



NACC
National Airlines
Council of Canada

**Potential Impacts of the
ArriveCAN Application on Certain
Canadian Sectors**

Submission To: House of Commons Standing Committee on International Trade (CIIT)
On Behalf Of: The National Airlines Council of Canada (NACC)

Dear Members of the Standing Committee on International Trade,

On behalf of the National Airlines Council of Canada (NACC), thank you for taking the time to read our comments related to the *Potential Impacts of the ArriveCAN Application on Certain Canadian Sectors*. This is an important study, happening at a critical time where air travel, and the tourism industry more broadly, are on the edge of recovery.

As you may know, the National Airlines Council of Canada represents Canada's largest national and international passenger air carriers: Air Canada, Air Transat, Jazz Aviation LP and WestJet. It promotes safe, sustainable and competitive air travel by advocating for the development of policies, regulations and legislation to foster a world-class transportation system.

As airlines, we operationalize and implement policies on behalf of the federal government - including those adopted during the COVID-19 pandemic.

Pre-pandemic, our members collectively carried over 80 million passengers annually, directly employed over 60,000 people and served as a critical component of Canada's overall air transport and tourism sector, which supported more than 630,000 jobs. Prior to March of 2020, airports had hit record growth and record passenger volumes. Canadians had never been better connected to each other, and to the world.

As members can appreciate, few industries have been as impacted by the pandemic as Canada's airlines, and their workers. We were the first hit, the hardest hit, and the last to recover. And while we are optimistic about the future of air travel, and encouraged to see passengers want to reconnect with the world, we must take every step necessary to ensure our airlines stay competitive in a global context.

Aviation is a global industry that relies on consistency, predictability and harmonization. That is why we are recommending that the federal government revisit all pandemic-era restrictions, including the ArriveCAN app, with an eye to following the latest science and evidence.

Canada's legacy public health restrictions, many of which remain in place exclusively for travel, set us apart from a growing list of over 50 countries that have removed barriers to travel altogether. Over 100 countries have eliminated vaccine mandates for foreign travellers - even the most recent announcement from the Government of Canada does not match this standard. Changes to mandatory vaccination in June 2022 are a step in the right direction, but there is more work to be done.

Staffing shortages at both CATSA and CBSA require immediate attention, and we've been pleased to see investments from the federal government to address this.

However, the continuation of legacy, pandemic-era measures and restrictions create a confusing, complex journey for travellers, and keep Canada out of step with other countries.

The National Airlines Council of Canada believes that the ArriveCAN app has outlived its utility and purpose. The app is a good example of pandemic-era measures which must be revisited from the perspective of the current public health environment.

Processing times for passengers increased significantly following the implementation of mandatory use of the ArriveCAN app at ports of entry. Even with high levels of compliance, which the Canadian Border

Services Agency has estimated at 99.65 per cent, processing times are about five times as long as they were before ArriveCAN was in place.

Duplicative health checks and questions through ArriveCAN at government checkpoints adds volume to custom lines. We estimate that the average processing time has increased from roughly 30 seconds to at least two and a half minutes per passenger. Compounded by resource issues at airports and the resumption of more frequent travel, ArriveCAN is creating significant bottlenecks.

It is also important to note that ArriveCAN has raised significant concerns with respect to universal access. NACC members collectively service 302 international destinations, and infrastructure gaps and language barriers can create issues for travellers filling out the app, leading to significant backlogs upon arrival at Canada's airports.

Notably, the ArriveCAN app was designed to help reduce complexity for passengers navigating travel in a pandemic environment. It's important that these systems adapt to reflect both what we know about the nature of COVID-19, and the reality of travel, today.

The system in its current form is simply not working. The continued use of ArriveCAN is causing bottlenecks at airports and is increasingly damaging Canada's reputation as a destination for international tourists. Meanwhile, it is not offering a public health benefit that comes close to justifying the ramifications of its mandated use.

Digital tools have tremendous potential to make travel more convenient, safe, and efficient, when implemented effectively. NACC would welcome an updated ArriveCAN policy that retained the benefits of offering Canadians a digitized forum for providing their documentation upon entering Canada. However, in order to move away from the problematic ramifications of the current policy around the use of the app, it must not be a mandatory tool. The Government of Canada should increase accessibility by offering analog options. CBSA should develop a system of triage for the queues to BSOs at airport ports of entry to facilitate the faster movement of passengers who have the documentation to move swiftly through customs control, while allowing more time for those who require more complex interactions with a BSO.

Ultimately, it is on the CBSA and its partner departments and agencies who have the necessary information to identify the precise policy solution to the problem of the mandatory ArriveCAN app. The National Airlines Council of Canada respectfully puts forward these constructive proposals, which we hope will lead to deeper engagement with the Government of Canada to build a workable solution.