

Nishnawbe Aski Nation Needs Assessment Ministry of Transportation Remote Northern Airports 2025

Co-developed with the Northwestern Ontario Aviation Council



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Acknowledgements

31 First Nations within Treaty 9, and the Ontario portion of Treaty 5 rely on 29 Ontario Ministry of Transportation (M)TO operated remote airports for year-round transportation. These airports are lifelines for the communities they service, providing thousands of people with access to essential services, goods and materials.

The Northern Ontario Aviation Council (NOAC) was reinstated in 2024, with the objective to act as "a collaboration of membership to lobby for and secure government support in areas that directly impact aviation safety and service in Northwestern Ontario". The council consists of regional carriers, regional tourism representatives, technical experts, government partners including MTO, Transport Canada, NAV Canada and Indigenous Services Canada (ISC). This network of groups and individuals has provided a comprehensive view of the challenges facing the current state of aviation in the far north of Ontario and has been instrumental in advocating for remote aviation transportation improvements.

NOAC would like to acknowledge the support and sustained efforts of First Nation leadership, the Sioux Lookout First Nations Health Authority (SLFNA), and the Weeneebayko Area Health Authority (WAHA).

Executive Summary

As Canadian aviation regulations are being developed in line with the International Civil Aviation Organization (ICAO) standards, it is critical to note that the infrastructure at the 29 provincially owned and operated airports in Ontario is not sufficient to support regional air service needs. The First Nations that rely on aviation continue to experience increasingly negative outcomes due to this lack of adequate infrastructure and the cost to implement solutions continues to increase as time passes.

This document is intended to inform the Office of the Minister of Transportation and all relevant government partners of the current aviation landscape in Northern Ontario, and to encourage a coordinated and actionable response from all stakeholders. Through consultation with regional aviation industry experts, three recommendations have been established:

- 1. Declare the clearway and stopway at all MTO airports as runways.

 Effectively extending the runways at remote MTO airports by approximately 500' will allow for payload increases and provide immediate service improvements for First Nations.
- 2. Create a temporary exemption from TP312 5th edition for all MTO airports. Facilitate the implementation of incremental infrastructure upgrades towards the standards set in the 5th edition of TP312.
- 3. Inventory and accommodate service requirements.

 Recognize the actual level of service required at each MTO airport and develop strategies to ensure service delivery.

The following sections of this document provide further detail and rationale to support the recommendations outlined above.

Background

The 29 remote airports in Northern Ontario were constructed in the 1970's and 1980's through the *Remote Airport Development Program* - a joint effort by both the Ministry of Transportation Ontario (MTO) and the Ministry of Northern Development (MND). Today, the Remote Airports Office (RAO) – a branch of the MTO is responsible for operating these airports in accordance with Transport Canada regulations. As the operator, the RAO is responsible for the maintenance of lighting, runways, buildings, heavy equipment, hiring and retention of staff, emergency response, as well as inspections and improvements as required.

The importance of these airports for remote First Nations in Ontario cannot be overstated. They serve a critical role for safety and well-being as air travel is the only means of year-round transportation for all goods, services and travel. Additionally, they are critical in evacuating communities in an emergency and ensuring access to medical care that is not available in these remote locations. The lack of landing approach infrastructure at these remote airports has contributed to the tragedy of lives lost, and safety compromised. The health and safety of these remote communities depends on the safe and reliable delivery of air transportation service.

The Report prepared by former Federal Cabinet Minister David Emerson for the Minister of Transport – Canada titled, *Pathways: Connecting Canada's Transportation System to the World*, calls for direct investment in improving navigational and landing aids at remote airports. "The Review recommends that the Government of Canada work with the provinces to further improve cost competitiveness by: a. committing to re-invest fuel tax revenues in safety, security, and reliability improvements at smaller regional, remote and northern airports;". The report further states that "Significantly increasing funding for the Airports Capital Assistance Program (ACAP) to support safer, more efficient, reliable services at regional and local airports. This would require expanding the eligible investments to include lengthening and surfacing runways for modern jet service in northern and remote airports, and investing in more advanced navigation, weather, and landing systems" (Emmerson & Meades, 2015).

The pressing urgency for aviation safety infrastructure improvements at remote northern airports is also referenced in the 2017 spring report from the Auditor General: 2017 Spring Reports of the Auditor General of Canada to the Parliament of Canada Report 6—Civil Aviation Infrastructure in the North—Transport Canada. Notably, the report finds that "Transport Canada was aware of information documented since 2005 about remote northern airports' safety- and efficiency-related infrastructure needs, such as the need for improved runway lighting and navigational aids. However, the Department had not taken a leadership role in addressing these needs by leading efforts and working collaboratively with its provincial, territorial, and industry partners to enhance the safety and improve the accessibility and efficiency of remote northern airports" (Office of the Auditor General of Canada, 2017).

In response to the clear need for improvements to aviation within NAN Territory, Nishnawbe Aski Nation Chiefs-in-Assembly passed *Resolution 16/48: Aviation Safety in First Nation Communities* in May 2016. This Resolution mandated the NAN Executive Council to advance aviation safety in northern Ontario First Nations by working with regional carriers, the MTO and any other relevant entities. Resolutions titled *Remote Airport Infrastructure Funding for Required Upgrades* were

passed in 2024 at both the Assembly of First Nations (AFN) and Chiefs of Ontario (COO). These mandates demonstrate commitments at the regional, provincial and federal level for upgrading current aviation systems at remote airports and the improvement of safety standards for public and commercial air service.

Recommendation One: Runways

Declare the clearway and stopway at all MTO airports as runways.

