



**UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, DC**

**CARRIAGE OF SERVICE ANIMALS IN AIR TRANSPORTATION INTO THE
UNITED KINGDOM AND FOREIGN HEALTH DOCUMENTATION
REQUIREMENTS FOR SERVICE ANIMALS IN AIR TRANSPORTATION**

NOTICE

July 17, 2007

This notice provides further guidance for airlines and the traveling public regarding the obligation of airlines under the Air Carrier Access Act (ACAA) and its implementing regulation 14 CFR Part 382 (Part 382) to transport service animals into the United Kingdom (U.K.). In addition, this notice addresses the general question of whether carriers may require health documentation for carriage of service animals on flights from the U.S. into countries other than the U.K. On February 26, 2007, the U.S. Department of Transportation's Aviation Enforcement Office issued a guidance document to assist carriers and passengers with disabilities in complying with both U.S. and U.K. regulations concerning the transport of service animals on flights from the U.S. to the U.K. by: 1) explaining the procedures passengers must follow to comply with the U.K.'s Pet Travel Scheme (PETS); 2) explaining the procedures U.S. and foreign carriers must follow to obtain an approved Required Method of Operation (RMOP) from the U.K.'s Department for Environment Food and Rural Affairs (DEFRA); and 3) notifying both U.S. and U.K. carriers operating flights between the U.S. and the U.K. that failure to obtain an approved RMOP from DEFRA will be considered a violation of the ACAA by the Department's Aviation Enforcement Office and may subject such carriers to enforcement action.¹

The purpose of this notice is to respond to inquiries from airlines and the traveling public since issuance of the February notice regarding foreign requirements for health

¹ 72 FR 8268, Guidance Concerning the Carriage of Service Animals in Air Transportation into the United Kingdom (February 26, 2007).

documentation for service animals and the transport into the U.K. of PETS-compliant service animals in the cargo hold of aircraft. These questions involve, among other issues, the responsibilities of carriers when a service animal is not suitable for in-cabin transport either because the animal is too large or does not behave appropriately. As a result of these and other questions, including those raised on our own initiative, we are issuing this further notice, which updates and expands upon advice previously provided airlines and the public about the carriage of service animals in air transportation from the U.S. to the U.K. This guidance is being provided in a question-and-answer format to assist readers in understanding the various issues involved.

Questions and Answers

1. What is a PETS-compliant service animal?

A service animal is PETS-compliant when the passenger can demonstrate that the animal meets the U.K.'s animal health requirements for entry into the U.K. (i.e., it has an embedded microchip ID, it has had a rabies vaccination, a rabies anti-bodies blood test no earlier than 6 months prior to the animal's entry into the U.K., and treatment against certain parasites), and possesses either a European Union (EU) pet passport or a third country official veterinary certificate documenting that these health requirements have been met. Under PETS, only dogs, cats and ferrets that meet these requirements may be transported into the U.K. from outside the EU without a 6-month quarantine upon arrival.

2. When may a PETS-compliant service animal be refused transport in the cabin on flights to the U.K.?

Under the ACAA and Part 382, a PETS-compliant service animal² that poses a significant risk to the health or safety of passengers or airline personnel or causes a significant disruption to cabin service may be denied transport in the aircraft cabin on flights from the U.S. to the U.K. Examples would be a PETS-compliant service animal which, due to its size, protrudes into or blocks the main cabin aisle(s) in violation of safety regulations, or an animal that barks or growls frequently or manifests other aggressive or disruptive behavior. In those instances, before deciding to exclude the animal from the cabin, carriers should first seek to eliminate or mitigate the significant risk to health or safety or the significant service disruption (e.g., offering the passenger a

² As discussed in the February notice, under the ACAA non-U.K. carriers must accept PETS-compliant service dogs and service cats in the cabin on flights into the U.K., and all U.K. carriers must accept PETS-compliant guide and assistance dogs in the cabin on flights into the U.K. In addition, carriers may accept PETS-compliant ferrets as service animals for transport either in the cabin or cargo hold at their option, but may decline to transport ferrets as service animals only if they generally exclude them as pets.

different seat in the same class of service where the animal will not block the aisle or create an obstruction, offering a passenger the option of traveling on a later flight, or muzzling a dog that barks frequently).

3. *What happens if a PETS-compliant service animal cannot be accommodated in the cabin on flights to the U.K.?*

If a PETS-compliant service animal cannot be accommodated in the cabin and there is a passenger-provided International Air Transport Association (IATA)-approved container (kennel) in which to transport the animal, the carrier must transport the animal in the cargo hold, but only if the carrier can ensure its safe passage in the cargo hold.

4. *When a PETS-compliant service animal must be transported in the cargo hold on a flight to the U.K., who is responsible for providing the IATA-approved kennel?*

The passenger is responsible for providing an IATA-approved kennel in order for his or her service animal to be transported in the cargo hold in accordance with U.K. regulations on flights into the U.K.

