

CHANGING LIVES.
ONE DOG AT A TIME.



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

Re: Phase II du RTAPH / Consultation Invitation Letter – Phase II of ATPDR

We were concerned to be notified by one of the major US Airlines (through Assistance Dogs International) that they'd been invited to consult on Phase II of the Accessible Transportation for Persons with Disabilities Regulations (ATPDR). Yet, surprisingly, neither Assistance Dogs International, nor any of the Accredited Canadian Assistance or Guide Dog schools were issued such a notification or invitation. Nevertheless, we would like to provide the following input:

ABOUT PADS

Pacific Assistance Dogs Society (PADS) breeds, raises and trains fully certified assistance dogs. Our service (mobility & PTSD) and hearing dogs provide life-changing independence to those with physical disabilities other than blindness. Our accredited facility dogs work with community professionals, such as teachers, RCMP and psychologists to help support healthy communities. PADS was the first fully accredited member of Assistance Dogs International in Canada and we have hundreds of working teams across the country.

PADS' values:

- Reducing barriers for individuals with disabilities, particularly those that use certified assistance dogs
- The health and well-being of animals, whether in service to those with disabilities (or otherwise)

For this reason, we oppose the inclusion of emotional support animals (ESA's) under the ATPDR for the following reasons:

1. ESA's have no formal training or any standards of behaviour. The only requirement is that the individual can provide a doctor's note stating that they require an animal for their emotional well-being. Neither the doctor, nor the individual in question have qualifications in dog behaviour or training to make a determination if the dog is suitable for this type of activity or public access.
2. In turn this puts undue stress on transportation workers (who are also unqualified in dog behavior and training) in determining the legitimacy of these requests.
3. Including ESA's will put not only legitimate working dogs, the public and transportation staff at risk by exposing them to these unqualified animals of unvetted temperament.
4. As a result of the number of fraudulent and ill-behaved dogs in public (due to lack of rigorous public access laws), many more barriers, frustrations and negative public opinion have now been leveled at legitimate, highly trained assistance dog teams.
5. The inclusion of ESA's disregards the wellbeing of the animals themselves that are ill-prepared (either in training or socialization) for the stress of public access and transport.

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Many countries internationally have allowed emotional support animals, this has resulted in huge abuses of the system by pet owners. I remember reading the attached article several years ago, in which reporter Patricia Marx, took a humorous approach to a very serious issue. But it is no joking matter. Since then I've also read many news reports sharing that individuals have flown successfully with emotional support peacocks and pythons, pigs and pooches. There's also been news reports of flight crews, children and legitimate service dogs being attacked by aggressive emotional support dogs. We do not diminish the clear benefits that animals have on their human partners, however, if they wish to be in the public space we have a responsibility to the public and the animals themselves to ensure that they meet public access standards that have been set for certified assistance dogs.

In closing, the US Department of Transportation (DOT) is now revising their regulations to exclude these animals. We applaud their initiative in protecting the access rights of certified teams, the safety of the public and the well-being of the animals and we sincerely hope that Canada will follow suit.

Should you have any questions or wish to discuss this further I would welcome the opportunity.

Sincerely,
Pacific Assistance Dogs Society

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Please Note: Neither the email listed in the letter for submissions nor the link to the consultation paper on phase II in your communication is functioning (both are loading error pages). You may wish to redistribute and extend the deadline to receive feedback from the impacted parties.

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