Currently, air service delivery to remote First Nations in Ontario is significantly restricted by a variety of intersecting factors. The recommendation to have the clearway and stopway declared a part of normal runway operations intends to provide an interim solution to the service delivery challenges while more involved infrastructure improvements take place. By effectively increasing runway lengths by up to 500', carriers will be able to maximize payloads and reduce the disproportionately high cost of transportation, including cargo and food, to and from remote First Nations.

Runways

In 2020, NAN requested that the Government of Canada and/or the province of Ontario, fund the necessary runway surface surveys, obstacle surveys as well as removal of obstacles to support localizer performance with vertical guidance (LPV) approaches to be published for the 29 provincially operated remote northern airports. In 2023 NAV Canada began a five-year project funded by the National Trade Corridor Fund (NTCF) to survey and design instrument flight procedures at 82 northern airports across the country. The project includes 37 airports in Ontario, 22 of which are remote Northern Ontario airports.

On average, the gravel runways at remote northern Ontario airports are 3500'. Paving and extending these runways to 5000' will be integral to fully leveraging what LPV approaches can offer. The aircraft operating in Northern Ontario are aging and becoming obsolete, leading to many needing to be replaced in the near future and regional carriers will be required to purchase new aircraft that are larger than the aircraft that are currently used. Newer, more modern aircraft are much more fuel efficient and produce fewer greenhouse gas emissions, making this a key step in mitigating climate change impacts in Ontario and an important contribution in line with the *Canadian Net-Zero Emissions Accountability Act (S.C. 2021, c. 22)*. However, larger aircraft will require carriers to restrict passenger, and cargo loads regardless of LPV approaches, as remote airport runways are not currently long enough, nor appropriately certified to accommodate larger aircraft.

Longer runways would allow carriers to maximize loads on new and existing aircraft, carrying more cargo and passengers. In return, this will decrease cargo and passenger fees, making it more affordable to travel and live in remote areas of Northern Ontario. Longer runways also increase safety when landing and taking off, giving pilots more clearway at the end of the runway. Paving these runways must also be considered, as aircraft must be equipped with costly customized gravel kits to withstand the damage to the aircraft, and they must be approved by Transport Canada. The Northern Air Transport Association (NATA) passed Resolution 2018-2: Alternate Runway Surface Test Project, supporting the need for testing of alternate runway materials for northern and remote

locations. A representative from NATA has met previously with the Manager of the RAO and NAN's Transportation Policy Analyst to discuss the project benefits.

To support an LPV procedure, the runway for which the procedure is being developed must be certified as an instrument runway at the non-precision level or higher. This essentially means that the aerodrome must have a survey conducted in accordance with TP312, including an assessment of local obstacles, and ensuring the runway meets specified standards with respect to markings and lighting. Aerodrome infrastructure requirements to support different levels of aerodrome and runway certification are defined in Transport Canada's Document TP312 - Aerodromes Standards and Recommended Practices.

The federal and provincial governments must collaborate to upgrade the runway certification at these airports from non-instrument to at least non-precision before LPV approach infrastructure can be utilized. It will then be imperative for NAV Canada to support the installation of LPV infrastructure at each airport. It is simply not possible for these airports to catch up to new safety standards without federal and provincial support, beginning with comprehensive needs assessments and followed with a strategic plan of action.

Recommendation Two: Infrastructure

Create a temporary exemption from TP312 5th edition for all MTO airports.

The MTO operated airports that service First Nations do not meet the minimum standards set out in the 5th edition of Transport Canada's *Aerodromes Standards and Recommended Practices - TP312*. Despite being published a decade ago, the significant infrastructure improvements needed at these aerodromes to meet the latest standards have not taken place.

Due to logistical challenges associated with remoteness, material procurement and a shortage of skilled trades workers it will take multiple years for any one of the MTO operated airports to fully meet the minimum standards. As such, the TP312 requirement for "compliance with the latest standards as they read on the date which the part or facility was returned to service" would fully cut remote First Nations off from all goods and services. The recommendation to provide a temporary exemption from TP312 seeks to provide the ability for the MTO to make incremental safety improvements while still supporting ongoing, critical service to First Nations.

Automated Weather Observation Stations

Automated Weather Observation Stations (AWOS) provide real-time weather information to pilots via GTA/VHF radio and landline modem. These systems provide current altimeter setting, temperature, dew point, wind speed, direction, ceiling height, among other metrics that impact flight. These vital pieces of technology allow flight crews to determine whether conditions permit a safe flight and are a tool for the creation of a safe plan of any given flight. The existing AWOS infrastructure is owned and operated by NAV Canada, with the MTO providing materials and site preparation as required.

The current AWOS in northern Ontario do not adequately cover all areas, considering the immense distances between stations. Information collected by Ornge identified two locations where additional AWOS would have the most benefit. The locations in which additional AWOS stations

would be best served in covering current gaps in coverage are Pikangikum First Nation (CYPM) and Webequie First Nation (CYWP). Neither airport currently has weather reporting capabilities and must rely on the Red Lake AWOS (47 NM away) when shooting the approach into Pikangikum First Nation and the Lansdowne House First Nation (Neskantaga) AWOS (51 NM away) for Webequie First Nation. Missed approach data collected by Ornge shows six missed approaches at Pikangikum and two missed approaches at Webequie over a twelve-month period (Appendix 2).

As of 2023, four new AWOS locations identified by regional carriers have been accepted by NAV Canada. The MTO has begun the process of closing the coverage gap by relocating two existing stations, with the long-term goal being to increase the number of stations in the region. NAV Canada is in the process of developing new AWOS equipment that will replace approximately 300 units nationally. As of early 2025, the new systems are in the testing phase and require approval from Transport Canada before they are deployed. Additionally, site selections, land use agreements and project approval from the MTO will be required prior to the installation of the new units. NAV Canada expects that, at the earliest, new units could be deployed in northern Ontario in 2026 or 2027.

