Canadian Transportation Agency | Office des transports du Canada

Accessible Transportation — Service Dogs: A Guide

Canadian Transportation Agency

Canada

Table of contents

Accessible Transportation — Service Dogs: A Guide 1

Canadian Transportation Agency 1

1. Purpose 4

2. What is considered to be a service dog 5

3. Assistance provided by transportation service providers 7

4. Responsibilities of persons who travel with a service dog 13

5. Travel tips for persons who travel with a service dog 15

6. Travel with Emotional Support Dogs (ESD) 17

7. We're here to help 18

Annex A: Transportation of a service dog — Obligations in the Accessible Transportation for Persons with Disabilities Regulations 19

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1. Purpose

This guide explains the obligations of transportation service providers covered by the *Accessible Transportation for Persons with Disabilities Regulations* (ATPDR), to accommodate persons who travel with a service dog. In particular, this guide explains:

- What is considered to be a service dog;
- What kind of assistance transportation service providers must give to persons who travel with a service dog;
- What are the conditions associated with travelling with a service dog; and
- Travel tips for persons who travel with a service dog.

Transportation service providers not covered by the ATPDR still have obligations regarding the transportation of service dogs. For more information, consult Canadian Transportation Agency's webpage on accessibility-related legislation, regulations, codes of practice, standards and guidelines.

This is not a legal document. The explanations and definitions it provides are for general guidance purposes only. The obligations for providing services to persons with disabilities travelling with a service dog are established in the ATPDR and reflected in Annex A of this guide.

In case of differences between this guide and legislation or regulations, the legislation or regulations prevail.

Nothing in the Regulations or this Guide is to be construed as

(a) limiting the duty to accommodate under the *Canadian Human Rights Act* or any other Act of Parliament; or

(b) requiring any person to do anything that jeopardizes security, public health or public safety.

2. What is considered to be a service dog

The ATPDR define a **service dog** as a dog that

- has been individually trained by an organization or person specializing in service dog training; and
- performs a task to assist a person with a disability with a need related to their disability.

Tasks performed by service dogs and proof of training:

Service dogs perform a variety of tasks to provide support in activities of daily living for a wide range of disabilities, including guiding persons who are blind; alerting persons who have hearing impairments to the presence of people or sounds, such as an alarm or telephone; pulling a wheelchair; providing assistance to persons with autism; recognizing specific changes that happen before a seizure and alerting a person; and providing assistance to a person with post traumatic stress disorder by providing a barrier against other people crowding too close to the person.

There are a variety of organizations and persons that specialize in the training of service dogs according to the disability-related tasks they perform — for example, schools for guide dogs for persons who are blind.

In order to establish that a dog is a service dog for purposes of the ATPDR, a person could be expected to provide information such as:

- an identification card or other document issued by an organization or person specializing in service dog training that identifies both the person with a disability and their service dog; and

- in the case of any service dog that is not a guide dog, an attestation by that organization or person specializing in service dog training that:

    - the service dog has been individually trained by that organization or person to perform a task or tasks to assist the person with a disability with a need related to their disability;

    - a clear description of the task(s) the dog has been individually trained to perform to assist the person with their disability-related need(s);

    - the credentials of the trainer(s), including any qualifications, certifications and affiliations with professional service dog organizations; and

    - a clear description of the specific content of the training program(s) completed by the dog, including the duration of the program, the goals to be achieved by the dog, the involvement of the handler, the assessment methods used and the assessment results achieved by the dog and its handler.

3. Assistance provided by transportation service providers

People who rely on service dogs to provide disability-related assistance during their daily living need to be able to travel with their dogs and keep them within their control at all times in order to have as much independence as possible in their travels. A person's service dog is essential for maintaining this independence and must be accepted for carriage under terms which recognize their importance to the person.

The ATPDR require carriers, terminal operators and Canadian Air Transport Security Authority (CATSA) (transportation service providers) to offer the following services to a person travelling with a service dog. Providing these services, in some cases, depends on a person who wishes to travel with their service dog fulfilling certain requirements (see Section 4).

