purposes. First, and foremost, these expenditures protect the brand by maintaining a high public profile and reassuring the public that the CNIB still exists and looks after the needs of the blind. This is critical for retaining public support for the status quo and hence maintaining the company's monopoly. The second benefit of CNIB's aggressive public fundraising is that it ensures that any donations intended to help the blind will be funnelled into their coffers. This creates a barrier to entry for any other non-profits wanting to compete with the CNIB and become a service provider for the blind and visually impaired.

The establishment of VLRC and DBCS has altered the presentation of CNIB's financial statements in fiscal 2019. Overall government contributions increased by \$13 million in fiscal 2019 to \$43.4 million; however, donations from the public fell almost \$6 million to

7 These figures come from Charity Intelligence Canada's website: <https://charityintelligence.ca/charity-details/70-canadian-national-institute-for-the-blind>

8 Charity Intelligence Canada: <https://charityintelligence.ca/charity-details/70-canadian-national-institute-for-the-blind>

9 Ibid.

\$19.2 million.¹⁰ In addition, the gain from the sale of capital assets decreased by approximately \$8 million. Despite lower revenue, CNIB's total expenditures in fiscal 2019 increased by \$15 million from \$74 million to \$94 million. CNIB drew down on its internal reserves to offset the revenue shortfall.

Blindness as business

For the vast majority of visually-impaired Canadians (outside Quebec) the CNIB is literally their only option for blindness-related services such as training and rehabilitation. It does not matter if the person was born without sight or lost it late in their life; whether their blindness was the result of a disease or a workplace accident, virtually everyone will be directed to the nearest CNIB office to learn the skills they will need for living independently, finding employment, and enjoying life without eyesight.

CNIB's market domination is not limited to training, rehabilitation and employment services. The CNIB tries to capture all of the market opportunities presented by the blindness value chain. Through *Shop CNIB*, its retail operation, the charity is a leading supplier of products and mobility aids to the visually impaired. With the benefit of 100 years of charitable donations and government grants behind it, CNIB assembled the country's largest accessible library collection. The Centre for Equitable Library Access (CELA), a non-profit corporation created by the CNIB, sells annual subscriptions to public libraries and library systems so their print-disabled members can have access to CNIB's historical collection.

Even today CNIB continues to expand its vertical integration and market dominance in the blindness business. As noted in its 2017/18 annual report, CNIB has recently expanded its "paw-print" by entering into the guide dog business and has placed 24 puppies with volunteer trainers in three cities, with the long-term goal of building a national program. It also recently acquired Frontier Computing, a leading supplier of assistive technologies to the visually impaired.

The CNIB also dominates blindness research in Canada and certainly any academic wishing to study blindness-related issues needs the CNIB's support, as well as access to their extensive private database. The linkage between blindness and the CNIB is so

¹⁰ The figures that follow come from CNIB's fiscal 2018/19 financial statements:
https://cnib.ca/sites/default/files/2019-09/CNIB_Final_Word_FS_FINAL-s_980269.pdf

ingrained in the minds of Canadians that in some municipalities it is necessary for a person to be a registered client of the CNIB to qualify for a visually-impaired bus pass.

Advocate for the blind

Not only does the CNIB have a national monopoly over fundraising and blindness services, it also is the self-appointed advocate for the blind and reportedly speaks to government and media on behalf of the blind. The CFB is not aware of another instance where one organization has ever had the dual roles of being a monopolistic supplier and consumer advocate for the same group of citizens.

It is important to note that as non-profit corporations, the CNIB and its affiliates are not subject to external reviews or oversight of their performance results. There have been no value-for-money audits conducted over the past century to see if the charity's results justify the public expenditure, or if Canada's social goals are being achieved. There are not even any shareholders to answer to. As a charity, it is left to CNIB to evaluate its own performance and report out on its successes. According to the CNIB's management and directors, they are doing a great job, supported largely by personal success stories and anecdotal evidence.

CNIB as a service provider

Monopolies are known to be unresponsive to their customers' needs and, from the blind consumer's perspective, the CNIB is no different. It is a large bureaucratic corporation and the amount and quality of training services that a blind Canadian will receive depends largely upon their proximity to a CNIB centre, the centre's workload, how many years the person has been visually impaired, the quality of the local volunteers and the funding CNIB receives from the provincial government. However, as a general rule, the amount of blind skills training that average visually-impaired Canadians will receive from their local CNIB office is extremely limited. Typically, CNIB's volunteers and staff teach their visually-impaired clients to memorize key routes, such as how to get to their doctor's office.

The young and working-age blind suffer the most from the lack of training and training options available in Canada. The vast majority of working-age blind Canadians live in poverty on disability assistance and are unduly dependent on help from their friends and family. Conservatively, it is estimated that unemployment among the working-age

blind is about 70% but it would likely be much higher if one includes underemployment.¹¹ Is someone truly employed if they work two-hours a week, or is on a company's long-term disability plan?

Learning the skills necessary for the blind to live independently takes time, practice and self-confidence. It is not good enough to memorize a few routes. To find and retain employment, or to participate in community events, the blind must develop the cane skills to navigate in unfamiliar areas and be able to circumnavigate unexpected obstacles such as road repairs. They need confidence and travelling skills in order to take regular public transportation. To live on their own, they must learn how to shop and cook. To be truly independent, they need to find and retain full-time gainful employment.

Benefits of having training choices

In the United States, the adult blind have choices when it comes to rehabilitation and blind skills training. Most states have government-managed training facilities for the visually impaired and the federal government provides residential training facilities for the deafblind. There are also a variety of blind training centres run by non-profits. Typically, US citizens who have lost or are losing their eyesight are eligible to receive public funding and can go to whatever training centre meets their individual needs and goals.

The CFB and its US counterpart, the National Federation of the Blind, have helped several blind Canadians go to US training centres where they have participated in intensive nine-month residential training programs. The results have been remarkable and life changing for every one of the participants. Appendix A includes an article from the CFB's magazine, *The Blind Canadian*, and tells the story of one of these participants, Elizabeth Lalonde. She went to the Louisiana Center for the Blind and then went on to create the Pacific Training Centre for the Blind, one of the few non-CNIB training programs operating in Canada.

Despite its long history and receiving hundreds of millions in taxpayer money, the CNIB does not operate a single residential training centre in Canada. In fact, the CNIB has sold properties that were donated to it with the expressed purpose of establishing a residential training facility for the blind. In appendix B, we have enclosed the story of

¹¹ CBC News: <https://www.cbc.ca/news/canada/british-columbia/visually-impaired-youth-face-70-unemployment-and-this-group-wants-to-change-that-1.5114803>; <https://www.cbc.ca/news/canada/british-columbia/braille-is-the-answer-to-large-unemployment-numbers-in-blind-community-says-advocate-1.4967404>

Camp Bowen and the group of young people trying to hold on to their dream of finally making it a residential training centre for the blind and deafblind.

Protecting the monopoly through branding

The primary goal of any monopoly is to protect the status quo and its market share. As noted earlier, the CNIB does this through corporate branding and skilful messaging to government and the sighted community.

The public relations campaign was in high gear in 2018 as it was the organization's centennial. In its 2017/18 annual report, CNIB recapped the year as follows:

This year, we proudly celebrated CNIB's 100th anniversary from coast to coast. We kicked our centennial year off with "Eye Believe", a Toronto event where we set the Guinness World record for the largest formation of the human eye.

