



Summary from TC's Stakeholder Engagement Session

On Wednesday, May 23rd, 2018, Transport Canada (TC) hosted approximately 40 unmanned aerial system stakeholders across the spectrum of industry companies and associations, training providers, manufacturers, and operators to discuss proposed changes to the regulations proposed in Canada Gazette 1 (CG1).

A summary document from TC was to be published shortly following the session, although nothing has been released yet.

It is important to note that the following are proposed changes to the proposed regulations, and **none** of the following proposed changes below have been confirmed as regulation.

INTRODUCTION

After reviewing the 650+ responses to CG1, TC agreed with the majority of respondents in amending the proposed regulations to streamline, simplify and reduce the overall complexity.

With safety as the underlying intent of the regulations, TC saw value in removing many of the prescriptive proposed regulations and to create “paths to compliance”. They are taking a more common-sense risk-based safety approach looking at what is essential for safety while encouraging to not hinder innovation within the UAV/RPAS space. The goal with the proposed amendments is to allow the majority of common use cases and reducing noncompliance issues which will contribute to a safer and more productive industry.

GENERAL

The term Remotely Piloted Aerial System (RPAS) is being proposed as the terminology to replace the use of Unmanned Aerial System (UAS). The rationale outlined suggested that this was a better term from an inclusivity/gender neutrality viewpoint as well as being a better representation of the system-oriented operations of RPAS systems.

TC is in the process of developing and testing an online Information Management System (IMS) that will handle functions such as aircraft and pilot registration, pilot exam

delivery and pilot permit applications. This drastically reduces the associated costs as proposed in CG1. As an example, the aircraft registration fee was forecast to be \$110 in CG1 and through the IMS is forecast to be between \$5-\$10.

Of particular note, mandatory Insurance and training course attendance will no longer be mandated through regulations.

OPERATIONS

As announced in CG1, TC is removing the recreational/commercial distinction for operators and instead opting for a risk-based approach based on weight and complexity of the operation. All aircraft above 250g but below 25kg will be classified as small RPAS and further broken out into two classes; limited and complex. Determinants of complex operations are proximity to people and airspace classification. It is important to note the removal of the terminology around “built up areas” that caused a lot of contention. Equally important, “people” refers to free-standing individuals and crowds, not those within vehicles or buildings.

There will be more flexibility in lateral distances from people depending on operator permits and the aircraft used.

Many parties were interested in changes to the proposed compliant aircraft requirements. TC has removed the grandfathering clause as it stood in CG1. They have instead engineered a set of requirements in a (very convenient) acronym called “SAFE”- Safety Assured Flight Envelope. Manufacturers will be able to provide evidence of their Aircraft meeting different levels or gradations of this SAFE framework with the more stringent envelopes enabling more “risky” operations.

No details on the requirements for a “SAFE” designation was available, leaving the UAV Industry in an uncertain position as far as acquiring new Aircraft.

TRAINING

As mentioned earlier, training course attendance will not be mandatory for pilots. The knowledge requirement will be demonstrated as met with an 80% or greater score on the online TC exam. This exam is multiple choice and generates from a test bank currently at 500 questions with a goal of it reaching 2000. The exam is open-book but timed and covers the material in the newly updated TP15263.

Though unconfirmed, comments from the TC presenters indicated there will be a limited category exam and another exam for the complex category. Those in the complex category will also need to conduct an in-person flight review covering a site inspection

and normal and emergency procedures. These flight reviewers will be qualified through TC and will be required to pass a separate reviewer specific exam in addition to the complex category exam.

CONCLUSION

This summary touches on the main themes though thoughtful questions from the stakeholders generated more in-depth responses from the UAS Task Force. More details are likely to come directly from TC, and although this level of engagement is not common at this stage in the gazette process, they seem open to stakeholder engagement and discussion.