Accept service dogs for transportation

All carriers must accept, subject to the conditions in Section 4, a service dog for transport and allow the dog to accompany the passenger on board.

> **Note:** While the Regulations do not include service dogs in training, it is a good practice to accept dogs that are being trained by an organization or a person specializing in training service dogs to perform a task to assist a person with a disability.

Note: Travellers with disabilities may require disability-related equipment or supplies at destination — such as an additional mobility aid, a prosthetic limb, or food for a service dog. Refusing to accept such items, or charging travellers for their carriage, may constitute an undue barrier to travel in the national transportation system. It is strongly recommended that carriers accept reasonable quantities of such items at no additional charge to the traveller, unless they can demonstrate that doing so would cause undue hardship (for example, the configuration of a small aircraft may not permit carriage of an additional large mobility aid). Travellers with disabilities are encouraged to provide advance notice of their request to carry disability-related items at no additional charge, and to be prepared, in some cases, to provide medical documentation to allow the carrier to assess the request.

Provide appropriate seating and sufficient space for service dogs

All carriers must ensure that the seat of a passenger travelling with a service dog provides sufficient floor space for the service dog to lie down at the passenger's feet in a manner that ensures the safety and well-being of the passenger and the service dog.

The CTA's regulations (both the ATPDR and Part VII of the *Air Transportation Regulations*) do not place size limitations on service dogs.

The floor space must be large enough for the passenger's feet and their service dog and avoid causing either of them injury while ensuring that they can travel in reasonable comfort. Inadequate space and objects, such as baggage restraint bars and seat fasteners located under the seat in front of the passenger, can injure the service dog and hinder its ability to provide the disability-related assistance that the passenger needs. This can also mean that the passenger needs to either place their feet on top of their dog or position them on either side of their dog, which can cause significant discomfort to both.

Recommendation:

There are many factors a carrier needs to consider when determining how much floor space will be sufficient for a service dog. Carriers should obtain information on physical characteristics of the passenger — such as long legs or the inability to bend a knee — and the size and other characteristics of the dog through a dialogue with the passenger. A service dog's ability to fit into spaces, and/or to maintain a curled position, will vary from dog to dog and must be determined on a case-by-case basis through dialogue with the passenger.

The CTA's *Space for Service Dogs onboard transportation equipment: A Guide* provides information on sizes of dogs and the space recommended for each size, which can be used by carriers as a base for guidance, to establish a process to ensure that sufficient space is provided to a person with a disability and their service dog.

In some cases, obstructions in the floor space will necessitate the use of floor space at an adjacent seat to ensure that the passenger and their service dog can share the space safely and in reasonable comfort.

All carriers, with the exception of ferries that do not offer assigned seating, must provide adjacent seating needed to provide sufficient floor space for the service dog, if the dog is too large to lie down at the passenger's feet in a manner which protects the safety and well-being of the passenger and the dog.

Canadian carriers must provide the adjacent seating needed without imposing additional fares or any other charges, when travel is within Canada.

Exception: The ATPDR do not prohibit carriers from imposing an additional fare or any other charge for an additional seat needed to accommodate a service dog when travel is between Canada and a foreign country.

Note: Carriers cannot charge a seat selection fee for any additional adjacent seat required by a passenger to accommodate their service dog while travelling on a domestic trip.

Where a passenger travelling on an international trip purchases additional seating to accommodate their service dog, the carrier must ensure that it is adjacent to the passenger's seat. The CTA expects that carriers will not charge seat selection fees for these additional seats.

A carrier's ability to accommodate a person's need for an extra seat, in order to ensure that their service dog has sufficient floor space, may be limited if the flight is full. The carrier may offer the person with a disability with alternate transportation with the carrier.

Permit the use of any washroom in an aircraft

The ATPDR recognize that an aircraft often has washrooms which are larger — for example, washrooms in premium classes of service — and that regular washrooms may be too small for both a passenger and their service dog.

