

Submitted to the Canadian Transportation Agency (Form submission)

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

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While many of the proposed changes seem reasonable, it must be a foundational principle that airlines are not insurance companies. The requirement in #7 is excessive. While airlines must be responsible for their actions / inactions, individuals must bear personal responsibility as well. Travel Insurance covers travel advisories. These advisories are well beyond the control of an airline, and should be considered "exceptional circumstances". Pandemics aside, the most common reason for a travel advisory is "Security risks such as war, political instability, illegal acts, sabotage, and terrorism" which is specifically listed in the proposal as an exceptional circumstance. These two clauses are at odds with each other.

If individuals wish to cancel their travel due to a travel advisory, they should have purchased appropriate insurance.