



**GREATER VANCOUVER
BOARD OF TRADE**

Greater Vancouver Board of Trade
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Bridgitte Anderson, ICD.D

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10 August 2023

Canadian Transportation Agency
60 Laval Street, Unit 01
Gatineau, Quebec
J8X 3G9

**Re: Proposed Changes to Clarify, Simplify and Strengthen
the Air Passenger Protection Regulations**

To Whom it May Concern:

On behalf of the Greater Vancouver Board of Trade, I am writing to share our perspectives on the consultation regarding “Proposed Changes to Clarify, Simplify and Strengthen the Air Passenger Protection Regulations.” As our organization has a long history of supporting Canada’s aviation sector and advocating for a more attractive operating environment for airlines in our country, we welcome the opportunity to participate in this consultation.

I would like to start by recognizing the collective commitment of all air sector stakeholders to enhance the passenger experience within Canada’s air travel network. A robust and well-connected aviation sector plays a pivotal role in driving the growth of both British Columbia and the wider Canadian economy. Each day, hundreds of thousands of Canadians rely on our worldclass air network to safely travel for business, visiting family, supporting our tourism sector and more.

With this context in mind, we wanted to provide feedback on the proposed changes to the Air Passenger Protection Regulations (APPR):

Competitiveness

Canada's reputable air travel network stands as a distinguished global player, effectively competing with major hubs such as those in the U.S. The resulting economic benefits permeate our economy, extending to immigration, foreign direct investment, trade, tourism and beyond.

Policies and regulations governing our air sector must remain competitive. Additional costs would raise prices for consumers, making Canadian flights more expensive and less competitive than alternatives, a lose-lose for Canada. As a massive country with a relatively small population, we need to ensure we have healthy airlines, with fair prices that are accessible for Canadians who need to travel for business or to connect with loved ones across the country. While we understand the need to compensate in some circumstances, this approach needs to be fair for all parties. One of the core tenants of the system should include the desire to maintain affordability in terms of the monetary and regulatory requirements in Canada. Adding more costs to the system as its contemplated with the expansion of the situations for which airlines would have to pay compensation would impact competitiveness and raise travel costs for every Canadian.

In the U.S., there is no compensation for delays and cancellations and the level of compensation already set out in the APPR are greater overall than those in Europe, particularly for short haul and domestic flights. We believe this is an additional deterrent for airlines from adding flights or launching new routes in Canada, tilting the balance toward more cost-effective markets.

Implementation Concerns

We also understand that some of the proposed regulations would be impossible or unreasonable to implement in the current operational landscape. For instance, setting a limit to the knock-on effects of a delay to a single subsequent flight, when the reality is that mitigating the consequences of a delay can take up to 48 hours or longer despite best efforts and optimal circumstances.

Safety is and has always been the number one priority for all airline operators and all involved in the air sector. Canada's reputation as one of the world's safest air travel systems is a cornerstone of the industry. Imposing financial compensation for unforeseen mechanical issues, as outlined in the proposed regulations, runs counter to the government's own safety requirements for airlines and even appears to simply penalize airlines for upholding their safety obligations. This runs counter to the basic principle of fairness and is potentially disincentivizing airlines from operating within Canada with far-reaching economic implications. The revised APPR list of exceptional

circumstances should include exemptions for flight safety and unplanned mechanical delays, aligning with established regulations and maintenance protocols.

Thank you again for the opportunity to contribute to this consultation. We look forward to continuing to work with the federal government and sector partners to ensure the continued growth and prosperity of Canada's worldclass air travel network.

Sincerely,

A handwritten signature in black ink, appearing to read "Bridgitte", with a long, sweeping horizontal line extending to the right.

Bridgitte Anderson
President and CEO
Greater Vancouver Board of Trade