What followed was a year filled with storytelling and celebrating our extraordinary first century:

- *We held over 60 celebration events across Canada, including our national celebration at the Canadian War Museum.*
- *The Royal Canadian Mint created a limited-edition commemorative silver coin and bronze medallion set, designed by partially sighted artist Meghan Sims.*
- *We launched "That All May Read", an online, fully accessible, multimedia exhibit highlighting our role, since our founding, in literacy and the right of people living with sight loss to enjoy equal access to information.*
- *AMI broadcast the CNIB documentary "CNIB: A Century of Service", looking at our past, present and future.*
- *Over 600 news stories featured CNIB and our 100th anniversary celebrations and initiatives across the country.*

It is unlikely that any of the aforementioned 600 news stories questioned why after 100 years Canada was still relying on a charity to provide training and library services for its blind citizens. None of the articles questioned why governments had not stepped up and included coverage and training for the blind as part of Canada's social safety net. None of the 600 news stories questioned the rationale, the benefits, or the costs of having a single service provider for blind Canadians. None of the news stories questioned why there was not a single residential training centre outside of Quebec. Rather, the media outlets just relayed the good news stories that were told to them and encouraged the public to continue supporting the organization and its important work through donations to the CNIB.

The CNIB is very skilful in its messaging and, with 100 years to build its brand, the organization is universally held in high regard by sighted Canadians, despite the fact that the vast majority of them have not had any direct contact or experience with the organization. Likewise, media outlets treat the CNIB like a sacred cow and have no interest in undertaking a critical examination of the organization or Canada's use of a charity model for blind skills training.

The CFB suspects that the media's reluctance to pursue this issue is because of the inevitable public backlash that would ensue from a critical article. Sighted people not only hold the CNIB in high regard, they also derive comfort in believing that Canada's blind are being well served by the charity. As a result, many sighted Canadians react with strong disbelief if they are ever told otherwise.

Retail businesses

According to CNIB's website, *Shop CNIB* sells hundreds of products and "*has grown to be one of Canada's largest retailers of assistive products for people who are blind or partially sighted, serving more than 15,000 customers per year.*"¹²

CNIB's stated pricing policy is as follows:

CNIB is committed to offering quality products at competitive prices. Our prices may change from time to time due to price increases from our vendors, inflation or taxes. We will also pass along any savings that we may incur when prices are decreased by our vendors in future pricing.

*CNIB's prices adequately reflect the cost of doing business. Any profits realized from the sale of products are directed towards providing CNIB services for Canadians who are blind or partially sighted.*¹³

The CNIB has no qualms about making profits from its visually-impaired clientele. As a general rule, *Shop CNIB's* prices are as high or higher than other retail suppliers. However, the company benefits from its reputation, its monopoly on training services, and convenience. CNIB's volunteers and staff can recommend assistive products that in turn are available to visually-impaired consumers from *Shop CNIB*.

12 CNIB website: <https://shop.cnib.ca/about/about-shop-cnib>

13 CNIB website: <https://shop.cnib.ca/about/shop-cnib-customer-charter>

Library services for the blind

A few months after its creation in 1918, the CNIB amalgamated with the Canadian National Library for the Blind and, for the next 96 years, the agency ran a national library for the blind out of its headquarters in Toronto. Historically, providing library services was an important tool in CNIB's fundraising monopoly as it led to ongoing contact with members of the blind community and their families.

Through government grants, private donations, and fees charged to public libraries, the CNIB assembled the largest collection of print accessible books in the country.

As noted earlier, in 2014 the CNIB created the Centre for Equitable Library Access (CELA) to take over responsibility for lending its historic library and to act as a central hub for the national distribution of accessible material to print-disabled Canadians. CNIB created CELA even though this model had been strongly opposed by user groups, provincial librarians, and provincial governments, which are the primary funders of Canada's public libraries.

Despite opposition to the proposed model, CNIB's market domination meant that public libraries had little choice but to acquiesce and subscribe to the service on behalf of their print-disabled members. Effectively the CNIB used its monopoly power to cast aside the objections of the stakeholder groups and implement what it wanted. The creation of CELA was not in the best interest of the users, Canadian libraries or taxpayers. However, control over CNIB's historical collection ensured that CELA would become entrenched in the public library system and would continue to be the dominant provider of library services for print-disabled Canadians for the foreseeable future.

Given the significance of the above, the CFB felt it would be advantageous to provide additional background information on this issue and CNIB's role in shaping the public library system for Canadians with print disabilities.

CNIB and public libraries

The blind and visually impaired are not the only groups that benefit from having access to accessible reading material. Individuals with certain learning or physical disabilities may also have difficulty reading conventional books. As these Canadians are not visually impaired, they were never eligible to borrow directly from CNIB's library.

In order to increase access to accessible material for all Canadians, public libraries entered into Partnership Agreements with the CNIB. This gave public libraries the right to borrow from CNIB's collection via inter-library loans and on a fee-for-service basis.

Canadians with print disabilities have been poorly served by the public library system and have only had access to a small fraction of the books available to other library users. In 2007 the Federal Government attempted to address this inequity by creating the Initiative for Equitable Library Access (IELA). The federal government provided \$3 million in funding to Library and Archives Canada and tasked them "to create the conditions necessary for equitable and sustainable access for Canadians with print disabilities."¹⁴

During the first phase of public consultations, it was apparent that there was a lot of dissatisfaction with users' access to accessible material, as well as CNIB's involvement in the public library system. There was also hope among many of the stakeholders that the federal government would follow the U.S. lead and that Library and Archives Canada would assume the role of being the coordinating body for Canadians with print disabilities.

After the first round of public consultations, the Assistant Deputy Minister of Library and Archives Services issued a public letter to the stakeholders to quash any hopes that the federal government was willing to take such a role. In it, he advised them of the following:

*One scenario for the national strategy that is currently under serious consideration involves a proposal made to the Government of Canada in March 2009 by a key stakeholder in library service delivery to Canadians with vision loss, the CNIB. CNIB proposed that one solution to the establishment of IELA would be the creation of a new non-governmental organization mandated to serve all Canadians with print disabilities. This new organization, built upon CNIB's existing infrastructure but no longer part of CNIB itself, would serve as a production centre or network resource centre for public libraries who serve people with print disabilities within their communities.*¹⁵

While the Federal Government and a hired consultant attempted to sell CNIB's proposal to other stakeholder groups, there was strong pushback from all quarters. User groups wanted a publicly-funded, publicly-run and publicly-accountable library system. They saw CNIB's proposal as merely dressing up the status quo and rightfully believed that the corporation would continue to exercise control over the new NGO.

¹⁴ Library and Archives Canada: <https://www.collectionscanada.gc.ca/iela/index-e.html>

¹⁵ Library and Archives Canada, *Letter to Stakeholders*, October 6, 2009: <http://www.collectionscanada.ca/iela/005002-920-e.html>

Provincial librarians wanted a system that was consistent with standard library principles; while provincial governments, as the primary funders of library services, wanted a governance structure that was accountable to provincial authorities, not to a non-profit's Board of Directors.

Recognizing there was strong unified opposition against CNIB's proposal, Library and Archives Canada abruptly ended the Initiative. IELA's *Final Report* was written by the Federal Government's Audit and Evaluation Directorate and focused on lessons to be learned from the Initiative's failure. They summarized IELA's demise as follows:

Early in 2009–2010, a review of the progress achieved to date was conducted and it was determined that the Initiative was not on track to achieve its intended goals within the specified timeframe and budget. At that point, efforts were directed to focus on the fifth workstream—developing a national strategy and business case. Later, when it became apparent that a consensus could not be reached, the decision was taken to end the Initiative and \$1.5 million was returned to the Consolidated Revenue Fund (CRF).¹⁶

Despite IELA's failure, the federal government continued to support CNIB's model and in 2011 the government made a one-time grant of \$7 million to the corporation in support of CNIB's accessible library services.¹⁷ The following quote is from the press release announcing the grant:

"Canadians with print disabilities rely on this library with its world-class resources and support services, and our Government is proud to step up to ensure the services can continue," said Minister (Rona) Ambrose. "By providing this one-time funding grant, we are supporting men and women who are blind or partially sighted in their ongoing educational development and quality of life."

