

Recognised assistance dogs: Call for evidence

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Recognised assistance dogs: Call for evidence

1. The CAA is calling for evidence regarding the carriage of assistance dogs by air. The CAA is seeking evidence to assist its understanding of the issues faced by assistance dog users in relation to the carriage of their assistance dogs by air, as well as those faced by the organisations required by law to facilitate their carriage, namely airlines and airports. The CAA is also seeking evidence on the principles for a framework that could be designed to recognise assistance dogs.

Background

2. The CAA is the National Enforcement Body for Regulation EC1107/2006¹ (the Regulation), concerning the rights of disabled persons and persons with reduced mobility when travelling by air. Under the Regulation, it is the responsibility of airports to facilitate the handling of 'recognised assistance dogs' through the airport. Further, it is the responsibility of airlines to carry 'recognised assistance dogs' in the cabin (subject to national regulations). Neither of the terms 'recognised assistance dog' or 'assistance dog' are defined in the Regulation.

The definition of a disabled person

3. Under the Equality Act 2010 (the Equality Act), a person is disabled if they have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to carry out normal daily activities.
4. Article 2(a) of the Regulation defines a disabled person or a person with reduced mobility as any person whose mobility when using transport is reduced due to any physical disability (sensory or locomotor, permanent or temporary), intellectual disability or impairment, or any other cause of disability, or age, and whose situation needs appropriate attention and the adaptation to his or her particular needs of the service made available to all passengers.
5. In the CAA's view, both of these definitions cover a broad range of conditions. Under the Regulation, disabled people and those with reduced mobility 'self-identify' as needing assistance. There is no requirement for people that require assistance to prove that they have a disability.

The definition of an assistance dog

6. In the context of accessing taxis and private hire vehicles, the term 'assistance dog' is defined in the Equality Act as a dog trained to guide a blind person or to

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32006R1107&from=EN>.

assist a deaf person, or a dog which has been trained by a prescribed charity² to assist a disabled person with a particular type of disability³ or a dog of a prescribed category⁴ which has been trained to assist a disabled person who has another type of disability.

7. Although this definition is provided in the context of accessing taxis and private hire vehicles, in the CAA's view it is a useful guide for the types of dog that should be considered to be an 'assistance dog'.
8. The Equality and Human Rights Commission (EHRC) provides a guide for businesses⁵ on assistance dogs to assist businesses to understand what they can do to comply with their legal duties under the Equality Act. The guide states that "thousands of disabled people rely on an assistance dog to help them with day to day activities that many people take for granted". It goes on to state that assistance dogs help not only blind people, but that they are "trained to help people with hearing difficulties, epilepsy, diabetes, physical mobility problems and more". Further, the guide states that assistance dogs "carry out a variety of practical tasks for people as well as supporting their independence and confidence". Finally, the guide makes clear that assistance dogs "are not pets and are treated as 'auxiliary aids'".
9. In the CAA's view, it is clear that the Equality Act meaning of an assistance dog is not intended to cover pet dogs, whether the owner of the dog has a disability or not. Neither is it intended to cover 'emotional support dogs'⁶ for people that do not have a disability. In the CAA's view, an assistance dog is defined by its role, which is to assist a disabled person so that they can carry out normal daily activities.

Assistance dogs and air travel

10. As set out above, the Regulation makes it the responsibility of airports to facilitate the handling of 'recognised assistance dogs' through the airport. Further, it makes it the responsibility of airlines to carry 'recognised assistance dogs' in the cabin (subject to national regulations).

² To the CAA's knowledge, no specific charities have been so prescribed by the Secretary of State.

³ The Equality Act sets out the type of disability as one that consists of epilepsy or otherwise affects the person's mobility, manual dexterity, physical co-ordination or ability to lift, carry or otherwise move everyday objects.

⁴ To the CAA's knowledge, no categories of dog have been so prescribed by the Secretary of State.

⁵ <https://www.equalityhumanrights.com/sites/default/files/assistance-dogs-a-guide-for-all-businesses.pdf>.

⁶ That is, dogs that are not specifically trained to assist their owner, but rather whose general role is to provide comfort for their owner and promote emotional wellbeing.