Air carriers must permit a passenger who needs the assistance of their service dog to use a washroom, to use the washroom that has the most space, regardless of where the washroom is located.

Provide service dog relief areas

Terminal Operators must provide a designated service dog relief area located outside the terminal.

Terminal Operators must also provide a designated service dog relief area on the secure side of the terminal, which can be reached without having to leave the secure area and re-enter it.

Domestic Ferry Operators must have a designated service dog relief area onboard a ferry on which passengers are travelling for four or more consecutive hours.

Relief areas in terminals and onboard ferries must be accessible to travellers with disabilities, identified by tactile and Braille signage, and regularly cleaned and maintained.

Note: Terminal Operators must publish on their website the location of the service dog relief areas.

Ferry operators are encouraged to let their passengers know where they can find a relief area on the ferry (applicable on trips of four or more consecutive hours).

Ensure accessible ground transportation from terminals

The ATPDR recognize that, like many passengers, those with disabilities often rely on ground transportation to be able to complete their trip.

Terminal Operators that have an agreement with a service provider for the provision of ground transportation from the terminal, including by taxi, limousine, bus or rental vehicle, must ensure that the transportation is accessible to a person travelling with a service dog.

Recommendation:

A terminal operator should emphasize the importance of accessible transportation for persons travelling with service dogs with service providers contracted to provide ground transportation from the terminal. This includes emphasizing that a driver of a ground transportation vehicle should never refuse to accept a service dog, including by failing to stop to pick up the passenger and their dog.

Simultaneously screen a person and their service dog

CATSA must, when screening a person who is travelling with a service dog, make every reasonable effort to simultaneously screen the person's service dog.

> **Note:** The screening of passengers travelling with service dogs may involve special procedures for service dogs. For example, carrying bags for service dogs must go through the X-ray and may be required to be swabbed for explosive trace detection. More information on the screening of service dogs can be found on CATSA's website.

Train personnel

Canadian transportation service providers must ensure that their personnel who interact with the public or participate in making decisions or developing policies and procedures that affect passengers with disabilities, including passengers who travel with service dogs, receive training that provides them with adequate knowledge in respect of the role and needs of a service dog.

> **Note:** While foreign carriers are not subject to the training requirements set out in Part 1 of the ATPDR, all carriers are encouraged to provide training for their personnel, to ensure that persons with disabilities receive services in a manner that respects their dignity and supports their human rights.

Retain information and documents for future trips

If a carrier requests information or documents from a person who wants to travel with a service dog, the carrier must offer to retain an electronic copy for at least three years.

This avoids a person having to provide the same information or documents each time they travel with the carrier.

Note: A carrier may ask a person to confirm, at the time of a new reservation, if information or documents already on file about the person's service dog have changed since they were provided.

Recommended practice for carriers

Carriers should establish a clear, written policy regarding the transportation of service dogs, including a policy that addresses conflicting disability-related needs — for example, the seating needs of a passenger travelling with a service dog and those of a passenger who has a severe allergy to dogs — and communicate the policy to all relevant personnel.

Carriers should communicate with passengers travelling with a service dog before departure and during travel to ensure they understand the services they will receive and the related requirements, such as providing information or documents regarding their service dog. More information on communication requirements for persons with disabilities can be found in *Communicating with Persons with Disabilities: A Guide*.

4. Responsibilities of persons who travel with a service dog

The ATPDR recognize that carriers are responsible for the safety of their passengers and personnel and that this can require them to establish travel conditions, including for persons who travel with a service dog.

Provide advance notice

A carrier may require a person who wants to travel with a service dog to provide it with advance notice. This is usually 48 hours notice in advance of departure but it can be as much as 96 hours if the carrier needs information or documentation relating to the service dog.

Note: If the person with a disability gives advance notice but the information or documents provided are insufficient or the notice period includes a day that is a weekend day or holiday, the carrier may not be able to complete its assessment of the request. In these cases, the carrier may not be required to provide the service. For this reason, it is important that travellers provide the requested documents or information and make every effort to give advance notice that includes two full business days.

