



# An Expert Report Regarding the Carriage of Emotional Support Animals On Board Transportation Equipment



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## **Context - Carriage of Emotional Support Animals On Board Transportation Equipment: Expert Report Commissioned**

The [\*Accessible Transportation for Persons with Disabilities Regulations\*](#) (ATDPR) require carriers to accept transporting, under certain conditions, service dogs and allow them to accompany the person onboard. This applies to dogs that have been individually trained by organizations or persons specializing in service dog training to perform tasks to assist a person with a disability with a need related to their disability.

In recent years, the Agency has received a number of complaints from travelers regarding the transportation of other animals that provide emotional support , which typically do not have the same level of training as service dogs. To further its understanding of the considerations applicable to the transport of animals onboard the various modes of transportation, the Agency commissioned an [\*Expert Report on the Carriage of Emotional Support Animals On Board Transportation Equipment\*](#).

# **1. Introduction**

Regarding the carriage of emotional support animals on board transportation equipment, it is this author's opinion that although a myriad of small animals might be considered as emotional support animals (ESAs) for travelers needing this provision, the only viable option considering all safety issues, is that canines are the most suitable.

## **2. Species that Generally Qualify for ESA**

Technically, any animal could be considered for an ESA, but only dogs can be trained for unique traveling environments. Service dogs, such as guide dogs for the blind, are bred, selected and prepared for years to be able to cope and withstand many different environments, scenarios and triggers that would otherwise cause most animals to become anxious and fearful during a travel experience. Pet dogs that have completed general dog training, could be considered however, this does not guarantee the animal will not feel anxious or fearful and therefore misbehave posing a safety risk. This is because ESA dogs do not undergo the level of sophisticated training service dogs must where they learn to cope and therefore behave in a travel environment. Training for other species does not exist.

### **a) Unique Travel Environment**

Travel environments are unique in that they usually require transported animals to be confined in small, crowded spaces and sometimes in an isolated environment for long periods of time. Additionally, considering air travel, variables like temperature considerations, noise level, the presence of crowds, smells, the change in turbulence, other emergency scenarios, and other animals such as canine service dogs, considered predatory to many small animal exotic pets, would all cause excessive fear, anxiety and distress for animals new to these environments.

Dogs can be conditioned to cope in such unique environments, if they complete a level of training like a service dog does. ESA dogs might be genetically sound enough to cope and could be well trained for these unique situations, however a "trained dog" does not mean there is a guarantee the dog won't misbehave, feel anxious and fearful nor be safe towards others in such an environment and not act aggressively. Cats and small animal exotic pets including but not limited to ferrets, birds, rodents, rabbits, iguanas, lizards

and others require specific environmental conditions that cannot be guaranteed in various travel environments. These animals are not accustomed to typical travel environments, are less able to cope emotionally and risk becoming sick from the experience.

## **b) Unsafe and inappropriate species-related characteristics and behaviours for travelling**

Temperature considerations, noise level, the presence of crowds, smells, the change in turbulence, other emergency scenarios, and other animals such as canine service animals, considered predatory to many small animal exotic pets, would all cause excessive fear, anxiety and distress for animals new to these environments. Several common ESA with dangerous concerns include birds, which have air sacs instead of lungs to breathe, making them particularly sensitive to changes in air quality and pressure, reptiles that require specific and consistent temperatures to keep them alive and rabbits when not well supported, flip on their back when afraid, break their back and die.

Dogs are the only animal that can be taught to fully control waste elimination. Other species of animals being considered as ESAs, including, but not limited to cats, rodents, reptiles, ferrets, pot-bellied pigs, miniature horses, and birds cannot be trained to refrain from relieving themselves. They urinate and defecate freely. This poses a significant health and safety risk for passengers and crew members in a typical travel environment. Many zoonotic diseases (diseases that are transmitted from animals to humans) are shed via waste products produced by the animal and live in fecal matter which may be present in the animal's housing and/or on the animal itself. It is noteworthy to mention that containers used for transport need to allow for ventilation, which also leads to the possibility of feces and urine leaking out into the environment. While travel containers might keep the animal contained, the animal's welfare for any lengthy travel experience will be compromised.