5. *What are the responsibilities of carriers to ensure that the carriage of a service animal in the cargo hold is done in accordance with U.K. regulations?*

The carrier is responsible for:

- a) Establishing procedures in its Required Method of Operation (RMOP) specifically addressing how a PETS-compliant service animal will be checked in, routed to the cargo area, transported in an IATA-approved kennel in the cargo hold, and moved to the inspection facility upon arrival in the U.K.;
- b) Obtaining DEFRA's approval of this RMOP. (Carriers may address the procedures for cargo and in-cabin transport either in the same RMOP or in separate RMOPs);
- c) Transporting the service animal in the passenger-provided IATA-approved kennel with the animal's PETS documentation affixed to the kennel as prescribed by DEFRA; and
- d) Following the procedures outlined in the approved RMOP for transporting a service animal in the cargo hold.

6. *What step(s) should carriers take to help ensure passengers with a PETS-compliant service animal are able to travel to the U.K. with their animal in the cargo hold if the animal cannot be accommodated in the cabin?*

During the reservations process, carriers should notify any individual indicating that he/she will be traveling with a service animal on a flight to the U.K. that if the animal would pose a significant threat to the health or safety of others or cause a significant disruption to cabin service that cannot be eliminated or mitigated (e.g., obstructing an aisle or other area that must remain unobstructed in order to facilitate an emergency evacuation, frequent barking when no muzzle is available, or displaying threatening behavior, such as by growling), then the animal will not be accommodated in the cabin. The carrier should also inform the passenger that in those circumstances, if the passenger wishes for the animal to travel in the cargo hold rather than be excluded from the flight, he/she must provide the carrier an IATA-approved kennel in which to transport the animal. Carriers can provide this notice during the reservations process by referring the passenger to its website where the information is posted, by sending the information to the passenger in an e-mail, or by telephone.

7. *What happens when the carrier cannot accommodate a PETS-compliant service animal in the cabin on a flight into the U.K. and the passenger does not have an IATA-approved kennel with him/her or does not wish to be separated from his/her service animal during flight?*

The Aviation Enforcement Office strongly encourages carriers to assist in making alternate travel arrangements for any passenger who is unable to travel on his/her scheduled flight until he/she can obtain an IATA-approved kennel for his/her service animal. The Office encourages similar action by carriers for any passenger who does not wish to be separated from his/her service animal during flight. Although not required, the Aviation Enforcement Office strongly encourages carriers to allow any such passenger who wishes to rebook on a different flight to the same destination, to do so at the same fare.

8. *What happens if the carrier cannot accommodate a PETS-compliant service animal either in the cabin or the cargo hold on a flight into the U.K.?*

The carrier should provide a full refund upon request to any passenger whose PETS-compliant service animal cannot be accommodated in the cabin (e.g., the animal is too large) or in the cargo hold (e.g., cargo hold temperature is outside the limits permitted for live animal transport, or the passenger does not have an IATA-approved kennel in which to transport the animal). In the alternative, the carrier should allow the passenger to travel with his or her PETS-compliant service animal on a later flight. The Aviation

Enforcement Office would consider it to be a violation of the law if a carrier refuses to provide a full refund or accommodate the passenger and his or her service animal on a later flight where the service animal can be accommodated safely either in the cabin or cargo hold.

9. *What steps should passengers take to ensure that they are able to travel to the U.K. with their service animal in the cargo hold if the animal cannot be accommodated in the cabin?*

A passenger can help ensure that he/she will be able to travel to the U.K. with his/her service animal in the cargo hold if it cannot be accommodated in the cabin by:

- a) Notifying the airline well in advance of the date that he/she will be traveling with a service animal;
- b) Asking the carrier for information about its policy on transporting animals in the cargo hold, including what is needed to ensure the animal's safe passage in the cargo hold and any restrictions for cargo travel that might apply (e.g., temperature conditions that limit live animal transport); and
- c) Having a back-up plan in place to ensure that his/her service animal can meet the requirements for transport in the cargo hold on the day of travel (i.e., have an IATA-approved kennel available) should the animal pose a significant threat to the health or safety of others such that the carrier is unable to accommodate it in the cabin.

10. *May carriers require health documentation for carriage of a service animal on flights from the U.S. into countries other than the U.K.?*

It is the position of the Aviation Enforcement Office that carriers may require health-related documentation (e.g., veterinary records) for service animals on flights into a country where the carrier is required by that country's law to ensure that animals transported by the carrier into that country are in compliance with the animal health requirements necessary for entry into the country.

Questions regarding this notice may be addressed in writing to Kathleen Blank Riether or Blane Workie, Office of the Assistant General Counsel for Aviation Enforcement and Proceedings, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590, or they may be contacted by telephone at (202) 366-9342 or by email at kathleen.blankriether@dot.gov or blane.workie@dot.gov, respectively.

By:

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Dated:
(SEAL)

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