



Canadian  
Transportation  
Agency

Office  
des transports  
du Canada

# Accessible Transportation —Space for Service Dogs onboard transportation equipment: A Guide

Canadian Transportation Agency

**(Draft)**

Canada 

# Table of contents

1. Purpose .....	3
2. What is considered to be a service dog.....	4
3. Obligations of carriers to transport service dogs .....	5
4. Factors to consider when determining the amount of floor space .....	6
5. Approximate amount of floor space to accommodate passengers and their service dogs .....	8
6. We're here to help.....	11
Annex A: Research and sources used to develop this guide .....	12

This is a **draft** guide in support of Phase I of the *Accessible Transportation for Persons with Disabilities Regulations* (ATDPR) which will start to come into effect on June 25, 2020.

Comments can be sent to [OTC.CETA-CEAT.CTA@otc-cta.gc.ca](mailto:OTC.CETA-CEAT.CTA@otc-cta.gc.ca) before the end of April, 2020.

# 1. Purpose

This guide provides information for air carriers and federal passenger rail, marine (ferry) and bus carriers subject to requirements in the [Accessible Transportation for Persons with Disabilities Regulations](#) (ATPDR) on the transportation of service dogs. In particular, this guide provides information useful for determining how much space is needed to transport a passenger and their service dog, including:

- What is considered to be a service dog;
- Carriers' obligations to transport service dogs;
- Factors to consider when determining the amount of floor space to transport service dogs; and
- The approximate amount of floor space required for service dogs.

Carriers not covered by the ATPDR may still have obligations for the transportation of service dogs. For more information consult *Accessible Transportation Guides introduction* available soon on the [CTA website](#).

This is not a legal document. The explanations and definitions it provides are for general guidance purposes only. The obligations for transporting service dogs can be found in the [ATPDR](#), Part 2. In case of differences between this guide and legislation or regulations, the legislation and regulations prevail.

## 2. What is considered to be a service dog

The ATPDR define a **service dog** as a dog that:

- has been individually trained by an organization or person specializing in service dog training, and
- performs a task to assist a person with a disability with a need related to their disability.

### Disability-related tasks performed by service dogs

Service dogs perform a variety of tasks to provide support in activities of daily living for a wide range of disabilities, including guiding persons who are blind; alerting persons who have hearing impairments to the presence of people or sounds, such as an alarm or telephone; pulling a wheelchair; providing assistance to persons with autism; recognizing specific changes that happen before a seizure and alerting a person; and providing assistance to a person with post traumatic stress disorder by providing a barrier against other people crowding too close to the person.

**Note:** The scope of this implementation guide is currently limited to space on transportation equipment for persons with disabilities travelling with service dogs, as defined in the ATPDR, and does not apply to the transportation of untrained emotional support animals.

The CTA is currently considering what, if anything, to require of carriers with respect to emotional support animals. The aim is to have any new rules in this area in place by summer 2021.

That said, under Part V of the Act, the CTA may, on application of a person with a disability, order a carrier to transport an emotional support animal that the person requires for their travel, and set out any related requirements.

This guide does not apply to pets. Passengers should consult an air carrier's tariff, or contact a rail, bus or marine (ferry) carrier for the applicable policy on the transportation of pets.

### 3. Obligations of carriers to transport service dogs

The ATPDR require carriers to ensure that the seat of a passenger travelling with a service dog provides sufficient floor space for the service dog to lie down at the passenger's feet in a manner that ensures the safety and well-being of the passenger and the service dog.

For more information and guidance about carriers' obligations on transporting service dogs, please see the CTA's *Accessible transportation — Service dogs: a guide* available soon on the [CTA website](#).

## 4. Factors to consider when determining the amount of floor space

The floor space must be large enough for the passenger's feet and their service dog, and sufficient to avoid causing either of them injury and ensure that they can travel in reasonable comfort. Inadequate space can result in injury to the service dog and hinder its ability to provide the disability-related assistance that the passenger needs. Insufficient space can also force the passenger to either place their feet on top of their dog or position them on either side of their dog, which can cause significant discomfort to both.

