

## A FULL PLATE

The new Transport Minister, the Honourable Pablo Rodriguez, was handed by his predecessor a full plate of issues to deal with that are critical to the air transport industry of Canada. The two-year maximum delay before the next election doesn't leave the Minister much time to successfully deal with these problems, and he will be hard pressed to challenge the department to review any of its current and unreasonable stances on many of them.

The ICAO Audit report that will be released shortly has the potential to be a major blow to the department. Not only will it uncover the department's non-compliance with approved ICAO standards on many fronts, but it could also jeopardize Canadian carriers access to certain jurisdictions which may be embarrassing given that Canada is the home of ICAO headquarters in Montreal.

While not a problem for the southern part of the country, the new Approach Ban proposed regulations present a sizeable challenge to Northern and remote routes where navigation and weather reporting services and airport landing aids such as approach lighting are minimal. The current proposal is problematic and would require significant investment in impacted areas to ensure the effectiveness of an Approach Ban. ATAC strongly recommends that the new Approach Ban regulations be only implemented for approaches at the major airports, while the required infrastructure is installed at the remaining airports especially those in the remote and northern areas of Canada.

The government's sought-after March 31, 2024 deadline for allowing the broad use by telecommunication companies of 5G frequency radio signals including on runway approach paths and near runway ends, is totally unrealistic. The equipment, its certification and installation of facilities required for transitioning to safe implementation of 5G operations cannot possibly be achieved by then. A more realistic deadline needs to be set that doesn't jeopardize air transportation and those reliant upon it.

Sustainable Aviation Fuel (SAF) is a promising solution for reducing aviation CO<sub>2</sub> emissions, an objective that ATAC has supported for many years. The challenge lies in the absence of infrastructure in Canada to produce and distribute SAF. Furthermore, the very high cost of SAF will have a major impact on air travel in Canada. Federal and provincial governments need to invest in SAF production and the distribution infrastructure in Canada, especially in smaller urban centers and in Northern and remote regions, if SAF is to be available and have an impact on reducing CO<sub>2</sub> emissions throughout Canada.

Canada, like the rest of the world, is facing a serious shortage of pilots and aircraft maintenance engineers. Government needs to work with industry to overcome this HR crisis. A major obstacle in recruiting talent to piloting is the cost of training. ATAC is drawing up a government loan guarantee program which will help attract people with limited access to the funds required, to consider aviation as a career.

Given the crippling shortage of pilots, ATAC is asking the government to ease up on regulations which exacerbate the problem. The implementation deadline of December 2022 of the new fatigue risk management regulations for smaller operators could not have come at a worse time. To impose an increase of 30% of pilots at a time when carriers can't even find sufficient crews to maintain their current level of service in terms of routes and frequency shows a disconnect with reality or worse, an indifference to the consequences on air service to Canadians.

Another obstacle faced by the aviation industry is obtaining student visas and work permits for foreigners wishing to come to Canada for flight training and possible employment. Furthermore, foreign student training is an important source of revenue for flight training organizations and has helped them develop world leading standards in terms of capital investments and best practices. If the government is going to limit foreign student visas for people wishing to come to train in Canada, then it needs to compensate by investing in Canadian flight training infrastructure capacity.

New Air Passenger Protection Regulations (APPR) are outrageous, and the result will be diminished service and higher costs for air travel in Canada. The result might well be short term gains politically but most definitely will have long-term losses to air service for the Canadian population, and again mostly affect those in Northern and remote communities who require it as an essential service. The new proposed regulations need to be taken back before it is too late.

Finally, the government has indicated that budget cuts in the order of \$8.2 billion over five years are expected to begin in 2024-25. How much is Transport expected to cut? What services are to be cut, or most likely, what new fees and charges will once again be imposed on our industry?

The Minister has a lot on his plate. A constructive dialogue needs to be established with industry if we are to salvage, let alone improve, air service to Canadians.



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