11. A definition of a recognised assistance dog was previously included in ECAC⁷ Doc 30 Section 5⁸, which defined it as a dog that has been trained to assist a disabled person by an organisation that is a member of Assistance Dogs International (ADI) and/or the International Guide Dog Federation (IGDF). This definition was referenced in the CAA's Safety Notice SN-2015/001 on the Carriage of Assistance Dogs in the Aircraft Cabin (issued 20 May 2015). However, the definition of a recognised assistance dog has since been removed⁹ from ECAC Doc 30 Section 5 (12th edition, May 2018) and the CAA's Safety Notice regarding the carriage of recognised assistance dogs was withdrawn altogether in April 2018.
12. It is the CAA's understanding that, in practice, many airlines are continuing to apply the previous ECAC definition of a recognised assistance dog (i.e. limited to dogs trained by organisations that are members of either IGDF or ADI). However, the removal of the definition from ECAC Doc 30 brings into question the legal basis of such a restriction. Further, it could be argued that such a restriction is contrary to a 'purposive' interpretation of the Regulation. On this last point, it is important to note that the Regulation states that disabled persons and persons with reduced mobility should have the same rights as all other citizens to free movement, freedom of choice and non-discrimination and therefore that they should "be accepted for carriage and not refused transport on the grounds of their disability or lack of mobility, except for reasons which are justified on the grounds of safety and prescribed by law" [emphasis added]. To the CAA's knowledge, there are no such laws¹⁰ applicable in the UK covering the carriage of assistance dogs.

⁷ ECAC is the European Civil Aviation Conference and is an intergovernmental organisation which seeks to harmonise civil aviation policies and practices amongst its Member States, including the UK, and to promote understanding on policy matters between its Member States and other parts of the world. ECAC produces a variety of guidance and codes of conduct covering air transport.

⁸ The latest version of ECAC Doc 30 can be found here: <https://www.ecac-ceac.org/documents/10189/51566/Doc+30+Part+I+12th-Dec+2018-Amdt1-final.pdf/7f35c0b7-9f18-48cb-aca0-aaed0a84f2a2>

⁹ It is the CAA's understanding that the definition was removed at the request of other ECAC members that did not consider it to be compatible with their domestic arrangements.

¹⁰ It should be noted that, through guidance issued by the European Aviation Safety Agency on compliance with aviation safety legislation (Commission Regulation (EU) No 965/2012, which lays down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council), it is recommended that the number and categories of Special Categories of Passengers (SCPs), which includes disabled and less mobile passengers (as well as infants and unaccompanied children, deportees, inadmissible passengers, or prisoners in custody), should not exceed the number of passengers capable of assisting them in case of an emergency.

13. It is difficult to establish the extent to which this issue is impacting on disabled people, in particular because data on the number of owners of non-IGDF/ADI assistance dogs in the UK is not readily available. Even if it was, it would be difficult to establish the proportion of these owners that have been, or would be, impacted by a restriction to air travel based on IGDF/ADI trained assistance dogs. However, since the removal of the IGDF/ADI definition from ECAC Doc 30, the CAA has seen a number of examples where disabled passengers with non-IGDF/ADI trained assistance dogs have been refused travel by the airline.

Assistance dogs in other EU Member States

14. As part of developing this call for evidence, the CAA has contacted other National Enforcement Bodies responsible for the Regulation to understand how they interpret the requirements in the Regulation for airports to ground handle recognised assistance dogs and for airlines to carry recognised assistance dogs in the cabin (subject to national regulations).
15. To date, the CAA has received responses from the Austrian, German, Swiss, Spanish, and Portuguese authorities. In summary, the Austrian, German, and Swiss authorities take a relatively similar approach to the issue overall. Each of these authorities takes the view that a general restriction limiting recognised assistance dogs to those trained by an organisation that is a member of IGDF and/or ADI would not be considered in their country to be compliant with the Regulation.
16. In the case of Germany and Switzerland, there is currently no national scheme for recognising assistance dogs for the purpose of the Regulation. Both national authorities consider that dogs trained by organisations that are members of either IGDF or ADI should be considered to be recognised assistance dogs under the Regulation. However, for all other assistance dogs, both national authorities take the view that airlines must make an assessment on a case-by-case basis of whether an assistance dog should be accepted as a recognised assistance dog. Both the German and Swiss authorities consider that this assessment should take into account whether the dog in question has been specifically trained to support the disabled person in their daily life and whether the training covered the behaviour of the dog in the context of public transportation / flights.
17. The German authority referred specifically to the provision of information by the disabled person as part of the pre-notification process. In the view of the German authority, the disabled person should be ready to submit documents verifying the specific function of the assistance dog and that the dog is obedient, calm and trained to be carried in public transport. Further, if the assistance dog is trained by a training organisation, then the disabled person should be prepared to

provide information on the training rules, standards, etc, of the training organisation.

