

Submitted by email to the Canadian Transportation Agency

Subject : Emotional Support Animals

Right now, the rules say large planes, trains, ferries, and buses must accept trained service dogs. Should the rules also tell them to accept Emotional Support Animals? If yes, what kind of animals should they let on board (dogs, cats, rabbits, other)?

The rules should not force transport companies to accept Emotional Support Animals, especially dogs. These animals do not have proper training for being in confined public spaces, making them a possible danger to other passengers, and most importantly, canine ESAs are often distractors for task trained service dogs, as ESAs are not trained to ignore other animals. Barking and lunging at a service dog puts the service dog and the handler at risk, the dog at risk of distraction or injury as ESAs are untrained and could have dog aggression, and the handler at risk of their service dog having a lapse in attention and missing something that they require the dog to pick up on, such as glucose levels for diabetic alert dogs.

I am also concerned by the number of false "Emotional Support Animals" that you see in public, abusing the public access rights of service dogs because the public lacks education on service animals. Untrained and unneeded Emotional Support Animals do not belong out of carriers in public spaces. False ESAs can have dog aggression or human aggression that puts the public at risk. Even real ESAs could have aggression, since they are completely unregulated and not required to have ANY training.

There should, however, be education on the difference between psychiatric service dogs and emotional support animals if the CTA were to not allow ESAs. Psychiatric service dogs have public access rights and are task trained for people with PTSD and other psychiatric disorders. They perform tasks that range from distraction to stop flashbacks and panic attacks to deep pressure therapy for handlers who are having flashbacks or attacks.

If the CTA were to force acceptance of Emotional Support Animals, I believe it should be limited to dogs and cats. I am very very hesitant to even include dogs, as irresponsible dog ownership is rampant and untrained dogs can be risky for needed service dogs.

Harley

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