

Hello,

I am writing to share my concerns over the apparent lack of coherent and reliant anaphylaxis policy on transportation services in Canada. My experience is specifically with trying to travel safely on airplanes with my young son who has a severe peanut allergy. He is, obviously, one of an increasing percent of his generation that suffer severe allergies to peanuts, nuts and other food substances. Given that this survey is part of the Agency's Regulatory Modernization Initiative, I can think of no more apt opportunity to address a health concern that is newly and increasingly impacting Canadian individuals and families.

Our experience includes everything from very helpful flight crew trying to help us manage the proximity to nuts on a cross-country flight with our son, to a Customer Service information "expert" at the very same airline telling us ahead of that flight that if we divulged our son's anaphylaxis needs to the flight staff, they could take discretionary measures not to allow him to fly to avoid the liability of exposing him to peanuts.

This is clearly absurd. Airplanes (and in a similar way, ferries, long-distance trains or any conveyance that carry individuals over great distances at a remove from health care facilities) should have clear, productive policies about managing the needs of the increasing number of Canadians dealing with anaphylaxis. My recommendations are as follows:

- A) Such families should not fear identifying their concerns and their needs to staff, lest they be told they cannot travel (as in the example of the Air Canada conversation referenced above.)
- B) All commercial vehicles operating under the CTA and serving or allowing food stuffs on board should be legally required to have an up-to-date epinephrine injector on board.
- C) All companies or agencies operating commercial vehicles in Canada should be required to have a crystal-clear, unambiguous policy on record and readily available that indicates that they shall make every reasonable accommodation to keep travellers with anaphylaxis safe, and will not prevent them from travelling. This may require occasional inconveniencing of other passengers, but the comparable risk of anaphylactic shock or death should have greater significance.
- D) The CTA should consider strongly advocating for a total ban on peanut and nut products on commercial vehicles. This is a generally accepted policy across school boards and, while no doubt things would slip through, it would be a tremendous effort with positive perception benefits.
- E) Commercial vehicles, especially airplanes, should include allergy-safe seating options for passengers with anaphylaxis. This could be a couple of rows reserved for travellers and their family who require extra precautions. Designating them as such would have multiple effects, not the least of which would be extra cleaning effort on behalf of the cleaning staff, extra awareness and consideration on behalf of both the flight staff and fellow passengers.

I would conclude with the following observation, again about airplanes in particular. Air travel is uncomfortable and often stressful and people, understandably, can get selfish in preparing for flights and keeping themselves happy during them. A lack of coherent and respectful policy leadership from airlines like Air Canada (who, on the contrary, continue to serve nuts - at least in first class - on many flights) not only add stress and risk to individuals travelling with anaphylaxis, but also run the risk of fostering a "not my problem" attitude among adult passengers that is notably at odds with the type of community support and understanding that anaphylaxis policies in school are intended to foster.

The CTA should take a strong position in making commercial travel safer for future generations of people at risk for anaphylaxis.

Thank you for your consideration,

