

**Unifor Submission to  
the Canada  
Transportation  
Agency's Consultation  
on Proposed Changes  
to the Air Passenger  
Protection Regulations**

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**August 10, 2023**

## **About Unifor**

Unifor is Canada's largest union in the private sector union representing 315,000 members from coast to coast to coast. Unifor members work in every sector of the economy including transportation, communications, manufacturing, resources and private and public sector services.

16,000 Unifor members work in the Air Transportation sector performing virtually every job in the industry including custodial services, aircraft groom, ground handling, customer sales and services, aircraft maintenance, in-flight services, piloting, air traffic control, specialist flight services, airport operations and more.

Unifor members in the Air Transportation sector regularly discuss issues they face in the workplace and develop solutions. Unifor collects information brought forward during these discussions and is pleased to provide feedback to this consultation on behalf of members.

## **Aviation Industry Dynamics**

The chaos workers and passengers have experienced at airports and on airplanes in the last three years is the result of insufficient staffing, poor training and a general lack of investing in the aviation workforce.

The pandemic and accompanying air travel restrictions certainly wreaked havoc on the industry. Thousands of workers were laid off and some found more stable, higher paying jobs in other industries. As the travel restrictions eased and travellers began to return to the skies, industry did not hire back a full staff complement to meet the travel demand.

The number of workers in the scheduled air transportation sector has declined by 9% since 2019 – that's 5,500 fewer workers in the industry ready and waiting to meet customer needs or to ensure airlines and airports stay on time and prevent cancellations or lost luggage.

A few employers recognized the need to improve job quality to hire more workers and have done so, but many are relying on technological change and increased workloads to pick up the slack. It is not working.

## **What's Missing from the APPR?**

Unifor and members working in the air transportation are generally supportive of the Air Passenger Protection Regulations (APPR). There is concern, however, that the Canada Transportation Agency has not given itself the ability to enforce staffing requirements that ensure airports and airlines are able to meet these requirements.

Providing the additional service required to meet these standards will require additional personnel. As currently proposed, the APPR will ensure human rights are respected

when flights are delayed or cancelled, but there are no provisions for ensuring service standards are improved in order to meet the regulations. This is a grave oversight.

Currently, passengers are often required to wait hours in line for service – in person, on the phone or on-line (and sometimes in combination) – leading to intense frustration that may be taken out on service staff. Our union believes this is unacceptable. Employers are required to provide a harassment free work environment. When their own actions lead to increased harassment towards service staff by customers, they are explicitly not providing or promoting a harassment free environment.

Without clear expectations on staffing levels and wait times, customers will continue to face unacceptable and frustrating waits to be rebooked, provided with food and drink or provided a hotel room if needed.

Fulfilling the APPR and providing an experience that travellers expect and deserve will require a substantially larger workforce. Attracting and retaining workers will require substantially better jobs.

In addition to the focus the Canada Transportation Agency is placing on rules for fines and reimbursements, the organization must focus on ensuring airlines have an achievable plan for meeting the requirements that doesn't result in long waits, customer frustration and worker harassment.

Unifor and its members in the aviation sector recommend that government, regulators and industry work together to implement an Air Transportation Workers' Bill of Rights which will dramatically improve pay, job security, worker health and safety and service for passengers.

There are 10 actions that must be taken in order to improve job quality to improve worker attraction and retention:

1. Make a living wage the minimum pay for workers across the sector;
2. Ensure fair pay for the tens of thousands of workers who earn above the minimum including pay equity, equal pay for equal work and inflation protection;
3. Provide a safe and effective reporting mechanism to ensure workers can report on airlines and airports not living up to the service standard;
4. Guarantee full successor rights and protection from contracting out;
5. Require sufficient staffing levels to ensure workers can provide superior service quality;
6. Establish provisions requiring high quality and adequate training for new and incumbent workers;
7. Demand employers provide a harassment-free environment;
8. Implement fair scheduling requirements;

9. Ensure airlines and airports are maintaining healthy and safe work places;
10. Require employers consult workers in any technological change – for input into designing the best possible technology and in ensuring no worker is left worse off in any transition.

Unifor and Air Transportation members across the country look forward to discussing these ideas further with CTA representatives.

Workers want to build an industry where passengers and workers thrive – their livelihoods and mental health depend on it.