



December 15, 2015

The Honourable Marc Garneau, P.C., M.P.
Minister of Transport
Transport Canada
330 Sparks Street
Tower C, Place de Ville
Ottawa, ON K1A 0N5

Dear Minister Garneau,

We, the undersigned have formed a coalition of associations to bring forward concerns and issues on the subject of Transport Canada’s regulatory oversight of Unmanned Air Vehicles (UAVs).

The coalition includes a broad group of organizations in the aviation sector representing pilots, aircraft operators, and airports. Our common goal is a comprehensive regulatory framework for the safe and efficient operation of UAVs that will ensure the **safety** of all aircraft sharing the National Airspace System and the area proposed by Transport Canada around aerodromes.

We thank the government for recognising the growing threat that Unmanned Air Vehicles pose to other traffic in Canada’s skies without timely action to reform the regulatory environment in which these increasingly sophisticated aircraft systems operate in ever increasing numbers. The NPA on UAVs, on which the Government of Canada already has received extensive comment from many of the undersigned organizations, represents a positive step in this direction and we look forward to the next iteration in this work.

At the same time, however, Canada's air transport sector fears this approach may not go far enough. Regulations that only apply to a small segment of the UAV operational landscape do not ensure that all UAV operations receive adequate oversight. Possession of a UAV operating certificate is no guarantee of safe operation. Safe skies can only be ensured through comprehensive aircraft performance standards, compliant and compatible equipment and standardized operating procedures so that UAVs can be seen by pilots in their aircraft and controllers on their displays.

There also are concerns that the current approach will fail to reach the large group of recreational or hobbyist operators buying increasingly sophisticated UAVs online or at big box retailers, and who may operate them without any reference to rules, good practice or safety. The expectations and concerns from industry are fuelled by projections from the retail sector that an additional 700k – 1 million UAVs will be sold to the general public by the end of the 2015 Christmas season. These UAVs should be restricted to operating under visual line of sight rules outside of controlled airspace at safe distances from airports and heliports. However, sighting of UAVs in proximity to commercial flights and aerodromes is rising at an alarming rate and the challenge of enforcement is becoming monumental in size and scope.

While the undersigned appreciate the public awareness activities initiated by the Department since 2014, we respectfully suggest that there should be even greater effort to educate distributors, retailers and purchasers of UAVs of the requirements and responsibilities of owning these aircraft systems. This new group of users is likely to create hazards to people, aircraft and property – one need simply to look at the myriad of UAV-related videos on YouTube to see examples of hazardous behaviour. An education plan with greater reach to the general public and distribution chain is essential. Linking all of these aircraft with their owner through a registration and marking process is important for accountability and to facilitate reporting of defects and operational difficulties. In this way the UAV owner/operator can be held accountable for his/her operation of the aircraft. In the absence of an identification process, the owner/operator of the UAV could simply leave the scene of an accident or incident and avoid any responsibility for their behaviour.

It also is very important to establish effective enforcement measures against individuals who, accidentally or intentionally, operate unmanned aircraft (model aircraft and unmanned air vehicles) unsafely near commercial aircraft or in restricted airspace. Rules and regulations can only be effective if there is an appropriately empowered and resourced approach to enforcement.

Your department is conducting important work in the area of UAVs and we wish to applaud this interest. In summary, we see the need for a multifaceted approach to raise awareness of the safety impacts and consequences of interfering with manned aircraft operations. This includes not only a robust regulatory framework, but also improvements in the monitoring of UAVs around airports and in commercial airspace, public awareness campaigns, and enforcement action.

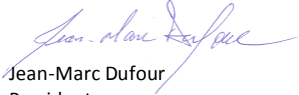
We thank the Minister for your consideration of this important initiative. As always, we remain available to discuss this issue with you, should you seek further information.

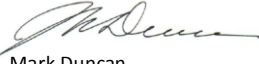
Sincerely yours,


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Air Transport Association of Canada


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