18. In its response, the Austrian authority referred to the work of the Messerli-Research Institute (University of Veterinary Medicine in Vienna), which was commissioned by the Federal Ministry of Labour, Social Affairs, Health and Consumer Protection to carry out examinations of assistance dogs and to issue a certificate upon the successful completion of the assistance dog examination. In the view of the Austrian authorities, assistance dogs that have been certified in accordance with these national standards should be considered to be recognised assistance dogs under the Regulation.
19. The situation in Spain is substantively different from that in the UK (and in other countries such as Austria, Germany and Switzerland) in that the Spanish language version of the Regulation refers only to assistance dogs for people with visual impairments. The Portuguese authority reported that, to date, it has not needed to establish a specific policy for recognised assistance dogs as the existing arrangements in that country have not led to any issues as reported by disabled passengers or airlines.

The main issues, risks and opportunities

20. Given the lack of clarity in the UK around the types of assistance dogs that are permitted to travel in the cabin with their disabled owners, establishing a new definition for a recognised assistance dog would be a welcome development in that it would provide more certainty to disabled people, airports and airlines about their rights and obligations. The scope of such a definition would align with the scope of the CAA's regulatory role under the Regulation – i.e. it would cover UK airports, all flights departing the UK, and all flights returning to the UK from outside the EU on an EU airline.
21. This is a complex issue and encompasses the interests of a number of parties including assistance dog users, assistance dog training organisations, airlines, airports, government departments and agencies, as well as other passengers travelling by air. As well as the legal obligations surrounding the carriage of assistance dogs by air, there are also a number of practical issues that need to be taken into account.
22. Given this, the CAA considers that it is important to identify the main issues, risks and opportunities that would be presented in seeking to develop a new definition for a recognised assistance dog. These are covered below.

Opportunity – access

23. Clearly, a proportion of assistance dog users would benefit from there being a broader definition for a recognised assistance dog (i.e. broader than assistance dogs trained by organisations that are members of either IGDF or ADI). Although

it is not possible to establish the extent of this benefit, it is likely to be significant for those individual assistance dog users that currently cannot travel due to airlines applying a narrower definition.

Opportunity – clarity

24. As set out above, the definition of a recognised assistance dog under the Regulation is currently unclear. Clarifying it would help assistance dog users to understand whether they can travel by air with their assistance dog (and, if not, what they would need to do in order to put themselves in a position where they could travel by air). Further, it would assist airlines and airports in identifying the assistance dogs that they are required to handle and carry by air under the Regulation and those that they are not.

Risk – safety

25. As explained above, to the CAA's knowledge there are no laws applicable in the UK justifying the refusal to carry disabled passengers with assistance dogs on the basis of safety¹¹. However, from a safety perspective it is important that flight and cabin crew are able to perform their required duties. It is conceivable that a poorly trained/behaved assistance dog could impede cabin crew in performing their required duties, for example because crew have to divert their attention to the assistance dog and/or owner due to the poor behaviour of the dog. A worst-case scenario would be where the assistance dog bites a member of the crew or another passenger.

Risk – abuse of the system

26. If the definition of a recognised assistance dog was expanded in an uncontrolled way, it is possible that individuals, in particular non-disabled people, would exploit the system to allow them to travel with their pet dogs. This would have two impacts. First, airlines and airports would be denied the revenue which they currently receive from transporting and handling pet dogs. Second, and more importantly, this sort of abuse could bring into disrepute the system for allowing assistance dogs to travel by air. Noting the risks covered above relating to the behaviour of dogs on board, this risk could be exacerbated by a small number of instances of bad dog behaviour on board an aircraft. Although there is no guarantee that this would come to pass, the risk of abuse should be taken into account in considering any new definition for a recognised assistance dog.

