



Canadian  
Transportation  
Agency

Office  
des transports  
du Canada

# Travelling with Animals that Provide Disability-Related Assistance

*A Resource Tool for Persons with Disabilities,  
Carriers and Terminal Operators*



**Making Transportation Efficient and Accessible for All**

available in multiple formats

**Canada**

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More and more Canadians with disabilities who use animals to provide them with disability-related assistance are travelling on planes, trains and ferries. A growing number of these persons are using different types of animals to provide them with disability-related assistance and these animals are performing a much wider variety of functions than ever before. This means that air, rail and ferry carriers are often asked to carry various types of animals.

This resource tool provides useful information for carriers, terminal operators and persons with disabilities about travelling with animals who provide disability related assistance, which may be referred to as service animals, guide dogs, emotional support animals, psychiatric support animals, seizure alert animals, etc.

This resource tool provides information about:

- Canadian standards for the carriage of assistance animals;
- How assistance animals help persons with disabilities;
- Factors for carriers to consider when determining under what conditions assistance animals may be accepted for carriage;
- How persons with disabilities should plan their travel with an assistance animal;
- Relieving areas for assistance animals at terminal facilities.

## **Equal access for persons with disabilities and the duty to accommodate**

Persons with disabilities have a right to an equal opportunity to benefit from the same level of transportation services afforded to others; this is called the right to equal access.

Independent access is an integral part of this right. Persons with disabilities want as much independence in life as possible and their use of transportation services is no exception. They should be able to move through the system with as much independence as possible.

Carriers and terminal operators have a duty to respect the right to equal access by accommodating persons with disabilities up to the point of undue hardship.

This means that carriers and terminal operators must:

1. Provide accommodations that give a person with a disability equal access to transportation services.

2. Provide these accommodations up to the point where doing so is either unreasonable, impracticable or in some cases impossible; in other words, up to the point that the accommodations would create undue hardship.

It is widely recognized and accepted that people who rely on animals to provide disability-related assistance need to be able to travel with their animals and keep them within their control at all times in order to have as much independence as possible in their travels.

## How animals help persons with disabilities

Assistance animals perform a wide variety of tasks, helping persons with visible and non-visible disabilities with their disability-related needs.

While assistance animals most commonly guide persons who are blind or partially sighted, these animals can perform many other tasks to help persons with physical, sensory, intellectual, and mental health disabilities.

## Tasks performed by assistance animals

The following are examples of the many types of tasks these animals perform:

- Assist persons who are blind or partially sighted with navigation.
- Alert persons who are deaf, deafened or hard of hearing to the presence of people or sounds, such as an alarm, a telephone, or the person's own name.
- Provide physical support and assistance with balance and stability to persons with mobility disabilities.
- Pick up dropped articles, pull wheelchairs, open and close doors, help a person in getting out of bed or a seat.
- Recognize specific changes that happen before a person experiences a seizure and provide a signal to warn the person, which allows them to move to a safe place or position before the seizure begins.
- Increase safety and reduce stress for a person with autism.
- Help persons with neurological disabilities by preventing or interrupting impulsive or destructive behaviours.
- Provide medication reminders and retrieve medication.
- Act as a buffer against other people crowding too close to a person with post-traumatic stress disorder.

- Provide emotional support by its presence.

## **Types of animals**

While dogs are the most commonly recognized type of assistance animal, there are other types of animals that provide assistance to persons with disabilities. Some of the many other types of animals that are used include capuchin monkeys and cats.

## **Training of assistance animals**

At the time this resource tool was written, dogs are the only type of animal that is trained and certified a by professional service animal institutions in Canada.

This means that some assistance animals may be trained by individuals or organizations that are not generally recognized, or independently trained by or for an individual with a disability.

Additionally, some assistance animals may not have been trained by a recognized professional service animal institution because of the type of tasks they perform for persons with disabilities. For example, some persons with disabilities may need to be accompanied by an emotional support animal whose very presence provides the disability-related assistance. Because the animal's comforting and calming presence is the task that the animal performs for the individual, it is unlikely to have received training by a recognized professional service animal institution to perform this task.

## **Harnesses for assistance animals**

Assistance animals do not always wear harnesses, although some may. Some assistance animals may instead be on a leash or, if very small, carried in a pouch.

