

BEFORE THE CANADIAN TRANSPORTATION AGENCY

**IN THE MATTER OF PROPOSED CHANGES
TO CLARIFY, SIMPLIFY AND STRENGTHEN
THE AIR PASSENGER PROTECTION REGULATIONS**

COMMENTS OF ETIHAD AIRWAYS PJSC

Date: August 10, 2023

On behalf of Etihad Airways PJSC, we appreciate the opportunity to respond to the Canadian Transportation Agency (CTA)'s consultation on proposed changes to strengthen the Air Passenger Protection Regulations (APPR). Etihad Airways provides scheduled international passenger services between Canada and the United Arab Emirates, and therefore has a substantial interest in the outcome of this consultation.

Etihad Airways supports the goal of improving the air passenger protection regime in Canada. We have always committed to providing quality services to passengers on our flights to and from Canada since we commenced operations to Canada in 2005. In order to clarify, simplify and strengthen the APPR, we would like to make the following comments.

Identifying the exceptional circumstances

In considering the criteria for events to be considered exceptional, we propose that certain situations required for safety should be considered exceptional—for instance, mechanical malfunctions the airline could not foresee or prevent through regular maintenance; decisions the airline makes based on its Safety Management System; and safety-related decisions pilots make at their discretion. The rationale is that airlines should not be penalized for adhering to the highest standards of safety.

Assistance

It is proposed that airlines would have to offer passengers assistance starting 2 hours after the scheduled departure time. We propose changing the threshold from 2 hours to 3 hours since most airlines' policies follow 3 hours or more.

Etihad Airways thanks the CTA for its commitment to fair, reasonable, and transparent regulations and its support of the aviation industry and the traveling public, and respectfully requests that the CTA take our comments into consideration.

Respectfully submitted,

ETIHAD AIRWAYS PJSC