Risk – access for disabled people

27. The definition of a recognised assistance dog should not directly or indirectly exclude disabled people with certain disabilities. On a practical level, this issue is

¹¹ Although assistance dogs do have to be secured safely once on board.

most likely to arise in relation to the training of the assistance dog and whether there is a requirement to have the dog's behaviour assessed. For example, any disabled person seeking to have their assistance dog recognised should be able to easily understand what is required of them and their assistance dog in terms of training and assessment. Further, the design of any requirements on training and assessment would need to take into account the importance of being as easily available as possible for disabled people across the UK, as well as the importance of being as cheap as possible, whilst still being robust and high quality.

Risk – complexity for airlines

28. Under the Regulation, it is the responsibility of airlines, their agents and tour operators to collect and record information from disabled passengers on their assistance needs. This will include information on whether the disabled passenger is seeking to travel with their assistance dog. It is important, therefore, that the definition of a recognised assistance dog is such that it is relatively straightforward for airlines to assess whether a particular assistance dog is 'recognised' or not¹². This would keep costs down for airlines (and ultimately passengers), would ensure consistent treatment within and across different airlines, and should help in building support from airlines for any new definition.

Risk – comfort of other passengers

29. It is important to acknowledge that, when assistance dogs travel on board aircraft, they will be in close proximity to other passengers, in a small space, potentially for quite a long period. Although there are no regulatory requirements covering the comfort of other passengers, the CAA considers that this is still an important consideration. As with the safety risk above, it is conceivable that a poorly trained/behaved assistance dog could cause discomfort for other passengers, for example by fouling on board the aircraft, which could undermine public support for the carriage of assistance dogs. Further, there is a risk that greater numbers of assistance dogs travelling by air could increase the health risk for passengers that are allergic to dogs.

Risk – inconsistency

30. DEFRA has certain statutory responsibilities in respect of the biosecurity and welfare of animals, including when carried by air. National regulations exist covering these issues, specifically for aviation the Non-Commercial Movement of Pet Animals Order 2011 (the Order). Under the Order it is an offence for an airline to carry a pet into Great Britain without an approval (the Required Method

¹² In this context, the previous ECAC definition of a recognised assistance dog had the advantage of being clear and simple to apply.

of Operation, or RMOP), except in cases where the airline is a Community air carrier and the dog is a 'recognised assistance dogs'¹³. However, as with the Regulation, there is no definition of a 'recognised assistance dog' in the Order^{14,15}.

31. It is important, therefore, that any new definition of a recognised assistance dog takes into account the views of DEFRA, as well as other government departments, especially the Department for Transport (which is currently developing its Aviation Strategy), and the Department for Work and Pensions / Office for Disability Issues (which had recently been facilitating a working group looking at public access for assistance dogs).

Principles for a new definition for a recognised assistance dog

32. Having had regard to the opportunities and risks identified above, the CAA considers that a number of high-level principles emerge for the development of a new definition for a recognised assistance dog under the Regulation. These are:
 1. The definition, and its implications for assistance dog users wishing to travel by air, should as far as possible be clear and easy to understand.
 2. The definition should distinguish genuine assistance dogs (those assistance dogs whose role it is to assist a disabled person) from pet dogs and emotional support dogs.
 3. The definition should reflect an appropriate standard of dog training and / or behaviour, relevant for the airport and aircraft cabin environment.
 4. The requirements on dog training and / or behaviour should be designed so that, as far as possible:
 - a) they do not directly or indirectly exclude disabled people, whether due to their disability, location within the UK, socio-economic status, or any other factor; and
 - b) they are simple to administer, such that is relatively straightforward for an assistance dog user to demonstrate to an airline that their dog is 'recognised'.
33. In addition to these principles, the CAA considers that a thorough consultation should also take place as part of the development of a new definition. This

¹³ It also does not apply in cases where the pet is being moved from the Republic of Ireland.

¹⁴ The Order states that 'recognised assistance dog' has the same meanings as in Regulation (EC) No 1107/2006.

¹⁵ DEFRA has been considering the issue but has decided not to seek to develop its own definition of a recognised assistance dog.

consultation should include all relevant stakeholders, including assistance dog users, assistance dog training organisations (and dog training organisations and experts more generally), airlines, airports, and government departments and agencies.

