

Minister Raitt

First of all I wish to thank you, on behalf of Unmanned Systems Canada's over 700 members, for the interest and attention that you have placed on our industrial sector. We can understand how many issues must vie for your attention and we are very pleased that you continue to keep Unmanned Aircraft in your agenda. We are also pleased to acknowledge the very productive working relationship we have with the Transport Canada staff and the access we enjoyed to your office through your former staff member, Veronica Gerson – we look forward to re-establishing this relationship with others from your office.

Regarding the NPA you have announced today, we are pleased with the principles and high level material that we have seen. The material presented thus far seems to align well with that developed over the course of the last 5 years through the CARAC process and we believe this will provide Canada a progressive regulatory framework based on solid, risk-management and performance-based principles. We look forward to reviewing the details and providing substantial comments.

If we look back to last November, when you announced the Safety First Awareness campaign and the revised staff instruction, we see a lot of the same principles and approaches, which in theory are all very good. I would like to provide back to you, however, some of the feedback provided to us by our members after the changes were made in November so that we can avoid some of the same pitfalls as we move forward.

1. The efforts being undertaken are on a schedule that is far more aggressive than typical for regulatory reform – ***We believe Transport Canada must apply more resources to this file over the short term to achieve success.***
2. Transport Canada must increase its efforts to respond in a timely and accurate fashion to UAS operators, the media and the public. – ***There are many opportunities to get the positive message out, we must work together to do so! Equally, there is nothing more frustrating than a lack of response to an application or question when clients are walking away!***
3. There is a general perception that the revised staff instruction of November 2014 was too complicated, leading to numerous misinterpretations and confusion in its implementation. – ***A clear implementation time-line and advisory material should be developed and associated with the NPA so that this does not occur in the future.***
4. The exemption criteria, especially for under 2 Kg UAS, should be reviewed – we believe that the intentions of a “Low Energy RPAS”, which were the basis of these exemptions, was lost. – ***It appears that the NPA has addressed this issue with the relaxation of distance from built up areas for the lowest risk class – will the corresponding exemption be revised to reflect this change in thinking?***
5. Transport Canada must take further steps to improve the consistency of application of regulations across all regions of Canada. ***While the regulation is being developed, our members are still applying for SFOCs and still need improvements in this process.***

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6. The unrestrained recreational/hobbyist remains a challenge for all of us, and will continue to do so with new regulation. – ***Point of sale information needs to be developed and mandated to help resolve this issue***

In closing, I wish to thank you, and your staff, for hosting this event and for your continued efforts on behalf of the Unmanned Aircraft sector and Canadians at large. This emerging industry provides well-paying jobs for a growing number of Canadians and is being harnessed to provide economic advantage in a tremendous number of other sectors. Our progressive and permissive regulatory framework, since the mid 90's, has provided us with a competitive advantage over many other jurisdictions, most notably the United States. To maintain our global leadership in this sector we are prepared to work hard with you to maintain our advantages and grow this industry in a progressive yet safe manner. Thank you.

Stewart Baillie
Chairman, Unmanned Systems Canada
28 May 2015