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General Comment

The lack of a limit for knock-on effects for small airlines is particularly problematic, especially in the North.

As a resident of a Northern community, I appreciate that the original proposal of limiting knock-on effects to one flight segment would be untenable for northern airlines. Even the proposed 24 hour knock-on effect limit for large airlines would be difficult in the north's operational environment. However, the imposition of a 48 hour knock-on effect would strike the correct balance. Many northern airlines do operate multi-leg flights. However, those multi-leg flight never exceed one calendar day for either the outbound or the inbound flight. Therefore, all aircraft return to a base within 48 hours (the outbound on one day, and then the inbound on the next day).

The fact that there are frequent weather disruptions in the North is already baked into the proposed regulations. If the weather is still so inclement that flights cannot operate, then it would be a primary cause and not a knock-on effect; and the knock-on effect timeframe would commence only once the weather is good enough to fly again.

Failing to have any rule for knock-on effects for Northern airlines ignores the fact that air travel is much more of a necessity in the North than in Southern Canada. Passengers rarely have other options. Therefore, the lack of any knock-off effects limit would have a disproportionate negative impact on Northern communities and other remote communities; and it would disproportionately benefit small airlines to the point of impeding competition by large airlines. A 48-hour knock-on effects limit for small airlines would strike the correct balance.

Small airlines also tend to serve indigenous communities, and not having any protection for knock-on effects for small airlines therefore disproportionately affects indigenous

communities, many of which rely on air travel for necessities of life such as healthcare. It is troubling that the consultations only heard from indigenous-owned airlines, rather than indigenous communities who rely on their services. Canadian North in particular is not owned by the indigenous community that is its main customer base (Nunavut Inuit) and has proposed a sale to a non-indigenous investment group.

In the alternate, if no knock-on limit will be implemented for small carrier, then at the very least the 72-hour rule in proposed subsection 12(4) should not apply to small carriers - they should be liable for assistance until they are able to transport the passenger.

With respect to the requirement to provide food and hotel accommodations, there should be a timeliness aspect added. Meals and accommodations should be required to be provided within two hours. Too many times airlines skirt their responsibilities by not having enough agents available for hotel bookings etc. meaning that the wait to receive the assistance is many, many hours long. If the airlines are not able to provide the assistance within a set amount of time, it should be clear in the regulations that food and accommodations are reimbursable at any rate that is available to the public (rather than special rates available to airlines).