Library services fall under the jurisdiction of the provinces and territories, and CNIB is currently exploring service arrangements with the provinces and territories and long-term funding.¹⁸

IELA's failure, combined with significant and abrupt increases in CNIB's lending fees, prompted librarians from several provinces to band together and establish the National Network for Equitable Library Service (NNELS). NNELS was launched in December 2013 as a repository of accessible material, where the content was owned and

16 Audit and Evaluation Directorate, Summative Evaluation Initiative for Equitable Library Access, February, 2013, page 3:

<https://www.bac-lac.gc.ca/eng/about-us/audits-evaluations/Documents/IELA%20Evaluation%20Report.pdf>

17 Government of Canada news release, February 23, 2011: <https://www.canada.ca/en/news/archive/2011/02/government-canada-supports-cnib-canadian-national-institute-blind-library.html>

18 Ibid.

sustained by Canadian public libraries. NNELS is fully funded by five provincial governments (BC, Alberta, Saskatchewan, Manitoba and Nova Scotia) and the three territories.¹⁹

CNIB creates CELA

If the CNIB wanted to maximize the public benefit from its historic collection, it could have simply donated it to NNELS and Canada's public libraries. This would have allowed for the widest possible distribution of accessible material to print-disabled Canadians at the lowest cost to taxpayers. It would have been entirely appropriate given that most of the money that was used to build and digitize CNIB's collection came from the various levels of government. However, fees from public libraries had become an important source of revenue for the CNIB and clearly the corporation was not willing to give up the earning potential or the political clout that came from controlling its "private" collection.

CNIB recognized that because its internal library could not serve all print-disabled Canadians, NNELS would have a significant advantage in getting future government funding. As a result, five months after NNELS' launch, the CNIB proceeded with the proposal that had been rejected by the stakeholders. Specifically, CNIB established the Centre for Equitable Library Access (CELA) to provide a national library service for all print-disabled Canadians. According to CELA's website, its relationship with the CNIB is as follows:

Launched under the auspices of public libraries and with the assistance of CNIB, CELA assumed service responsibilities of the former CNIB Library and inherited some of its knowledgeable and dedicated staff who have helped CELA grow to be Canada's leading accessible library service. While CELA and CNIB are completely separate organizations, governed by independent boards and with separate funding arrangements, CELA does maintain a business relationship with CNIB for the provision of some business services, primarily IT support and production. CELA evaluates our agreement regularly to ensure that it is in the best interests of CELA patrons.²⁰

The above wording implies that the CNIB did not donate its library to CELA but rather CELA acts as CNIB's agent and lends out the historic collection on CNIB's behalf. The CFB suspects that there likely are strong financial ties between the CNIB and CELA

¹⁹ <https://nnels.ca/about>

²⁰ CELA website: <https://celalibrary.ca/about-us>

but we have found it difficult to obtain any public information on CELA's finances let alone the details of its financial agreements with the CNIB.

Although CELA was created as a non-profit corporation, it's in the business of providing accessible content to print-disabled Canadians on a fee-for-service basis. CELA is funded through a combination of government grants and subscription fees to local libraries and library systems.

Although many Canadian libraries initially resisted paying higher borrowing fees to the CNIB, most acquiesced to CELA. In reality, they had little choice, as failure to pay CELA's fees not only meant that their disabled members would be denied access to CNIB's historic collection; it also was a PR nightmare for the libraries as disabled members and the CNIB complained to media outlets about the loss of content because their local library would no longer pay for the service.

Today, according to CELA's website:

...CELA is fully funded to serve 97% of the estimated 3 million Canadians with print disabilities in partnership with member public libraries and we offer a digital-only service to those in non-funded areas.²¹

To put these individual subscription fees in some sort of context, according to the Vancouver Public Library's 2017 financial statements, they paid \$43,696 to CELA for its subscription fees.²² In the same year, the Surrey Public Library paid CELA \$31,702 for its subscription.²³

CELA vs. NNELS

CNIB's website recognizes both library services exist but clearly favours and encourages its clients to subscribe to CELA. The following is CNIB's description of the two services on its website:

CELA works with public libraries in almost every part of Canada to provide free access to reading material in the format of your choice.

21 Ibid.

22 Vancouver Public Library 2017 Financial Statements: <https://www.vpl.ca/sites/vpl/public/2017LibrarySOFI.pdf>

23 Surrey Public Library 2017 Financial Statements:
<https://www.surreylibraries.ca/sites/default/files/StatementOfFinancialInformation2017.pdf>

If you are blind or partially sighted, or have another disability that prevents you from reading regular print books, CELA gives you:

- *Canada's largest accessible library collection, with more than 500,000 titles in English and French, 50 newspapers and more than 150 magazines*
- *choice of formats: audio, braille or accessible e-books*
- *option to digitally download books or receive them by mail*
- *free subscription to Bookshare, an amazing online library with an additional 500,000 digital books*
- *personalized support to make sure you get the most out of the service*

How to register

Signing up is as easy. Fill out CELA's online registration form, visit your local CELA member library or call 1-855-665-2273.

The CNIB website describes NNELS service as follows:

NNELS is a national service owned and sustained by Canadian public libraries. NNELS offers more than 35,000 titles in English and French in a number of downloadable digital formats.

How to register

*You can register for NNELS online or call 1-888-848-9250 for more information.*²⁴

Significantly, there are links on the CNIB's website to facilitate someone interested in registering for CELA or wanting further information on its service but there are no links for NNELS; only the statement that anyone interested can phone or register online.

From a user and public policy perspective, NNELS offers a number of significant advantages over CELA. These include the following:

- NNELS integrates accessible material into the existing public library system whereas CELA operates a separate library system for print-disabled users. Appendix C is a *Blind Canadian* article/speech by Mary Ellen Gabias, president of the CFB, explaining the importance and benefits for a blind person to be included in the public library system rather than served through a separate system;

²⁴ CNIB website: <https://cnib.ca/en/sight-loss-info/living-blindness/library-services-people-who-are-blind?region=bc>

- NNELS is owned and funded by the public libraries and there are no annual subscription fees for accessing and lending out its content. As a public body, NNELS staff report to, and are accountable to, provincial librarians. CELA is a non-profit corporation and, as such, its staff report to and are accountable to their Board of Directors; and,
- CELA is continuing to add content and, as its collection grows Canadian libraries have less incentive to acquire accessible content on their own. CELA's growth and market presence may also adversely affect governments' willingness to fund NNELS, thereby slowing the growth of its content. As CELA grows, it will gain an even more dominant position and Canada's libraries will become even more dependent upon the non-profit to provide accessible material for their print-disabled members. This, in turn, makes public libraries more vulnerable to future fee increases and will make it even harder and more expensive to build a competing public library service in the future.

Whether the CNIB and CELA are closely linked or two separate companies is at best a moot point. They each have a market monopoly in a segment of the blindness business that virtually guarantees their survival regardless of their efficiency, cost controls, results, or the quality of their service.

In its 2018 budget, the Federal Government initially failed to provide any funding to CELA for converting conventional books into an accessible format. The failure to fund CELA drew an immediate angry rebuke from John Rafferty, CEO of the CNIB. In a letter sent to all MPs, Senators and the media he indicated the following:

[The] CNIB is disappointed and deeply troubled that the federal government has not addressed our budget request for \$3 million to support accessible book production...This lack of funding will force CNIB to decommission our accessible book production operations effective April 1, 2018 – unless something is done.²⁵

Within hours of the media's coverage of Mr. Rafferty's letter, the government announced that it had been a human error and that they would be providing the requested \$3 million to CELA. The Federal Government provided another \$3 million for CELA in 2019.