A carrier is required to make a reasonable effort to transport a service dog even if the person does not provide advance notice or the information or documents that are requested by the carrier.

Reasonable efforts may mean, for example, asking a passenger to move to a different seat in order that a person and their service dog can occupy adjacent seats.

Why is it important to provide advance notice

Providing a carrier with adequate advance notice about the need to travel with a service dog will allow the carrier to ensure sufficient space is provided for the dog and that both the passenger and the dog will travel safely and in reasonable comfort.

Where additional seating is required to accommodate a larger service dog, advance notice provides a carrier with a better opportunity to assign appropriate adjacent seats.

Advance notice will also help a carrier to provide both appropriate seating for a passenger travelling with a service dog and a buffer zone for any passenger with a severe allergy to dogs.

Provide information and documents

At the time of reservation, carriers may require a person who wants to travel with a service dog to provide a declaration attesting that the dog has been individually trained by an organization or person specializing in service dog training to perform a task to assist the person with a need related to their disability.

Before departure, carriers may require a person who wants to travel with a service dog to provide an identification card or other document that is issued by an organization or person specializing in service dog training. The document would need to identify the

person and attest that their service dog has been individually trained by the organization or person to perform a task related to a person's disability.

> **Note:** A person who is unable to provide a copy of an identification card or other document in support of their service dog's training when they contact a carrier to make a reservation — for example, because they do not have access to a computer to send an electronic copy — can ask the carrier whether they can make a verbal declaration and follow up with a copy of the required document.
>
> Documentation can be useful to mitigate health and safety risks to passengers, staff and other service dogs. At the same time, persons with disabilities have the right to travel with a legitimate service dog and should not be required to prove, at every step of their travel, that their dog is a service dog. To avoid this, carriers are required to provide a person with confirmation that their service dog has been approved for travel by noting this on the person's itinerary. They could also note the confirmation on the person's boarding pass to ensure the information is available to personnel at check-in, at the gate and onboard the aircraft.

Controlling the service dog

Carriers can require a person travelling with a service dog to control the dog with a leash, tether or harness during travel.

5. Travel tips for persons who travel with a service dog

There are things a person who wants to travel with their service dog can do to help avoid problems during their trip:

- Contact the carrier as soon as possible (a carrier may require between 48 and 96 hours advance notice) to find out what information or documents are required. The carrier may already have this in an electronic file if it was provided for a previous trip. Carriers must offer to retain an electronic copy of information provided in relation to a request for a service (such as travelling with a service dog) for a period of at least 3 years.

- Provide information to the carrier on the size of the dog to ensure that the passenger and their service dog can travel safely and in reasonable comfort (Note: the ATPDR does not place size limitations on service dogs).

- Find out the location of relief areas at the terminal (this must be indicated on its website). If travelling on a ferry for four or more consecutive hours, ask the ferry operator where the relief area is located.

- Get information on rules and restrictions related to travel with a service dog outside of Canada, including quarantine and permit requirements that may apply in the destination country.

- Find out whether an international health certificate and/or proof of vaccination is required for the service dog.

- Carry certification documents for the service dog, such as a training certificate and, for international travel, vaccination records.

- Find out whether the security screening process involves any special steps for the service dog.

Note: The ATPDR only apply to service dogs and do not address travelling with pets or emotional support animals. Carriers should be contacted for information on the transportation of these other types of animals, including any conditions that may apply.

6. Travel with Emotional Support Dogs (ESD)

The ATPDR only sets out requirements related to service dogs and do not address travelling with emotional support animals.

However, on June 23, 2023, the Agency issued Decision No 105-AT-C-A-2023 where it determined it would not be undue hardship to require carriers to accept Emotional Support Dogs (ESD) for carriage in the passenger cabin under the following conditions:

1. Proof from a physician or medical health professional who is licensed and in good standing with their governing body, that they are treating the person for a mental health disability, and that the person requires an ESD to accommodate that disability.

