

Testimony of John McKenna

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to the

HOUSE STANDING COMMITTEE ON TRANSPORTATION,
INFRASTRUCTURE AND COMMUNITIES

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Good morning.

My name is John McKenna and I am the President of the Air Transport Association of Canada.

ATAC has represented Canada's commercial air transport industry since 1934. We have approximately 190 members engaged in commercial aviation operating in every region of Canada.

We welcome the opportunity to present our comments on aviation safety. I will limit my comments to four key issues, namely Fatigue Risk Management, Safety Management Systems, Fitness to Fly, and Transport Canada Level of Service.

From the onset, I want to stress the fact that Canada enjoys one of the best aviation safety records in the world and is an innovator in terms of safety management systems.

Fatigue Risk Management

Being an ICAO Signatory Country, Canada strives to be compliant with the standards and recommended practices set by that organization. In actual fact, developed countries largely only use these standards as a guideline to develop what is applicable to them. In Canada, the vast majority of air carriers do not engage in ultra long-haul international flights targeted by the ICAO Standards on which the proposed Transport Canada regulations are based.

We have long been asking that Transport Canada better consider the size and complexity of the many types of carriers operating in Canada. While we certainly agree that it is important to manage Fatigue, we are asking the Minister to pause, seriously listen to

stakeholders and, rather than dictate to industry, develop new regulations that, while compliant with the spirit of the ICAO Standards, also consider the huge socio-economic and financial costs associated.

ATAC insists that the proposed new regulations will not enhance safety but will erode it through many unintended consequences, including wasting valuable and limited experienced flight crew members. The proposed regulations will require that large airlines poach these resources from smaller carriers, leaving a huge vacuum of experienced pilots.

Safety Management Systems

ATAC is a long-time supporter of Safety Management Systems (SMS) and has been urging Transport Canada to impose a SMS culture on all segments of our industry. We cannot endorse Transport Canada's recent decision to shelve SMS implementation indefinitely for the smaller carriers for lack of resources to oversee its application.

The safety culture present in Canadian operators and the economic and safety benefits associated to SMS have motivated many operators to implement SMS regardless of the regulator's decision. Smaller operators would benefit the most from SMS yet Transport Canada prefers to concentrate on imposing badly planned Fatigue Risk Management regulations devoid of any cost analysis and input resulting from industry consultations.

Fitness to Fly

Fitness of flight crews has been an area of interest for ATAC long before the German Wings accident. There needs to be a better

dialogue between Transport Canada and the employers on loss of privileges. Where do you draw the line between the protection of privacy and the safety of the public?

Transport Canada Level of Service

While demand for air services in Canada has been growing at an annual rate of almost 5% the Transport Canada - Aviation Safety budget has been consistently cut. Total Aviation Safety Estimates for 2017-18 were set at \$185.5M, down from \$248.5M in 2011-12. That is a \$63M or a 25.4% cut in six years, making it increasingly difficult for Transport Canada to properly carry-out its mandate.

In the face of such cuts, Transport Canada needs to delegate administrative duties and concentrate on improving the level of service of those key safety related oversight activities.

We implore the House of Commons to support Transport Canada by increasing the funding for this crucial mandate.

In closing

In closing, I want to say that there are many other issues of major interest to our industry that we hope this Committee will study. Airport Privatization, Carbon Taxes, Laser Attacks, Foreign Ownership, Passenger Protection Legislation are just a few examples of issues we feel passionately about and are eager to share our comments with the Members of this Committee, should they address them.

I thank you.