Sufficient floor space is needed for both the service dog to lie down on the floor at the seat of the passenger and for the passenger's legs and feet, while ensuring that they can both travel safely and in reasonable comfort. Some encroachment by the service dog into the passenger's floor space may be acceptable. The carrier should ensure that sufficient space will be available to allow the passenger to sit with their legs and feet in a position which will not result in discomfort or the service dog lying on the passenger's feet or legs.

Sufficient leg room is necessary at the seat of the passenger so that the service dog is positioned in front of their legs. This is to avoid the passenger having to place their legs over their service dog in a confined space which may result in injury to the passenger if the dog is startled or gets up quickly for any reason.

Objects that impede usable space — for example, electrical boxes, entertainment and safety equipment, foot rests, baggage restraint bars, and seat fasteners — affect the ability of service dogs to use the space under the seat or seats in front of the passenger. In some cases, the existence of such 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 in reasonable comfort. Assigning a passenger travelling with a service dog to a seat with the

fewest impediments means less chance that the service dog will be injured or accidentally damage the equipment causing the impediment.

Carriers should obtain the following information from a person travelling with a service dog during the reservation process:

- The size of the service dog in terms of its weight, height and length.
- Whether the passenger has any physical characteristics that may affect how the floor space at their seat will be shared with their service dog (e.g., the person has a prosthesis, long legs, or large feet or is unable to bend one or both knees).

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

- A service dog should not have to 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 for 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 for a passenger's seat to the back of the seat in front of them. The entry path must be wide enough for the service 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 food and beverage carts, feet, etc. for the safety of the service dog, other passengers and crew members.
- Using space under the passenger's seat or seats in front of the passenger 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.

## 5. Approximate amount of floor space to accommodate passengers and their service dogs

The floor space to accommodate a passenger and their service dog set out below reflects four sets of floor area measurements, based on a range of dog sizes.

The measurements indicate the approximate requirement for unimpeded space, which may include the space under a seat (or seats) in front of the passenger. However, they do not include space under the seat occupied by the passenger where there is a luggage restraint bar.

Using space under the seat or seats in front of the passenger 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 passenger 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.

Space under seats which provide less than the following clearances may not be usable by a service dog, in which case floor space which is adjacent to the passenger's seat may be needed to accommodate their dog.

- a small or medium-sized dog 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 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, 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.

Carriers should refer to both the weight and size measurements reflected below when determining sufficient space for a particular passenger and their service dog.

**Note:** Carriers are required to provide sufficient space for a service dog to lie down at the person's feet in a manner that ensures the safety and well-being of the dog and the person. The weight and the size measurements are approximate guidelines to assist carriers in meeting this obligation.

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

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

## 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 passenger 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 passenger 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 passenger 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 passenger and their service dog (area measurements) – Minimum space required: 6190 to 8681 square centimetres (959 to 1346 square inches).

**Note:** Carriers must individually assess how much floor space is needed to ensure that a service dog can travel safely. In some instances, it will not be necessary to assign extra seating to provide sufficient floor space, in which case, only one seat would be assigned to a passenger travelling with a service dog. In other cases, such as when the service dog is larger or the configuration of the transportation equipment limits the amount of unimpeded space at seats, carriers may be required to provide an extra seat in order to ensure that the floor space is sufficient.

## 6. We're here to help

For more information and guidance about accessible travel and the CTA's dispute resolution services, please contact us at [info@otc-cta.gc.ca](mailto:info@otc-cta.gc.ca).

# Annex A: Research and sources used to develop this guide

This guide uses information and data gathered from Canadian air carriers and professional service dog training institutions. The information and data gathered from the air carriers were also appropriate for developing guidance applicable to federal passenger rail, bus and marine (ferry) carriers.

The data related to several issues, including:

- the factors taken into consideration by carriers when determining which seat to assign to a passenger travelling with a service dog; and
- the typical floor space dimensions at passenger seats.

Information was obtained from training institutions about:

- the size and physical characteristics of the breeds of dogs typically used as service dogs;
- estimated dimensions for floor space (length, width and height) needed by dogs to lie down and manoeuvre;
- the impact of the duration of a trip on a service dog's ability to remain sitting or lying down at the passenger's seat; and
- factors that should be considered when assigning seating for a passenger with a disability travelling with a service dog.

This guide also reflects measurements taken of various sizes of dogs and of floor space used by representatives from service dog training organizations and service dogs seated at different seats.

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.