2. A veterinary certificate that:

    - identifies the specific ESD by name and breed;

    - identifies the person with a disability who relies on that dog as an ESD;

    - attests that the ESD is healthy enough to travel; free of any contagious diseases, ticks and fleas; and current on its vaccinations; and

    - states whether the veterinarian has any knowledge of inappropriate behaviour exhibited by the ESD, including aggressive behaviour, excessive whining or barking, or causing injury to others.

    - is dated within two months prior to the date of initial travel set out in the itinerary if the timing for the veterinary certification has not otherwise been prescribed in the jurisdiction of the county, province, state or territory where the person travels to or from.

3. The person with a disability must provide the above documentation to the carrier at least 96 hours in advance of travel. If a request is made less than 96 hours in advance, the air carrier should make every reasonable effort to transport the person with a disability and their ESD. However, the Agency strongly encourages all persons with disabilities to provide sufficient advance notice and to provide adequate supporting documentation for themselves

and their ESA when they make their request to minimize the risk that they will not receive adequate accommodation.

4. The ESD must fit comfortably in an appropriate animal carrier that must fit and be kept at the seat—or in the case of air travel, under the seat in front—of the person with a disability for the duration of the trip. The animal carrier must meet the carrier's conditions and restrictions for carriage of animal carriers in the cabin, and the ESD must remain in the carrier for the duration of its time in the passenger cabin.

5. The person with a disability must demonstrate to the carrier that their ESD meets all travel, entry or exit requirements of the country, province, state or territory they travel to or from, which includes providing all required documentation, as applicable.

6. A person with a disability travelling with their ESD in compliance with these conditions must not be charged for this accommodation.

A carrier may refuse transportation to any person with a disability and their ESD if the ESD poses a threat to the health or safety of others by exhibiting aggressive or other inappropriate behaviour, or if the user removes it from its animal carrier during travel.

7. We're here to help

For more information and guidance about accessible travel and the CTA's dispute resolution services, please contact us at info@otc-cta.gc.ca.

Annex A: Transportation of a service dog — Obligations in the *Accessible Transportation for Persons with Disabilities Regulations*

Provisions in the *Accessible Transportation for Persons with Disabilities Regulations* applicable to assistance provided to persons travelling with a service dog are set out in Part 1 (Requirements Applicable to Transportation Service Providers — Personnel Training for the Assistance of Persons with Disabilities); Part 2 (Service Requirements Applicable to Carriers); Part 3, Division 3 (Technical Requirements Applicable to Carriers—Marine Carriers); Part 4, Division 2 (Requirements Applicable to Terminal Operators—Technical Requirements); and Part 5 (Requirements Applicable to CATSA and CBSA).

Part 1 Requirements Applicable to Transportation Service Providers

Personnel training for the assistance of persons with disabilities

16(1) If a member of personnel may be required to interact with the public or to participate in making decisions or in developing policies or procedures in relation to the requirements of these Regulations, they must receive training that provides an adequate level of knowledge and skills to carry out those functions, including training with respect to the requirements of these Regulations and the policies and procedures of the transportation service provider with respect to persons with disabilities.

Contents of training

(2) The training referred to in subsection (1) must provide an adequate level of knowledge in respect of

… **(f)** the role and needs of a service dog.

Note: The training obligations do not apply to foreign carriers.

Part 2: Service Requirements Applicable to Carriers

Duty to transport

51(1) A carrier must, on the request of a person with a disability who needs to travel with a service dog, accept the service dog for transport and permit the animal to accompany the person on board, subject to subsection (2).

Requirements

(2) A carrier may require a person with a disability who requests to travel with a service dog to control the dog with a leash, tether or harness during travel and to provide

(a) at the time that the person with a disability makes the reservation with the carrier, a declaration attesting that the service dog has been individually trained by an organization or person specializing in service dog training to perform a task to assist the person with a disability with a need related to their disability; and

(b) before departure, an identification card or other document that is issued by an organization or person specializing in service dog training that identifies the person with a disability and attests that the service dog has been individually trained by the organization or person to perform a task to assist the person with a disability with a need related to their disability.