# Canadian standards for the carriage of animals that provide disability-related assistance

## Standards for air carriers

Accessibility standard	References
<p>Canadian carriers in respect of their domestic services using aircraft that have 30 or more passenger seats are required to accept an animal for carriage without charge if the animal is:</p> <ol style="list-style-type: none"><li>1. required by a person for assistance and certified, in writing, as having been trained to assist a person with a disability by a professional service animal institution; and,</li><li>2. properly harnessed in accordance with standards established by a professional service animal institution.</li></ol>	<p><a href="#">Air Transportation Regulations (ATR)</a></p>

If the air carrier considers it necessary to confirm that the animal has been trained, it may obtain verbal confirmation from the person with a disability. If this is insufficient, the carrier may request to see supporting documents from the training institution.

Carriers are not prevented from accepting assistance animals that do not meet the training and harnessing requirements of the regulations. Many carriers do accept such animals.

## Standards for rail carriers and ferry operators

Accessibility standard	References
<p>Service animals will be accepted for carriage.</p>	<p><a href="#">Rail Code</a> <a href="#">Ferry Code</a></p>

Carriers are expected to comply with the provisions in the Agency's codes of practice. Both the Rail Code and Ferry Code reflect the expectation that service animals will be accepted for carriage.

The Rail and Ferry Codes refer to a service animal as being an animal that is required by a person with a disability for assistance and is certified, in writing, as having been trained to assist a person with a disability by a professional service animal institution.

However, like air carriers subject to the ATR, neither rail carriers nor ferry operators are precluded from accepting animals that are not trained by a professional training institution or that are not harnessed.

## No additional charges

Where carriers accept animals that provide disability-related assistance, it is expected that they are carried free of charge.

## Ensuring sufficient space for animals

Accessibility standards	References
<p><b>Air carriers:</b> For aircraft with 30 or more passenger seats, each class section of a passenger cabin should have a number of passenger seats that provide enough floor space for a service animal to lie down.</p> <p>Note: the Implementation Guide provides more detail which can help carriers determine how to ensure that there is sufficient floor space so that both the person with a disability and the service animal can travel safely.</p>	<p><a href="#">Section 2.6 of the Air Code</a></p> <p><a href="#">Space for Service Dogs (Implementation Guide)</a></p>
<p><b>Rail carriers:</b> Each passenger rail car (other than a sleeping car) should have a number of passenger seats that provide enough floor space for a service animal to lie down.</p>	<p><a href="#">Section 1.2.8 of the Rail Code</a></p>
<p><b>Ferry operators:</b> Where there are passenger lounges on a ferry, at least 5% of the seating in each lounge should have enough floor space for a service animal to lie down.</p>	<p><a href="#">Section 2.16 of the Ferry Code</a></p>

It is expected that if a carrier accepts an assistance animal, it will ensure that sufficient space is provided to the passenger and their assistance animal at the passenger's seat.

## Relieving areas

Accessibility standard	References
Accessible relieving areas should be provided so that these animals can relieve themselves during travel.	<a href="#">Section 2.5 of the Terminal Code</a> <a href="#">Section 1.5 of the Non-NAS Code</a>

People travelling with assistance animals need to relieve their animals regularly, particularly during lengthy trips.

In many cases, the location and layout of a terminal facility will already provide suitable space outdoors where animals can be relieved.

## Factors to consider when deciding to accept an assistance animal for carriage

If an animal meets the requirements of the standards noted above in the Canadian standards section, carriers are expected to accept the animal and allow it to remain with the person who relies on it for disability-related assistance. However, with more and more travellers using assistance animals for a variety of disability-related needs as well as using different types of animals, carriers are receiving requests to accept assistance animals that have not been trained by a professional training institution and may not wear a harness but nonetheless provide disability-related assistance. This section provides information and guidance regarding the carriage of such animals.

While the standards set out above expect carriers to accept animals that provide disability-related assistance under certain conditions for carriage, they do not preclude carriers from accepting animals that may not meet those conditions.

The variety of assistance animals and functions they perform can make it difficult for carriers to distinguish these animals from pets in some cases. It may be especially difficult if the passenger has a disability that is not readily visible, or if the animal has no obvious indicators, such as a specialized harness.