Any animal's emotional state along with their physiological needs are important factors with respect to public health and safety concerns for travelers and employees of the travel industry. Since small animals and exotic pets such as, but not limited to, cats, rodents (rabbits, rats, mice), reptiles (snakes, iguanas, lizards), ferrets, pot-bellied pigs,

miniature horses, birds (budgies, parrots, chickens, turkeys) are “sentient beings”. This means that they feel and suffer pain and core emotions like fear and anxiety just like people.

In a novel environment like during travel, these animals would not be accustomed to travel conditions, experiences and environments and would be subject to stress, fear, anxiety and distress. Animals who experience stress, anxiety and fear are at an increased risk of relieving themselves and therefore these pet animals would be considered generally unsafe to the public in a public transportation environment.

With prolonged stress there exists an increased chance of disease and injury to the animal and a risk of zoonotic disease spread and fear based active defensive behaviour toward other animals and people.

**Relevant scientific information regarding one of the more common zoonosis, Salmonella:**

Salmonella is classified as a gram-negative bacteria responsible for gastrointestinal illness in people and has been isolated from all classes of animals. Many small animal pets act as reservoirs (mice, rats, gerbils, hamsters, guinea pigs, chickens, reptiles, iguanas, turtles, amphibians and hedgehogs). Salmonella is so common in reptiles that all pets should be assumed to carry it. It is recommended for people to wash their hand or sanitize them after touching all reptiles, which is unlikely when traveling. Animals can carry the bacteria without signs of illness. Most often people are contaminated when their hands touch surfaces contaminated with stool and the infectious agent is then transferred to the mouth. It is considered a hardy and viable infectious disease organism, sustainable in the environment for lengthy periods of time.

Zoonotic disease spread isn't only theoretical or what could happen, it is prevalent today, being one of the most common causes of bacterial diarrhea today in the world. The Center for Disease Control in the US reports 1.35 million cases every year – causing hospitalizations and deaths in a small percentage. A recent outbreak, during covid in the United States, is the cause of 44 illnesses and 25 hospitalizations. The investigation is currently ongoing by the Centre for disease control and prevention.

## **Other common zoonoses of small animal pocket (exotic) pets and details of safety concerns:**

### **Birds:**

Parrots, budgies, and cockatiels are all asymptomatic carriers of the bacteria *Chlamydophila psittaci* which can be transferred to people via aerosolization. Commonly birds that are stressed with transport/travel can get sick and die. People inhale the bacteria when it is shed in feces and they can remain asymptomatic. If stressed, symptoms can escalate to pneumonia in the pet.

### **Rodents:**

Rabbits can carry *Salmonella sp.*, *Escherichia coli*, *Clostridium difficile* which are also pathogens transmitted to humans via stool contamination of food, water or hands followed by transfer to the mouth. These pathogens cause severe gastrointestinal signs in people. *Pasteurella multocida* is a common pathogen in the respiratory system of rabbits which is transmitted to humans through an infected bite wound. Generally, there is low risk, but the risk remains.

A rare, but recently surfaced pathogen to humans is the obligate parasite of rabbits, *Encephalitozoon cuniculi*, primarily a fungal infection found in 50%-75% of rabbits.

The organism is transmitted through urine and is an emerging zoonosis of concern in immunocompromised people.

Pet rats are asymptomatic carriers of Seoul virus, transmitted to humans via aerosolized rodent droppings causing severe respiratory and renal disease in people. Recently the CDC (Center for Disease Control) determined a pet “dumbo rat” breeding facility transmitted this disease to 31 facilities in the United States where some people were infected and hospitalized with kidney issues.

### **Ferrets and Hedgehogs:**

Although uncommon, ferrets can transfer the seasonal flu to people which causes mild respiratory disease.

