

## **Submitted by email to the Canadian Transportation Agency**

**Subject:** Accessible Transportation for Persons with Disabilities Regulations (Phase II)

I own a medium-sized travel management company in Vancouver (ie. a travel agency handling corporate travel).

While I understand my concern below falls outside of the scope of this consultation, I would appreciate it if you would consider a related issue in the future.

I see that the focus of this current consultation is not IF animals should be allowed onboard airplanes (and other modes of public transportation?), but HOW. Some of my clients have severe allergies to some animals, particularly dogs and cats. Yet, their legitimate needs are ignored as far as CTA and airline policies are concerned. I have, in fact, a client who at this moment is too sick to return home from a trip because she was exposed to two dogs located near her on a flight.

None of my clients with pet allergies have suggested that service animals and other legitimate cases where an emotional support animal is deemed necessary should be banned for flights. They recognize that the rights of disabled persons must be balanced against the rights of other passengers to travel without the threat of severe reactions to animals located nearby.

From my survey of clients with this medical condition, this is the consensus:

1. Airlines travelling in Canada should be required to apply stricter scrutiny on both service dogs and emotional support animals. Right now, both rights are blatantly being abused. I know of two instances myself. When a passenger is forced by an airline to set up a "medical file," the airline's medical desk contacts the passenger's physician by phone or email to assess the passenger's ability to take the flight. The same requirement should be enforced, one time only, before credentials are given to passengers requesting a service dog or emotional support animal confirmation.

Scrutiny should not be limited to a ludicrous, easily forged document.

2. Pets-in-cabin, on the other hand, is only a privilege, neither a right nor a necessity. In an earlier decade, in fact, several Canadian airlines banned pets in cabin outright. At that time, it was felt that the rights of passengers not to get sick outweighed the privilege of taking your pet inside the

cabin, rather than “in the hold.” Pets in cabin should be banned for all flights operating in, out, or inside Canada.

3. For legitimate cases of service animals and emotional support animals in the airplane cabin, greater effort should be taken by the airline to distance passengers with animals from passengers identified with allergies to certain animals. To its credit, Air Canada already does this officially; however, there are several deficiencies in their procedures:
  - (i) The policy is inconsistently applied. (Many times we have booked a pet in cabin without the call centre agent doing this check.)
  - (ii) The only way to register a passenger with a severe allergy is the phone it in: there is no automated way to alert airlines of the passenger’s issue. In an era when call centre hold times range up to 3 hours, this is an undue burden on consumers. An automated procedure should be established for both online reservations and GDS reservations.
  - (iii) In the case of Air Canada, notwithstanding (i) above, it is possible for a passenger to reserve a pet-in-cabin, service dog, or ESA without assigning a seat. Pre-assigned seats are often subject to a fee; and this airline does require a passenger travelling with an animal in the cabin to pay for a pre-assigned seat. Consequently, the good intentions of this policy are for nothing!

Thank you for inviting consultation on this issue. Again, I realize this issue is outside the scope of this project, but I hope that you will put it forward as an important issue worth exploring in a future study.

Best regards,

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