Carriers should make every effort to accommodate passengers with disabilities while considering the impact on their operation and their safety obligations. Carriers are entitled to obtain assurances that they can safely transport the animal, and that the animal behaves properly in a public setting. The considerations set out below are intended to assist carriers in determining whether an animal is an assistance animal and whether to accept the animal for carriage as an assistance animal.

It is important to be aware that “no pet” policies of federal transportation carriers do not apply to assistance animals.

## Identifying an assistance animal

Carriers are entitled to ask for information to help them assess whether an animal is required by a person with a disability to provide assistance. It is important for carriers and passengers travelling with assistance animals to engage in a discussion, ideally at the time of reservation and as early as possible before departure. This ensures that each party has the information it needs and helps avoid problems when it is time to travel.

The following considerations may help carriers identify whether an animal is an assistance animal:

- **Assistance animals aren't pets.** The key difference between assistance animals and pets is that assistance animals perform functions that assist a person with a disability.
- **Some animals don't have obvious indicators.** Not all assistance animals wear identifying equipment (e.g., harness, vest, cape). Some assistance animals may be on a leash or, if very small, carried in a pouch.
- **Some animals don't require training.** Some assistance animals, such as emotional support animals, may not have or require specific training to perform their assistance function.

Carriers will need to determine whether the animal has been individually trained or is able to perform a task or serve a function such as emotional support to be provided before, during or after the trip.

Carriers may rely on information they obtain from consulting with the person with a disability and/or physical indicators of the animal's role such as equipment (e.g., harness, vest, cape). However, carriers should be aware that an animal can still be providing assistance even if it has no identifying equipment.

### **Questions to help identify an assistance animal**

Carriers may wish to ask questions to the traveller:

- What task does your animal perform for you when travelling within the federal transportation network (i.e. before arrival at the passenger's destination)?
- Would you please describe how the animal performs the tasks for you?
- What has your assistance animal been trained to do?

Avoid asking about personal information, such as: "What is your disability?"

Questions should be limited to the disability-related tasks that the animal performs.

If a carrier is uncertain about a person's need for an assistance animal, it may wish to ask for documentation that substantiates the need. For example, carriers may wish to request a letter from a licensed physician or mental health professional to ensure that the animal is required for travel by the person with a disability.

### **Considerations for letters documenting the need for an assistance animal**

Carriers may wish the letter to:

1. Be a relatively recent letter if the nature of the disability is not static.
2. Confirm that the passenger has a disability-related need that requires that the animal accompany the passenger when travelling within the federal transportation network, i.e. before arrival at the passenger's destination.
3. Set out the task(s) that the animal performs for the passenger when travelling within the federal transportation network, i.e. before arrival at the passenger's destination.
4. Be printed on the letterhead of a licensed medical professional.

If the carrier is satisfied that the animal is required to provide disability-related assistance, it will also usually assess whether the animal poses a threat to the health or safety of others, or is likely to cause a disruption of service on board the aircraft, train or ferry. The factors described below can help with this assessment.

## **Unusual animals**

To determine whether an unusual animal (e.g., capuchin monkey or cat) should be accepted for carriage, carriers should make an individual assessment.

Carriers may wish to consider the following when deciding whether the animal should be accepted for carriage:

- **The animal's size and weight.** Is there sufficient space for the animal to remain with the person with a disability at their seat?
- **Foreign country restrictions.** Will the animal be permitted to enter the destination country?
- **Whether the animal would pose a threat to the safety of others.** Could it be a dangerous animal or an animal that burrows or chews and could cause damage to an operating system?
- **Public health concerns.** Is it a species of animal that is known to carry disease?

## Animal behaviour

Assistance animals are expected to be able to behave appropriately in public settings, including:

- Remaining with the person with a disability – no wandering off or running freely. Depending on the animal, this may mean the animal would have to be leashed, carried in a pouch or have some other means of restraint/containment;
- No barking, growling or making aggressive noises at other passengers or carrier personnel;
- No aggressive behaviour such as biting, lunging at or jumping on people;
- Not spontaneously relieving themselves in a waiting area, a terminal or on an aircraft, railcar or ferry.

Carriers should not make assumptions about how an animal will behave based on past experiences with other animals. Instead, carriers should ask whether an animal has experience being in public settings, travelling, or whether it has been trained to behave appropriately in a public setting. When in doubt, carriers may wish to ask for documentation regarding the animal's training.