*Campylobacter*, is typically a serious contaminant of poultry foods and ferrets. Ferrets can shed the bacteria for over 100 days once recovered. Hedgehogs may harbour the bacteria.

### **Cats:**

Pet cats carry *Bartonella henselae*, transferred to people via a scratch causing “cat scratch disease” and can carry *Toxoplasma gondii* which does not commonly cause illness in healthy individuals but can result in serious complications for pregnant women.

### **Dogs:**

Dogs can also carry potential zoonoses however dogs are the only animal trained to have full control over their elimination functions.

### **Pet Monkeys:**

Some pet monkeys can also spread diseases such as *Campylobacteriosis*, *Ehrlichiosis* and *Streptococcus* to name only a few. Pet monkeys can behave unpredictably aggressively towards people when frightened.

**Rabies:** A viral infection of the nervous system which is most commonly found in dogs that have been in contact with bats and many other mammals. Transmission typically occurs from a bite but can also be transmitted when an infected animal’s saliva is introduced to a person’s mucous membranes. Any mammal can contract Rabies but the concern would lie mostly with individual dogs, monkeys or ferrets that were not immunized.

### **A detailed example of the health and welfare concerns for small animal exotic pocket pets when traveling:**

### **Reptiles:**

Snakes require very specific enclosure details. Typical cabin temperature in a plane can be between 14.5 and 28 degrees Celsius. Many pet snakes require warmer environments with the ability to regulate their temperature by moving to warmer or colder areas to maintain homeostasis. Temperature changes as little as 0.003 degrees



Celsius can be detected by some snakes and result in triggering aggression. Acute hyperthermia can kill some snakes and prolonged hypothermia causes ataxia and varying degrees of motor paralysis.

Most snakes are also predators stimulated by the sight and sound of rodents which could include a rodent emotional support animal nearby. When handled outside of their safe containers, even at home, snakes can emit a musky odour in their environment. Any container used for small animals include holes for air circulation, which also allows for fecal matter to leak in the environment. When scared, snakes become aggressive and will strike, bite and squeeze people. Serious injuries have been reported in people when handling and feeding pet snakes. Additionally, a significant number of people in the general population are afraid of snakes.

### **c) Species for which safety concerns could be mitigated**

Dogs are also the only animal that can be taught to fully control waste elimination. Other species of animals being considered as ESAs, including, but not limited to cats, rodents, reptiles, ferrets, pot-bellied pigs, miniature horses, and birds cannot be trained to refrain from relieving themselves. They urinate and defecate freely. This poses a significant health and safety risk for passengers and crew members in a typical travel environment. Many zoonotic diseases (diseases that are transmitted from animals to humans) are shed via waste products produced by the animal and live in fecal matter which may be present in the animal's housing and/or on the animal itself. It is noteworthy to mention that containers used for transport need to allow for ventilation, which also leads to the possibility of feces and urine leaking out into the environment. While travel containers might keep the animal contained, the animal's welfare for any lengthy travel experience will be compromised.

### **d) Species of Animals that can be trained to behave safely and appropriately**

Animals that are domesticated and can be reliably trained to respond to commands, refrain from relieving themselves, refrain from exhibiting aggressive behaviour towards people and service animals such that they could be considered safe and appropriate in a travel environment at present only include the domesticated dog.

Rodents, equines and felines are only partially domesticated or not domesticated at all. When an animal is not accustomed to people, places or environments and is then exposed to these, their response can range from coping to feeling anxious, fearful or distress. A less domesticated animal is more likely to be fearful among people. A fearful animal increases the risk of health and safety concerns, most notably transmission of zoonotic disease and dangerous aggressive behaviour.

For species that are unreliable in travel environments the use of pet carriers and muzzles are not wholly reliable to mitigate safety concerns.

