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Dear Ms. Johnson,

I welcome this opportunity to provide comments on the proposed Regulations Amending the Air Passenger Protection Regulations under the *Canada Transportation Act*.

While we support fair treatment of air passengers, we believe a number of the provisions in the proposed amendment fail to fully consider the realities of our environment or our communities, and are likely to significantly increase the cost of transportation to those communities without meeting the intention of the amendment.

For context, there are 25 remote communities in Nunavut, all of which are entirely dependent on commercial air operations for access to essential goods and services. The population count of six of those communities is less than 600; three communities are populated by between 600 and 1000 persons; 11 communities are populated by between 1000 and 2000 persons, five communities exceed 2000 persons with the largest, Iqaluit, numbering 7500.

Commercial accommodation in most of these communities is very scarce -- either not available on short notice, or only in limited quantities at much higher rates than those factored into the regulatory analysis. The same is true of commercially available meals and taxi services.

During parts of the year, weather disruptions are significantly more common in Nunavut than in other regions of Canada. These disruptions can affect multiple communities in a region, and can have knock-on effects on the availability of airport infrastructure, navigational aids and services, and other community resources.

Given the above, we are concerned that the regulatory analysis cost- benefit does not accurately reflect the incremental costs likely to incurred throughout northern and remote communities, and that the \$0.99 *per-passenger-segment* estimated cost impact (across Canada) of the proposed changes severely underestimates the impact for carriers operating in Nunavut.

We are concerned that the requirement to provide costly assistance in response to circumstances beyond the control of air carriers may lead to increased airfares due to the need to build the cost of such assistance into pricing models. This could also impact the competitive environment of Nunavut's aviation sector, including the procurement of medical travel services, due to uncertainty around such factors as the real versus projected cost implications or the level of effort that will be applied to compliance and enforcement in Nunavut.

I would like to emphasize the need to diligently consider the implications of all of the proposed changes in the Nunavut aviation environment, which has much in common with the circumstances in other territories and the northern reaches of some provinces, but is unquestionably the most remote example. We are aware of the input air carriers and other aviation stakeholders operating in the Arctic have provided in response to the proposed amendments, and we strongly encourage the Agency to confirm that adequate engagement with those operators has taken place before the proposed amendments are brought into force.

Thank you for considering Nunavut's perspective on this important matter, and I invite you to contact me with any follow-up questions or requests for clarifications you may have.

Regards,



Kristie Cronin
Deputy Minister
Economic Development and Transportation