Localizer Performance with Vertical Guidance (LPV) and High Intensity Runway Lighting (HIRL)

Communities in Northern Ontario are predominantly located in the Hudson Bay and James Bay lowlands. In the fall, early winter, spring and early summer, steady low-level overcast skies are common, resulting in 300-500-foot ceilings. Current navigational aids serving remote northern airports will not allow safe operation of aircraft in these conditions. There are very few published Localizer Performance with Vertical Guidance (LPV) approaches in Northern Ontario, and airlines are required to perform non-precision approaches. This involves using antiquated radio devices (non-directional beacons; NDBs) and Visual Flight Rule (VFR) approaches to fly into northern communities. In the event of inclement weather, a minimum altitude must be maintained relatively high (600 – 1,500) feet to ensure aircraft do not encounter the ground or other obstacles.

Without LPV approaches, northern airports are subject to Visual Flight Rules (VFR) or non-precision approaches. The lack of modern infrastructure and technology, combined with regional weather systems, leads to unreliable access to communities, and missed approaches require aircraft to return to base or to an alternate airport – resulting in wasted fuel, money and time. Air carriers following Transport and NAV Canada guidelines under current approach aids are operating at approximately 50% of planned operational efficiency. Further, when a life is dependent on being airlifted out of a community in the months of September- December, and February – May, low ceilings may delay Medevac dispatch or result in a missed approach. Communities have reported instances of waiting for urgent medical transportation while being able to hear a potentially life-saving aircraft flying above the cloud ceiling, unable to land. Delayed access to medical care is traumatic for patients and families and can cause worse patient outcomes and loss of life.

Explanation of LPV Approach Coupled with High Intensity Runway Lighting (HIRL)

The purpose of this section is to inform valued stakeholders of the need to advance and enhance aviation safety at remote airports serving northern Ontario First Nation communities using Localizer Performance with Vertical guidance (LPV) aircraft approaches. Some important points include:

 LPV approaches utilize existing satellite-based Global Position Systems (GPS) coupled with a Wide Area Augmentation (WAAS) of ground-based infrastructure. The result is enhanced

- visual awareness for pilots allowing a lower minimum Decision Height (DH) for landings, facilitating safe approaches and landings during inclement weather.
- During inclement weather, a minimum altitude must be maintained relatively high (600 1,500 feet) to ensure aircraft do not encounter the ground or obstacles. This is because the current system does not allow for a high degree of precision and thereby certainty related to situational awareness to obstacles. The DH tolerances related to current systems are approximately 700-900 feet. At this altitude range, a missed approach must be executed if a visual for DH is not reached.
- Terrain with few visual features and little light pollution combined with meteorological factors such as fog and precipitation can lead to "black hole approach" conditions where pilots may experience disorientation when landing at night.
- Airlines that serve the area such as First Nation owned Wasaya Airways LP, have invested in training their crews and purchased and installed necessary specialized equipment in their aircraft to facilitate enhanced LPV approaches. NAV Canada, the provider of Air Navigation Services across Canada has made their geostationary satellites available for use by such airlines. The publication of LPV approaches requires a survey of the land surrounding an airfield, certifying and publishing the approach.
- LPV approaches take advantage of the refined accuracy of WAAS lateral and vertical guidance to provide an approach very similar to a Category I ILS. Like an ILS, an LPV has vertical guidance and is flown to a DH. The design of an LPV approach incorporates angular guidance with increasing sensitivity as an aircraft gets closer to the runway. Sensitivities are nearly identical to those of the ILS at similar distances. This is intentional to aid pilots in transferring their ILS flying skills to LPV approaches.
- The vertical guidance an LPV approach supplies gives the flight crew information to safely fly a Stabilized Constant Descent Angle (SCDA) approach. The SCDA approach is preferred by Transport Canada and the International Civil Aviation Organization (ICAO) as the safe alternative to traditional step-down approaches. The SCDA approach is a method helping to avoid Controlled Flight into Terrain (CFIT) accidents. Unlike traditional ground-based navigation aids, the WAAS covers nearly all of Canada's airspace. The WAAS provides augmentation information to GPS receivers to enhance the accuracy and reliability of position estimates.
- High Intensity Runway Lighting (HIRL) are an upgrade to the LED bulbs like the ones installed for medium intensity lighting MIRL at remote airports. Lighting costs can be obtained from the MTO as MIRL upgrades are ongoing in the region.
- HIRL works by augmenting the visual accuracy of a flight crew during an approach as the HIRL can 'cut through' low ceiling and poor visibility caused by clouds for pilots to confirm 'runway in sight' to allow for a safe landing.
- HIRL are superior in this region as they have built-in ice melting components. Arctic option (U.S. Patent 7192155 B2) uses a thermostatically controlled heater to prevent ice and snow buildup from obscuring light output, and melts ice similar to traditional incandescent fixtures. The heater is available in both glass and polycarbonate options (ADB Safegate, 2023).
- The most difficult time to find an airport is when it is obscured by a blanket of fog or haze within a few hundred feet of the tarmac. In broad daylight, the runway can remain invisible.
- To help alleviate this problem, runways with instrument approach procedures have one or more types of approach lighting systems (ALS). ALS comes in a variety of configurations, but

all are designed to guide pilots onto the runway in low-visibility conditions. HIRL provides the maximum visual identifiers to pilots.

LPV approaches could allow air transport providers to more safely and reliably provide essential year-round transportation to remote communities in Northern Ontario by safely descending to lower DHs of 200 – 250 feet. And allowing the crew to see terrain and land. LPV approaches allow aircraft to safely descend to a lower DH of 200 – 250 feet. LPV approaches could enhance air transport operation from 50% efficiency to a level of operational efficiency that is closer to 99%.

