



Ottawa, May 7 2020

The Honourable Marc Garneau P.C., M.P.
Minister of Transport of Canada
(via email)

Re: Saint-Roch-de-l'Achigan Aerodrome

Minister Garneau,

It is with much sadness that I am now contemplating the future of aviation in Canada, after taking note of the document accompanying the Ministerial Order issued on May 4, 2020 regarding the Saint-Roch-de-l'Achigan aerodrome (SRA).

The first three paragraphs of the note summarize the quality of the work performed by the proponent and the compliance with Responsible Aerodrome Consultations Regulations (CAR 307). The document also underlines the good faith of the proponents and the supplemental iteration of work following your initial comments. The note could well have terminated the whole issue at that point, with the consequent repeal of the initial Order issued on August 29, 2019.

Unfortunately, this is not how it unfolded. As we know well, your mission is to promote aeronautics¹, yet the document amounts to an attempt to justify a totally opposite stance. The most offending part is an allusion to a public referendum held in contempt of current legislation² which you attempt to legitimize and give credibility to in your decision. The mere mention of it is already extremely damaging for aviation across Canada; from now on, opponents of any aerodrome project in the country will simply have to replicate this totally random process, certainly not prescribed by the regulations (CAR 307).

Item 3 of the document alludes to our 2017 analysis of the Economic Impacts of General Aviation to infer that the global economic contribution of the projected SRA aerodrome is not well defined. It goes without saying our study was of a general scope and meant to address economic issues at large, under a variable geometry approach, yet it clearly points to substantial economic benefits. If this reasoning were used by opponents to the project, I would perfectly understand the underlying motive, but coming from the Minister whose mission includes the promotion of aviation, the oversimplification is tantamount to a lack of vision and certainly unbecoming of your role.

¹ Art. 4.2 (1) *Aeronautics Act*

² Amongst others, article 517 of the *Act respecting elections and referendums in municipalities* in Quebec stipulates that a municipality may submit a question within its competence, which aeronautics is clearly not.

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In the following point, you refer to COPA's support letter of December 13, 2019 where we specifically mention the importance of refraining from oversimplifying the contribution of aerodromes to the economic welfare of the country and to the transportation network at large. Each individual aerodrome in the country contributes to the wellness of the network. Contrary to your view and with all due respect, I believe that each new flight training unit (FTU) helps solve the present pilot shortage. Let's not forget that before being trained as an instructor or as an examiner, as the government suggests, one has to train to become a pilot.

The last point is especially contemptuous. If people have invested in this portion of land in SRA, if the promoter and his supporters spent hundreds of hours from their personal time and hundreds of thousands of dollars in legal fees to defend Canadian aviation, it is certainly not to be curtly told to just pack up and move over by the Minister whose mission is to promote and defend aviation. It's only fair game, I agree, that they would have to use other aerodromes for a while, but it's certainly not a reason to support your justification in not letting SRA see the light of day.

Our biggest concern was that politicization of the Consultation process (CAR 307) promulgated in January 2017 would materialize at some point. In dealing with Transport officials to make sure the process was properly followed, we were assured that the consultation process was neutral, transparent and would remain so, even more in light of an illegitimate referendum or a sprinkling of political opponents resorting to dubious tactics. They would not be the deciding factor in the future of aeronautics in this country. We see that the "public interest" has now sadly taken a very political turn, as we feared. The aviation community in Canada was hoping for so much more.

For the benefit of aviators, aerodrome proponents, regular citizens and even opponents, it is of the utmost importance on your part that you clarify what surrounds CAR 307 to make it a factual, clear and concise process, far from the political tactics to which the SRA Aerodrome fell victim.

During my five years as President of COPA, I always worked with Transport Canada in a spirit of trust, confidence and transparency while striving to solve our occasional differences by defending our mutual points of view with deference and respect. I'm afraid the position we could adopt in the future might be detrimental to the progress achieved during the last few years, and that we would have to once again "fight" instead of collaborate in preserving our internationally recognized Canadian freedom to fly. I hope this will not be the case.



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