Small animals can physically be contained in suitable carriers placed by the owner's feet, underneath the seat in front of them or on a person's lap while traveling. These types of travel containers are acceptable for shorter visits to a veterinary clinic when medical care is needed or when an owner adopts a pet and brings it home. Otherwise, travel experiences for any length of time and for less domesticated small animal pets, pose both public health and safety concerns for other travelers and employees.

Muzzling an animal is done when a known risk of biting exists. In general, if an animal is a bite risk, a basket muzzle can be an excellent tool to prevent a bite from happening. However, muzzles should not be used for any lengthy period as they hinder normal respiratory function, especially when the animal is anxious or fearful and respiratory rate is increased. Animals also need to be habituated to wearing them.

Dogs that require muzzling in novel public environments are communicating they cannot cope well in that situation and intervention is needed to help them feel better. Dogs with this potential pose a general safety risk to the public and themselves.

In reference to the ACAA document, "carefully reviewed...considering the realities, risks and limitations associated with transporting animals on an aircraft", approximately 15,000 comments given and were reviewed by the ACAA committee, from individuals, disability rights advocacy organizations, airlines, airports, transportation workers association, "animal health and training organization and a number of other special interest organizations." It was concluded that "emotional support animals should be treated as pets" and "during air travel all animals be leashed, tethered, harnessed or be otherwise able to be tethered to a stable structure during transport for the public's

safety” to ensure they are kept safe and are well behaved. This is considered only the bare minimum to transport a dog, in the author's opinion, as an ESA, because it does not guarantee that the dog won't feel anxious or frightened, eliminate or act aggressively during travel.

### **e) Animals Other Than Service Dogs that could be considered Safe Outside of a pet carrier**

Service Dogs that are successful in a service dog program end up with the ability to cope, feel fundamentally positive, and work in many types of environments, including different travel scenarios. Canines have been historically the most successful at this process for many reasons, one unique factor includes the history of being the most domesticated animal thus far. Animals such as reptiles, rodents, equines and felines are not as domesticated while some are not domesticated at all. Domestication is defined as being a mutual relationship between an animal and human, where the human has significant influence over the animals care. When an animal is not accustomed to people, places or environments and is then exposed to these, their response can range from coping to feeling anxious, fearful or distress. A less domesticated animal is more likely to be fearful among people. A fearful animal increases the risk of health and safety concerns. Identifying when an animal is fearful takes a certain level of education on the part of the handler or owner. This is often unrecognized, misunderstood or simply not considered with many pet owners and animal trainers.

## **3. Emotional Support Animal Training**

For animals to be safely transported when in close proximity to other persons and other animals such as service dogs they must be well behaved. Animal training is not regulated. Animal training is an unregulated field. Many dogs are trained using punishment based techniques. Any animal “trained” by punishment or correction methods poses a risk for animals and unfamiliar people in their environment. Animals who are taught to behave using punishment techniques can act as “ticking time bombs” if scared in a public environment.

Misbehaved animals pose a safety risk to everyone traveling with them. ESA, pets dogs, are not experienced and prepared to the extent needed for safe travel on planes, trains

and buses and therefore pose a risk to others. When frightened or scared they can react aggressively and result in others being injured.

## **a) Appropriate Training Requirements**

Animal training is an unregulated field. An animal “trained” by punishment or correction methods poses a risk for animals and unfamiliar people in their environment. Animals who are taught to behave using punishment techniques can act as “ticking time bombs” if scared in a public environment. Animals can only withstand a certain amount of frustration before they start to protect themselves through aggression.

