

## **Air Crew-Duty Hours: Ensuring the availability of safe, affordable and accessible air travel**

### **DESCRIPTION**

On July 1, 2017, Transport Canada published through Canada Gazette proposed air crew-duty hours. These proposed regulations are meant to address the issue of pilot fatigue. Regrettably, these regulations do not appropriately address the realities of Canada's immense size, threaten service to our most remote and northern communities, and undermine the maintenance of safe, affordable and accessible air travel.

### **BACKGROUND**

Commercial, cargo and helicopter air service providers serve large urban centers and remote northern communities alike. They move people and cargo, to connect our vast country. As airline operators, safety is always the top priority. Air service providers are supportive of updating crew-duty hours regulations, but believe they must be updated correctly and with proper industry consultation. Good policy requires more than just good intentions and concerns have been expressed that the proposed regulatory changes on crew-duty hours will have negative, unintended policy consequences. It is not sensible for the government to impose a one size fits all regulation to an industry with diverse needs and operating conditions. From our most easterly point to our most westerly point, Canada's width is almost ten thousand kilometres, with hundreds of communities spread along the way. Those communities are served by bush pilots, small carriers transporting essential goods including food and water, air ambulances providing critical medical services, charters used for business and tourism, short haul operators and many other flights covering a wide variety of purposes. Regulating a long-haul international carrier in the same way as a small regional airline does not make sense. Of specific concern are: The implementation timelines; The inability to make use of a fatigue risk management system (FRMS) since the requirements are too prescriptive and specific to medium and long-haul airlines; The cumulative impact of the new regulations on manpower requirements.

The timing of these proposed regulations, coinciding with arguably the greatest pilot shortage the industry has seen, puts Canadian communities in jeopardy of losing their service. It is smaller, rural and remote northern communities that will be the most affected by these proposed regulations. They will see their air service reduced or possibly cancelled. There is significant concern about the impacts that these proposals will have on First Nations communities across Canada that do not have all-weather roads. These citizens depend on regional air service for the basic necessities of life, including food, fuel, and healthcare; as such, they will be the ones most negatively impacted by service reductions or increased costs that result from regulatory changes.

### **RECOMMENDATIONS**

That the federal government:

1. delay implementation of the regulatory changes to air crew duty hours until:
  - a. Meaningful consultation is held between Transport Canada and industry to assess the impact the proposed changes on short-haul and regional air service providers;
  - b. The government is able to conduct an analysis of the impact of these changes on rural and northern communities; and,
  - c. Air service providers have had sufficient time to develop and implement policies and procedures to address regulatory changes.

**SUBMITTED BY THUNDER BAY CHAMBER OF COMMERCE**

**CO-SPONSORED BY FREDERICTON CHAMBER OF COMMERCE, GREATER SUDBURY CHAMBER OF COMMERCE, NORTH BAY & DISTRICT CHAMBER OF COMMERCE, SAULT STE MARIE CHAMBER OF COMMERCE, TIMMINS CHAMBER OF COMMERCE**

**THE TRANSPORTATION AND INFRASTRUCTURE COMMITTEE SUPPORTS THIS RESOLUTION**