Terminal Upgrades

Terminal buildings at the 29 remote Northern Ontario airports offer a small amount of seating for waiting passengers, a workspace for the airport staff, washrooms and typically have wireless internet accessibility. As with other infrastructure, these terminals require upkeep to function properly and provide their intended level of safety. Having been constructed as long as 50 years ago and without maintenance and expansion relative to population growth, these facilities require significant upgrades and modernization to accommodate the needs of the communities they service. Some of the needs identified include adequate storage space for equipment, separate areas for incoming and outgoing passengers, appropriate rest areas for flight crews, and waiting areas for medical patients.

While terminal upgrades are needed, comprehensive assessments and consultation with each First Nation are necessary to ensure new facilities are appropriately designed, and that construction is prioritized appropriately in relation to other required infrastructure upgrades.

Recommendation Three: Service Levels

The 29 MTO operated airports were constructed several decades ago at a time when the population of the First Nations that rely on them was significantly lower, technology was far less advanced, and the regulatory landscape was much different than it is today. As such, it is imperative that a comprehensive assessment of service is completed. A clear understanding of the air service disparities that exist between First Nations and municipalities will support planning for improvements that will ensure full ability for Aboriginal and Treaty rights to be upheld.

De-Icing

Icing conditions that cause supercooled liquid water to build up on aircraft occur most often in clouds between 0°C and -15°C and can exist at temperatures as low as -40 °C (source). Freezing precipitation when aircraft are on the ground and in low-level flight cause ice buildup and the accumulation of ice on the surface of an aircraft significantly degrades drag and lift performance, making de-icing a requirement for safe flight operations. In the fall between September and November, in the spring between April and May, and for increasingly longer periods of time due to climate change, icing conditions are commonplace in Northern Ontario. The remote airports that service 29 First Nation communities in the region do not supply material and equipment to perform necessary de-icing, causing a variety of service and safety concerns. Altitudes with icing conditions may be navigable to avoid icing conditions but may be unavoidable when deboarding/boarding at a remote airport. Without adequate weather observation technology in the region, carriers are left having to decide between delaying or cancelling flights or bringing de-icing fluid on a flight. Carriers

that opt to travel with de-icing fluid on board require pilots to attempt de-icing using sporadically available equipment available at remote airports. The lack of consistent and reliable de-icing services across the 29 remote northern Ontario airports significantly reduces the service to the region and makes existing service less safe. In addition to the impacts of reduced passenger and commercial service, medical evacuation flights are also restricted. Without guaranteed de-icing services and adequate weather reporting capabilities in the region, Medevac dispatch may be delayed when inclement weather is present. This means that communities are left without access to emergency medical services for significant periods of time, leading to worsening health outcomes and death.

In 2021, the Transportation Safety Board of Canada (TSB) released a report on their investigation into the 2017 plane crash in the territory of the Denesųliné First Nation in Fond-du-Lac, Saskatchewan which resulted in several serious injuries and one death. This investigation found that because the de-icing equipment that the pilot had access to prior to takeoff was inadequate, enough ice accumulated on the aircraft that an asymmetrical lift distribution occurred, causing the aircraft to collide with the terrain. As a result of their investigation, in 2018 the TSB made two recommendations.

TSB Recommendation A18-02 states "the Department of Transport collaborate with air operators and airport authorities to identify locations where there is inadequate de-icing and anti-icing equipment and take urgent action to ensure that the proper equipment is available to reduce the likelihood of aircraft taking off with contaminated critical surfaces.". This recommendation led to the formation of the De-Ice in Northern and Remote Communities (DNRC) Working Group by Transport Canada (TC), with the aim of further developing recommendations on how to proceed with the implementation of A18-02. In 2023, TC confirmed that the recommendations from the working group were reported, however they were not shared with TSB.

The second recommendation, A18-03 states "the Department of Transport and air operators take action to increase compliance with Canadian Aviation Regulations subsection 602.11(2) and reduce the likelihood of aircraft taking off with contaminated critical surfaces." As a result, Transport Canada launched a targeted inspection campaign. Phase one of the campaign focused on the observation of de-icing events on-site and information collection, and phase two utilized the information gathered in phase one to review existing operator operations and procedures. The long-term phase of the campaign is to result in a final report summarizing information and providing recommendations, as well as ongoing communication with stakeholders with the aim of increasing compliance. While TC has provided some recommendations to date, TSB notes a concern about delays in actions related to increased compliance, as without action there is also no mitigation of risk.

To achieve safe and equitable transportation for the 29 remote communities that rely on MTO operated airports as lifelines it is critical that a de-icing service model is created and implemented. This will require de-icing fluid and equipment to be available with appropriate storage facilities at each airport. As the chemicals used in aircraft de-icing can cause significant negative impacts on water systems, including community wastewater treatment operations, it will be necessary to ensure a proper reclamation and drainage system is installed to mitigate as much environmental and community health risk as possible.

Fueling

Standardized fueling services are not provided by the airport operator at remote northern airports; however, several regional carriers own and maintain their own fuel caches at select remote airports. These caches are primarily intended for use by the carrier that they are supplied and maintained by, though fuel sales will occasionally take place between carriers. While this ad-hoc system functions well enough to ensure aircraft don't become stranded due to a lack of fuel, fully developed fuel storage infrastructure at every remote MTO operated airport will provide significant improvements to service delivery, as well as an opportunity for First Nations to benefit from fuel sales. In addition to economic development opportunities, adding fuel services through the region would reduce delays associated with additional stops needed for refueling – especially during emergencies when these delays can lead to severe health consequences or death.

