

Submitted to the Canadian Transportation Agency (Form submission)

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

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Throughout the operation of the existing APPR, airlines have shown that they will take every opportunity to exploit ambiguity regulation's language. The proposed list of "exceptional circumstances" is vague and therefore leaves too much room for airlines to act in a way that is not in keeping with the intent of the regulations. Specifically, "Airport operational issues for which the airline is not responsible", "Health risks or medical emergencies on route that require a flight diversion or discovered shortly before flight departure that make it impossible to safely operate the flight", and "Labour disruptions at the airline or by essential air service providers like airport managers, air navigation personnel, or ground handlers" are all problematic. Additionally, in terms of chain reactions, the proposed exemption limitation language of "The next flight scheduled to use that plane (or flight crew)" could be problematic.