

## HOW TO TRANSFORM AN ISSUE INTO A HUGE PROBLEM

Transport Canada is preparing to bring into law new regulations that will reduce the number of hours that commercial pilots in Canada can work. These changes would have huge implications and seriously threaten the sustained service to communities across Canada – but particularly in northern and remote areas of Canada where people depend the most on air transport as a lifeline.

If the new regulations move forward in their current form, they will significantly increase the cost of air travel. Remote, northern, and Indigenous communities will be hardest hit by the proposed new regulations as operators of commercial aircraft will have much less flexibility when deploying pilots to these regions, and pilots will need to be replaced more frequently. Operators will not be able to benefit from extended periods of summer daylight, and will have to deal with the logistics of replacing crews in remote locations and during a short summer operating season.

The new regulations will aggravate the current shortage of experienced pilots at all levels of the commercial aviation community - the large scheduled airlines, commuter operators, air taxi operators, floatplane operators, and helicopter operators. Roughly 30% more pilots will be required just to maintain the current levels of service in Canada.

For remote communities without well-equipped medical facilities who rely on MEDEVAC helicopter and aeroplane services to transport patients, the cost of these services may rise to unsustainable levels. Even for those services that continue to operate, operations are certain to be constrained and thus services reduced.

Fatigue is a risk in aviation, but these proposed regulatory changes are not proportional to the very low level of risk found here nor are they suited to the different types of air operations that exist in Canada. Also, the Minister is promoting a “one size fits all” set of regulations that just won’t work for many Canadian operators.

Aviation fatigue is not - and never has been - on the Watchlist for the Transportation Safety Board for aviation, and the TSB has indicated that there are a low number of commercial aviation events where fatigue has even been a “factor” in Canada.

In spite of these clear indications from the TSB that fatigue is an issue that is being managed in the Canadian commercial aviation community, the Minister is continuing to promote radical changes to the fatigue management regulations – ones that we believe will have disastrous consequences for the Canadian communities that we serve. We have urged the Minister to pause, and to consult in a more meaningful way with all commercial air operators.

In summary, we believe that if the proposed regulations move forward in their current form, they will have the following effect:

- The cost of air service at all levels of the industry will rise considerably – but particularly in northern and remote communities;
- The cost of fresh fruit and vegetables will rise in the north;
- Some operators will be forced to reduce or withdraw service, particularly to northern, remote, and Indigenous communities. Some of these

communities - during certain times of the year - rely on air service as their only link to the outside world – during the Winter months, or during freeze-up and break-up, for example;

- MEDEVAC operators will have less flexibility when scheduling crews, and their operations are likely to be constrained or limited – the service may even become unsustainable;
- The proposed new regulations would significantly aggravate the current shortage of experienced pilots at all levels of our industry with much higher negative impacts on the smaller carriers across the country and especially those that serve remote and northern communities. A higher number of pilots will be required at all levels of our industry to maintain current levels of service – many of which will have less experience.

Given the overwhelming negative social and economic impact of the proposed regulations, other unintended negative consequences should be measured against any possible benefits. We are urging the Minister to revisit the most problematic elements of the current proposal, and to work with the industry to find solutions that are more proportional to the risk and appropriate to the different sectors of our industry.

Commercial air operators in Canada are world innovators in terms of Safety Management Systems through which they are carefully and effectively managing rest amongst their pilots. The Federal Government says that they are serving the interests of all Canadians by constraining these essential air services, which we find very difficult to understand.

We are asking for your assistance to appeal to the Minister of Transport to revisit the terms of these oppressive draft regulations to ensure that the interests of Canadians are protected. We are led to believe that these regulations may become law sometime this summer.