

March 5, 2025

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Letter to the Government of Canada Regarding Amendments to Canada's Air Passenger Protection Regulations (APPR) Submitted by the Chambers of Commerce of Fredericton, Greater Moncton and the Saint John Region

We, the Fredericton Chamber of Commerce, the Chamber of Commerce for Greater Moncton, and the Saint John Region Chamber of Commerce, are writing to express our concerns regarding the proposed amendments to Canada's Air Passenger Protection Regulations (APPR). These amendments present the potential for disruptive challenges that could greatly impact the cost and accessibility of air travel for Canadians.

Our primary concern revolves around both the identified and unforeseen circumstances where the proposed amendments will unavoidably increase the cost of flying for Canadians and reduce the available customer choices.

Canada's funding model presents competitively as some of the world's highest charges, taxes, and fees on air passengers, airlines, and airports. While other countries invest to keep air travel costs low through government funding, Canada's approach appears to result in a cost prohibitive option for air travelers. The APPR and its proposed amendments has the potential to add significant costs to airlines. These additional expenses are then passed on to passengers, making air travel less affordable. Any imposed regulations in this area will further limit competitive fares and thereby reduce customer choice. We must be clear, customer choice and the viability of connectivity through regional markets is utmost in our recommendations for the government to protect through investment and policy decisions in the future.

At a time when the government and industries are prioritizing a competitive national environment, and increased connection between provinces and regions, it is inadvisable to impose additional financial burdens on Canadians and businesses. The regional and economic connectivity of our country, provinces, and communities is essential for our people and our national economy. It is precisely this connectivity that is threatened by the proposed regulation amendments. Regional routes could become more expensive to operate, thereby reducing connectivity across Canada. The potential increase in operating costs could disincentivize large carriers from operating in smaller markets, introducing a chaotic variable into an already uncertain time. Canada must align its aviation policies accordingly.

In conclusion, based on these considerations, we urge the government to reconsider the proposed amendments to the APPR. Instead, we advocate for a regulatory approach that elevates and encourages the protection of passenger rights through provisions to address the economic realities faced by the airline industry. A more sustainable model would ensure that air travel remains affordable and accessible to all Canadians, preserving the vital regional and economic connections that underpin our national fabric. To this end, we ask that airlines be rigorously consulted concerning amendments and the implementation of new regulations be provided with necessary support and timelines to best grow our national connections, for the benefit of all Canadians and our business communities.

We appreciate your attention to this matter and look forward to a constructive dialogue aimed at finding a balanced and equitable solution for all stakeholders involved in our national connectivity.

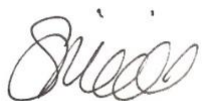
Sincerely,

A handwritten signature in black ink, appearing to read 'Morgan Peters', with a stylized, cursive script.

Morgan Peters, CEO Fredericton Chamber of Commerce

A handwritten signature in black ink, appearing to read 'K. Wilson', in a cursive script.

Kim Wilson, CEO The Chamber of Commerce for Greater Moncton

A handwritten signature in black ink, appearing to read 'Shannon Merrifield', in a cursive script.

Shannon Merrifield, CEO Saint John Region Chamber of Commerce