Below are three examples of publicly “recommended and established training and assessment programs” in Canada:

1. [Canine Good Citizen](#) (run by the AKC (American Kennel Club)):
  - Evaluates 10 skills that make dogs easier to handle in public
  - Treats are allowed during training but not during the test.
  - Prong collars, head collars and electric collars are not allowed during the test.
2. [Canine Good Neighbour](#) (run by the CKC (Canadian Kennel Club)):
  - Evaluates 12 skills similar to CGC (Canine Good Citizen) test
  - Use of force or excessively loud voices by handler results in a fail
  - No treats allowed during test.
  - Only slip, buckle or martingale collars allowed
3. [Canadian Canine Good Citizen](#) (run by Responsible Dog Owners of Canada)
  - Very similar to CGC (Canadian Good Citizen) but not a lot of info available

Note that these programs do not specify how the animal should be trained and instead focus on what the behaviour looks like eliminating what the dog feels like. Some dogs may pass the test while still feeling anxious or fearful, being at risk for active defensive aggressive behaviour in public. The evaluators of the test are typically chosen based on their involvement in dog clubs and their experience in dog training. They are not required to attain any level of current science based education or experience to be an evaluator.

This does not guarantee that they will recognize anxiety or fear in dogs. Therefore, no establishment, considered reputable or not by the public or by training professionals can guarantee an ESA assessed animal would not pose a safety risk in a public travel environment.

Conclusion about dog training for an Emotional Support Animal:

1. Training is an unregulated industry.
2. A trained animal cannot be confirmed by simply looking at a document. A document from a training establishment cannot confirm that the animal will not pose a safety risk in a travel environment.
3. Poorly trained or untrained animals pose a safety risk to travelers, service animals and the owner.
4. Training cannot confirm that an ESA animal won't pose a risk.
5. There exists training facilities that train animals using current scientific methods which result in well trained and well behaved dogs but this isn't standardized or regulated and details are not included in the scope of this document.

## **b) Public Access Training**

Animal training is an unregulated field. Dogs are the only animal that reach a level of training with experience needed to be able to work in various travel, and other, environments. Trained and certified service dogs, have been bred and raised to function, cope and work in many different environments and circumstances. These animals have experienced enhanced preparation on how to behave in any public situation. ESAs, as previously defined and to be considered by the ACAA and DOT as "pets", haven't achieved this level of habituation. What remains significantly different in other species including pet dogs is that they simply have not been prepared for a working career in public spaces. Public access training does not provide this.

## **c) Professional training versus Owner or Public Access Training**

Animal training is an unregulated field, therefore "Professional training, Owner training and Public Access training" can all be considered the same "level" of training with respect to a person's pet . This is because there does not exist a current scientifically

approved standard, evaluated and defined by animal behaviour experts. Identifying when an animal is fearful takes a certain level of education on the part of the handler or owner. This is often not well understood, unrecognized, misunderstood or simply not considered with many pet owners and animal trainers.

#### **d) Can appropriate training be achieved through training by the animal owner**

Animal training is an unregulated field, therefore “Professional training, Owner training and Public Access training” can all be considered the same “level” of training as there does not exist an approved standard, evaluated and defined by animal behaviour experts. Identifying when an animal is fearful takes a certain level of education on the part of the handler or owner. This is often not well understood, unrecognized, misunderstood or simply not considered with many pet owners and animal trainers.

There are certain criteria that are included in a sophisticated service dog training program in order for the dog to be considered safe during transportation. Even with the sophisticated training programs, not every dog will succeed and graduate to become a working service dog. This speaks to the unique qualities these animals develop and how fundamentally sound their emotional state is. This is not the case with ESAs. It is fundamental in service dogs.

Emotional Support Animals, pets, are not privy to such sophisticated training and experience and therefore cannot be guaranteed to behave well and not pose a public health safety risk.

It could be argued by an ESA owner, that as part of their particular training process, assessing that animal’s good behaviour during the course of travel to and inside an airport or a train or bus station could support having the animal on an airplane, train or bus. It is reasonable to have the opinion that if someone’s pet dog is well behaved while partaking in the entire pre-travel experience (travel to an airport, waiting in line to check in, checking a bag, going through security, waiting for boarding, being in crowds of people), that this is in itself an assessment of how the animal could cope and behave during travel. There exist dogs that are genetically very stable and able to cope with change easily. This opinion cannot verify nor confirm that the animal will not pose a

safety risk during the actual travel experience. Any dog that feels fearful or anxious can be unruly and this poses a safety risk to others in the environment.