If the animal demonstrates inappropriate behaviour, carrier personnel may wish to speak with the passenger about mitigating the problem and give the passenger the opportunity, within a reasonable amount of time, to correct the inappropriate behaviour of the animal.

Ultimately, carriers may deny carriage if an assistance animal engages in behaviour that is inappropriate or dangerous to other passengers or personnel.

## Seating accommodation

Persons with disabilities should never be separated from their assistance animals. Carriers must ensure that there is sufficient space to carry the animal safely at the passenger's seat (for larger animals, this will mean floor space, and for smaller emotional support animals, the passenger may wish to retain the animal on their lap) without causing injury or extreme discomfort to the passenger or the animal.

Persons with assistance animals cannot occupy seats where the animal blocks access to an emergency exit and/or interferes with the crew's ability move through the aisles (including with food and beverage carts or to take action during an emergency situation).

Carriers are under no obligation to offer a seat in a higher class of service free of charge to accommodate the person with a disability and the assistance animal. However, carriers should consider ways to provide sufficient space to accommodate the person and the animal. In some cases, this may mean providing two seats to ensure that there is sufficient space.

The Agency's [Implementation Guide Regarding Space for Service Dogs Onboard Large Aircraft](#) provides guidance to carriers on how to ensure that they provide sufficient space.

## Health and sanitation

On long trips, health and sanitation issues could arise in relation to the animals' eating, drinking and elimination functions.

For long trips (e.g. flight segments of 8 hours or more), a carrier may wish to require a passenger travelling with an assistance animal to provide assurance that the animal will not need to relieve itself during the trip or that the animal can do so in a way that does not create a health or sanitation issue.

### Questions to establish the animal's needs

Carriers can ask questions to establish the animal's needs, such as:

- Given the length of the trip, can your animal wait to relieve itself at designated areas (e.g. outside of an airport between connecting flights)?
- Can your animal relieve itself in a way that won't create a health or sanitation issue (e.g. using diapers made for this purpose)?

Passengers travelling with assistance animals on long trips should give consideration to alternative travel options, such as connecting flights/trains which would allow the animal an opportunity to disembark and use a relieving area.

## Impact on other passengers

Some passengers may be uncomfortable with the presence of an assistance animal, due to factors such as allergies, cultural reasons, personal discomfort or fear of the animal. To respond to conflicting needs, carrier personnel should consider options, such as relocating passengers to separate areas of the aircraft, train or ferry.

Carriers are expected to permit passengers travelling with assistance animals to access food service areas that are open to the public such as those found on trains and ferries.

## Passenger responsibilities

Planning, communication and an exchange of information with the carrier are key for persons with disabilities who wish to travel with an assistance animal.

Even in the early stages of planning a trip, there is a lot a person can do to prepare for travel with an assistance animal, such as gathering information and knowing what questions to ask. Persons with disabilities who plan to travel with an assistance animal should inform the carrier well in advance of their travel.

Contacting the carrier with specific questions will help ensure that the carrier is fully aware of a person's needs and that all issues are understood and properly addressed before the day of travel.

Before travel, you should:

- **Find out what information the carrier needs from you.** You can consult a carrier's website or printed materials, or contact it directly.
- **Ask the carrier about its policies for assistance animals.** Find out whether it requires any additional information or written documentation regarding the use of the animal.
- **Talk to the carrier at least 48 hours in advance.** Let the carrier know that you plan to travel with an assistance animal. Companies are expected to meet disability-related needs for you when you give them at least 48 hours notice. With less than 48 hours notice, they should make a reasonable effort to help you.

- **Ask about space for your animal.** You can ask the company to make sure that there is enough floor space for your service animal to remain at your feet, without extreme discomfort to you or your animal.
- **Confirm how far in advance of departure you should arrive at the terminal or station.** You need to allow sufficient time for check-in, boarding, and individualized safety briefings or orientations, if required.
- **Find out where the relieving area is located.** You can check the terminal's or station's website or contact them directly.
- **Find out if you need travel documents.** Check to make sure you know about the different regulations for your service animal when travelling, especially to another country.

**Additional information carriers may require:**

Carriers may need more information about your requirements. You should be prepared to explain that your animal provides disability-related assistance. You might need to provide additional information or medical documentation.

