

## **President's Message**

### **Coalition Associations Meet with Minister Garneau**

On February 7, four associations met with Minister Garneau to discuss our concerns with the looming publication of new Fatigue Management Regulations in Canada Gazette I – the first step in the public consultation phase. The new rules - when they become final - would come in to force roughly five years later. The four national associations have joined with five other Regional Associations representing the interests of all segments of the commercial aviation community from across Canada, to oppose the proposed new rules in their current form.

The message, that the one-size-fits-all regulations in their current form, would cause irreparable harm to the customers and communities that we serve – was delivered loud-and-clear. HAC's "Transport Canada staff have made some relatively minor modifications to the proposed new rules since the Fall of 2014 when they were first presented to industry, but they don't go nearly far enough" said HAC's President. The combination of the elimination of the zeroing provisions; reduced cumulative flight time limits; and new Cumulative Flight Duty Periods are among the most offensive elements of the proposed new rules. The Minister agreed to discuss our issues with his staff.

HAC's President went on to say "What's more, the first DRAFT *Fatigue Risk Management System* (FRMS) Guidance Material recently presented to industry – long held-out by Transport Canada staff as having the potential to provide relief from the oppressive prescriptive rules – are well beyond the reach of any small or medium-sized operator." Transport Canada staff have been flirting with the option of "splitting" the regulation to publish the prescriptive regulations, and the FRMS regulations in separate issues of Canada Gazette I. The Minister agreed that this would make it difficult for commenters to determine if the FRMS regulations could possibly provide any relief from the prescriptive regulations. The two parts *must* be considered in Canada Gazette I at the same time.

HAC and other like-minded associations will continue to press Transport Canada for pre-Canada Gazette I changes to the draft regulations. Significant changes, post-Canada Gazette I, are much more difficult to make.