25 Global News, March 10, 2018: <https://globalnews.ca/news/4075364/trudeau-liberals-cut-funding-cnib-accessible-books/>

During the past two years, the federal government has provided \$2 million for the publicly managed NNELS, one third of what it gave to CELA to fund its growth.

CNIB pension

Historically, CNIB provided retirement benefits to its employees through a defined benefit pension plan. Under this plan, retired members are entitled to a lifetime pension based on their years of service, years of contributions, and final average earnings.

Due to cost concerns, the CNIB closed its defined benefit pension plan to new entrants in June 2010. Active members were grandfathered and were allowed to continue to accrue pension benefits. A defined contribution plan was established to provide retirement benefits for CNIB's new and future employees.

With its defined contribution plan, the CNIB's cost is limited to employer contributions, which are based on a percentage of the employees' pensionable earnings. In fiscal 2018 CNIB contributed \$733,000 to its defined contribution plan on behalf of its employees.²⁶

There are two potential costs for the defined benefit plan. The first is the employer's contributions for active members who continue to work for CNIB. Employer contributions to the defined benefit plan fiscal 2019 were \$2.9 million.²⁷

The second potential cost of a defined benefit plan is that the sponsor is responsible for fulfilling the pension promise and funding any future shortfalls. It is currently estimated that CNIB's defined benefit plan has assets of \$124.7 million versus an estimated accrued pension obligation of \$112.6 million.²⁸ As such, the plan is currently estimated to have an actuarial surplus of \$12.1 million and it is not necessary for the employer to provide supplemental contributions. However, this has not always been the case nor is the plan guaranteed to remain fully funded in the future.

The 2008 financial crisis, combined with low interest rates, had a devastating impact on the funding status of most defined benefit pension plans, including CNIB's. In 2009, CNIB's Chief Financial Officer wrote to Ontario's Minister of Finance and expressed grave concerns about the impact that these events had on their pension plan's funding status.

26 CNIB 2019 financial statements: https://cnib.ca/sites/default/files/2019-09/CNIB_Final_Word_FS_FINAL-s_980269.pdf

27 Ibid.

28 Ibid.

The Chief Financial Officer argued that the company should be exempt from meeting the Province's solvency requirements on the grounds that there was "a negligible chance" that the CNIB would ever cease operations.²⁹ The corporation also warned that covering the plan's solvency deficiency would pose a significant problem and would reduce the funding available to provide services for the blind and visually impaired.

Because the CNIB has a monopoly, it can reduce its services to the blind and visually impaired without fear of losing any of its customers. Fortunately this was not necessary as changes in pension regulations and a stock market rebound helped mitigate the impact that the 2008 financial crisis had on the plan's funding status. However, the pension issue illustrates two significant points.

First, it is noteworthy that the CNIB has set aside more assets to fund its pension benefits than it has to fund its operations.³⁰ Second, and more importantly, it illustrates the societal risk that results from relying on a single company to provide services to the blind, visually impaired and deafblind. Effectively, governments across the country have "put all of their eggs in one basket".

What would have happened if the markets had not recovered and CNIB was required to increase its pension contributions? Would governments accept lower service levels for the blind or increase their grants to CNIB? What would happen to service levels if there was a corporate scandal and private donations dried up suddenly?

The only way that Canadian governments can reduce the firm-specific risk is to diversify their suppliers and decrease their reliance on the CNIB.

Conclusion

Most working-age blind will eventually give up looking for paid employment, resigning themselves to collecting disability assistance and doing volunteer work. Once they stop actively seeking employment, they are no longer considered to be unemployed, or even in the labour force. Rather, they fall into the ubiquitous and unmeasured category that economists call "discouraged workers."

While this status means that unemployment among the blind is largely omitted from the official statistics, governments are aware that the blind face enormous challenges in finding employers willing to give them a chance. In its most recent budget, the

²⁹ Letter from CNIB's CFO to the Minister of Finance dated February 25, 2009:

<https://www.fin.gov.on.ca/en/consultations/pension/submissions/CNIB.html>

³⁰ CNIB 2019 financial statements: https://cnib.ca/sites/default/files/2019-09/CNIB_Final_Word_FS_FINAL-s_980269.pdf

Federal Government allocated an additional \$1 million to CNIB: “to improve employment opportunities for people with visual impairments by connecting them to employers.”³¹ The CNIB was very appreciative of the additional funding and issued the following public statement:

*Canadians with sight loss are talented and capable, and their unique skills and perspectives can be a real asset to employers. This investment will help us open new doors to employment for them.*³²

Unfortunately, the above illustrates one reason why Canadian governments continue to support the status quo. Specifically, as long as non-profit corporations are mandated to provide services for blind citizens, governments are not held responsible for the quality of those services, or the consequences of inadequate training. However, by giving an additional \$1 million to the CNIB, the government can still claim that it has responded to the problem of chronic unemployment among the blind. The government can even quote the accolades from the CNIB, the self-appointed advocate for the blind.

Leaving responsibility of providing training and employment services to the non-profit sector is bad enough but using a single national monopoly to provide these services has made the situation considerably worse for visually-impaired Canadians.

Despite overwhelming historical evidence that competition improves service quality, companies' responsiveness to their customers, and overall efficiency; no one in government or the media ever questions the idea that a single national charity, established over a century ago, is still the most efficient model for delivering goods and services to blind Canadians.

If governments wanted to see the benefit of competition in blind skills training, they only need to look south. Unfortunately, the cost of attending a US training centre is out of the reach of most blind Canadians.

Governments should also be concerned about the systemic risks that result from relying on a single firm to provide critical services to its visually-impaired citizens.

The CNIB controls the blindness business in Canada and its reach has spread throughout the lives of the blind, including providing them public library services. One

31 Federal government- fiscal 2019 budget: <https://budget.gc.ca/2019/docs/gba-acsgba-acsgba-chap04-en.html>

32 CNIB Commends Government of Canada on Budget 2019 Commitments: <https://cnib.ca/en/news/cnib-commends-government-canada-budget-2019-commitments?region=bc>

consequence of this market dominance is that the charity holds great power over the lives of the blind. Therefore, despite poor service levels, many blind Canadians are concerned about publicly criticizing the charity out of fear of losing the only support that is currently available to them. Others may have a fond memory of a special volunteer who truly helped them. However, when compared to the situation in the United States, the level of training and support for visually-impaired Canadians is simply pathetic. Having a monopoly on services means that there is little need or incentive for the CNIB to change or improve.

Breaking up the monopoly would be a difficult and challenging undertaking. Given the CNIB's reaction to the Federal Government's failure to fund CELA in 2018, the company can be expected to come out swinging— using all of its political and media clout should its monopoly or brand ever come under threat.

However, the process must start somewhere or blind Canadians will be forced to suffer with a single service provider for another century. The CFB hopes that this report will become a catalyst and will trigger a long-overdue dialogue and debate on the need for a new competitive model to provide services for blind and visually-impaired Canadians.

Appendix A

The Road Leads Back Home: The Pacific Training Centre for the Blind

The following panel discussion occurred at the CFB's 2017 Convention: "Vote of Confidence" and was reprinted in the October 2017 edition of CFB's magazine, The Blind Canadian.

Elizabeth Lalonde, CFB Secretary and Director of the Pacific Training Centre for the Blind, moderates this panel discussion.

Panel participants are: T.J. Evans, Ann Mofatt, Kashmere Bling and Delores Thompson – all are PTCB students or former students.

