

President's Message

Transport Canada Delivers Survey with Incomplete Information

Did you recently receive a request to complete a survey on the new Fatigue Management Regulations?

Transport Canada recently delivered a matrix summary of the proposed new Fatigue Management regulations to ALL AOC holders. They are conducting a survey in support of the Regulatory Impact Analysis (RIA) that goes with the Canada Gazette I Publication containing the draft regulations - that they are planning to publish in the Spring of 2017.

The problem is, that the matrix doesn't provide enough information for helicopter operators to make a realistic assessment of their prospective impact. That is, an incomplete summary of the regulations will make for an inaccurate evaluation of their impact by the regulated community.

The upshot? We recommend that helicopter operators should NOT complete the survey until we get some clarification from Transport Canada. I have been receiving a flurry of emails from operator-members on this subject, so please pass the word...

Here some examples of problems with the Survey:

- In the 2014 draft, Helicopter Operators were excluded from any Sector-based limitation on the Flight Duty Period (formerly known as Duty Day)
- There is no mention of the Split Duty Day provisions, which could mitigate the Cumulative Duty Day Limits set out in the matrix
- No mention that operators should also make an assessment of "Revenue Loss" as well as an estimate of increased costs
- Key definitions are missing

Please stand-by for further, as we discuss our options with Transport Canada on this important subject.