Call for evidence

34. The CAA is calling for evidence regarding the carriage of assistance dogs by air. The CAA is seeking evidence to assist its understanding of the issues faced by assistance dog users in relation to the carriage of their assistance dogs by air, as well as those faced by the organisations required by law to facilitate their carriage, namely airlines and airports. The CAA is also seeking evidence on the principles for the development of a new definition for a recognised assistance dog under the Regulation.
35. In particular, the CAA is keen to receive information from assistance dog users, assistance dog training organisations, dog training organisations and experts more generally, airlines, airports, and government departments and agencies.
36. There are a number of questions for each of these particular stakeholders and these are set out in Appendix A.

How to respond

37. Please provide your submissions to consumerenforcement@caa.co.uk by Friday 10 January 2020.
38. In your submission, please provide the following:
 - Your name or that of your organisation;
 - The nature of your interest in this area (in particular if you are an assistance dog user or an assistance dog organisation or charity);
 - Whether you would be prepared to be contacted directly by the CAA in relation to this issue (and, if so, the best method for the CAA to contact you);
 - Whether you would be content for the contents of your submission to be made public by the CAA;
 - If you are an assistance dog organisation or charity, and you have a public facing presence such as a website or via a social media platform, please also provide the details of this in your submission.

APPENDIX A

Questions for stakeholders

All stakeholders

We request that the following questions are answered by all stakeholders.

Q1 – Please specify whether you are an assistance dog user, an assistance dog training organisation, a dog training organisation or a dog training / behaviour expert, an airline or an airport, or a government department or agency.

Q2 – Referring to paragraphs 21 to 31 above, has the CAA identified the main risks and opportunities that would be presented in seeking to develop a new definition for a recognised assistance dog?

Q3 – Referring again to the main risks and opportunities presented in paragraphs 21 to 31 above, is the CAA's assessment of the nature and magnitude of these risks and opportunities correct?

Q4 – Referring to paragraphs 3 to 5 above, do you think that permitting airlines to request proof of disability from individuals seeking to travel with their assistance dogs would assist in mitigating any of the risks identified in paragraphs 21 to 31 above (in particular paragraph 26, which covers the risk of the system being abused)? If so, what form of proof do you consider would be appropriate (e.g. a letter from a doctor or other medical / health professional)?

Q5 – Referring to paragraphs 3 to 5 above, as well as paragraph 13 concerning the safety guidance on the limits on the numbers of disabled and less mobile passengers that can be carried on a flight, do you think that permitting airlines to limit the numbers of assistance dogs on a flight would assist in mitigating any of the risks identified in paragraphs 21 to 31? If so, what do you think this limit should be?

Q6 – Although the well-being of assistance dogs has not been considered in this call for evidence, do you think that this is a relevant consideration? If so, do you think that permitting airlines to limit assistance dog users to e.g. only short-haul (or mid-haul) flights would be appropriate. If so, do you consider that this would assist in mitigating any of the risks identified in paragraphs 21 to 31 above?

Q7 – Referring to paragraphs 6 to 9 above on the definition of an assistance dog, do you agree that neither pet dogs (whether the owner of the dog has a disability or not) nor 'emotional support dogs' (for people that do not have a disability) should be considered to be assistance dogs for the purpose of defining a recognised assistance dog under the Regulation? Please explain why.

Q8 – Referring to paragraph 32, is the CAA’s assessment correct in terms of the high-level principles that should apply for the development of a new definition for a recognised assistance dog under the Regulation?

Assistance dog users

We request that the following questions are answered by assistance dog users.

Q1 – Was your assistance dog supplied and / or trained by an organisation that is a member of either IGDF or ADI? If not, please provide the name of the organisation the supplied and / or trained your assistance (or specify ‘owner-trained’ if you trained your assistance dog yourself).

Q2 – If your assistance dog was not supplied and / or trained by an organisation that is a member of either IGDF or ADI, or if your assistance dog is owner-trained:

- a) Please describe any behavioural training that your dog has received and any assessments or evaluations of the behaviour of your assistance dog.
- b) Please describe how your dog behaves in busy public environments and in confined spaces on public transport (e.g. buses, trains, etc).
- c) Please provide your views on whether this behavioural training (and any assessments or evaluations of your assistance dog’s behaviour) would be relevant and appropriate for the airport and aircraft cabin environment.

Q3 – Have you ever taken, or tried to take, your assistance dog on a flight from the UK? If so, what was your experience? (To the extent possible, please describe your experience from the point of selecting and booking your flight, travelling through the airport, and on-board the flight).

