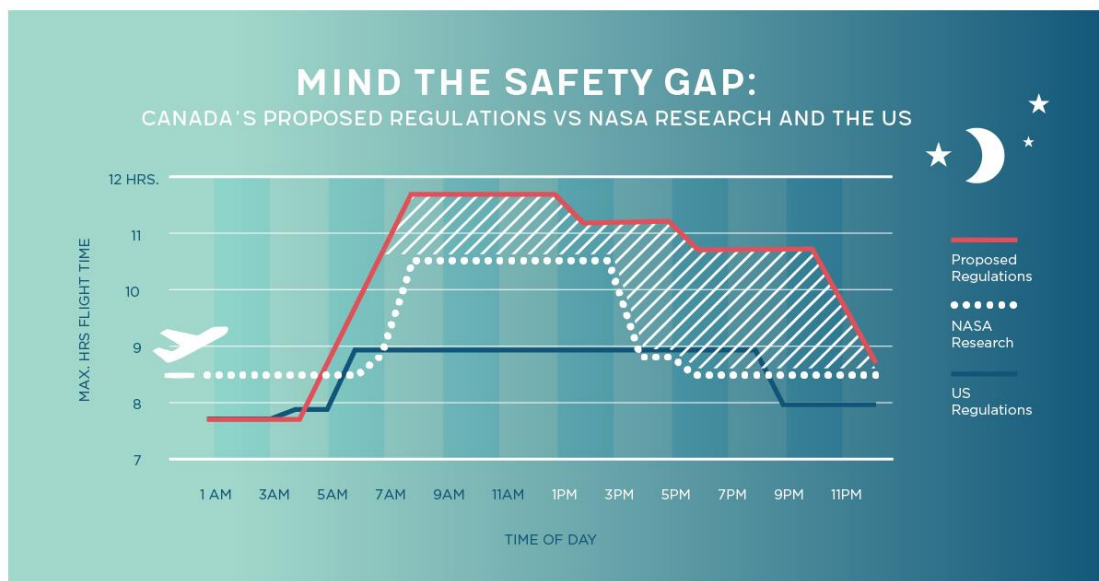




## Backgrounder

The 4,000 pilots of the Air Canada Pilots Association have grave reservations about the integrity of the Canadian system following the changes made by the government to the Regulations Amending the Canadian Aviation regulations (Parts I, VI and VII — Flight Crew Member Hours of Work and Rest Periods), which was published in the Canada Gazette, Part II on December 12, 2018.



### The Two-Hour Gap in Flight Duty Times

A significant body of undisputed scientific evidence (including NASA's Ames Research Center) has found that pilot fatigue during night-time operations has significant consequences for alertness and vigilance. Following the 2009 Colgan Air crash, the U.S. Federal Aviation Administration implemented new science-based fatigue rules which limited flight time for U.S. pilots to 8 hours at night.

### Dividing Pilots and Passengers

ACPA pilots are disappointed that the government has chosen to divide pilots, their passengers, and the communities they serve. All pilots are equal and should have the same margin of safety across the board. Aviators flying smaller aircraft have to wait for 48 months to be protected by the regulations, much longer than pilots at larger carriers, who have an implementation timeframe of 24 months.

**Commercial Profits Over Safety Concerns**

Another concerning issue contained in the regulations is that the proposed Fatigue Risk Management System does not rely on science-based prescriptive limits as a foundation, nor does it require independently verifiable data. This will allow operators to place commercial considerations ahead of safety concerns, thereby creating an unacceptably low margin of safety for Canadian pilots and air passengers.