

March 6, 2025

Canadian Transportation Agency

Re: Consultation on Regulations Amending the Air Passenger Protection Regulations

Canadian Transportation Agency,

On behalf of The Calgary Airport Authority, I appreciate the opportunity to provide feedback on the proposed changes to the Air Passenger Protection Regulations (APPR) found in Canada Gazette, Part I, Volume 158, Number 51. I recognize these regulations do not enforce specific standards on airports; however, as key transportation hubs impacted by airline activity, our voice is important to consider in these decisions. To that end, I echo many other organizations in this sector that the proposed regulations are not appropriate to proceed with in our current political climate, especially given Canada's tense relations with the United States and need to strengthen our domestic economy.

Our major concern revolves around impacts to affordability in air travel. It is clear that increased regulatory costs would drive up expenses for airlines, ultimately leading to higher ticket prices for passengers. Air travel in Canada is not a luxury—it is an key service to Canada's economic and connectivity success. Our vast geography makes air connectivity critical, enabling travel and trade between regions that would otherwise take days or even weeks by road or rail. At a time when national unity and sovereignty remain top priorities, air travel plays an undeniable role in connecting Canadians from coast to coast to coast.

Given the financial pressures airlines already face, including high operational costs that have led some carriers to exit the market in recent years, we believe this is not the time to increase the cost burden on passengers in what is proposed in these regulations. Should a greater number of Canadians continue to be priced out of the air travel market, impacts to airports include cost pressures and slowed growth as we rely heavily on passenger numbers and spending for our economic success. Canada needs a regulatory environment that is supportive of competition, and regulations such as these continue to be reasons that smaller carriers or companies wishing to enter the market cannot afford to give Canadians greater options and affordability.

Impacts of these proposed regulations will also extend to current issues of market competitiveness and regional connectivity in Canada. The aviation industry was among the hardest hit by the COVID-19 pandemic, and since then, we continue to see smaller regional airports in Alberta and across Canada who have not recovered from the pandemic's impacts. This has led to a smaller aviation market for Canadians, and the industry continues to face challenges in the ability of larger and smaller carriers to expand their service, in part due to heavy regulatory burdens. As already mentioned, the consequences of higher airline, and

therefore passenger, costs must be considered when Canada needs greater connectivity across the country, from the smaller airports that generally feed into the hub airports like YYC Calgary International Airport. These higher costs can make regional routes unviable for airlines and keep our country locked in a state of stagnant growth caused by over-regulation.

Another concern to be raised is how the proposed regulations describe what is worthy of consideration as an “exceptional circumstance” for flight delays or cancellations, which we understand all too well. Airports are uniquely positioned to understand the complexities of balancing efficient operations, guest experience, and strong partnerships with airlines and service providers. We sympathize with passengers affected by flight delays or cancellations that occur for a variety of reasons, and therefore it is important to consider the complex and significant operational challenges faced by Canadian airlines and other service providers. Above all considerations, the safety of passengers, flight crews and other operational staff must be the top priority in air travel. This is why examples in the proposed regulations such as the “exhaustive list of exceptional circumstances” is an improper way to determine an exceptional circumstance for cancelling or delaying a flight. It is unwise to limit these reasons to a very specific list, as it ignores the complexity and unpredictability of air travel.

To conclude, unreasonable changes to APPR put the sector at risk of falling further behind in global competitiveness. This not only impacts Canadians’ ability to travel domestically but also threatens national connectivity and economic growth. The reality is simple—without accessible and affordable air travel, Canadians cannot reasonably connect as a country. Recognizing the significance of the aviation industry and fostering a competitive, sustainable, and affordable market is essential to ensuring a strong, unified Canada. With that in mind, we would encourage the APPR changes to not proceed at this time. Thank you for considering our perspective.

Sincerely,



Chris Dinsdale
President & CEO
The Calgary Airport Authority