

January 29, 2025

Air Consultations  
Canadian Transportation Agency  
60 Laval Street  
Gatineau, QU, J8X 3G9

## **Re: Consultation Response**

---

Dear Air Consultations,

Upon reviewing the latest proposed amendments to the APPR, it is clear that the rationale to balance legislative goals with the operational realities of air carriers serving remote and northern communities are not fully considered.

### **Standards of Treatment**

Many challenges remain in Northern Operations, which makes a standardized approach between two geographical areas difficult to accept. Infrastructure in northern communities create many barriers compared to larger airports in the southern region. Both regions should not be held to the same standards with respect to Standards of Treatment due to the difference in infrastructure. As a region with unique geographical challenges and a critical role in connecting communities, it is essential that the infrastructure supporting northern airports is not only maintained but also enhanced to meet the demands of the future.

It is proposed that air carriers will be responsible for providing assistance during all flight disruptions resulting in delays of two hours or more, even in cases classified as exceptional circumstances. Regular and proactive maintenance of runways and airfield infrastructure, including weather reporting, is essential for all carriers operating in the north. Due to the region's challenging weather, the approaches have not been upgraded to assist in completing flights during poor weather conditions. Additionally, airport hours of service are limited to standard business hours (typically 08:00–16:30), meaning airport staff are unavailable outside of these hours to assist with delays. As a result, many runways and de-icing services may not be sufficient on certain days.

Further complicating northern operations, Transport Canada's Flight and Duty Time restrictions for fatigue management reduce the number of flights operators can complete when delays occur. On top of these challenges, Transport Canada's Approach Ban regulations will introduce another layer of complexity, directly impacting finances due to the associated standards of treatment. These external variables, beyond the control of air carriers, will now place an additional financial burden on operators.

The lack of adequate accommodations in northern communities will create a significant challenge for airlines when required to provide overnight accommodations. As options are limited at best, persons with disabilities may not be provided with suitable accommodation that meets their needs. This places a risk of non-compliance on the carrier or potential elimination of some routes that air carriers serve.

**Burden of Proof**

As the burden of proof is transferred from the passenger to the airline, technical documentation can contain proprietary information, which will not be passed onto the public.

**Communication**

As the agency pushes for detailed communication to be provided electronically, many passengers traveling into and out of the north are booked by a third-party agency. In fact, 48% of passengers are not financially responsible for their airfare. Many community members rely on social media to communicate, rather than by phone or email. Throughout the northern communities that we serve, some still do not have cellular service. Gathering contact information at the time of check-in will not solve the lack of communication due to the barriers that already exist. This proposal places a risk of non-compliance on many northern operators.

**Impact**

Air travel to northern communities is already costly, and additional penalties and fees imposed on the industry may not serve the greater good. While it is noted that Indigenous peoples were invited to participate in the consultation process, was there consideration given to the potential impact on communities if airlines were to discontinue services due to external factors such as inadequate runway maintenance? The proposed standards of treatment, which can apply up to 72 hours following a delay or cancellation, would impose a significant financial burden on air carriers, further complicating the sustainability of air services to these remote regions.

Northern air travel is an essential service, which can't be compared to the leisure travel of your everyday East and West travelers. Operators will need to significantly increase fees to offset additional APPR costs or potentially stop service into problematic northern airports, this will only result in controversial issues for the federal government. The proposed amendments would force us to increase our airfare by 5% to compensate for these proposed changes. If compensation standards can be broken down into large and small operations, geographical scope should be considered. We strongly urge the CTA to visit northern communities to fully understand the complexities that the north brings.

Sincerely,



Brad Byrne  
Vice President, Commercial Services  
[Brad.byrne@perimeter.ca](mailto:Brad.byrne@perimeter.ca)  
Perimeter Aviation LP