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Via email only to carrac@tc.gc.ca

Ms. Marie-Anne Dromaguet
Chief, Regulatory Affairs, AARBH
Safety and Security
Transport Canada
Place de Ville, Tower C
Ottawa, Ontario
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Subject: **CARAC ACTIVITY REPORTING NOTICE #: 2014-016 – Seaplane Operations NPA**

Dear Ms. Dromaguet:

Thank you for the opportunity to respond to this NPA. Since the effort leading up to the NPA and the NPA itself did not include private operations, COPA was not intending to respond until we learned that L'association des Aviateurs et Pilotes de Brousse du Québec (APBQ) decided to recommend that mandatory egress training be required for private operators. We are grateful for the extension to the comment period so that COPA can now provide input.

With relatively little time to study the NPA and issues surrounding the amendments, COPA sought a position from our COPA Flight 72, which is also the BC Floatplane Association, and which is one of the largest if not the largest organized group of private seaplane pilots in Canada. Following consideration by their Board of Directors, a position opposed to the amendments being made applicable to private operations was sent to COPA and it is enclosed to this letter.

Since this is considered a policy matter for COPA, the COPA Board of Directors was also polled for their direction. The Board agreed that the requirement for egress training and for mandatory wearing of PFDs should not be extended to our sector of aviation. The following are reasons why COPA is opposed.

- As I hope you can appreciate, there are advantages and disadvantages to be weighed whenever increased regulation is considered. Such was the case for commercial operations, including convening a focus group, but to my knowledge there was no formal discussion with our sector. Transport Canada should not extend the NPA to include private operations without sufficient time, other than the extension of the comment period by a few days, for a thorough discussion with our sector of aviation.
- There are a wide variety of aircraft involved in private seaplane operations. Because of their configuration, it may be impractical and even dangerous to require the wearing of

PFDs at all times. Careful consideration should be given before the wearing of PFDs at all times is extended to this sector of aviation.

- While COPA encourages our members to seek egress training, there are significant cost and time burdens placed on our sector, as well as the egress training organizations, if the requirement is extended to all seaplane pilots. To my knowledge, no consideration was given of the capability of the training industry to accommodate this large number of pilots, including making training conveniently located for private pilots who may not be able to readily travel for the training. Therefore, the NPA requirements should not be extended at least until a cost and benefit analysis is conducted for this sector.
- The TSB recommendations and subsequent focus group effort were directed at commercial operations and pilots. It would, as a minimum, be unfair to our sector to simply extend the requirements without due consideration.

Awareness and educational materials are the way to go for our sector of aviation. To that end, COPA recommends that:

- Transport Canada increase educational efforts regarding wearing of PFDs for private seaplane pilots and passengers. COPA, with assistance from the Donner Canadian Foundation <http://www.donner.ca> and the production capabilities of AOPA US, has produced several safety videos <http://www.copanational.org/IntroductionPage.cfm> and we are willing to work with Transport Canada in the production of a safety video on the wearing of PFDs.
- egress training should be highlighted and encouraged but not be made a requirement of holding a seaplane rating. COPA is already engaged in the education effort on egress training with one of the videos referred to above, entitled *Underwater Escape*. We could highlight this and other videos as part of periodic Transport Canada Aviation Safety Newsletter articles.

Yours truly,



Kevin Psutka
President and CEO

Enclosed: BCFA letter to COPA