



ATAC COMMENTS ON PROPOSED AMENDMENT TO APPROACH BAN REGULATIONS

The Transportation Safety Board's recommendations to review the Approach Ban regulations has prompted Transport Canada to propose an amendment introducing prescribed approach visibility minimum requirements in Canada. ATAC appreciates the opportunity to provide comments on behalf of our membership on this Notice of Proposed Amendment.

In general, ATAC supports the overall direction TCCA is proposing for the Approach Ban regulatory amendment. Since the time when the initial regulation was developed and implemented, the subject of approach bans has been highly contentious and ATAC and its members have been keen to find solutions to improve this very cumbersome regulation, especially as it relates to the required actions of the flight crew during safety critical phases of flight.

ATAC is pleased to see that the intent of the current regulatory proposal is to simplify the requirements especially as they relate to the operating flight crew members. While keeping this goal in mind we must also not lose sight of the necessity to maintain the ability to operate flights safely, efficiently, and reliably to locations that are very much dependent upon air transport of people and supplies.

While ATAC is supportive and in fact often initiates regulatory change requests to harmonize with other major authorities such as the FAA and EASA, this must always be done within the context of the issue being addressed and the regulation being considered. As ATAC often remarks, "one size doesn't fit all" and that applies to regulations developed for certain environments and then adopted for use in totally different environments. Such is the case of adopting the FAA's regulations wholly as they pertain to the Approach Ban.

The United States has an enviable record of investment throughout their country at airports of all sizes whereas Canada has for the most part only invested in large infrastructure projects at major airports, and by far the majority of these are in the south near major metropolitan areas. This has created an unfortunate dilemma wherein the vast part of the country that relies the most upon air transportation for its survival and economic wellbeing is also where the worst weather occurs, over the longest period, and

yet has the least amount of the required aviation infrastructure ensuring safe operations.

ATAC members that operate in Canada's remote and northern regions utilize some of the most modern and well-equipped aircraft that are best suited for the most challenging geographic and meteorological scenarios that nature can create. To operate under such conditions, operators create and fully use stringent standard operating procedures and training for their flight crews. The combination of better equipment on board the aircraft, excellent training, and well-established company procedures ensures the ever-improving safety environment in which our companies operate now, especially compared to days long ago before many of the technological advancements as well as the safety culture brought about through Safety Management Systems. The use of the latest technology and safety programs continue to evolve and are fully used by forward thinking companies, especially those operating in areas with the least amount of infrastructure, in order to be successful from a safety perspective which leads to financial success as well.

As it has been well described in our members' submissions and during our consultation sessions, ATAC never wants to see regulations that would encourage the use of VFR flights in lieu of IFR flights. The vast amount of experience within the ATAC operator community, especially within our members that operate in the remote and northern parts of this country, justifies why their input must be fully understood and taken seriously.

Taking all the above into account, ATAC encourages Transport Canada to carefully understand the many interactions at play within our industry that affect aviation safety. ATAC is supportive of improving dated regulations but not just adopting other jurisdiction's requirements without seriously considering the differing geographic and socio-economic situations in remote and northern parts of Canada. The Government of Canada and its Provinces and Territories must seriously reconsider the severe neglect of aviation infrastructure in remote and northern communities, most of which are the home to many of Canada's indigenous peoples. Infrastructure improvements for airports including approach lighting and weather reporting are long overdue and key enablers for improving operations into remote and northern airports. These infrastructure improvements are a mandatory part of a balanced approach to solving the Approach Ban issue. ATAC looks forward to working with Transport Canada in developing such a complete solution.



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