



Canadian
Transportation
Agency

Office
des transports
du Canada

Implementation Guide Regarding Space for Service Dogs Onboard Large Aircraft

Making Transportation Efficient and Accessible for All

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Canada 

Introduction

This implementation guide provides information for Canadian air carriers subject to the Code of Practice *Aircraft Accessibility for Persons with Disabilities* (Air Code) and the *Air Transportation Regulations* (ATR) on the carriage of persons with disabilities travelling with service dogs.

The ATR state that on aircraft with 30 or more seats, the carrier must accept a service animal (such as a service dog) for carriage without charge, provided that the animal is required by a person for assistance and is certified in writing as having been trained to assist a person by a professional service animal institution.

Section 2.6 of the Air Code, which applies to fixed-wing aircraft with 30 or more passenger seats used by Canadian air carriers, states that "Each class section of the passenger cabin of an aircraft, e.g., first class, business class, economy class, should have a number of passenger seats, other than exit row seats, that each provides enough floor space for a service animal to lie down."

While this implementation guide applies to section 2.6 of the Air Code, it should be read in conjunction with other sections of the Air Code¹.

The objective of section 2.6 of the Air Code is to ensure that air carriers provide sufficient floor space to permit the service animal to remain on the floor at the person's seat while ensuring that both the person with a disability and the service animal can travel safely. Sufficient space will also prevent injury and extreme discomfort to the person and will ensure the animal is able to carry out its duties.

¹ In particular, reference is made to section 1.2 of the Air Code which, in part, addresses safety considerations. Safety on board aircraft is the responsibility of Transport Canada Civil Aviation and air carriers are required to conduct their operations in accordance with the *Canadian Aviation Regulations* made pursuant to the *Aeronautics Act*. In no way do the *Air Transportation Regulations* or the Codes of Practice relieve air operators from complying with the provisions of any safety regulations made under the *Aeronautics Act*.

The Air Code defines "service animal" as "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." While many different types of animals are used by persons with disabilities to provide assistance in daily living (e.g., dogs, pigs, ferrets, monkeys and miniature horses), dogs are the most commonly used.

At the time of developing this implementation guide, research indicates that professional service animal training institutions in Canada only certify dogs as trained assistance animals. Therefore, the scope of this implementation guide is limited to space on aircraft for persons with disabilities travelling with service dogs.

In addition to the two above-noted requirements, a service dog must be properly harnessed in accordance with standards established by a professional service animal institution.

Consultation Process

In the development of this guide, the Agency consulted with Canadian air carriers and professional service dog training institutions. Questionnaires were distributed to seven air carriers and to four professional service dog training institutions.

The data gathered from the air carrier questionnaire dealt with such issues as:

- the information persons with disabilities who travel with service dogs are asked to provide;
- the factors taken into consideration by the carrier when determining which seat to assign to a passenger travelling with a service dog; and
- the typical floor space dimensions at passenger seats in each of the different classes on the aircraft.

The training institutions were asked for information regarding the size and physical characteristics of the breeds of dogs typically used as service animals, as well as estimated dimensions of floor space (length, width and height) for large, medium and small dogs to lie down and manoeuvre. In addition, training institutions assessed the impact of the duration of a flight on a service dog's ability to remain sitting or lying down at the passenger's seat and factors air carriers should consider when assigning seating for a passenger with a disability travelling with a service dog.

The consultation also included a viewing of various aircraft types and configurations by Agency staff, and by representatives from air carriers and service dog training organizations. The viewings permitted the measurement of various sizes of dogs and of floor space used by the trainers and service dogs seated at different rows in different areas of aircraft cabins.

Measurements were taken with the dogs in a standing position and reflect:

- the length from the tip of the nose to the base of the tail;
- the height from shoulder bone to floor; and
- the width between hind quarters.

The approximate dimensions found in this guide are based on the data collected during this exercise. They can be used by air carriers in determining how best to provide sufficient floor space to be shared by persons with disabilities and their service dogs. This space should be sufficient to allow the dog to lie down without lying on the passenger's feet or legs to ensure that the passenger and their dog can share the space safely and without extreme discomfort.

Finally, consultations were held with the Agency's Accessibility Advisory Committee, following which this implementation guide was prepared.

This implementation guide is not intended to dictate the manner in which a carrier ensures that a person and their service dog can travel safely. For example:

- In some instances, it will not be necessary to assign extra seating to provide sufficient floor space, in which case, only one seat will be assigned to the person with a disability travelling with a service dog.

- In other cases, such as when the service dog is larger or the aircraft configuration limits the amount of unimpeded space, air carriers may be required to provide an extra seat in order to ensure that the floor space is sufficient.

Factors to Consider

Dialogue between the carrier and a person with a disability travelling with a service dog

In order to ensure that appropriate accommodation can be arranged, persons with disabilities who travel with service dogs are expected to discuss their needs with the carrier at least 48 hours in advance of travel. Holding this dialogue in advance of the flight:

- allows the carrier to effectively plan seat assignments;
- saves time; and
- alleviates stress for both the passenger and the carrier's personnel at the time of boarding.

