



CANADA'S AIR TRANSPORT INDUSTRY NEEDS MORE THAN THRONE SPEECH PROMISES

The Air Transport Association of Canada (ATAC) and its 175 Members and Industry Partners welcome the Government of Canada's commitment found in the Speech from the Throne concerning support to regional aviation in Canada.

As tens of thousands of aviation personnel have either lost their jobs outright or have been indefinitely laid off, our industry has been appealing to the Government to support the Canadian aviation industry now operating at levels of at least 85% below where they were a year ago, with passenger numbers down by 94%. High fixed costs and drastically reduced activity are putting a strain on our operators that is no longer sustainable.

We look forward to commitments made in the Throne Speech quickly translating into desperately needed support for our industry. The federal and provincial support shown to date to some segments of our industry, particularly in the North, has been greatly appreciated. Regional air services, however, connect Canadians from coast to coast to coast not just in the North. Many regions of Canada depend on regional air services for their socio-economic survival, particularly in smaller and remote communities below the 60th parallel.

More needs to be done

ATAC has been asking the Federal Government to show leadership and coordinate with provinces and territories for the removal of onerous COVID-19 related air travel restrictions which greatly diminish our industry's ability to recover and offer all Canadians the service they need. The remedy, which is based on science, promotes the development of a rapid testing protocol that can be utilized across the aviation sector throughout Canada. These tests provide a multilayered approach and would facilitate the removal of, or at least greatly reduce, the quarantine rules and their onerous time limits for travel to and within Canada.

Relaxation of deadlines for new financially significant regulations

Support to the air transport industry goes beyond financial aid. If the government truly wants to help our industry recover from the consequences of COVID-19, they need to temporarily ease the heavy financial and operational burden caused by the regulatory changes scheduled to take effect during the pandemic.

ATAC met with Transport Canada senior officials on numerous occasions to discuss the devastating impact of COVID-19 on our industry. A major discussion point has been the subject of deferring regulatory changes at least until COVID-19 has been dealt with and the industry has substantially recovered, with the most significant Civil Aviation regulatory challenge being the new Pilot Fatigue regulations.

The current timing of these very complex and costly regulations is hindering our operator members' ability to recover from the pandemic and the government measures put in place to limit the spread of the virus.

Unfortunately, it has become painfully obvious that Transport Canada is not willing to work with and support industry's many valid requests for alleviations to the new Pilot Fatigue regulations for CAR 705 Operators that are currently scheduled to come into force on December 12, 2020.

ATAC has continuously advocated for logical, achievable, and reasonable alleviations to the implementation of the new regulations. A deferral of the implementation deadline for at least one year would be a hugely significant help to the aviation industry. However at this very late stage it has become clear that Minister Garneau is not allowing Civil Aviation to be flexible with regards to the implementation deadlines of these regulations even though our industry and the economy in general is suffering to a degree not seen since World War II.

We urge the Prime Minister, the Deputy Prime Minister and Finance Minister, and Minister Garneau to recognize the devastating impacts on the important markets that we serve, and that they revisit this impending deadline as soon as possible. It is imperative to assist commercial aviation in being the socio-economic enabler that all parts of our vast country rely upon. Government action is needed under challenging times, however it is more critical than ever at this time as Canada tries to extricate itself from the huge financial deficit that COVID-19 has brought upon us.

The Government needs to appreciate that:

- Operators are doing everything possible to meet the December 12, 2020 deadline for implementation of the new Pilot Fatigue regulations.
- This work has been completed despite the fact that Transport Canada had not provided the workable Fatigue Risk Management System (FRMS) option promised by Minister Garneau.
- Transport Canada only published the required guidance material for the prescriptive regulations this past July.

The pandemic is having a direct impact on our ability to meet the December 12 deadline, namely because of the following:

- o Strained financial situation of aviation stakeholders across Canada is nearing a crisis.
- o Lack of access to software providers especially those located outside of Canada.
- o Lack of new pilots adequately trained on aircraft types necessary to meet the additional numbers of pilots required due to the new Pilot Fatigue regulations.
- o Difficulties in having current pilots maintain their proficiency on simulators due to accessibility problems and especially those simulators located outside of Canada.

Key markets that will suffer due to the inability of air operators to fully function under these new regulations especially while Canada is still under the effects of COVID include:

- o Northern communities
- o Remote communities
- o Small and medium regional communities
- o Low-cost travel
- o International leisure travel supporting tourism
- o Resource Sector

There is no financial cost to the Government in alleviating these new Pilot Fatigue regulations, but such a gesture would be of great assistance to our industry at this most difficult time.