



Transport Canada Civil Aviation External Stakeholder Engagement Strategy

Commercial Air Services Standards (CASS) Omnibus Package

Background

In 2023, the International Civil Aviation Organization (ICAO) launched their Universal Safety Audit Program (USOAP) in Canada, auditing the *Canadian Aviation Regulations* (CARs) and associated Standards. The audit evaluated the effectiveness of Canada's civil aviation system and its alignment with international norms. While this audit was not a direct measure of safety indicators or an assessment of unsafe operations within the Canadian aviation industry, it highlighted several areas where changes are necessary to better align with international requirements. Among its findings, the audit revealed a large number of low-impact and administrative misalignments between the CASS and international standards, which have been consolidated into the upcoming CASS Omnibus Package.

Purpose

In response to the recent ICAO audit, Transport Canada Civil Aviation has been working on the publication of a Notice of Proposed Amendment (NPA) combining amendments to the *Commercial Air Services Standards*. To ease the consultation burden on stakeholders and minimize the number of NPA's, Transport Canada elected to consolidate various Part VII standard amendments resulting from the ICAO audit into one omnibus package. The upcoming NPA proposes a variety of administrative and non-safety related changes that seek to safeguard Canada's international reputation by harmonizing Part VII Standards with international norms. The amendments also seek to harmonize language and standard requirements between the various CASS. The upcoming NPA will propose amendments to the following standards:

- Standard 722 - Aerial Work;
- Standard 723 - Air Taxi: Aeroplanes;
- Standard 723 - Air Taxi: Helicopters;
- Standard 724 - Commuter Operations: Aeroplanes;
- Standard 724 - Commuter Operations: Helicopters;
- Standard 725 - Airline Operations – Aeroplanes; and
- Standard 726 - Air Operator Maintenance.



Summary of Proposed Changes

The upcoming NPA will propose amendments to the above-mentioned CASS. The majority of the proposed amendments are contained to the following areas: *Contents of a Company Operations Manual, Training Programs, Issuance or Amendment of Air Operator Certificate and Operational Flight Plan*, among others. All amendments in the upcoming CASS Omnibus NPA are designed to improve alignment with international standards to meet the requirements of the Convention on International Civil Aviation.

To align with international standards, the CASS Omnibus NPA proposes, for example, that the *Contents of a Company Operations Manual* now include procedures to report routine and non-routine observations of volcanic activities to align with ICAO Annex 3. While ICAO requires operators to establish such procedures, Canada has not updated the CASS to require the establishment of the above-mentioned procedures. Such amendment will require operators to update their Company Operations Manual to include this additional process.

The CASS Omnibus NPA also addresses a series of administrative misalignment with international norms. For example, Article 29 of the Chicago Convention and ICAO Annex 6, Parts I, II, and III require operators to carry a passenger manifest, cargo manifest and a certified true copy of the Air Operator Certificate on board. While this is a common practice for operators, the CASS does not expressly align with this requirement. As a result, the *Contents of a Company Operations Manual* and the *Operational Flight Plan* under Part VII Standards are proposed to be amended to explicitly require that these documents be carried on board.

The above-mentioned examples serve to provide context on the nature of the amendments contained in the CASS Omnibus NPA. The CASS Omnibus NPA will propose numerous other, but similar, low impact and administrative amendments.

Implications

Given the number of proposed amendments, Transport Canada recognizes that industry will need time to adapt and is committed to working with stakeholders to ensure the smooth and gradual implementation of the proposed amendments.

To minimize impacts on stakeholders, Transport Canada plans to commence oversight gradually, and in phases. This approach seeks to offer leniency on the enforcement of the amendments.

The first phase of the oversight will have a duration of 18-months from the coming into force of the amendments. During this first phase, Transport Canada oversight will consist of non-punitive observations for non-compliance with amended CASS. Phase one will also afford industry opportunities to raise additional concerns about the amendments and may result in further



changes to the CASS, if required. In the second phase of the oversight, following additional assessment as to the readiness of the industry, conventional oversight will begin. This approach seeks to facilitate stakeholder compliance with the amendments while Canada continues its efforts to better align with ICAO norms.

Consultation

The target audiences for these consultations are Canadian civil aviation industry stakeholders, particularly those impacted by CARs Part VII – Commercial Air Services regulations and standards.

The NPA will be subject to a 60-day consultation period. Transport Canada is targeting publication of the CASS Omnibus NPA for April 2025, with a final publication of the amendments for summer 2025. It is anticipated that the final standard amendments will be subject to a 30-day delayed implementation period.

The NPA will be published on the online CARAC activity reporting system and distributed to CARAC members.