Carriers may also need information about the animal's training and behaviour in public settings. You should be prepared to provide proof of any training or assurances about the animal's behaviour.

**Note:** You should have control over your animal at all times.

## At the airport

- Ask to be guided to an area where the animal can relieve itself if necessary.
- Be aware that the screening of passengers entering the secure zones and boarding areas may involve [special procedures for assistance animals](#).

**Are you travelling outside of Canada?**

1. Find out about any regulations or restrictions related to the type of animal, travel, quarantine, or permit requirements that may apply in your destination country for travelling with an assistance animal.
2. Find out whether your animal requires an international health certificate and/or proof of vaccination.
3. Always carry all available certification for the animal, such as an international health certificate or a training certificate.

## About the Agency

The Canadian Transportation Agency is an independent, quasi-judicial tribunal and economic regulator of the Government of Canada.

The Agency makes decisions on a wide range of matters involving air, rail and marine modes of transportation under the authority of Parliament. For certain accessibility matters, the Agency also has jurisdiction over extra-provincial bus transportation. Part V of the *Canada Transportation Act* provides the Agency with a human rights mandate to eliminate undue obstacles to the mobility of persons with disabilities in the federal transportation network to ensure that persons with disabilities have equal access to transportation services.

In exercising its human rights mandate, the Agency applies the fundamental principle of equality and balances the right of persons with disabilities to be provided with services that meet their disability-related needs with the transportation service provider's operational, commercial and regulatory responsibilities.

The Agency eliminates undue obstacles in three ways:

1. by developing and monitoring compliance with regulations, codes of practice and standards concerning the level of accessibility in modes of transportation under federal jurisdiction;
2. by eliminating problems before they occur by responding to pre-travel inquiries and by educating persons with disabilities and service providers about their rights and responsibilities; and,
3. by resolving complaints on a case-by-case basis using an approach that is consistent with the one used for identifying and remedying discrimination under human rights law.

## How this resource tool was developed

In developing this resource tool, the Agency conducted research and consulted its Accessibility Advisory Committee which is made up of associations representing persons with disabilities, including those who use animals to provide disability-related assistance, transportation service providers and other government departments.

# Additional references

## Accessibility standards

- [Air carriers](#)
- [Passenger terminals](#)
- [Trains](#)
- [Ferries](#)

## Information for passengers

- [Take Charge of Your Travel](#)
- [Checklist: travelling with an assistance animal](#)
- [Requirements in foreign countries](#)
- [Security screening at Canadian airports](#)

The Agency does not keep a list of professional service animal institutions in Canada that train service animals.

# Definitions

## Accommodation

The provision of services, new equipment or facilities, or modifications to a rule, policy, practice, or existing equipment or facilities to meet a disability-related need.

## Adequate notice

What constitutes adequate notice of a person's disability-related needs will vary depending on the situation. However, as reflected in Part VII of the *Air Transportation Regulations* and in Agency decisions, 48 hours prior to departure is generally considered adequate notice.

## Carriers

“Carriers” includes Canadian airlines, passenger rail carriers and passenger ferry operators.

## Equal Access

Equal opportunity for a person with a disability to benefit from the same level of transportation services afforded to others.

## **Federal transportation system**

The following transportation services, which are under the authority of Parliament:

- air carriers operating within, to, or from Canada;
- airports located in Canada;
- passenger rail carriers, ferry operators, and bus operators providing services between provinces and/or between Canada and the United States, and their stations or terminals located in Canada; and
- services that are integral to the transportation services provided by a carrier or terminal located in Canada.

## **Obstacle**

A rule, policy, practice, physical barrier, etc. that directly or indirectly discriminates against a person with a disability and has the effect of denying the person with a disability equal access to services that are available to others in the federal transportation network such that accommodation is required from the service provider.

## **Person with a disability**

A person has a disability for the purposes of Part V of the CTA if they have an impairment and an activity limitation and experience a participation restriction in the context of the federal transportation network.

## **Undue hardship**

Excessive hardship as determined by evaluating the adverse consequences of providing accommodation, considering factors such as:

- safety constraints;
- operational constraints;
- economic and financial constraints; and
- physical or structural constraints.

## **Undue obstacle**

An obstacle that can be removed without imposing undue hardship on the transportation service provider.