

ENAC GUIDELINES ON THE CARRIAGE OF PETS IN CABIN ABOVE 8 KG

(Courtesy Translation)

Introduction

This document updates the Guidelines approved by ENAC Management Board Resolution No. 25/2025 of 12 May 2025, reflecting recent developments in ENAC's initiative on the welfare of companion animals (PETs) in air transport, the initial expressions of interest received from national operators, the adoption of alternative means of compliance, and the demonstration activities conducted during commercial flights.

Animal welfare, recognized as a fundamental value both at European and national level, is now an integral part of the legal and social frameworks of reference.

In this context, ENAC has issued these Guidelines to provide air operators with a reference framework for developing operational procedures that progressively enable the carriage of PETs exceeding the current weight limits in passenger cabins, while ensuring adherence to safety requirements, passenger compatibility, and animal welfare.

Regulatory Framework

Italy, through the constitutional reform introduced by Constitutional Law No. 1 of 11 February 2022, added a third paragraph to Article 9 of the Constitution: *'State law regulates the ways and forms of protection of animals'*. This amendment elevated animal protection to a primary value within the legal system, assigning central importance to their safeguarding and establishing an absolute ban on mistreatment as a fundamental right. It aligns with the Treaty of Lisbon (2009), which introduced specific obligations for animal protection into the European Union legal framework.

This principle is further reinforced by the provisions of the Penal Code (Articles 544-ter and 727), which provide penalties for anyone who mistreats or abandons animals.

In light of this framework, the technical rules issued by EASA, integrated with procedures adopted by air carriers, should be interpreted consistently with the general principle of protection enshrined in the Constitution.

The carriage of pets in passenger cabins is regulated by Regulation (EU) 965/2012 and the IATA Live Animals Regulations (LAR), to which additional restrictions established by individual carriers may be added.

In particular, Article CAT.OP.MPA.160 of Regulation (EU) 965/2012 establishes that only hand baggage that can be safely stowed may be brought into the cabin, and that any object potentially hazardous in case of displacement must be placed in appropriate compartments. The corresponding AMC2 specifies that:

- In aeroplanes, the presence of live animals in the cabin is permitted only for PETs up to 8 kg and for guide dogs;
- For both aeroplanes and helicopters, the load must in no case obstruct passenger evacuation or the crew's field of vision.

The AMCs are designed to demonstrate compliance with regulations for commercial air transport (CAT), unless the National Authority authorises alternative methods, which must be communicated to EASA for subsequent verification (Reg. EU 965/2012, ARO.GEN.120).

The regulatory framework also includes:

- Regulation (EC) 1107/2006, safeguarding the right of passengers with disabilities or reduced mobility (PRM) to travel with a guide dog;
- IATA LAR Guidelines, which establish international operational standards;
- ICAO Doc. 9984, which applies exclusively to assistance animals.

In view of the 2022 constitutional amendment, current legislation, and evolving social dynamics, ENAC deems it appropriate to revise transport practices by encouraging innovative and inclusive procedures that uphold equivalent safety standards while advancing higher levels of animal welfare.

Carriage of PETs Over 8 Kg in the Hold

Experience over the years has shown that carriage in the hold, although statistically associated with a relatively small number of incidents compared to the total number of animals transported, still entails concrete and significant risks to animal welfare. Documented cases such as loss, serious injury, or death have a considerable impact both on the individual case and on public perception, undermining confidence in air transport. Investigations and reports identify several recurring causes:

- acute stress (sometimes fatal);
- suffocation due to ventilation or, rarely, pressurization issues;
- heat stroke or hypothermia;
- worsening of pre-existing pathologies;
- handling accidents such as accidental drops of the carrier;
- carrier failure.

Although these are rare events, each episode represents a serious compromise of animal welfare and a significant loss for owners, with reputational consequences for the sector. It has also been observed that carriage in the hold may expose animals, under certain operational conditions and for certain particularly sensitive breeds, to potentially harmful environmental factors, with possibly serious outcomes.

