

Submitted to the Canadian Transportation Agency (Form submission)

Subject: Consultation on proposed changes to strengthen the Air Passenger Protection Regulations

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My submission is short & limited exclusively to the provision of onboard food. This is a subject that is not addressed in the CTA regulations but in my opinion, should be. First let me advise that I was a lawyer for 43 years, and practised a considerable amount of transportation law, usually dealing with clients having issues with travel agents. I am familiar with transportation law and in particular air transportation.

Many times I have seen clients who are upset with the food included in their airfare or which they have purchased onboard. The issue arises because somewhere between 10 and 15% of the population has food sensitivities or allergies. Food sensitivities are non-life-threatening where as allergies most commonly are.

The issue is the lack of knowledge of ingredients in the onboard meals provided either included with the fare or for purchase. The food often contains various substances that cannot be readily ascertained and which do present a problem to the passenger. In addition, many passengers are diabetic so a choice not to eat onboard is not realistic.

The most common substances that are found in food but which cannot be readily ascertained are substances such as monosodium glutamate (and its precursors such as anything hydrolyzed/autolyzed, as well as others), sodium nitrate/nitrite, anatto, sulfites. There are other substances to which people have sensitivities/allergies which are more easily ascertained; one such example would be theobroma line which is fo