Workforce

Remote northern airports are currently only staffed on weekdays between 8:00 and 17:00 by one Airport Foreperson, and during winter months, an additional seasonal assistant. These employees serve a vital role in guaranteeing service at these airports. Remote northern airport staff are responsible for almost all duties at the airports and are required to provide Runway Condition Reports (RCR) to NAV Canada, Medevac service providers, and carriers before dispatch can commence. Carriers also prefer to have RCRs before landing to ensure the runway is safe.

With the absence of an on-call provision in the Ontario Public Service Employees Union (OPSEU) Collective Agreement, remote northern airport staff are not paid to be on standby outside of regular hours. Most Medevac flights to remote northern airports occur outside of regular service hours, putting immense pressure on airport staff to stay within their respective communities during evenings and weekends in order to guarantee service. In addition to the added workload associated with winter airport maintenance, airport staff are increasingly relied upon during emergency evacuations year-round for flooding, forest fires and critical infrastructure failures.

Maintenance of the roads connecting communities to remote airports requires established agreements to ensure the MTO is providing this service in communities. These road connections are vital links to the airport and are necessary to transport people for general travel and emergencies, as well as all goods that arrive by air. Previous incidents with maintenance of these vital links have cut off communities from airports (i.e. Bearskin Lake First Nation in 2019).

Remote northern airport staff are required to perform extensive duties compared to municipal airport staff. Remote northern airport staff are also subject to lower rates of pay than most other Ontario Public Service (OPS) employees and municipal airport staff. The cost of living in a remote community must also be considered in wages for remote airport staff. For example, gas prices in a remote community can often exceed \$3/litre, and groceries can be 300% more expensive than in a city or municipality with year-round access. Current pay for remoteness does not reflect the actual cost of living in these remote locations. Despite being members of the Ontario Public Service Employees Union (OPSEU), the employees have not received equitable representation in resolving issues around rates of pay, classification, harassment, safety, and payroll taxation. **Table one** demonstrates a comparison between a Remote Northern Airport Foreperson and positions at the Thunder Bay Airport:

Remote Northern	RAO – Duties/Responsibilities	Rate of Pay/hr.	Thunder Bay Airport Position	Thunder Bay – Duties/Responsibilities	Rate of Pay/hr.
Airport Position					
Remote Airport Foreperson	Direct, supervise and perform a variety of maintenance tasks Perform maintenance (changing fluids, lubricating, making adjustments to components) Operate a remote	\$24.15- \$26.89	Air Operations Specialist 3 (AOS3a)	Responsibilities to aircraft Allowed on runway Safety Management System (SMS) reporting Supervise 4-6 staff Oversee work	\$37.46
	 Operate a remote airport facility including airstrip, airport buildings and equipment Supervise the construction and repairs of runways, roads, fencing and brush clearing 	OPSEU Position #12494	Air Operations Specialist 2 (AOS2)	NOTE* No manager on shift 4 years minimum experience Performance based Responsibilities to aircraft Allowed on runway SMS reporting online, other minor reporting	\$33.56
				NOTE* No supervising or	
Assistant Remote Airport Foreperson	Operate the airport facility Maintain the runway, airport buildings and operating maintenance equipment Inform pilots and airport users concerning safe airport conditions	\$24.15- \$26.89 OPSEU Position #12494	Air Operations Specialist 1 (AOS1) Winter Maintenance Technician	paperwork 1 year of experience to become certified in this position Cannot respond to incoming flights Operates equipment Emergency response Work on airside and ground Operate equipment Stay on for spring clean-	\$31.30 \$30.31
				up (November-May) NOTE* No paperwork	
			Standby Position	Cover holidays, etc. Duty Manager cell phone provided or partial compensation for personal cell phone 1 standby unit per day during weekdays, 2-3 standby units on weekends	
Standby/on-cal agreement	l are outlined in OPSEU 22-24	collective	Standby Electrician	Electrical work only Called in when required if issue cannot be solved remotely	

Table 1

In addition to airport staffing challenges, the hiring and retention of pilots by some regional carriers also presents a challenge for regional aviation. Globally, airline operators face a shortage of pilots, partly due to the COVID pandemic that began in 2020 which saw a major drop in the demand for pilots. In addition to the effects of the global pandemic, North America is experiencing a significant number of pilots retiring and fewer new pilots entering the workforce due to high barriers of entry. These factors have created a level of competition that makes large carriers increasingly lucrative for pilots, and less so for smaller carriers that service remote areas. These smaller carriers must tap into the same labour pool as larger carriers but may not be able to offer the same level of salary and emerging technology. Additionally, pilots flying in this region are often required to take on several other duties such as managing passengers, luggage and cargo, as well as de-icing and fueling their aircraft, whereas larger carriers that service more urban areas are better equipped to provide the human resources and infrastructure that allow pilots to focus more on flight specific operations.

Approach Bans

Approaches in reduced visibility conditions pose a risk to flight safety. Existing regulations are intended to advise flight crews on how to navigate approaches at various levels of visibility and define approaches that are prohibitively unsafe. In 2002, the Transportation Safety Board (TSB) issued recommendation A20-01 to Transport Canada, relating to low ceiling approaches and the need to ensure "an adequate safety margin for the approach or landing". This led to the implementation of significant changes to approach ban regulations in 2006, with Transport Canada noting challenges in creating appropriate regulations due to complicated practical factors. As noted by the TSB in recommendations A20-01 and A20-02, the standards set in 2006 were overly complex and difficult for pilots to follow – especially during the already busy approach and landing segment of a flight. The basis for the new standards in development by Transport Canada is a move to a prescriptive approach and ensuring regulations are in line with those set out by the International Civil Aviation Organization (ICAO).

