



Vancouver Island

BUILDING TRADES

October 3, 2017

House of Commons
Ottawa, Ontario K1A 0A6

Attention: The Honourable Marc Garneau, P.C., M.P.
Minister of Transport

Dear Minister:

Re: New Canadian Aviation Regulations should be updated to the highest international standard for the safety for our membership and the public at large

As the representative of 8,000 Vancouver Island workers in the construction industry, I am writing to express my deepest concern about our current Canadian Aviation Regulations when it comes to pilot fatigue and its potential devastating effect on our membership both on and off the job. I am especially concerned after watching the recent story produced by the CTV News W5 program that aired September 30, 2017. Our membership uses Canada's air transportation to get to and from large resource projects and remote areas, as well as for vacations and other travel needs. Canada currently has some of the oldest and most lax rules on pilot fatigue in the world – this disregard for worker and human safety we believe is not acceptable when we consider the ramifications.

We understand some changes are in the works for Canada's Aviation Regulations, but not only have these changes not yet been put in place, it took seven years to develop them. Moreover, it is also recognized that the proposed changes would only somewhat improve conditions, improving our position only slightly when compared with others in the global industry. When it comes to our safety in the skies, and for those potentially impacted on the ground, a band-aid solution that falls below international standards should not be considered. Canada leads the aviation industry in many areas, but on this topic, we lag far behind, with our current regulations placing us only slightly above standards set by India and Bangladesh. Enacting regulations with only mediocre improvement could come with dire consequences. Without stronger regulations, it is only a matter of time before we feel these consequences will become a reality that will blemish our character as a caring nation, and a leader in the pursuit of human dignity and the value of human life.

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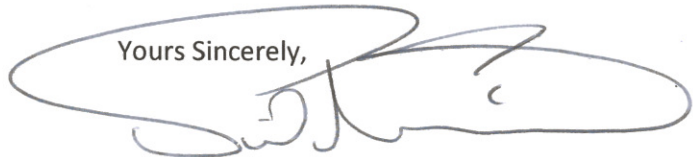
Far too many pilots are falling asleep accidentally while flying, and regulations that rely on self-reporting of fatigue are not reliable. When one is fatigued, especially flying over 14 hours per day while working nine days in eight cities and five time zones, reaction time slows, attention is hampered, decision making is more difficult, and performance is impaired as if one is drunk. Research is supporting the need to pay attention to the inner time clock – recently announced Nobel Prize winners were awarded for their research in to the body's biological clock and the importance of sleep, the effect of jet lag, and the diseases that are caused by a mismatch between our external environment/lifestyle and our inner clock. We cannot afford to debate or delay the pilot fatigue regulations any longer. The time to act is now.

The US has some of the toughest fatigue rules, but it took tragedy to get them there. In February 2009, 49 people died on a flight from Newark to Buffalo, New York, with the accident attributed to pilot fatigue. Prior to changing their regulations with the 2010 Airline Safety Act in response to this tragedy, there were over 1,100 fatalities. Since then there have been none.

Canada cannot lag behind – we must act as well. The Air Transportation Association of Canada, with a “mission to support our members in their commitment to a safe, world-leading and sustainable Canadian air transport industry,” does all of us a disservice when its President, John McKenna, states there is “no fatigue problem in Canada,” emphasizing there is no hard evidence fatigue causes crashes. But in July 2017, a fatigued Air Canada pilot almost caused the worst loss of human life in aviation history in San Francisco, assuming a busy taxi runway was the landing runway.

This is a pivotal moment, and we must act now. On behalf of our membership and all travelling Canadians, I implore you to please do what is right and enact stronger pilot fatigue regulations that adhere to international standards immediately.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Phil Venoit', enclosed within a large, hand-drawn oval shape.

Phil Venoit, RSE
President
Vancouver Island
Building and Construction Trades Council

cc. Bob Blakely, Canadian Operating Officer, CBTU
Tom Sigurdson, Executive Director, B.C. B.T.U.