Elizabeth:

I'm going to start by giving a brief explanation or background on the Pacific Training Centre for the Blind.

This is one of my favourite quotes from James Omvig, a prominent National Federation of the Blind scholar: “A successful blindness training centre must instil a belief in its students that blind people are simply normal people who cannot see, and that the average blind person can live a normal life and compete on terms of absolute equality with people who are sighted, if given proper training and opportunity.”

I started the Pacific Training Centre for the Blind in 2011. This was following my sojourn at the Louisiana Center for the Blind in 2009 – 2010, though the concept had been in my mind for a long time prior to that.

When I first learned from Paul and Mary Ellen Gabias about the intensive training centres that existed in the United States, I couldn’t believe it. I knew we needed something like them in Canada. In the U.S. they have three National Federation of the Blind (NFB) training centres, which CFB has been talking about for a long time. They also have other centres, some state run, some are other non-profits – and almost every state has something. I mean, there’s different degrees of how good they are, but they do have them almost in every state. Some states even have two.

So, I knew we needed something like that in Canada. And in the U.S., blind people can, at least now and hopefully that will remain the same, get rehabilitation for free from the government. In Canada, there is little to no public funding from government for blindness rehabilitation. That’s starting to change a little bit but not much yet.

When you lose your sight in Canada you receive very little in the way of training. You are handed a white cane and given a few cane lessons and maybe a few cooking lessons – and some people don’t even get that. There’s nothing regular or systematic, nor any group program. So blind people all over, in various organizations including ours, are doing a lot of advocacy to try to change this, but so far nothing really significant has changed. So I wanted to do something to make a change, at least to make a start – to demonstrate a model of training that works – and also just to feel like I was doing something tangible.

The Pacific Training Centre for the Blind is a grass-roots organization. It’s based in Victoria, B.C. We’re community focused, accountable to the people we serve and most of our funds are spent on direct program delivery.

Our Mission: PTCB is committed to empowering its students to achieve independence, employment, equality and first-class citizenship by offering cutting-edge blindness skills training based on a positive, proven, world-renowned model. Teachers instil a belief in blind people’s capabilities and in the limitless possibilities open to them, and adopt a non-custodial approach. It’s not about sighted people doing things for the

blind, it's about blind people doing things for themselves. And it's about blind teachers working with blind students to increase skills and confidence.

Our Vision: Blind people empowering blind people to be employed, independent and free.

Our main program is called Blind People in Charge and our centre provides this right now three days a week at the Victoria Disability Resource Centre on Fort Street. As far as I know, it's pretty much the only program of its kind in western Canada that offers regular blindness training to people who are blind or are losing their vision. It's also the only program that uses an empowering, problem-solving method of instruction where blind people are the teachers, planners, directors and administrators. The program involves a collaborative, positive and empowering approach to blindness in which blind people learn from each other in a supportive, can-do atmosphere.

Instructors teach non-visual independent skills, such as Braille, cane travel, adaptive technology, cooking and other life skills, and develop positive strategies for living without sight. We also work with students to find volunteer opportunities, job shadows, accessing community resources like housing, financial support, and other essential services.

The model we use is pretty ground-breaking in Canada. It's the approach we talked about in the previous panel. (See: "On the Road to Rehabilitation" in this issue.) The academic term is called "structured discovery" and it's very different from the traditional route-based method where you teach someone so they learn and memorize a route, and then if they want to learn somewhere else, they have to go get help and learn and memorize that. That's what we're familiar with here in Canada.

But, our model at PTCB is based on the National Federation of the Blind in the United States, and their success is really confirmed by "the proof is in the pudding". And, they're doing a lot of academic research now to back them up. There's actually now a master's program in Louisiana, started, designed and run by blind people, where you can go and learn and get your master's degree in cane travel instruction, rehabilitation and Unified English Braille certification. You can be sighted. Mary Ellen's daughter is sighted and she graduated last year from that master's program. She's now teaching blind people in Arizona and she works a lot under blindfold. She trained entirely under blindfold.

We have some amazing students. I'm just going to talk about sleepshades. We wear sleepshades so we can focus on our other senses, without the distraction of limited vision, and it also helps to build confidence and teaches students that they can truly do things independently without sight. When students develop their non-visual skills then they can reincorporate their vision and use it when it's helpful and use their other

senses when that would be more productive. For example, even though I still use my residual vision quite a bit in my daily life, I know now that when I need to, I can accomplish the same activities without any sight at all. I often switch from visual to non-visual techniques throughout the day. Often I have to tell myself to switch over to a non-visual skill because I know it will work better in a certain situation – for example, at night or in dimly-lit rooms when I pretty much have no sight; or when I'm doing something like preparing a meal and trying to find something on a table, then it's much more efficient to use my sense of touch. Or when I walk into a store and want to find the cashier counter, it's much easier just to listen to the sound of the cash register than try to strain and see if I can see some shadow that might indicate a counter.

The "Blind People in Charge" program seeks to address the high unemployment rate of blind Canadians (which is 80% or more), isolation, and the severe lack of intensive rehabilitation available to blind Canadians. We provide this program free of charge.

Our funds are limited. We receive some donations. We organize fundraisers. We've recently received grants from the Victoria White Cane Club, BC Gaming, Victoria Foundation, Vancity, Pacific Blue Cross and Uniform and Medicine Centre Pharmacies Charitable Foundation. We get contracts occasionally on an individual student basis. We also build partners in the community, which is really important. For example, we've partnered with the Neil Squire Society, the Victoria Disability Resource Centre, and the Disability Alliance of B.C.

So now, the most important part of this. I want to call our students up to the podium. I've asked them and they've been so kind to come today and talk about their experiences at the centre and their personal stories and what the training has done for them. T.J. would you like to start?

T.J.:

Hello everybody. My name is Thomas John Evans. Everybody calls me T.J. I'm one of the students from the Pacific Training Centre. I came to them a couple years ago. I was on the transition side – I've still got some sight but basically the type of sight I've got is not functional. I see a bit of light and it's also what gets me into trouble because it gives me severe migraines on top of everything. I went from almost not knowing where I was going or what I was going to do. I was trying to give myself my own training because no other place would help me as I had very limited funds and I had even less than I do now.

But PTCB very kindly said, "No, we're going to help you out." And they've taught me so much and given me a lot of encouragement and direction in things that I did not know – cane travel, for instance. They taught me the techniques and the other skills that go along with cane travel – the auditory, the vibrations, and basically gave me the motivation I needed to do a lot of stuff on my own. They helped me with independence

training like life skills, how to develop and rely on my other senses – tactile-wise/what I'm feeling; auditory-wise/what I'm hearing; my sense of direction.

Even though I had a fairly good basis on some of that, they taught me how to refine and focus. They also gave me a proper cane, whereas before I was trying to use a short piece of bamboo. Picture that one. That was quite interesting trying to get myself around with that. They actually gave me a proper cane that was fitted to my height. They taught me the other proper techniques and they gave me a little kick in the butt when I needed it.

One of the first people that helped me with the cane travel was Danielle Frampton (Fernandez) and one of the chief things she taught me was not to be afraid of bumping into things – even when I tried once to lay down in a planter! She told me, “Come on. Get up. Stop resting. Let's go.” In the way of the encouragement, the way of making you feel that you're not alone, these people do a great deal and so much more than I can even tell. And they give you such a boost. Even when they're not teaching you, they're teaching you something.

Elizabeth:

We're so proud of you T.J. You work so hard and you have such a good attitude. Thank you so much. Now I'd like to call upon Ann Mofatt who started with us at the training centre four months ago. Ann is exceptional. We really do believe that she is our model student. She's got a fabulous attitude and we're really happy to have her at the centre.