Transport Canada has acknowledged the potential for service impacts to Northern regions if approach bans are implemented without infrastructure improvements. In Northern Ontario, 28 of the 29 remote airports that service First Nation communities lack non-precision runways thereby necessitating a minimum decision height of 500'. In comparison, the minimum decision height could be as low as 250' if the runways were upgraded to non-precision the aerodromes were upgraded to standards described in TP312; Transport Canada's safety document that sets the standard for aerodromes in Canada. The fifth, and most recent, edition of TP312 was published in 2015 and has since been revised. The Canadian Aviation Regulation (CAR) 302.07 enables airport operators to make incremental infrastructure improvements based on TP312 standards. Despite updated standards and Canadian Aviation Regulations (SOR/96-433) 302.07 acting as a "grandfathering" clause, MTO operated airports have not seen infrastructure upgrades and are currently operating at a standard that is not sustainable as technology advances. As CAR 302.07 does not define the length of time in which aerodromes are able to operate under previous editions of TP312, remote airports continue to fall behind in terms of modern technology, reliable infrastructure and overall safety while the costs associated with improvements rise substantially each year.

Regional carriers have expressed frustration with the recurring theme of new regulations being introduced to improve aviation safety in Canada without funding solutions for remote operations that provide essential service to vulnerable populations. The process through which Transport

Canada is developing new approach ban regulations has lacked the level of transparency expected by carriers. Collaboration is needed between the federal government as the regulator, provincial government as the airport operator, and regional carriers that can provide operational insight. This would allow for strategic planning for remote airports in Northern Ontario and facilitate a move towards operating at standards on par with the rest of the country.

Impact on First Nations

Safety and Wellbeing Benefits for First Nations

Medical patients requiring scheduled and urgent medical transfer are the most affected by the aviation limitations of remote northern Ontario - when carriers are unable to operate, lives are at risk. Under current landing aids, cancelled flights and missed approaches further add significant costs to the operation of air transport providers, which in turn raises the cost of essential air transport for community members and service providers. Because airports servicing Northern Ontario First Nations are lifelines to the communities they service, it is imperative that safe landings and a consistent supply of goods, services and transportation are available to communities. Currently, air transportation providers are unable to adequately service remote Northern Ontario communities due to a variety of intersecting factors.

In 2016, **over 50,000 First Nation people** across Northern Ontario in need of medical attention required air transportation to access treatment by physicians and specialists. Air transportation is the vital link connecting remote First Nation communities in Northern Ontario with centres such as Thunder Bay, Winnipeg, Toronto and Ottawa (Wasaya, internal).

Approximately 200 passenger flights to First Nation communities were cancelled/missed approaches in November 2016 due to inclement weather/low ceiling and visibility. These are 200 flights that would have been able to land in communities with LPV approaches. The average capacity on these flights is approximately 19 people per flight/ community. This means that up to **3,800** people were not able to travel into or out of their communities. It is important to note that 50 – 55 % of airline passengers traveling in Northern Ontario are medical travelers. In November 2016 alone, approximately **1,900** health patients were prevented from attending their medical appointments/ procedures due to cancelled flights/missed approaches. As medical appointments are often scheduled months in advance and are difficult to reschedule, cancelled flights/missed approaches result in barriers to accessing health services and negative health outcomes for people living in First Nation communities in Northern Ontario. (Wasaya, internal).

In addition to disruptions to medical travel, First Nation communities lacking LPV approach also experience delayed delivery of pharmaceuticals, and expiry of blood/tissue samples. If air carriers are not able to land and deliver medication, people may risk going without their vital medications. There are no 'all hours' pharmacies in communities as an alternative if an aircraft does not deliver the necessary medications. The implications of the LPV approach can literally be life or death. A further related implication of an aircraft being unable to land in the community is not picking up time-sensitive blood/tissue samples in Health Canada lab coolers. In this situation, samples expire, and patients must return to the nursing station to provide another sample which is inappropriately invasive. It is important to note that lab coolers are picked up daily from almost every community.

Ornge is one of the largest air ambulance services in Canada, providing lifesaving medical evacuations both in scheduled road evacuations (SCHEDEVAC) and in emergency medical evacuations (Medevac). Ornge experienced 76 missed approaches for Medevac transfer at remote northern airports from 2012 -2016. This means that **76 First Nation people** in life threatening emergency situations were not able to be air lifted out of community for potentially lifesaving medical attention during inclement weather/low ceiling situations (Homer Tien, Ornge, 2016).

There have been many tragic instances where First Nation members lost their lives due to the inability of aircraft to operate. In May 2014, 4-year-old Brody Meekis died in his home community of Sandy Lake from what is a common and treatable strep throat infection. Had Medevac been able to airlift him, or aircraft been able to deliver concentrated antibiotics, death may have been prevented (Galloway, 2017). In 2016, a boy in Poplar Hill First Nation died from appendicitis. Because of several days of low ceiling conditions, aircraft were unable to operate. Had an LPV approach been available, once again, a life could potentially have been saved. Similarly, in 2011 a young man from North Caribou Lake First Nation (Round Lake) succumbed to burn injuries as Medevac flights were not able to respond in the crisis due to low ceiling conditions which prevented a landing.

In 2006, the previous Chief of Wawakapewin First Nation. Sheila Childsforever, passed away after a delay in Ornge response. This community does not have an airstrip and an initial coroner's report noted that a delay in Ornge response time and the care available on board the ambulance "had some bearing" Childsforever's on death. The Ornge helicopter needed to stop for fuel on its way to pick Childsforever up, and on its way to hospital (Porter, 2012). LPV approaches would have drastically changed these figures by enhancing air transport operation from 50 % efficiency closer to 99% operational efficiency. Table 2 shows the number of unique patient transportation flights completed by Ornge in 2023 and 2024.

