

February 3, 2025

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Dear Mary Johnson:

Manitoba is closely following the Canadian Transportation Agency's consultation under Part 1 of the Canada Gazette regarding amendments to the Air Passenger Protection Regulations (APPR).

The Agency faces the complex challenge of balancing the rights of consumers to fair airline practices, including standard of treatment and redress frameworks for flight delays, denied boarding, cancellations, baggage issues, and communications with the need to avoid imposing undue costs and risks that could inadvertently impact airline services.

This balance is especially critical for northern remote and remote air services in Manitoba. Many remote First Nations communities in the province rely on timely, efficient, modernized and cost-effective aviation services to access social and healthcare services and to participate fully in Canada's economy.

Manitoba Transportation and Infrastructure (MTI) owns and operates 22 remote airports across the province. We continue to invest in northern airport infrastructure and airport operations, supporting airline services and improving the overall passenger travel experience.

MTI recognizes that the air operations and services to northern and remote communities differ significantly than those in major southern population centres. Flights are less frequent, and scheduling constraints mean that a delay or cancellation can cause significant cascading disruptions. Additionally, the infrastructure and logistical conditions that underpin aviation and flight operations in the north present unique challenges. Factors such as variability in NAV Canada's service levels, weather forecasting limitations, airport infrastructure constraints, telecommunications gaps, and

the availability of community amenities all contributes to operational complexities. Further other federal regulatory measures currently under review such as flight crew fatigue requirements and approach ban considerations are also impacting northern airline services.

We acknowledge that the Agency has considered some of these northern-specific challenges in its regulatory impact statement for the proposed amendments. However, we request the Agency to conduct additional pro-active, on-the-ground outreach to aviation community servicing remote and northern communities, as well as with the communities themselves, before finalizing any revision to the APPR. This outreach should focus on ensuring that the APPR strikes an optimal balance between protecting the rights of northern and remote air passengers and recognizing the distinct operational realities of northern airlines services. The goal must be to deliver the best possible outcomes and passenger travel experiences for residents of northern and remote communities.

We look forward to working together to ensure that air travel remains safe, reliable and accessible for all Manitobans, particularly those in the northern and remote regulations.

Sincerely,



Ryan Klos

Deputy Minister of Transportation and Infrastructure

c: Honourable Lisa Naylor, Minister of Transportation and Infrastructure  
Joey Petrisor, President and CEO, Perimeter Aviation LP