

Guide Dog Users of Canada
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Introduction: For almost two decades, Guide Dog Users of Canada has been a nationwide voice for blind, partially sighted, and deaf-blind Canadians who travel with guide dogs. We have also been a long time participant in the Canadian Transportation Agency. Below are our comments for your consideration. Although many other organizations discussing travel accommodations for blind, partially sighted and deaf blind persons, this feedback focuses mainly on guide dog handlers and their dog guides.

1. Airline's Obligation to Communicate Clearly:

Obligation to ensure all communications are available in accessible formats, texting, email, large print, Braille and electronic documents upon request. All air carrier passenger information for all airline websites must be accessible for those persons who need to navigate any website using any assistive technology, such as a screen reader or ZoomText software.

2. Flight Delay, Cancellation or Denial of Boarding:

Passengers who travel with a guide dog will require assistance by airport staff to bring their dog to a safe, designated relief area without the necessity of passing through security a second time.

Note 1: When travelling, guide dogs are on a strictly regimented relief schedule. Depending on the length of the delay, additional accommodations may need to be made. Note 2: If a passenger with a guide dog is denied boarding, all avenues should be pursued to ensure that the passenger and guide dog are on the next available direct flight to the desired destination.

Note 3: Persons with any medical conditions may require extra food or drink to take prescribed medications. If a passenger using a guide dog is denied boarding due to an allergy as an example, other arrangements would need to be made for that passenger and guide dog. If a seat change is necessary due to another passenger's allergy, the onus should be on the flight staff to reseat that second passenger.

3. Tarmac Delay:

Depending on the length of the delay, flight staff should be ready to assist the guide dog handler to exit the plane and find a safe and appropriate relief area for the guide dog. Careful climate control measures are vital to the safety of all passengers, particularly guide dogs. Adequate water should be available to all passengers based on the duration of the delay on the tarmac. Ensure that all communication updates are given in accessible formats.

4. Lost or Damaged Baggage:

Passengers who are blind or visually impaired may travel with costly assistive technology. If the luggage is lost or damaged, the onus should be on the air line to replace all damaged or lost goods. It is the passenger's responsibility to provide any necessary estimates for replacement costs for assistive technology. It should be noted that passengers travelling with a guide dog must be permitted to carry at least two meals of dog food in their carry-on luggage.

5. Scope of the New Regulations:

Any new regulations should incorporate any and all air transportation arriving and departing from all Canadian airports.

6. Application of the New Regulations when Different Airlines are Involved: See point 5.

7. Complaints and Enforcement:

A streamlined passenger focused complaint mechanism should be implemented on site, or through website or by phone, which would enable passengers to ensure that their needs are addressed in an expeditious manner by airline carrier or terminal operators.