Investments in remote airport infrastructure will also improve the ability to evacuate a community during an emergency, such as a forest fire,

Nursing Station City	Nursing Station	CY2023	CY2024
Angling Lake	Angling Lake Clinic	38	38
Attawapiskat	JBGH-Attawapiskat	223	278
Bearskin Lake	Bearskin Lake Nsg Stn	46	46
Big Trout Lake	Big Trout Lake Nsg Stn	157	145
Cat Lake	Cat Lake Nsg Stn	84	102
Deer Lake	Deer Lake Nsg Stn	72	77
Fort Albany	JBGH-Fort Albany	145	120
Fort Hope	Fort Hope Nsg Stn	111	132
Fort Severn	Fort Severn Nsg Stn	36	63
Kasabonika Lake	Kasabonika Nsg Stn	114	96
Kashechewan	WAHA - Kashechewan	316	259
Keewaywin	Keewaywin Nsg Stn	37	43
Kingfisher Lake	Kingfisher Lake Nsg Stn	62	45
Lansdowne House	Lansdowne House Nsg Stn	24	22
Muskrat Dam	Muskrat Dam Nsg Stn	26	34
North Spirit Lake	North Spirit Lake Nsg Stn	25	32
Ogoki	Ogoki Post Clinic	50	28
Peawanuck	Peawanuck Nsg Stn	51	43
Pikangikum	Pikangikum Nsg Stn	414	430
Poplar Hill	Poplar Hill Nsg Stn	65	77
Round Lake	Round Lake Nsg Stn	146	123
Sachigo Lake	Sachigo Lake Nsg Stn	59	48
Sandy Lake	Sandy Lake Nsg Stn	243	259
Slate Falls	Slate Falls Nsg Stn	26	31
Summer Beaver	Summer Beaver Nsg Stn	45	56
Webequie	Webequie Nsg Stn	66	79
Wunnummin Lake	Wunnumin Lake Nsg Stn	78	80
Grand Total		2760	2786

Table 2

flooding or infrastructure crisis. Several remote First Nation communities have faced evacuation, and the challenges have been significant.

In 2019 Pikangikum First Nation was evacuated due to a forest fire, which led to the declaration of a state of emergency. The community is located near the Manitoba border in an area that is prone to forest fires and has a population of almost 4000 people. A Hercules CC-130H was brought in by the Department of National Defense to assist with the evacuation, but was delayed, leaving. According to the Ministry of Indigenous Affairs quoted in an APTN article from May 30, 2019, "Specifics for Pikangikum airstrip showed it was too narrow side to side for either landing or ground operations given the plane's wingspan length, preventing routine landing of the aircraft" (Fiddler, 2019). The aircraft has a wingspan of 132.6 feet and the runway in Pikangikum First Nation is only 100 feet wide according to NAV Canada's Flight Supplement Guide. There was also heavy smoke cover in the area, which initially prevented pilots from obtaining a visual confirmation of the runway. The addition of LPV approaches would increase the overall width of the runway by expanding runoff areas on either side and would also provide pilots with precise situational awareness despite heavy smoke cover.

A Hercules CC-130H also exceeds the weight limitations for the specification of runway at remote northern airports. Runway materials are not able to withstand repeated landings of this aircraft and cause damage to the landing area each time. Maintenance of the runway must occur consistently throughout evacuations when using this aircraft. Gravel surface runways also cause damage to the aircraft upon landing, as the material can chip and dent the body of the aircraft. Landing a Hercules aircraft can be restricted based on conditions such as on snow packed runways, as compacted snow and ice (hard contaminants) reduce the friction forces, creating difficulty with landings and take offs. These examples speak directly to the need to invest in remote airport infrastructure and increase staffing capacity to support runway maintenance requirements in high traffic circumstances.

As Climate Change continues to further impact these remote regions, evacuations due to natural causes, such as wildfires and flooding will continue to be necessary. Additionally, a significant amount of infrastructure including sewer, water and electricity within many communities is approaching, at or past its end-of-life and liable to fail catastrophically, which is likely to result in a greater number of year-round evacuations. With known limitations to the quick and efficient evacuation of communities, investments are needed to ensure infrastructure deficits are addressed in anticipation of future evacuations.

Economic and Socioeconomic Benefits for First Nations

Primary carriers in Northern Ontario are owned directly by the First Nation communities in which they serve. First Nation communities sought investments in airlines operating in their communities as primary drivers of economic growth, given that air transportation is the only method of transporting goods and services into and out of communities. Many of the First Nations in NAN territory own airlines to drive their own economic well-being.

Due to inclement weather/low ceiling, the Northern Ontario Air Transport industry experienced a total of over **200 community flight cancelations and missed approaches** in November 2016 alone.

approximate ratio of flight hours to flights is 1:1 average flight cost is \$3,000

average flight time is 1 hour (Northern Ontario)

\$3000.00 x 200 flights = \$600,000

One month of misses in **November alone** would be worth \$600,000 of lost economic value

That means that \$600,000 is now not going into Air Transportation Carriers First Nation community owners That is \$600,000 not available to the First Nation people living in these communities (Wasaya, internal).

LPV approaches and associated infrastructure upgrades are a direct way to lower the cost of necessity of life supplies and the cost of living in First Nation Communities that are served by remote airports in Northern Ontario. Food prices in remote communities are significantly higher due to the cost of flying in goods as opposed to transporting it by road. For example, bananas are on average 320% more expensive; Robin Hood flour is on average 186% more expensive; and Catelli Pasta is on average 148% more expensive in fly-in communities (Nishnawbe Aski Nation, internal).