Electronic copy

(3) The condition in paragraph (2)(b) is met if the person has provided the card or other document referred to in that paragraph to the carrier for the purpose of a previous request for a service and the carrier has retained an electronic copy of it.

Additional space for service dog

(4) If, because of the size of the service dog, the passenger seat of the person with a disability does not provide sufficient floor space for the service dog to lie down at the person's feet in a manner that ensures the safety and well-being of the dog and the person, the carrier must provide to the person any passenger seat adjacent to their passenger seat that is needed to provide sufficient floor space for the service dog.

Additional passenger seat

Duty to provide additional seating space

51(4) If, because of the size of the service dog, the passenger seat of the person with a disability does not provide sufficient floor space for the service dog to lie down at the person's feet in a manner that ensures the safety and well-being of the dog and the person, the carrier must provide to the person any passenger seat adjacent to their passenger seat that is needed to provide sufficient floor space for the service dog.

Note 1: The obligation to provide additional seating space, where required, without imposing a fare or any other charge, does not apply when the transportation service is provided between Canada and a foreign country.

Note 2: If a marine carrier does not offer assigned passenger seats to passengers on a ferry, it is not obligated to provide adjacent seating.

Retention of electronic copies

59 If, on the request of a carrier, a person with a disability provides the carrier with information, including personal health information, in relation to a request for a service referred to in this Part, the carrier must offer to retain an electronic copy of that information for a period of at least three years for the purpose of permitting the carrier to use that information if the person makes another request for a service.

Part 3: Technical requirements applicable to carriers

Division 3: Marine Carriers

Designated relief areas

178(1) A ferry on which passengers are travelling for four consecutive hours or more must have a designated area for service dogs to relieve themselves that a person with a disability may reach by means of a path of travel that is accessible to persons with disabilities and that is

(a) identified by tactile and Braille signage; and

(b) cleaned and maintained on a regular basis.

Signage

(2) The ferry must have signage that indicates the direction to follow in order to access a designated relief area.

Part 4: Requirements Applicable to Terminal Operators

Division 1: Service Requirements

Communication of information

215 A terminal operator must publish, including on its website, information about the services or facilities available at the terminal for persons with disabilities, including information about

… **(c)** the location of designated areas for service dogs to relieve themselves

Service provider for ground transportation

217(1) If a terminal operator enters into an agreement or arrangement with any service provider for the provision of ground transportation from the terminal, including by taxi, limousine, bus or rental vehicle, the terminal operator must ensure that the service provider provides transportation that is accessible to persons who are travelling with a mobility aid or any other assistive device or with a service dog, including transportation with vehicles that are capable of carrying non-folding or non-collapsible mobility aids.

Division 2: Technical Requirements

Designated relief area

227(1) A designated area for service dogs to relieve themselves must

(a) be identified by tactile and Braille signage; and

(b) be cleaned and maintained on a regular basis.

Signage

(2) The terminal must have signage that indicates the direction to follow in order to access a designated relief area for service dogs.

Designated relief area outside terminal

(3) A terminal must have a designated area for service dogs to relieve themselves that is located outside of the terminal and that a person with a disability may reach from the terminal by means of a path of travel that is accessible to persons with disabilities.

Direct access from restricted area

(4) A terminal must have a designated area for service dogs to relieve themselves that a person with a disability may reach, from the area of the terminal into which access is strictly controlled, by means of a path of travel that is accessible to persons with disabilities and that does not require the person to exit and re-enter that area.

Part 5: Requirements Applicable to CATSA and CBSA

Security Screening

Assistive device, support person or service dog

233(1) CATSA must, when screening a person with a disability who uses an assistive device or who is travelling with a support person or a service dog, make a reasonable effort to carry out the screening simultaneously with the screening of the person's assistive device, support person or service dog, as the case may be.