



March 6, 2025

Ms. Mary Johnson
Team Leader, Senior Policy Advisor
Analysis and Regulatory Affairs Directorate
Canadian Transportation Agency
60 Laval Street, Unit 01
Gatineau, Quebec K1A 0N9

Via electronic mail: Consultations-aeriennes.Air-Consultations@otc-cta.gc.ca

RE: Canada Gazette, Part I, Volume 158, Number 51: Index; Published December 21, 2024

Dear Ms. Johnson:

On behalf of the Canadian Chamber of Commerce, I am writing you regarding the proposed amendments to the Air Passenger Protection Regulations published in the Canada Gazette, Part I, on December 21, 2024. These proposed changes will make air travel more expensive and put connectivity at risk for Canadian travellers.

By way of background, the Canadian Chamber of Commerce is Canada's largest and most activated business network — representing 400 chambers of commerce and boards of trade and more than 200,000 businesses of all sizes, from all sectors of the economy and from every part of the country — working to drive change, partner broadly and be the undisputed champion and catalyst for the future of business success. Our vision is to build a Canada of thriving business opportunity, a strong economy, and a better life for all.

At a moment when Canadians are contending with an uncertain economic landscape due to a lack of stability in the trading relationship with the United States, it is disappointing to see government looking to introduce new regulations that will increase the cost of air travel. Instead, it should be considering how to make Canada's aviation industry's more competitive globally through solutions that will grow a pillar of our economy, and one that plays a vital role in tying our country together.

While we had warned that previously proposed changes failed to effectively consider impacts on Canada's aviation sector and consumers, we nonetheless find requirements included here around communications and the claims process that will create significant administrative burden. Additionally, more stringent timelines for rebooking and addressing knock-on effects will result in unrealistic obligations and unsustainable costs.

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– 2 –

Simply put, Canada's new proposed Air Passenger Protection Regulations will make flying more expensive and threaten regional connectivity, hurting businesses across the country. Instead of bringing in costly new regulations, the federal government needs to capitalize on the strengths of our aviation sector by creating new opportunities that drive inbound tourism and attract investment.

We hope the Canadian Transportation Agency will give adequate consideration to the potential impacts of more regulation, and how these additional requirements will impact air travel in Canada. A fair and balanced approach to regulation is needed, and in the absence of evidence to warrant imposing a greater regulatory burden, we are advising against placing further strain on Canada's aviation sector and creating another rising cost for Canadians.

Sincerely,

Pascal Chan
Vice President, Strategic Policy & Supply Chains
Canadian Chamber of Commerce