



September 30, 2016

Canadian Transportation Agency
Ottawa, Ontario
K1A 0N9

Sent via email: consultations@otc-cta.gc.ca

Dear Sir/Madam,

Re: Accessible Transportation Consultation

Food Allergy Canada is pleased to provide feedback on the Canadian Transportation Agency's (CTA) *Accessible Transportation Discussion Paper for Regulatory Modernization*, as it pertains to food allergies.

We are pleased to see that the CTA has undertaken this public consultation to determine the appropriate regulatory measures to help make federal transportation accessible to people with disabilities. We appreciate the opportunity to provide our input on this very important initiative.

Food Allergy Canada is the leading national advocacy and education organization for more than 2.5 million Canadians living with food allergy. As a very small amount of a food allergen, when ingested, can cause a serious reaction, and there is no known cure for food allergy, avoidance is key to staying safe. While our organization promotes measures to self-protect, travel can be particularly worrisome for families managing food allergies, especially when emergency medical care may not be immediately available.

Scope of Accessibility Standards

Food Allergy Canada supports the CTA's consideration of creating a comprehensive set of accessibility regulations that would:

- apply to all modes of transportation under the CTA's jurisdiction, which includes air travel, extra-provincial rail, ferry and bus services in Canada
- be structured in such a way that recognizes that regardless of the mode of transportation, carriers and terminals are expected to provide many of the same services to a person with disabilities
- contain provisions to reflect the services that are mode-specific
- create consistent and reliable levels of accessibility within the federal transportation network
- ensure compliance of service providers in meeting accessibility standards

Overall Recommendations

As a starting point, Food Allergy Canada recommends that common standards could apply, though the implementation of each may differ depending on the mode of transportation. These include:

- Staff training on food allergies, including the identification of signs and symptoms of an allergic reaction and how to respond in an emergency
- Having stock epinephrine available (see description below)
- Strategies to minimize exposure to common food allergens
- Development of documented allergy policies and procedures
- Clear and easily accessible information on allergy policies for passengers developed by each sector (e.g. on website)

In addition, depending on the mode of transportation, more comprehensive standards and procedures could be developed to meet the needs of passengers with food allergies as has been done for airline travel (as outlined below).

To ensure a well-rounded dialogue that represents the perspectives of those affected, we recommend a sub-committee be formed, comprised of stakeholders from the different transportation sectors, Food Allergy Canada and other patient groups, allergists from the Canadian Society of Allergy and Clinical Immunology and members of the affected and non-affected public.

Specific Recommendations: Air Travel

We recognize that a considerable amount of work has already been undertaken by the CTA regarding airline travel and accommodations for passengers with food allergies. As such, Food Allergy Canada would like to provide the following feedback and recommendations to be considered in determining potential regulations for both the airline industry and other modes of transportation. As per our comments above, however, the implementation of specific practices may differ by mode of transportation.

The recommendations for air travel outlined in the *Accessible Transportation Discussion Paper* reference the recent CTA report, *Ministerial Inquiry into Allergies to Peanuts, Nuts and Sesame Seeds in Commercial Air Travel*, released this past spring. While this report contains welcome recognition that reasonable accommodations can and must be taken to help keep air travel safe for people with food allergies, some of the key recommendations in the report ignore the consensus expert medical and patient advocacy advice (as outlined below). **As such, we would strongly recommend that the CTA reconsider some of its recommendations as it considers future regulations for airlines and other modes of transportation.**

Among its recommendations the CTA rejected two important measures proposed by Food Allergy Canada and the Canadian Society of Allergy and Clinical Immunology, and supported by the CTA's own medical advisor on this report:

1. **Stock epinephrine** - an auto-injector not prescribed to an individual, but that can be used to treat anyone experiencing a severe allergic reaction, be carried on airlines in the event of an emergency (some international airlines already do this).

Airline travel poses an exceptional set of circumstances for passengers with food allergies as they are in an enclosed space for long periods of time, thousands of feet in the air and away from emergency medical attention. We are particularly concerned about Canadians who may have a serious reaction for the first time on board or those who may need a second dose of epinephrine if they have experienced an allergic reaction in flight. If such events were to occur, and epinephrine was not easily accessible immediately, the result could be tragic.

The following news report (*Allergic Living* – [Allergist calls for change after saving girls life during in-flight reaction](#)) underscores the need for immediate access to life saving medication which can be easily used by non-medical professionals on board an aircraft. The article recounts the story of an American allergist who was called upon to help a young girl having an allergic reaction and the difficulties she encountered using the on-board medical kit, which contained only vials of epinephrine.

It is also worth noting that over the past five years various airlines have made arrangements to carry stock epinephrine on board, including but not limited to:

- Qantas Airlines
- British Airways
- JetBlue
- Virgin Airlines
- JetStar
- WestJet – carried EpiPens® on board from 2010 to October 2015

In addition, stock epinephrine is also being carried in other public venues across Canada including;

- St. Hubert chain of restaurants (ON, QC)
- Bell Centre (Montreal, QC)
- La Ronde Amusement Park (Montreal, QC)
- Jackson Square Mall (Hamilton, ON)
- 72 city recreation facilities (Hamilton, ON) in Fall 2016
- Various public schools, daycares and university campuses across the country

2. Staff training - In-flight staff be trained on how to respond and treat an individual experiencing anaphylaxis (the most severe form of allergic reaction).

