



March 6th, 2025

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cc: The Honourable Anita Anand, Minister of Transport and Internal Trade

Subject: Canada Gazette, Part I, Volume 158, Number 51: Regulations Amending the Air Passenger Protection Regulations - December 21, 2024

Dear Ms. Johnson,

On behalf of the Board of Trade, representing over 800 businesses in Newfoundland and Labrador, we are writing to express our concerns regarding the proposed APPR regulations and their potential impact on air travel access in our province.

Newfoundland and Labrador already face significant challenges when it comes to air connectivity. Existing limited routes and expensive fares already create barriers for businesses, tourism, and residents alike. The proposed regulations, while well-intended, could have serious unintended consequences, including:

1. **Increased Fares** – As airlines face rising costs, those costs will be passed on to passengers. This means businesses and residents will have to pay more to stay connected.
2. **Fewer Regional Flight Options** – Many regional routes (which are normally the first to be cut, in our market) are already operating on tight budgets. Added financial pressure will likely mean fewer flights, reduced service, or even the loss of important routes that keep our communities linked.
3. **Increased Costs for Businesses** – Connectivity truly matters when conducting business on an island. Businesses are already facing affordability challenges, and these regulatory changes will only add extra costs and complications—making it even tougher to move people and goods efficiently across the country.
4. **Negatively Impacting our Competitiveness** – While the U.S. has paused similar regulations, Canadian airlines will be disadvantaged, making it harder for our economy to compete on the global stage.

While we support the intent of many of the changes being tabled to protect passengers, measures that increase the financial burden and expectations of air carriers (which will ultimately be passed to consumers), comes with risk. We must strike a balance to enhance air access capacity in Newfoundland and Labrador, not create additional barriers.

We urge the federal government to consider alternative approaches that support both consumer affordability and airline sustainability, ensuring that our province remains accessible and competitive, working collaboratively toward solutions that benefit both businesses and travellers.

Sincerely,



AnnMarie Boudreau
CEO, The Board of Trade