Ann:

My name is Ann Mofatt. I'm an 80-year-old woman with macular degeneration. I still have some sight. I can travel by bus and I can more or less take care of my home and make meals for my 85-year-old husband and myself.

I've been going one day a week to the training centre since Christmas. Since I started at the Pacific Training Centre, my whole perspective on my deteriorating eyesight has really changed. I don't worry much about the future anymore because using the skills I'm learning, I'll remain independent and I will adapt to life as my eyes change. Although I still do everything I can to maintain my vision – I do my eye exercises almost daily to keep my eye muscles strong so I can focus well, and I take my recommended supplements, and I'm very careful not to over-strain my eyes.

I was interested in hearing about the difference between the maximum and the optimal use of eyesight in the previous panel discussion, and my life is really much more comfortable now that I've moved from maximum use of eyes to what may be a more optimal stage. And, I love the training centre's approach which is to stop relying on sight quite so much and to develop other senses – hearing, touching, smelling, even

tasting. So I'm using them instead of relying on sight. I now listen mindfully to the movement of traffic as I practise using a cane and find my way along the streets of Victoria – which are not very simple and they're very, very busy, I'm sure, compared to a little town like Duncan might be. It can be absolutely terrifying when you put those blindfolds on at first. But I'm getting better at it now and I'm moving faster, which helps me to stay straight.

I use Siri and VoiceOver on my iPad to read and write emails, search the web, and to keep up with the new technology, which isn't easy at my age I can tell you. I've discovered that my hands and fingers have a kind of cellular memory that enables me to do many familiar tasks without needing to look. Tasks like preparing vegetables, finding the right coin or bill when I need to pay for something, threading a needle, and sewing on a button (which we did the other week) and making simple repairs to clothes. Often I find I don't bother to put a light on anymore – I just do it by feel.

Learning Braille challenges my brain and I actually find this exciting as I think of the new neurons being connected together in my old brain, rejuvenating it and helping to keep dementia at bay.

My problems are probably quite a bit different from the rest of you in this room, but they are very important to me. Trying to feel and differentiate the little bumps to read the letters, words, and now, even short sentences, is very slowly bringing a whole new sensitivity to my arthritic fingers. As well as being able to read, I'm able to make labels for my kitchen containers – those elusive spice jars that somebody was talking about earlier, they're now at my fingertips with Braille labels.

Perhaps best of all, is the optimistic way that Elizabeth and Linda and Sky have helped me to approach problems. They see them as just another challenge that can be overcome with a little thought and ingenuity. I could go on and on about the new things I'm learning and we've heard most of them already today, so I won't keep going on that one. The Pacific Training Centre is providing an exciting journey for me.

I'll end by saying that I think that I'm really incredibly lucky to be able to learn these new skills while still having some sight. It is helping me to make a much smoother transition. I know that losing my vision now doesn't mean that I have to cut out important activities. I just know that I will always be able to do what I want to do. I just have to find another way of doing it. So, thank you.

Elizabeth:

Well, thank you so much Ann. That was incredible. Wow. I would now like to call upon Kashmere Bling. I just want to cry. Kashmere came to us a few months ago too and I will let her tell her story, but I'm just so proud that she comes to the centre and that she

is really making an effort to learn different ways and different approaches, so thank you Kashmere.

Kashmere:

My name is Kashmere Crystal Bling. It's very hard for me, but actually I'm doing pretty well, I feel. I've been a model all my life and I like to be looked at as a beautiful woman. But I once thought that using a white cane would make me feel ugly and look ugly. But actually, it didn't.

I had to go away for a month to two weddings, one in Florida and one in New York. Going there alone was a challenge. But, thank god, I met Elizabeth and her school and everyone.

I've always told people that I would never use a white cane. "No, no, no, that's not going to be me." But I had no choice. So I did get my cane. I practised with it and learned how to use the stairs, which was challenging but I did it. Thank you Elizabeth. That was a lot of work, but it was great. Walking out in the streets was fun. I also hit a homeless man with my cane on the ground that I did not know. But hey, we experienced it. It was an experience, but it was something that I had to do because it's going to happen – it could be a homeless person or it could be someone else, right?

So, my U.S. trip challenge was going to the airport. I went around Christmas. I took my cane out. Oh, there's one thing I forgot to mention. Being that my name is Bling, I'm all blinged out, I'm wearing all bling on my clothes, but my girlfriends were like, "Well, what can we do to make you use your cane?" I said, "I don't know." So they took my cane and surprised me. They blinged it out. It has bling on the top, it has gold (my favourite colour), then white, then silver. Some of you may not know that I'm hearing impaired too. I wear hearing aids. I have retinitis pigmentosa (RP) and Usher's Syndrome, so I see only through a pinhole in one eye and it's blurry, the other eye unfortunately I lost in surgery. So the cool thing is, I found out in London, England about how they identify deaf-blind people – they have some red on their white canes – the red with the white symbolizes visually and hearing impaired. So my cane is striped in bling, gold, white, silver, gold, red, black and the same colours repeated all the way down.

So I took this cane with me to the airport. First time I pulled it out, first time using it in public by myself without a trainer or anyone. I had people come up to me and say, "Oh, my goodness, I love the candy cane." "Oh no, this is my cane. I'm visually impaired." They said, "You are? You don't look it." I said, "Thank you. But no, seriously, I am." One kid got in trouble by the mother. He was, like, "Mom, mom, I want that candy cane." Then the mother said, "Shh, shh, shh." And I thought, OK, thank god I had my hearing aids on. I said, "Is it OK ma'am if I approach your son?" She said, "Sure." I said, "Hi, this means..." and I explained my cane to him. He was looking at me. He had questions and I had to think about the answers before he asked me. Then

he said, "If you're blind, how did you see me standing here?" "I see a little bit, honey, a little." He said, "OK." Then he said, "If you're deaf, how do you hear me ask you a question?" I said, "I'm not deaf, I'm hearing impaired."

That was my first time. Honestly, I was scared to use the cane and that's the truth. I didn't used to feel beautiful with a cane, but then when my friends blinged it out and I had people approach me, I did feel beautiful for the first time in a long time.

So anyways, I navigated, got on the plane and everything was fine. The first wedding I went to was Miami, Florida and I had a bling dress on, of course, and I walked in with my cane. I had more people come up to me and compliment me with my cane, in using it, and how they thought, wow, you navigated so well through this whole entire reception. It was amazing – and I was proud of myself.

Going to New York – oh my gosh. Now, that city is busy, busy, busy. Wearing the hearing aids, it felt like a bomb was going off everywhere – it was just the crowds and the people and the honking. That's a place where you would get scared, but you know, I didn't. I actually got on the busiest street. Don't ask me how, I just did and I brought my cane and I thought, oh, I don't know if I can do it. I've never wanted to ask for help because I am so independent, but I was always scared to take that step forward. But, you know what? I walked straight through the downtown. I was walking and I was proud. Some people that I didn't know were videotaping me. They actually told me so. They said, "You know what? I had to come up to you and say I videotaped you. Do you mind if I share this with my friends because I've never seen anyone so smiling and looking so good and so confident with their cane." And I was proud of myself too, because I didn't think I could do that. And I have to say, using the cane is important.

And I'm going to say something else that I learned. Being a model, I love shopping and then I stopped doing that because I was scared – I couldn't see what I was doing; I was not giving the right amount of money; I was losing money; I was getting frustrated in the stores – and I couldn't do it. That's what I said, "I couldn't, I couldn't, I couldn't."

Since Elizabeth and the staff had taught me how to read money, it was amazing. I was so excited. I go to a motorcycle group that's called a Thursday Night Bike Club and we sit there and they all support me, "How's school? We're glad you're using your cane.

