

To: CTA Regulatory Group Studying Accessibility Matters

My submission is prompted largely by a recent article on the CNN website (<http://www.cnn.com/travel/article/airplane-cabin-fragrances/index.html>) about air carriers beginning to introduce “allergen-free” aromas into the passenger cabins.

Federal and provincial human rights legislation recognizes multiple chemical sensitivities as a disability which must be accommodated by organizations under their jurisdiction.

The CTA’s mandate is to ensure that people with disabilities be accommodated when using various modes of transportation. As per the Canadian Human Rights Act, this must include those with both visible and invisible disabilities.

Over the past few years, we have seen increasing accommodation as workplaces and public institutions, including hospitals, have implemented scent-free policies. That is a good thing. While there is still a lot that needs to be done, at least we are going in the right direction.

A 2009 U.S study (<https://www.ncbi.nlm.nih.gov/pubmed/19326669>) and a 2016 US study (<https://www.ncbi.nlm.nih.gov/pubmed/27867426>) note that more than 30% of Americans suffer some degree of scent-related allergies. Admittedly, many suffer no more than a mild reaction. Unfortunately, a good number do. There is no reason to think the results would be different in Canada.

The 2016 article also points to how widespread the use of fragranced products are, how they cause many adverse health effects and how many individuals would prefer to avoid them if possible.

So it is concerning that hotels, which are private business, and airlines, which are federally regulated, are starting to introduce fragrances into the aircraft cabin or into their lobbies.

The more severely sensitive carry Epipens to be used in the event of a life-threatening reaction. It is not difficult to imagine what could happen if someone were to have severe reaction mid-flight caused by the needless distribution of fragrances throughout the cabin.

The CNN article prompted me to follow up on a few fronts.

I contacted the medical desk at Air Canada. They advised that AC’s main line does not (for now) add fragrances into the cabins, but that Rouge does. I did not receive information about Jazz and have not yet asked Westjet. Similarly United, for now, does not add scents but they would not confirm if there are future plans to do. My concern of course extends beyond these few airlines to all other domestic, transborder and international air carriers as well.

According to the CNN article, Scent Air, the world’s largest manufacturer of scented fragrances, claims to have produced an allergen-free product. I spoke with the article’s author. He confirms that this is indeed the manufacturer’s claim.

It's possible that Scent Air creates products that don't include most common allergens. (The company does not list the ingredients in the thousands of scents it sells). However, that does not make its products allergen-free or sensitivity-free.

After speaking at length with someone in their fragrance department, I have concluded that they are neither. And, if I am correct, the claim is misleading and potentially dangerous.

It must be acknowledged that Scent Air's product is currently being used on private aircraft only, but there are plans to distribute it to commercial carriers.

Scent Air's website mentions that it has created the fragrances that are piped into the lobbies of Starwood hotels, including ALoft and Sheraton properties. This year I had 2 very strong reactions, one in an Aloft lobby and another in a Sheraton lobby, both so strong that after 40 years of using the Sheraton chain we can no longer do so. Starwood stands behind its recent policy and is not going to change it.

So what am I requesting?

1. Disallow the use of added fragranced products in the aircraft cabins.

Ideally, airlines, which are federally- regulated bodies and which must respect human rights legislation, should not be allowed to add fragrances to the aircraft cabins.

2. Public education campaign

Heightened public awareness would help but is not a panacea. Ideally airlines and travel web sites would be required to provide a consumer alert in advance of booking onto a fragranced flight. However, I suspect such a solution may not be feasible.

3. Public accommodation on request

Alternatively, airlines could be required by regulation to accommodate requests from passengers to forego spraying fragrances in passenger cabins on specific flights when requested with adequate advance notice. I suspect that would also be difficult to implement.

Thank you for your consideration.

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