The Experience of Assistance Dogs

The established experience of allowing service animals in the cabin has demonstrated that it is possible to ensure both accessibility for passengers with reduced mobility and the overall well-being of all travelers. The management of assistance dogs on board has led to the development of balanced practices that reconcile diverse needs and rights, turning potential challenges, such as allergies, phobias, or general comfort concerns, into opportunities for organizational and operational improvement.

The transport of persons with reduced mobility (hereinafter “PRM”) accompanied by guide dogs is protected under Regulation (EC) No 1107/2006 on the rights of PRMs in air travel, which guarantees passengers the right to travel safely with their assistance animal.

From an operational standpoint, Regulation (EU) No 965/2012 – CAT.OP.MPA.155 requires operators to define the maximum acceptable number of PRM passengers accompanied by guide dogs and to assess all factors affecting compliance with safety requirements. The experience gained in this area thus serves as a positive reference model, which can be adapted and extended to other types of companion animals, promoting innovative and balanced solutions in air transport.

Operational Measures

The positive experience gained with the air transport of assistance dogs suggests the possibility of adopting some of the already consolidated measures also for the carriage in cabin of medium- and large-sized companion animals. Initial assessments indicate, in fact, the practical feasibility of accommodating dogs up to 25 kg in cabin configurations commonly used in commercial air transport, without compromising safety or comfort standards.

In this perspective, operators wishing to develop procedures for the carriage of PETs over 8 kg in the cabin may draw inspiration from the following criteria, already successfully tested in the context of assistance dogs:

- Identification of maximum number and placement: definition of a reasonable limit of PETs in the cabin, preferably placed next to bulkheads and by the windows, leaving the middle seat free and assigning the aisle seat to the owner.
- Safety and accessibility: no obstruction to emergency exits or crew activities, with exclusion of emergency exit rows.
- Boarding and disembarkation: procedures organized to minimize direct interactions between animals and between animals and other passengers.
- In-flight conditions: use of absorbent mats, harnesses secured to the seatbelt, and, where necessary, muzzles during specific phases of the flight and boarding.
- Owner’s responsibility: prior information on procedures, presentation of updated veterinary certificates and animal identification documents, and signing of a declaration of responsibility.
- Crew training: specific training for flight crew and ground staff on the management of PETs in the cabin.
- Passenger compatibility: implementation of mitigation measures such as buffer zones or seat change options for allergic or phobic passengers.
- Air quality: use of HEPA filtration systems to minimize exposure to allergens.
- Operational aspects: consideration of all factors that may affect the application of emergency procedures, with additional measures where necessary.
- Passenger information: prior communication about the presence of animals in the cabin on affected flights.

Progressive Approach to the Introduction of PETs in Cabin

ENAC has initiated a gradual process aimed at expanding the possibility of carrying companion animals in the cabin beyond the current weight limits. The first step was taken in 2024, when the maximum limit was raised from 8 to 10 kg (including carrier). This measure marked a concrete step towards a more inclusive and flexible management approach.

Demonstration flights are underway in 2025 with ENAC's approval, allowing medium and large sized dogs (25 Kg) to travel in the cabin under controlled conditions. These trials, informed by the existing experience with assistance dogs, served to test operational measures, evaluate passenger compatibility, and ensure that safety procedures remained robust

Building on the established experience with assistance dogs, demonstration flights allowed ENAC to test and validate operational procedures while ensuring their alignment with safety standards, passenger comfort, and the overall travel experience. Looking ahead, the aim is to progressively introduce in-cabin transport of PETs over 8 kg, making Italy the first Member State to move in this direction. ENAC's approach goes beyond compliance with safety requirements, embracing broader considerations of animal welfare, passenger compatibility, and the quality of the travel experience.

Conclusions

ENAC confirms that, with appropriate provisions and through a gradual process, the carriage of PETs over 8 kg in the cabin is compatible with operational safety and represents an essential step in ensuring animal welfare. Operators are invited to align with these Guidelines, promoting inclusive and innovative procedures. ENAC will monitor implementation and update the provisions based on the results achieved, with the aim of positioning Italy as an international reference model in the field of air transport of PETs.

Alexander D'orsogna