We're happy for you" and all that. I said, "You guys want to learn something?" And I didn't think I'd ever be able to do this. I said, "Do you guys want to learn how to read money?" They said, "What?" I said, "Yeah." So, I've got the fives, the tens, twenties, fifties and a hundred. They said, "She did learn." They were so impressed with the short amount of time that I went to school and before I used to tell them, "I don't want to go to the school, I don't want to go, I don't want to do this." You know, I was so negative. I'll tell you one thing, just by listening to how many people actually listened to

me – I passed the money around, they were all like, “Oh, my god, this is exciting.” And then they asked, “What about coins?” I showed them. It was interesting and I was proud of myself. And that’s what I’m saying – I’m proud that I finally got out of my shell.

I’ve been well-known in the mall because I shop there. So for years, as soon as the security guards see me, they say, “OK, Kash, where would you like to go?” And, he’ll walk me and say, “Call me and I’ll come and get you.” You know what? It takes about 20 or 30 minutes before I get someone to come and pick me back up. Now that I have the cane, girlfriends, guys, you know what? I walk in there proud, I’m in and out of the mall within 20 minutes. Before I’d be in there maybe for three hours. I know where I’m going so now I don’t need to wait for security’s help.

Now I use my cane and I can pay money without being ripped off, you know? And, it feels good. So, thank you so much to the Pacific Training Centre. I love it and I hope everybody else that wants to learn will go to this school. It takes time, I mean, I’m still struggling with the sleepshades. But, listening to everybody’s stories, what you guys have said, I am feeling that too. Thank you for letting me share my story.

Elizabeth:

Thank you so much. I’ve one more person, Delores Thompson. Delores is truly awesome and invincible. We’re so grateful that Delores can come to our centre and I’m going to let her tell her story.

Delores:

Hi people. I’m Delores Thompson. I used to live in Nanaimo, B.C. My parents had 10 children and I am the only one who is totally blind. I lost my sight when I was eight years old. I couldn’t see colours when I was five. I got told that I couldn’t do this and couldn’t do that. I was 36 years old when I moved out of my mom’s house. Needless to say, I then got into a group home and have been there for 26 years.

I heard about this program and I thought, “Hmm, maybe I should try this and see what I can learn from it.” So I went. At first, the centre was at the Scout Hall. I met Elizabeth Lalonde and Linda Bartram, who is another teacher of ours, and of course, I met Danielle Frampton (Fernandez). Both Elizabeth and Danielle taught me some things that I didn’t know before. I’m also learning to use a computer, which I never did have a chance to learn. I am one who gets frustrated travelling out on the street. I haven’t accomplished that one yet, but I will. That’s just me, I’m a cheeky one and I’m glad I’ve come to the Pacific Training Centre. They’ve also helped me learn how to use a knife and how to cook on the stove and all the things that a blind person can learn. So, thank you very much.

Elizabeth:

Wow, I think maybe all the Pacific Training Centre students can be public speakers now. Well, thank you so much. I’m just so emotional now and in awe of all these

tremendous people and for your courage to come and try and open your mind to a new way of doing things and I'm just so proud of all of you. Thank you.

Appendix B

Camp Bowen

Bowen Island is a short 20-minute ferry ride from Horseshoe Bay in North Vancouver. It is an island municipality of about 3,600 people and part of Metro Vancouver. Traditionally, Bowen Island was used for summer homes and cottages, but today many residents live there on a full-time basis and commute daily to Vancouver.

In the 1950s the *Fraternity of The Eagles* purchased a property on Bowen Island in order to establish a fishing camp program for the blind. In the 1960s, a local Lion's Club acquired the property and donated it to the CNIB. The intent was for the CNIB to use the property as a training facility for the blind and deafblind, as well as a summer camp for blind youth.

The CNIB was not interested in using the property as a training facility. However, the CNIB did use the property and facilities as a meeting place and, for about five decades, it operated Camp Bowen, a summer camp for visually-impaired youth.

It is impossible to overstate the importance and significance that Camp Bowen had upon its alumni. Many visually-impaired youth report that they feel different and isolated from the sighted children in their neighbourhood and rarely did they ever get an opportunity to interact with other blind people, let alone someone who was around their own age. However, everything changed when they went to Camp Bowen. Camp gave blind children the opportunity to make friends with other visually-impaired children. Most alumni speak of Camp Bowen with great fondness and tell stories of the positive impact that it had on their lives, such as it was the place where they met their first boyfriend.

During the 1990s, the CNIB attempted to generate additional revenue from the Bowen Island property by renting out the facilities for weddings and conventions. Noise and parking issues associated with these activities resulted in many complaints from the neighbours. There was, however, strong community support for using the property to help the blind. As a result, in 2002 the Municipality established a covenant on the property designating that its central purpose was to be a summer camp and training facility for the blind and deafblind. It also imposed restrictions on the frequency that the property could be rented out for unrelated activities, such as conventions and weddings.

In 2011, the CNIB sold the property and it sold again in 2015. The current owner has no interest in operating a summer camp for visually-impaired children or in using the property as a training facility for the blind and deafblind. As a result, they are attempting to persuade the municipality to amend or remove the restrictive covenant on the property. However, their proposal is encountering strong resistance from the Camp Bowen Society, a dedicated group of alumni who are fighting to restart Camp Bowen and to see the property finally used as a residential training facility.

In many respects, the Bowen Island facility would be an ideal location for a residential training centre. It is a small community located near Vancouver. Camp Bowen operated for almost 50 years, and there is strong community support for the program and support for the blind. However, the CNIB had little interest or incentive for establishing such a training facility.

Appendix C

This appendix is a reprint of an article appearing in the March 2019 edition of CFB's magazine, *The Blind Canadian*.

Lumberjacks and Librarians: Mary Ellen Gabias on the Power of Accessible Public Library Service

Editor's Note: The following talk was presented by Mary Ellen Gabias, President of the Canadian Federation of the Blind (CFB), for the funding announcement with the Honourable Carla Qualtrough at the North Vancouver District Public Library on November 14, 2018. The National Network of Equitable Library Service (NNELS) received \$1M. Reprinted from the NNELS newsletter of December 3, 2018.

<https://nnels.ca/news/lumberjacks-and-librarians-mary-ellen-gabias-power-accessible-public-library-service>

In his lively history *The Library Book*, David Obee explained what it is about librarians that make them heroic figures for me. Librarians were on the British Columbia frontier bringing access to books, newspapers, and other information for the loggers, trappers, and fishers who would otherwise have been isolated. Later, in the larger cities, it was librarians who helped immigrants and their children learn to read and write in English or French by providing them with books, a welcoming place to read them, and warm encouragement to become not only basically literate, but well-read.

Librarians quietly and consistently helped generations raise their expectations by offering access to the printed word. Heroes, beyond a doubt!

As a young blind child, I went with my sighted brothers to our branch library. I breathed in that library smell, I touched shelf after shelf of books, and wondered if it would be possible to read all those books and know what could be known. And I felt horrible, because none of those books – none of that mind-expanding knowledge – was for me.

The nice library ladies felt badly, too, so badly that I got the feeling they were relieved when I left. The public library was the only place in the world where I felt sorry for myself and completely unwelcome. I didn't blame the nice library ladies. At the time, library services for blind people were completely separate from the mainstream, and the production methods for the books I read were completely detached from the production methods for print.

For example, if they were produced at all, braille books were published at least two years after the print edition of a new book was released. Many braille books had to be hand-copied in a process that bore more resemblance to a monk handwriting manuscripts than to anything Mr. Gutenberg invented. Audio books were vinyl LP records used only by the blind.