Refresher training is part of a service dog's life, if needed. Because training is an unregulated field, 'refresher training' for ESAs would always pose a risk to the animals learning ability, especially if punitive methods are used and could not guarantee any standard of desired behaviour for travel.

#### **4. Indicators that Could Assess Safety Risks**

Identifying when an animal is fearful takes a certain level of education on the part of the handler or owner. The ability to read an animal based on their body language and behaviour is too often unrecognized, misunderstood or simply not considered by many pet owners and animal trainers. Although well established for an animal behaviour expert, it is certainly not a required skill for an employee in an airline, train or bus travel industry. Fearful dogs which could pose a safety risk to travelers would go undetected by staff on planes, trains and buses.

Dogs can also carry potential zoonoses, however dogs are the only animal trained to have full control over their elimination functions. It is common practice for dog owners to complete a recent health examination by a veterinarian and receive documentation before travel to ensure the animal is being treated with recommended parasite preventatives, is not contagious with any zoonotic disease, and does not suffer from any other medical issue. This documentation can include that the animal is in good health, and an assessment of the dog's behaviour in that setting. This should be a basic requirement for accepting an animal to travel in public and supports a safe environment for the animal, handler/owner and general public. Some dog owners feed a raw based diet which poses a health risk to anyone the dog comes in contact with since they may spread salmonella, E. coli, listeria, etc.

This author agrees with the ACAA document summary and the DOT information, to allow airlines to require current documentation from a Veterinarian to ensure the animal is healthy enough to travel, free of any communicable diseases, current on vaccinations, and be able to comment on the dog's general behaviour (has not acted aggressively, caused injury to others in the environment in which it was examined). This

does not include any confirmation by the veterinary professional that the behaviour of an animal would be consistent in any given travel situation.

It would be reasonable to consider “current” meaning within 2-3 months and that the document stating the findings is from a Veterinarian in “good standing” with their governing body (e.g. The College of Veterinarians of Ontario).

## **5. Other Considerations for ESAs in a Travel Environment**

Below are a few concepts that experts in the field of animal behaviour, agree are vital background knowledge in considering ESAs.

### Five Freedoms

All animals are deserving of the well-established “Five Freedoms of life” philosophy which gives individuals guidance on basic animal needs, for their protection, and emphasizing the ability to cope in any given environment.

### Five Freedoms:

1. Free from pain, disease and injury
2. Free from conditions that cause mental suffering (stress, anxiety, fear)
3. Free from thermal and physical discomfort (by providing suitable shelter, resting area).
4. Free from hunger and thirst (by providing suitable food/diet and fresh water)
5. Freedom to perform most natural behaviours, (space, substrates), including resting.

Any animal not trained in a sophisticated program such as that provided to service dogs, which includes the experiences required to feel good, or be habituated, to a travel environment, is a risk for suffering severe stress, anxiety and fear.



## 6. Conclusion

It is vital to consider that a trained animal differs from an animal that feels stable enough to cope in any given environment. This concept can be generalized to all types of pets. The focus on whether or not an ESA is suitable should be on the emotional stability of the animal in a travel situation, because this includes but isn't limited to also being well trained. All species of animals except dogs should be excluded as options for ESA in a travel environment. From a health and safety concern, all other species cannot control relieving themselves which causes a risk for zoonotic disease transmission in the travel environment. The travel environment inevitably includes passengers that are considered high risk for transmission, namely the elderly, children under 5 and pregnant women. Additionally because animal training is a highly unregulated field, a document stating the dog is well behaved is ridden with possible risk, including the inability to confirm the animal will not feel anxiety and fear while traveling and behave aggressively towards someone else. Determining if an animal is coping well, and is not anxious or fearful for a travel experience, would be something an animal behaviour expert could do, however, the average person working in a plane, train or bus station, would not have this skill nor the time to assess an animal which, if allowed, would increase the variables contributing to a safety risk for others in any case.

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