While carriers may delay the assignment of a specific seat or seats, persons with disabilities travelling with service dogs need assurance that they will be able to travel safely. Leaving the determination of sufficient space to the day of travel or even until boarding is likely to jeopardize the carrier's ability to meet the objective of section 2.6 of the Air Code.

Further dialogue will be needed if there is a change in aircraft after the traveller has confirmed a reservation in order to ensure that the new seating assignment will provide sufficient floor space.

When connecting flights are operated by another carrier, the originating carrier should communicate to the connecting carrier the need to accommodate the person and service dog in order to ensure sufficient floor space will be provided.

Carriers should develop policies and procedures to ensure that:

- when a request is made **at least 48 hours prior** to a scheduled flight departure, persons with disabilities travelling with service dogs will be assigned seating with sufficient floor space.

- when a request is made **less than 48 hours prior** to departure, the air carrier will make a reasonable effort to provide the service.

Carriers must ensure that carrier personnel who interact with persons with disabilities are made aware of these policies and procedures, as prescribed by the Agency's *Personnel Training for the Assistance of Persons with Disabilities Regulations*.

Floor Space Considerations

The space to accommodate a person with a disability and their service dog has been set out in this implementation guide in four sets of floor area measurements, based on a range of dog sizes. These measurements reflect the approximate requirement for unimpeded space, which may include the space under a seat or seats in front of the person with a disability. However, they do not include space under the seat occupied by the person where there is a luggage restraint bar.

Objects that impede usable space, such as electrical boxes, entertainment and safety equipment, foot rests, and seat fasteners, affect the ability of service dogs to use the space under the seat or seats in front of the person with a disability. In some cases, the existence of impediments will necessitate the use of some floor space at an adjacent seat to ensure that the passenger and their service dog can share the space safely and without extreme discomfort.

The space to accommodate a person with a disability and their service dog is reflected in terms of a range of approximate dimensions, in recognition of:

- differences in aircraft configurations;
- service dogs' abilities to curl; and
- the various sizes of service dogs.

If a carrier is able to accommodate a passenger with a disability and a service dog safely, and without extreme discomfort, in a space that is smaller than those identified in the section "Approximate amount of floor space to accommodate persons with disabilities and their service dogs", then the carrier will have been deemed to have met the objective of section 2.6 of the Air Code. Conversely, some persons with disabilities and their service dogs may have space requirements that exceed those set out in this implementation guide.

When determining the amount of floor space required to accommodate persons with disabilities and their service dogs, the passenger and the carrier have a shared responsibility in terms of the information needed to make this determination.

The following are factors that the carrier should determine during the dialogue with the person with a disability travelling with a service dog:

- The size of the service dog that will need to be accommodated (i.e., the dog's weight, height and length). This will enable the carrier to take appropriate steps to ensure that the accommodation they plan for the person with a disability and the service dog will meet actual needs.
- Whether the person with a disability has any physical characteristics that may affect how the person and the service dog will share the space (e.g., the person has long legs, large feet or is unable to bend one or both knees).

In addition, the following factors should be considered when determining the required amount of floor space:

- A service dog should not stay in a tight curl for any significant period of time. The ability of the service dog to curl will vary, depending on its size, breed and flexibility.

- Entry paths of seat rows affect the space available for a service dog to lie down. An entry path for this purpose is measured from the front of the seat cushion to the back of the seat in front of the person with a disability. The entry path must be wide enough for the dog to get in and out of the row without having to be squeezed through the space.
- Tails and paws must be kept protected from carts, feet, etc. for the safety of the dog, as well as other passengers and crew members.
- Sufficient floor space is needed for both the service dog to lie down on the floor at the seat of the person with a disability and for the person's legs and feet, while ensuring that they can both travel safely. Some encroachment by the service dog into the person's floor space may be acceptable. The carrier should ensure that sufficient space will be available to allow the person with a disability to sit with their legs and feet in a position which will not result in an unacceptable level of discomfort or the service dog lying on the person's feet or legs.
- Sufficient leg room is necessary at the seat of the person with a disability so that the service dog is in front of the person's legs. This is to avoid the person having to place their legs over a service dog in a confined space which may result in injury to the person if the dog is startled or gets up quickly for any reason.
- Assigning a person with a disability and their service dog to a seat with the fewest impediments (e.g., electrical boxes, entertainment and safety equipment, footrests, seat fasteners) means less chance that the service dog will injure itself or accidentally damage equipment.
- Using space under the seat or seats in front of the person with a disability may be necessary to accommodate the extremities of large and extra-large service dogs while small and medium dogs, depending on the height of the space from the floor to the seat base, may be able to use more of this space for their bodies.