The CTA report did recommend that an effective risk mitigation measure would be “training flight crews on signs and symptoms of an allergic reaction” (Section 5.2.1), but not on how to properly respond and help treat a reaction. This, in our opinion, and that of the medical experts consulted in this report, is a critical oversight in ensuring the safety of allergic passengers. This was specifically noted in Section 5.2:

“Dr. Greenhawt noted that it is vital that passengers with allergies be prepared to recognize and self-manage a reaction. He also expressed the view that it is crucial that flight crew be able to properly identify the signs and symptoms of an allergic reaction and **be able to quickly provide appropriate treatment**. Several allergy associations agreed with Dr. Greenhawt's view and recommended that flight crews receive the necessary training.”

According to the Canadian Society of Allergy & Clinical Immunology's national anaphylaxis guidelines* for the community:

- Signs and symptoms of a severe allergic reaction can **occur within minutes** of exposure to an allergen (a substance capable of causing an allergic reaction). In more rare cases, the time frame can vary up to several hours after exposure.
- Epinephrine is the first line treatment for anaphylaxis. This life-saving medication helps to reverse the symptoms of a severe allergic reaction by opening the airways, improving blood pressure, and increasing the heart rate. It is recommended that epinephrine be given at the start of a known or suspected anaphylactic reaction.

*Source: [Anaphylaxis in Schools & Other Settings](#), 3rd Edition (© 2005-2015).

Given that allergic reactions can happen very quickly it is imperative that flight crews be able to identify symptoms and also know how respond to this medical, and potentially life-threatening, emergency.

In addition, we would also recommend an overall review of the CTA findings and our recommendations set forth in Section 5.2.1, including:

Buffer zone

- CTA's finding: Create a buffer zone consisting of the row the allergic passenger is in and not serving meals or snacks containing peanuts, nuts or sesame seeds in the buffer zone.
- Our recommendation: Retain buffer zones requirements currently in place with Canadian airline providers, until additional research is conducted to advise on the effectiveness of buffer zones.

In-flight announcement

- CTA's finding: Advise other passengers within the buffer zone that they must refrain from eating peanuts, nuts or sesame seeds or foods containing them.
- Our recommendation: Make a cabin-wide announcement, upon a passenger's request, informing other passengers that there is someone on board with peanut, nut or sesame seed allergies. Passengers may be asked to refrain from consuming these products during the flight.

Communication with passengers with food allergies

- CTA's finding: Advise passengers who provide advanced notification of their allergies about safety measures they can take, such as carrying their EpiPens® and bringing their own food.
- Our recommendation: Upon booking and again at check-in on the day of travel, inform the passenger of the airline's allergy policy, including a reminder for the person to carry their EpiPens® onboard and bring their own food for the flight.

Cleaning

- CTA's finding: Allow passengers to pre-board to wipe down their seating areas.
- Our recommendation: Have specific protocols for airline staff in place for cleaning areas of an aircraft where a person with allergies is to be seated and provide passengers with the option of pre-boarding so they have the opportunity to clean the area themselves with cleaning wipes.

Website information

- CTA's finding: Have allergy policies on air carrier websites.
- Our recommendation: Have written policies and procedures in place for accommodating passengers with food allergies, which are easily accessed on air carrier websites. This provides travellers with food allergies the information they need to make informed decisions prior to booking their flight and plan accordingly.

Quality of life considerations

- The CTA report did not specifically address the significant impact food allergies have on a passenger's overall quality of life and the emotional impact of this medical condition on millions of families across Canada.
- Our recommendation: When considering appropriate accommodations for travellers with food allergies, it is important to take into account the psycho-social impact food allergies play in the daily lives of those affected and their families. Given that food allergies affect every aspect of an individual's life – shopping for food, attending school/daycare/work, dining out, travel - daily vigilance is essential to staying safe.

We recommend the CTA review the following resources which outline the key challenges for people with food allergies:

- Research – food allergy and impact on quality of life
[The psychosocial impact of food allergy and food hypersensitivity in children, adolescents and their families: a review, AJ Cummings et al, Allergy, August 2010](#)
- Real-life experiences:
 - [Passenger asked to leave airplane due to child's food allergy](#)
 - [Family kicked off Allegiant Airlines flight because toddler has peanut allergy](#)
 - [British Airways 'bullied' family of girl, 5, with severe allergy into leaving plane after father asked the airline not to serve nuts during flight](#)
- Allergy-related resources:
 - National anaphylaxis guidelines - [Anaphylaxis in Schools & Other Settings](#), 3rd Edition Revised
 - Online anaphylaxis courses for the community – allergyaware.ca
 - [Travel Plan](#) of the International Food Allergy & Anaphylaxis Alliance

Food Allergy Canada views discussion around safe travel as another opportunity to identify reasonable accommodations that will improve passenger safety. Many airlines are already taking important measures in response to advocacy from the community, such as allowing passengers (or parents/guardians of children) to pre-board, allowing them time to check their seating area and wipe down trays, in-flight announcements about food allergies, and buffer zones (where certain allergens are not to be sold or consumed). The importance of these measures was affirmed in the CTA report.

Additional considerations now need to be made in order to ensure allergic passengers have access to safe travel across all modes of transportation (air, rail, ferry, bus). Creating a regulatory framework within which there are specific standards to help protect allergic travellers will make an important difference in the lives of passengers with food allergies in Canada.

Next Steps

Food Allergy Canada would be pleased to work with the CTA, and stakeholders from the medical community and industry, to establish appropriate measures to help protect individuals with food allergies travel by all modes of transportation regulated by the CTA. By working together, we can create effective regulations that guide the transportation industry and reflect the needs of a growing number of Canadians affected by food allergy.

Thank you for the opportunity to provide our feedback on this important initiative. We look forward to hearing back from you as you move toward drafting modernized regulations and standards to help create accessible transportation for all Canadians with disabilities.

Sincerely,

Laurie Harada
Executive Director
Food Allergy Canada