



Assistance Dogs
INTERNATIONAL

Assistance Dogs International, Inc. North America Regional Chapter

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From: Assistance Dogs International, North America (ADI, NA)

To: Canadian Transportation Agency (CTA)
Via email: OTC.CETA-CEAT.CTA@otc-cta.gc.ca

Re: Consultation on Phase II of the Accessible Transportation for Persons with Disabilities Regulations (ATPDR).

Assistance Dogs International (ADI) is a worldwide coalition of non-profit programs that train and place Assistance Dogs. Founded in 1986, ADI is the leading authority in the Assistance Dog industry.

The objectives of ADI are to:

- Establish and promote standards of excellence in all areas of assistance dog acquisition, training and partnership
- Facilitate communication and learning among member programs
- Educate the public to the benefits of Assistance Dogs and ADI membership.

ADI, North America (ADI, NA) consists of 75 Assistance Dog training organizations:

- Canada – 9
- United States – 65
- ADI Service Dog teams currently active in North America – 17,504

ACCESSIBLE CANADA ACT (ACA)

Objective: Determine what, if anything, to require of transportation service providers with respect to Emotional Support Animals and service animals other than dogs.

ADI, North America appreciates this opportunity to share its expertise regarding transportation and accessibility with respect to Emotional Support Animals and Service Animals other than dogs.

ADI, NA wants to ensure the Canadian Transportation Agency (CTA):

- Provides non-discriminatory access to individuals with disabilities and their service animals
- Deters the fraudulent use of animals not qualified as service animals

- Does not accept animals that are inadequately trained to behave appropriately in public for transport as service animals.

EMOTIONAL SUPPORT ANIMALS (ESAs)

ADI, NA opposes the inclusion of Emotional Support Animals (ESAs) as ESAs are not required to have training of any kind. More specifically, ESAs do not have public access training, which is especially necessary for high distraction and high stress environments such as airports and airplanes. Because of this:

- ESAs pose a potential threat of disruption or harm to passengers, crew and legitimate service animals
- ESAs are ill-equipped to handle the stress of being in the public environment for air travel stemming from:
 - Exposure to crowds
 - Changes in air pressure, altitude, vibrations and noise associated with travel

If the Canadian Transportation Agency were to adopt a rule that allowed Emotional Support Animals for transport, ADI, NA recommends that dogs or cats that can travel in pet carriers be the only animals accepted. This would minimize the chance of injuring personnel or passengers; although, the animals themselves, and likely their owners, will still be subject to extreme stress.

Anyone can claim emotional support from any species of animals; however, this does not mean that the animal can safely travel in public. Public access and travel can be stressful for any animal; however, it is all but guaranteed to be stressful for an animal with no training in public work.

SERVICE ANIMALS – SPECIES LIMITATION TO DOGS

ADI, NA recommends that species of service animals should be limited to dogs. Dogs are the most common species of service animals trained worldwide. Allowances can be made for miniature horses already in use for guiding people who are blind; however, these should only be grandfathered in for miniature horses currently in service, or in service as of some previous date.

Miniature horses are not commonly used as service animals. Restricting the definition of service animals to dogs will not impact a great number of individuals, if any. This is the case for other species of animals, as well. The training industry trains dogs to assist individuals with disabilities. Dogs have both the temperament and the ability of assisting people with disabilities to mitigate their disabilities through the performance of tasks, well beyond merely comforting the individual. Over 100 years of training dogs to assist individuals who are blind or who have other disabilities attests to the fact that most travelers using trained service animals use dogs.

SUMMARY:

ADI, NA appreciates the opportunity to provide input on these two considerations for the Accessible Canada Act. We would also welcome the opportunity to support and help the Canadian Transportation Agency on this issue should you require any further information.

ADI NA Legislation & Advocacy Committee has been working with the US Department of Transportation (DOT) and the airline industry for policy for Traveling by Air with Service Animals for over two years. The DOT is proposing revisions to the Air Carrier Access Act regulations on the transportation of service animals by air. These proposed revisions are intended

to ensure that the air transportation system is safe for the traveling public and accessible to individuals with disabilities. Additionally, the DOT proposes to define a service animal as a dog that is individually trained to do work or perform tasks for the benefit of a qualified individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. Furthermore, the DOT proposes to allow airlines to recognize emotional support animals as pets rather than service animals.

We appreciate that the DOT is now addressing a systemic problem within the transportation industry and with these new Proposed Rules, is working to create regulations to ensure that only dogs that are qualified to perform tasks to mitigate disabilities and have the training necessary to handle the stress of air travel are allowed air transport access.

ADI, NA cautions the Canadian Transportation Agency against broadening access to include Emotional Support Animals when other countries and Regulatory bodies are trying to reverse such policies.

We recommend that the Department of Transportation Proposed Ruling dated Wednesday, February 5th, 2020 be consulted <https://www.govinfo.gov/content/pkg/FR-2020-02-05/pdf/2020-01546.pdf>.

Thank you.

Sheila O'Brien
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