



Model Aeronautics Association of Canada
Modélistes Aéronautiques Associés du Canada
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August 17, 2015

The Honourable Lisa Raitt, Minister of Transport

cc: Aaron McCrorie - Director General, Civil Aviation

cc: Marie-Anne Dromaguet - Chief, Regulatory Affairs

carrac@tc.gc.ca

Dear Minister Raitt,

Reference: NPA Unmanned Air Vehicles 28 May 15, RDIMS # 10477932

The Model Aeronautics Association of Canada (MAAC) represents the interests of more than 11,000 Canadian recreational model enthusiasts from coast to coast. MAAC has a history of over 65 years ensuring the safety of model aircraft flying. There has never been a recorded in-flight collision between a model aircraft and any manned aircraft in Canada. Traditional Model Aviation, advocated through MAAC, has an outstanding safety record operating under the current legislation and MAAC's comprehensive safety code, which is a living document maintained to current standards.

MAAC provides members with excellent liability insurance coverage and our premium reflects that insurers see model flying by MAAC members as low risk.

Our co-operative partnership with Transport Canada is a long-standing demonstration of how to safely operate traditional model aircraft. MAAC works in close and harmonious cooperation with Transport Canada. An example of this is our cooperative website linkages. Our website promotes safety not only to our membership, but to all who access it. A further example is the many years we have been involved in CARAC on the whole UAV discussion from the beginning. During that time, all concerned parties have always agreed that traditional model aircraft are not a cause for concern and are adequately covered within the existing CARs.

MAAC recognizes that irresponsible operation of camera equipped remotely piloted aircraft that may be capable of operation beyond the direct line of sight of the operator is a cause for concern. We are prepared to offer all of our resources in order to assist in safety campaigns. Our organization is already working on ways to promote safe and acceptable standards of operation beyond our own membership. We are reaching out on social media and are investigating further avenues.

MAAC has a long and well demonstrated history of cooperation with government agencies at the Federal, Provincial and local levels to promote safe and responsible operation of model aircraft, and to introduce young Canadians to aviation. We share common objectives and this drives our preference for working cooperatively with all stakeholders



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Le conseil d'administration de modélisme



to resolve issues and develop solutions. MAAC is submitting comments on the Transport Canada NPA in this spirit of partnership so that regulatory changes can be introduced that encourage the development of a healthy and safe UAV industry while preserving the ability of model flyers to continue to enjoy their traditional recreational activities.

MAAC compliments Transport Canada on introducing regulatory concepts in the NPA that are balanced, sensible and that will serve the best interests of all Canadians. The work of the UAV Systems Program Design Working Group has provided a valuable basis for these concepts and it should be noted that MAAC has been an active participant in the Working Group discussions since the beginning.

1. Applicability

It is noted that the proposed rules would apply to all UA operations regardless of purpose where the aircraft weighs 25kgs or less and is operated within visual line-of-sight. The current regulations limit model aircraft to 35kgs. Models over 35kgs require a SFOC. MAAC has worked with Transport Canada to develop a simplified SFOC process for MAAC members and our international guests. This simplified process has been effective in reducing the workload for Transport Canada Inspectors while maintaining appropriate safety oversight. The 35kgs limit has worked well and there is no need to change it. A reduction would increase the SFOC burden for Transport Canada and necessitate a revision to the process without any benefit to justify the change.

2. Model Aircraft

MAAC appreciates that Transport Canada intends to provide a "carve-out" to allow traditional modelers to continue flying for recreation purposes. There is an international dimension to model flying, particularly with regard to competition. The Aero Club of Canada (ACC) governs all sport aviation in Canada and is affiliated to the Fédération Aéronautique Internationale (FAI). MAAC is a member of the ACC and is affiliated through them and FAI to national recreational aviation associations worldwide.

MAAC is in contact with a number of national model flying associations and is monitoring the implementation of similar regulatory changes in other countries. There are slightly different approaches being taken from one country to another. MAAC looks forward to working with Transport Canada to develop a detailed solution that serves the best interest of Canadians and does not adversely impact international competitions and activities.

MAAC considers Approach 1 to be practical and workable. We believe that Approach 2 would not be a desirable way forward. The Attachment to this document suggests a practical implementation of the intended "carve-out".

We are fully committed to working with Transport Canada to cooperatively develop the detailed structure that would allow Approach 1 to be implemented. MAAC does not favor a mechanism that would bestow exclusive recognition on a single organization. It would be preferable to develop a standard that would allow any compliant association to be recognized.

3. Terminology and Definitions

MAAC supports the stated intent to harmonize terminology and definitions with ICAO practices. This is in line with the reality that aviation is truly international and that model flying also has an international dimension as stated above.

4. Categorization of the Regulatory Structure

MAAC does not see the need for a "Very Small UAV" category provided that the operating rules for the "Small UAV" category are not unduly restrictive as seems to be the intent expressed in the NPA.

Effective enforcement will be a challenge for Transport Canada. MAAC advocates a flexible approach that encourages voluntary compliance since this develops a culture of safety and instills in individuals a positive attitude that respects the rules for flight safety. MAAC's structure is built on clubs that are a social unit in which community belonging and peer pressure naturally discourages unsafe practices. CAR 602.45 is not included in the Schedule of



Designated Provisions and so it is not easy for Transport Canada to take enforcement action against irresponsible recreational model operators since judicial action is the only option. We recommend that the schedule of designated provisions is reviewed as part of the regulatory update process so that administrative action is more widely available as an enforcement option.

MAAC is ready to work with Transport Canada to develop a comprehensive program of education, training and, if necessary, enforcement that will enable recreational model flying in Canada to be conducted to the highest safety standard.

Training and Knowledge Requirements

The training and knowledge requirements proposed in the NPA are reasonable and are consistent with the recommendations of the UAV Systems Program Design Working Group.

MAAC through our sanctioned clubs and committees provides training to new members and serves to educate them in appropriate aeronautical knowledge. We will continue to develop and update our training programs to align with established best practices using TP15263E as a guide.

Conclusion

MAAC appreciates the excellent work done by Transport Canada to develop new aviation regulations that will encourage the growth of a new industry sector while maintaining a safe airspace environment for all users.

MAAC also appreciates that Transport Canada recognizes recreational model flyers as legitimate airspace users and intends to provide a "carve-out" to cater to the needs of responsible modelers. We are ready to meet with Transport Canada at any time to discuss the details of how this would be implemented.

Please do not hesitate to contact us if you have any questions or if we can provide any additional information.

Regards,



Rodger Williams

President

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cc: Richard Barlow T.C. Advisory Chairman

cc: Jeremy Cartlidge UAV Chairman

ATTACHMENT



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