

TRANSPORT CANADA CIVIL AVIATION: ADDRESSING THE NEED TO SPEED UP STCs & TSOs

Issue

Transport Canada Civil Aviation (TCCA) is the Civil Aviation Directorate¹, and promotes the safety of the national air transportation system through its regulatory framework and oversight activities. As part of the regulatory framework, TCCA develops policies, guidelines, regulations, standards and educational materials to advance civil aviation safety in Canada. The issue in this policy is the delay in approvals of STCs – Supplemental Type Certificates and TSOs - Technical Standard Orders. TCCA, through oversight activities, verify that the aviation industry complies with the regulatory framework through certifications, assessments, validations, inspections and enforcement.

Background

TCCA is managed from five regional offices:



The issue arising is that some regions are far busier than others. Requests for approval arriving from outside Canada are handled on a first-come, first-served basis, i.e., US. Requests from within Canada must be handled within the geographic region where the company is based which files the approval request.

This has a two-pronged negative effect on Canadian companies, especially in BC (Pacific Region) where the back-ups are lengthy. Foreign companies have an edge in the market over Canadian companies; and Canadian companies are being driven to open satellite offices in the US from which to file paperwork in order to receive approvals in a timely manner.

¹ <https://www.tc.gc.ca/eng/civilaviation/menu.htm>

Background

Supplemental Type Certificates - STC

TCCA issues Type Certificates for Canadian-designed aeronautical products to certify that the product complies with the appropriate airworthiness standards. Hundreds of aviation-related companies produce products under some of the strictest controls in manufacturing today, incurring research and development (R&D) costs, high-paid staff costs and the costs of testing.

Approval certificates are a critical final step in the process. Delays in the Pacific Region have been growing for the last decade, from a variety of reasons: chronic understaffing; change in directors; lack of resources; increase in requests for approvals.

Ten years ago, the wait for paperwork was 5-6 weeks. Now, it is 12-15 weeks and continues to grow. New products are vital to improve a wide range of aircraft performance and maintenance factors as well as maintain and grow Canada's vital aerospace industry

Technical Standard Order – TSO

The TCCA requires that an applicant for a Canadian Technical Standard Order (CAN-TSO) design approval in respect of an appliance or a part has or shall have access to, the technical capability to conduct the design analyses and tests required to demonstrate the conformity of the appliance or part with its certification basis². Our Canadian-based aviation companies – and there are thirty in the Okanagan, more than 100 in the lower mainland, and several others throughout the province – submit application to qualify new products on a year-round basis.

Many TSO agreements are in place between TCCA other international bodies, i.e., the EASA (European Union Aviation Safety Agency) and the FAA (US)³.

This paperwork, both TSOs and STCs, is critical to the economic well-being of Canadian-based aerospace companies, and to the growth of professional level jobs in BC. One Okanagan-based company has decamped to the US (Washington State, in order to remain close to BC markets); rumours constantly swirl in the local industry about companies planning to open satellite offices in the southwestern US from which to file paperwork on products researched and designed in Canada.

This is a loss for Canadian business, and adds unnecessary layers of wasted time, increased costs, doubling of regulations and tax and audit reporting, for reasons which can be resolved through TCCA regional assignment flexibility, e.g., utilizing the less-busy Atlantic Region for Pacific Region requests.

THE CHAMBER RECOMMENDS

That the Provincial Government represent the needs of BC businesses with the Federal Government by:

² Canada, Aviation: Schedule V, Aeronautical Product Approvals, Canada:
<https://www.tc.gc.ca/eng/civilaviation/publications/tp14984-with-05-2710.htm>

³ Reciprocal Acceptance of TSOs; <https://www.tc.gc.ca/en/services/aviation/aircraft-airworthiness/international-agreements-arrangements/reciprocal-acceptance-tso-easa-faa-tcca.html>

1. Requesting that TSOs and STCs be processed to the first regional office that has processing capability, rather than queuing by geographic region;
2. Encouraging the Federal government (TCCA) to bring its staffing to levels that meet regional demand to prevent the bleed-off of BC businesses to the US and protect BC jobs.

Submitted by the Kelowna Chamber of Commerce
Supported by TBC.