Q4 – Have you ever taken, or tried to take, your assistance dog on a flight from another Member State in the EU? If so, what was your experience? (To the extent possible, please describe your experience from the point of selecting and booking your flight, travelling through the airport, and on-board the flight).

Q5 – Have you ever been unable to travel by air due to your assistance dog not being ‘recognised’ by the airline under the definition of a ‘recognised assistance dog’? If so, please describe your experience.

Q6 – If you have experience of travelling by air with your assistance dog, please provide your views on the provisions made at the airport so that you could travel with your dog (e.g. spending areas, drinking water, etc) as well as on-board the aircraft (e.g. the appropriateness of the seating, the availability of a suitable harness for securing your dog, etc). Please also provide your views on how well airports and airlines provide information on these the availability of these provisions.

Assistance dog training organisations

We request that the following questions below are answered by organisations, including charities, that have an involvement in providing and / or training assistance dogs for disabled people.

Q1 – How many assistance dogs does your organisation provide and / or train each year? Please provide an estimate of the number of disabled people have an assistance dog trained by your organisation.

Q2 – Please describe the assistance dog training that your organisation provides. Please specify whether this training includes any behavioural training for the dog that would be relevant and appropriate for the airport and aircraft cabin environment (and if so, why).

Q3 – Please describe any assessments or evaluations that your organisation performs that would be relevant and appropriate for the airport and aircraft cabin environment (and if so, why).

Q4 – Are you aware of any other behavioural training programmes for dogs, or assessments or evaluations of dog behaviour, that would be relevant and appropriate for the airport and aircraft cabin environment? If so, please provide further details.

Dog training organisations and dog training / behaviour experts

We request that the following questions are answered by organisations and individual experts involved in the behavioural training of dogs, including the setting of training standards for dog behaviour.

Q1 – Please describe the dog training that your organisation provides. Please specify whether this training includes any behavioural training for the dog that would be relevant and appropriate for the airport and aircraft cabin environment (and if so, why).

Q2 – Please describe any assessments or evaluations that your organisation performs that would be relevant and appropriate for the airport and aircraft cabin environment.

Q3 – Are you aware of any other behavioural training programmes for dogs, or assessments or evaluations of dog behaviour, that would be relevant and appropriate for the airport and aircraft cabin environment? If so, please provide further details.

Airlines

We request that the following questions are answered by airlines.

Q1 – What definition do you currently apply for a ‘recognised assistance dog’ under the Regulation?

Q2 – Are you required to, or do you choose to, apply a different definition for a ‘recognised assistance dog’ for flights to or from another EU Member State? If so, what definition do you apply?

Q3 – Approximately how many recognised assistance dogs do you carry each year (i.e. carry in the cabin as required by the Regulation).

Q4 – Approximately how many dogs do you refuse to carry each year (i.e. carry in the cabin as required by the Regulation) on the basis that the dog does not meet your interpretation of the definition of a recognised assistance dog?

Q5 – Are you aware of any behavioural training programmes for dogs, or assessments or evaluations of dog behaviour, that would be relevant and appropriate for the airport and aircraft cabin environment? If so, please provide further details.

Airports

We request that the following questions are answered by airports.

Q1 – Approximately how many recognised assistance dogs do you ground handle each year (i.e. ground handle as required by the Regulation)?

Q2 – Approximately how many dogs do you refuse to ground handle each year (i.e. ground handle as required by the Regulation) on the basis that the dog does not meet your interpretation of the definition of a recognised assistance dog?

Q3 – Are you aware of any behavioural training programmes for dogs, or assessments or evaluations of dog behaviour, that would be relevant and appropriate for the airport and aircraft cabin environment? If so, please provide further details.

Government departments and agencies

We request that the following questions below are answered by Government departments and agencies.

Q1 – Please describe the nature of your interest in this area, with reference to any legislation, regulations, rules and / or guidance relevant to your organisation in relation to assistance dogs.

Q2 – If a new definition for a recognised assistance dog under the Regulation was to be proposed by the CAA, how would this impact the work of your organisation? Specifically, what action (if any) would your organisation have to take in order for disabled people to benefit from any new definition.

Q3 – Are you aware of any behavioural training programmes for dogs, or assessments or evaluations of dog behaviour, that would be relevant and appropriate for the airport and aircraft cabin environment? If so, please provide further details.