

“...Each application *is* a unique set of circumstances however, those circumstances should be evaluated against a consistent national set of standards and policy. This is an area of Federal jurisdiction after-all, and operators should be able to expect the same policy to be applied in all regions. How can Transport Canada defend different standards in each region on this subject? Just how is a Low Flying Permit application in the Halifax area so different from an application in Calgary? With respect, our industry is filled with "unique circumstances" that lend themselves to the development of national policy.

What's more, If each set of circumstances was completely unique how could there possibly be any predictability for industry against the same regulatory backdrop? "We don't know what is acceptable, but we will know it when we see it. And incidentally, our practice in xxx region is not necessarily the same practice in xxx."

If Transport Canada expects to have any credibility with industry on this subject, and if Transport Canada is going to "walk the talk" on SMS, the RA process and hopefully the National policy flowing from the RA, should be logical and transparent. That is what Transport Canada would expect when an RA is conducted by industry in the context of an SMS. Transport Canada would also naturally insist that the RA team be populated with experts in the specific area of operation who have recent experience – something the xxx Region RA on this subject will not do. If we really are "partners" in safety, then perhaps industry should be involved, at least in an advisory or technical capacity, even if we aren't ultimately making the decision. We should *understand* the decision and the process that was used to arrive at it. We might even agree with it - but at the very least, we would understand how Transport Canada arrived at it.

It is not bad enough that it has been suggested that there is no role for industry in the RA, and that there will be no transparent policy for industry in xxx Region, but I am led to believe that the non-existent policy will change across the country, and make life difficult for operators who conduct operations in multiple regions, in an area of Federal regulatory jurisdiction, no-less ... this is such a glaring example of a long-standing regional disparity, I couldn't resist." ... "There are not too many issues that are as important as the ability of a SE helicopter to operate at low altitude in Canada...."