- In order to be usable, the space under the seat in front of a person travelling with a service dog must be unimpeded space and must provide enough clearance to allow the dog to enter and exit this space without injury. For example, small and medium-sized dogs may typically use as much as 25.4 cm (10 inches) of the under-seat space, where the space from the floor to the underside of the seat base measures 26.67 cm (10.5 inches).
- A large dog may typically use as much as 38.1 cm (15 inches) under the seat, where the back of the seat in front slopes from 36.83 (14.5 inches) down to 26.67 (10.5 inches) at the underside of the seat base. At seats for which the space under the seat is 26.67 cm (10.5 inches) from the floor to the underside of the seat base, as much as 20.32 cm (8 inches) may be included as usable space. In this case, a minimal portion of the dog's body and its legs may fit under the seat.
- An extra large dog's legs and head may take up to 25.4 cm (10 inches) under the seat where the back of the seat in front slopes from 36.83 cm (14.5 inches) down to 26.67 cm (10.5 inches) at the underside of the seat base. At seats for which the space under the seat is 26.67 cm (10.5 inches) from the floor to the underside of the seat base, the dog's legs may partly fit in the under-seat space.
- Space under seats which provide less than the above-noted clearances may not be usable by the service dog.

Approximate Amount of Floor Space to Accommodate Persons with Disabilities and Their Service Dogs

It is recommended that carriers refer to both the weight and size measurements reflected in the following section, when determining sufficient space for a particular person and their service dog.

Small Service Dogs

Approximate weight of dogs: 7 to 11 kilograms (15 to 25 pounds)

Approximate size of dogs in standing position:

- length: 45.72 to 55.88 cm (18 to 22 inches)
- height: 20.32 to 40.64 cm (8 to 16 inches)
- width: 12.7 to 17.78 cm (5 to 7 inches)

Unimpeded floor space to accommodate a person with a disability and their service dog (area measurements) - Minimum space required: 2268 square centimetres (352 square inches)

Medium Service Dogs

Approximate weight of dogs: 12 to 25 kilograms (26 to 55 pounds)

Approximate size of dogs in standing position:

- length: 58.42 to 86.36 cm (23 to 34 inches)
- height: 38.1 to 53.34 cm (15 to 21 inches)
- width: 15.24 to 20.32 cm (6 to 8 inches)

Unimpeded floor space to accommodate a person with a disability and their service dog (area measurements) - Minimum space required: 3871 to 4903 square centimetres (600 to 760 square inches)

Large Service Dogs

Approximate weight of dogs: 26 to 39 kilograms (57 to 85 pounds)

Approximate size of dogs in standing position:

- length: 88.9 to 101.6 cm (35 to 40 inches)
- height: 53.34 to 66.04 cm (21 to 26 inches)
- width: 17.78 to 21.59 cm (7 to 8.5 inches)

Unimpeded floor space to accommodate a person with a disability and their service dog (area measurements) - Minimum space required: 4916 to 5787 square centimetres (762 to 897 square inches)

Extra-large Service Dogs

Approximate weight of dogs: 40 to 46 kilograms (88 to 100 pounds)

Approximate size of dogs in standing position

- length: 104.14 to 116.84 cm (41 to 46 inches)
- height: 63.5 to 73.66 cm (25 to 29 inches)
- width: 20.32 to 25.4 cm (8 to 10 inches)

Unimpeded floor space to accommodate a person with a disability and their service dog (area measurements) - Minimum space required: 6190 to 8681 square centimetres (959 to 1346 square inches)

Timeframe for Implementation

While this Guide generally provides information that air carriers may find useful to establish an assessment process to ensure that sufficient space is provided to a person with a disability travelling with a service dog, the Agency recognizes that carriers need time to develop and implement uniform policies in this regard.

Air carriers are to therefore implement their uniform policies in accordance with this Guide as soon as possible, but no later than December 1, 2009.

Domestic Flights

In the domestic context, this timeframe for implementation is not to be interpreted as a waiver to comply with the regulatory requirements set out at subsections 149(1) and 149(2) of the ATR, which apply to air carriers in respect of domestic services operated with aircraft that have 30 or more passenger seats.

The ATR state that on aircraft with 30 or more passenger seats, the carrier must accept a service animal (such as a service dog) for carriage without charge, provided that the animal is required by a person for assistance and is certified in writing as having been trained to assist a person by a professional service animal institution.

Furthermore, if the animal is properly harnessed in accordance with standards established by a professional service animal institution, the air carrier shall permit the animal to accompany the person on board the aircraft and to remain on the floor at the person's passenger seat.

Until uniform policies in accordance with the Guide are in place, carriers must address requests for extra space on domestic flights on a case-by-case basis to ensure compliance with subsections 149(1) and 149(2) of the ATR.

International Flights

With respect to international flights operated by Canadian air carriers with aircraft having 30 or more passenger seats, the Air Code sets out the expectation that enough floor space will be provided. This space should be sufficient to allow the dog to lie down and to ensure that the passenger and their dog can share the space safely and without extreme discomfort.

Until uniform policies in accordance with the Guide are in place, carriers must address requests for extra space on international flights on a case-by-case basis to ensure they meet the objective of section 2.6 of the Air Code.

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