Libraries for the blind all over the world were separate and necessarily segregated places that sent books to readers through the mail. Their collections were pitifully small compared to those in most public libraries. Although a borrower could request a specific book, the library often did not have it, so the selector would choose another book for a borrower and mailed that instead.

Getting a book in the mail from the library was a little like opening a Christmas present. You never knew what to expect. The surprises were often wonderful. When they weren't, getting a replacement often took two weeks which was a very long time to go without anything to read.

When I immigrated to Canada in 1989, a friend who worked at the Fredericton Public Library in New Brunswick invited me to get a library card. I was surprised by her encouragement and wondered why she thought I would bother. That was my first experience with a welcoming public library. The shelves contained commercially-produced cassette books as well as specially produced books for readers with print disabilities. I began to think that, just maybe, the public library had a place for me.

Now, the people at the Rutland Branch of the Okanagan Regional Library deepen my conviction that I can be welcome in a Canadian public library. I have come to respect what a competent and caring librarian adds to my reading life.

The Canadian Federation of the Blind has always advocated for increased access to the printed word. Over time, our understanding of what that requires and of what is possible have changed and grown. Our goal, which was beyond our imagination a few decades ago, is the complete and total integration of blind people into public library

services.

But we haven't achieved that integration, yet. We need bridges. NNELS is helping to construct those bridges and this federal grant is helping to build them faster. I am delighted about every book NNELS produces or acquires, but my real sense of hope and joy comes from three aspects of the NNELS philosophy.

First, NNELS is building capacity by leveraging the skills of libraries across Canada and drawing on the collective experience of the user community. By distributing aspects of services to people with print disabilities across the system, NNELS is helping to deepen the overall knowledge base and to create a resilient service structure. This philosophy has already led to employment opportunities for people with print disabilities which we applaud and trust will continue.

Second, through publisher education and emphasis on building accessibility into the structure of electronic books produced in Canada, NNELS is helping to raise awareness and to make it more likely that commercial electronic publications will be accessible out of the box. Accessibility works best when it's built in as part of the foundation; it can be devilishly difficult when it's added as an afterthought.

Digitization, electronic publishing, optical character recognition – all those processes that are challenging traditional library methods – are continuing to strengthen the hope of the CFB and all blind people and others with print disabilities. In theory, every book that is born digital can also be born accessible. A braille reader can now purchase an iBook or a Kindle book on the day that it is published and have a reasonable expectation of being able to connect a braille display to a cell phone and read. Compare that to the two-year average wait we endured in the past and our profound excitement is easy to understand!

Finally, because public libraries are being encouraged to see providing access as part of their core mission, people with print disabilities will be increasingly able to come to their public library for help in accessing library collections and learning how to read with technology. Librarians are doing more than picking out audiobooks from their shelves: they are burning books to CD from online collections, helping patrons load books onto electronic book readers, and teaching people how to use ebook and audiobook services the library employs for its print-abled borrowers. This last role necessarily requires that librarians as a group push digital content vendors to be much more accessible than they currently are. We hope and trust that librarians will increasingly become welcome fellow advocates in our quest for accessibility.

Because NNELS is striving along with the community for the full integration of people with print disabilities into the mainstream of library services, Canada is creating a new paradigm that is leading the world in a quiet, but truly revolutionary, way.

In short, the NNELS revolution is returning librarians to the role they occupied when this country was frontier territory. We readers with print disabilities are among this century's lumberjacks and immigrants, and we love that librarians are holding open the doors to a world of full and fair access to the books and ideas so important to all of us.

Letter from CFB to Matthew Boswell, Competition Commissioner

June 19, 2020

Matthew Boswell
Commissioner of Competition
Competition Bureau Canada
Place du Portage I
50 Victoria Street, Room C-114
Gatineau, Quebec
K1A 0C9

Dear Mr. Boswell,

Re: CNIB

I am enclosing a copy of the complaint that we filed with your department last month. It explains the challenges that blind Canadians face with only one supplier of critical services.

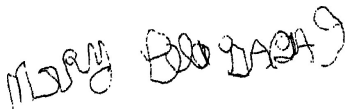
We discussed the complaint with two competition law officers and, although they were very sympathetic to our situation, they advised us there was little that they could do unless we could point to recent and specific examples where the CNIB engaged in uncompetitive behaviour. Unfortunately, this poses a challenge when you are dealing with a monopoly that was established over a century ago and has dominated the blindness business and fundraising ever since.

Working-age blind Canadians are suffering from a lack of training and the lack of training options. We need a champion who will stand up and have the courage to ask the question, "Is a non-profit monopoly the best model to serve blind Canadians? If not the Competition Bureau of Canada, to whom can we turn?"

I understand that your organization prepares reports and discussion papers on competition issues in Canada. I am writing to you personally on the hope that you will undertake to examine the concerns we have outlined in the attached report and, assuming you concur the absence of competition in the blindness business poses a problem, issue a report on the situation and challenges facing our members.

I would greatly appreciate a written response, one way or the other.

Yours truly,

A handwritten signature in dark ink, appearing to read "Mary Ellen Gabias". The signature is written in a cursive, somewhat stylized script.

Mary Ellen Gabias
President
Canadian Federation of the Blind

Letter from Competition Bureau Canada to CFB

July 24, 2020

VIA EMAIL

Mary Ellen Gabias
President, Canadian Federation of the Blind
P.O. Box 8007, Victoria, BC, V8W 3R7

Concerns regarding the Canadian National Institute for the Blind

Ms. Gabias:

Thank you for bringing your concerns to our attention.

The role of the Competition Bureau (“Bureau”), as an independent law enforcement agency, is to ensure that Canadian businesses and consumers prosper in a competitive and innovative marketplace. In carrying out our mandate, information brought to our attention by consumers, businesses and other market participants is very important, as it contributes to the identification and analysis of potentially anti-competitive practices in the marketplace.

I understand that you spoke with members of my investigative staff about your complaint on May 29. As discussed in that call, we initially assessed your complaint under the abuse of dominance provisions of the Competition Act (“Act”). Under the Act, an abuse of dominance requires evidence that a dominant firm has engaged in a practice of anti-competitive acts (carried out in the last three years) intended to have a predatory, exclusionary or disciplinary negative effect on a competitor, among other things. As noted in your letter, we did not find sufficient evidence in your complaint on this element of the statutory test to justify taking further investigative steps at this time.

I can report that we subsequently evaluated your complaint under our competition advocacy mandate. Under the Act, the Bureau has the ability to make representations and call evidence before regulators in respect of competition. Typically, this involves identifying specific barriers to competition set out in legislation or regulation, such as government rules that make it difficult for businesses to emerge or compete, or that

make it difficult for consumers to make informed choices or switch products or services. We were not able to identify these types of regulatory barriers to competition in your complaint. Rather, in our view, your complaint raises a broader set of public policy questions surrounding the needs of blind Canadians, and whether they would be better served through public provision of certain services or more diversified government funding to non-profits. The Bureau recognizes the importance of these questions to the Canadian Federation of the Blind. However, after a careful review, we consider that these questions fall outside the bounds of our competition advocacy mandate under the Act.

We regret that we cannot provide further assistance to you at this time. Should you have new information, I would encourage you to provide it to us, either through our information centre or by directly contacting the officers you have been in touch with. I would also encourage you to bring your concerns to other government officials with direct responsibility for policies on accessibility, such as the Minister of Employment, Workforce Development and Disability Inclusion.

We appreciate you taking the time to bring this to our attention.

Yours truly,

A handwritten signature in black ink, appearing to read 'Matthew Boswell', with a long horizontal flourish extending to the right.

Matthew Boswell
Commissioner of Competition