

Speaking Notes

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to

The House of Commons Standing Committee on
Transport, Infrastructure and Communities

Study on Aviation Safety

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Check against delivery

Good morning.

CFPA members work as Transport Canada's most highly skilled aviation inspectors. I am here to add their frontline perspective to this important study.

Our message is sobering.

We are witnessing the dismantling of aviation safety oversight in Canada and the progressive weakening of Transport Canada's inspectorate.

This state of affairs has been years in the making.

Piece by piece, the checks and balances that have delivered one of the safest aviation systems in the world are falling victim to cost cutting and misguided management. Meanwhile, the perishable skills and competencies of inspectors are deliberately being allowed to wither.

All the while, Transport Canada officials reassure you that all is well.

But, consider this.

A dangerous culture of non-compliance and secrecy has set in over the years.

Transport Canada has come to regard safety regulations and international safety requirements as little more than inconveniences that can be ignored to satisfy budget limitations or industry pressure, and without regard to public safety.

I say dangerous, because this culture affects aviation in Canada at large.

A recent example.

Last August, without consultation and in secret, Transport Canada completely withdrew or reduced safety oversight from a significant portion of aviation including:

- All airports in the country
- Business aircraft like those Jim Prentice and Jean Lapierre died in
- Urban heliports, and
- Aircraft that do dangerous work like fire bombing

[See Tab 1 for reference]

While assuring you that inspection is robust, Transport Canada watered down its inspection process in order to boost its 2016 performance metrics¹.

These and other decisions have been taken without notice to Parliament, MPs or the public through a bureaucratic tool called an Internal Process Bulletin, a practice the department is using with increasing regularity.

Transport Canada is quietly planning to roll back oversight even further by:

- Completely washing its hands of monitoring the proficiency of pilots
- Delegating professional pilot exams to industry, and
- Allowing airlines to set their own operational safety standards without checking

[See Tab 2 for references]

With the cancellation of the Inspection and Audit Manual, Transport Canada gave up its ability to ensure compliance with the safety regulations.

[See Tab 3 for reference]

This singular reliance on SMS puts Canada offside with ICAO, which requires member states to establish and maintain safety through direct operational oversight.

In fact, Canada fails to meet more than half of ICAO's mandatory minimum safety requirements. That's right. Transport Canada is off-side with 8 out of 13 of ICAO's mandatory minimums. These are requirements, not just suggestions. Our assessment of Canada's performance in this regard can be found at Tab 4.

[See Tab 4 for reference]

In keeping with its default toward secrecy, Transport Canada hasn't notified ICAO of these deficiencies as required of member states.

You may be wondering how it is possible for my remarks to be so different from the story you heard earlier from Transport Canada.

¹ *"The primary objective of this temporary program change is to increase the inspection capacity to meet the 2016/2017 National Oversight Plan by leveraging existing albeit leaner surveillance tools."* Source: Transport Canada IPB 2016-03 issued on July 29, 2016.

I was struck by the misleading nature of the testimony you heard from officials. It deserves the reality check we have produced for your information.

[See Tab 5 for reference]

We should be able to provide the Minister with a signed written statement that the inspected airline is fully compliant with all safety regulations. Right now, an inspector not able to do that. That is why I urge your committee to recommend that the government reinstate compliance audits to determine if an airline is in compliance with safety requirements or not.

On behalf of the public, the Minister needs to know if the airlines are meeting safety requirements, not whether they have a good SMS or not. To paraphrase Ronald Regan, the public is expecting the Minister to trust the airlines to act in their own self-interest, but, also, to verify that safety standards and requirements are being met.

Without this change, an aviation disaster on the scale of Lac Mégantic is very likely.

Transport Canada must be put on a tighter leash. No more sweeping decisions to dismantle oversight made in secret. Require Transport Canada to justify in a public forum, such as this committee, why less oversight means more safety.

It has been more than a decade since ICAO last audited Canada's aviation safety oversight system in 2005. Your committee should recommend that Transport Canada invite ICAO to complete a full assessment of Canada's compliance with minimum international safety requirements.

Finally, we concur with Justice Virgil Moshansky's recommendation for a Commission of Inquiry into aviation safety oversight. We agree it is long overdue.

Thank you.