An average load carrying perishable groceries and medicines such as refrigerated medicines, meats, fruits, vegetables, dairy, grains etc. along with other grocery products would be approximately \$10,000 – \$14,000 on an average twin engine turboprop aircraft utilized in Northern Ontario. For Northern Ontario's cargo air transportation industry, approximately 110 community flights experienced missed approach or cancellation due to low ceiling conditions.

Using \$12,000 as the average approximate value per aircraft

\$12,000/load x 110 affected shipments = **\$1,320,000** of potentially spoiled groceries/medicines per month **for First Nation communities in Northern Ontario**

As a result, prices for these goods in communities would be raised by **\$1,320,000** just from one month of missed approaches/cancellations due to low ceiling which could have been avoided with LPV approaches.

Airport Agreements

Twenty-six of the twenty-nine remote airports operated by the MTO directly service NAN First Nations communities, with the remaining two servicing the compact rural community of Armstrong, and the township of Pickle Lake. Seventeen MTO operated airports are either located fully or partially on reserve, with the remaining ten being located outside of reserve boundaries. Airport agreements were historically implemented with the purpose of defining key terms including financial remuneration, building and equipment maintenance, safety and the responsibilities of both the First Nation and the MTO. As of 2025 these airports are effectively operating without agreements due to expiration of previous agreements of a lack of agreement entirely. While the MTO has acknowledged that these agreements are to be reviewed and reinstated, there has been no clarification to date on a process or timeline for when new agreements will be negotiated.

Being without clearly defined agreements between the MTO and the First Nations allows for critical services to exist in a jurisdictional "grey area", which in some cases, contributes to infrastructure gaps and worsens the relationship between the two parties. An example of this is seen in the

maintenance of roads that connect communities to their airports. The MTO has historically included road maintenance in agreements with communities, but currently there are no provisions in place to define responsibility for this critical infrastructure component.

These agreements are also needed to establish emergency response measures in the event of an accident or fire at a remote airport. Most remote communities rely on nursing stations for health care services and are effectively without firefighting capabilities. Given the lack of in-community resources coupled with a lack of formal agreement, a fire or collision at a remote airport would be catastrophic and could potentially fully sever transportation to and from a community.

As the needs and capacity of each First Nation are unique, it is important that airport agreements between the communities and the MTO are developed effectively. Not only would this serve to provide autonomy for communities over their transportation but also allow the MTO to optimize the operation and maintenance of the airports they constructed. Furthermore, if the province were to move toward divestiture from the airports, similar to the move the federal government made in the 1990's, developing a plan for transfer of care and control could be done in alignment with these agreements. Open, honest and transparent dialogue with each community is necessary to ensure agreements are appropriate and equitable.

Security Screening

Stopping the import of illegal contraband into NAN communities is a key regional priority. NAN has been advocating for the implementation of airport security screening to prevent contraband from being transported into remote First Nations.

The Canadian Air Transport Security Authority (CATSA) is responsible for conducting security screening at designated airports across Canada. CATSA is mandated to protect the public by effectively and efficiently screening passengers and their belongings at pre-board screening checkpoints for items that are identified on the general list of prohibited items and items that pose an immediate threat to civil aviation at designated airports. Airports designated to have security screening were identified through a risk assessment process by Transport Canada (TC). Of the 209 airports identified, 89 were designated by the Minister of Transport as airports at which security screening must take place. The assessment included an analysis of risk variables such as passenger volume, aircraft size, flight routing, threat, vulnerability and impact on the aviation system.

In May 2018, the *Transportation Modernization Act* (Bill C-49) became law, allowing CATSA to provide screening services on a cost-recovery basis to non-designated airports in an effort to facilitate the travelers' journey and to support an efficient aviation system. TC is finalizing the policy guidelines, standards and procedures for the administrative designation of airports and provision of screening services.

Section 30.1 of the Canadian Air Transport Security Authority Act (S.C. 2002, c. 9, s. 2) provides that CATSA can "enter into an agreement respecting the delivery of screening referred to in subsection 6(1) with any person who requests the delivery of such screening." Although it states that "any person" can request the delivery of such screening, it is important to note that the airport owner/operator will need to be supportive and work collaboratively with whomever wishes to provide screening services, as there are specific regulatory requirements that the airport owner/operator must meet to allow for screening services to take place. The airport owner/operator (the Ministry of

Transportation of Ontario) will also be responsible for all costs associated with any service rendered before and after to the administrative designation process. It must also be noted that CATSA Screening Services do not apply to charter flights.

There have been resolutions passed by NAN and Mushkegowuk Council that speak directly to the need for searches at remote northern airports to reduce contraband making its way into remote First Nations. Mushkegowuk Resolution No. 2015-10-14: *Mushkegowuk Council Renews Campaign Against Illegal Drugs and Alcohol* supports increased searches and spot checks at airports, as well as incoming mail service.

With several remote NAN First Nations expressing interest in this service, it is suggested that the MTO strongly consider working collaboratively with interested First Nations to implement this service at remote northern airports and municipalities who serve as the main thoroughfares (i.e. Thunder Bay, Timmins, Sioux Lookout, Pickle Lake, Red Lake, Nakina, Winnipeg, etc.).

Funding

Airport funding in Canada has changed significantly over the past 50 years. Most Canadian airports were originally constructed using public funds and by the late 1960's, the federal government was incurring an annual deficit of millions of dollars for airport operations and aviation subsidies. Throughout the following decades the federal government moved to divest from airports and aviation, culminating in the 1990's with the implementation of the Airport Transfer Act, Canada Transport Act, and the Civil Air Navigation Services Act. These acts allowed the federal government to retain regulatory oversight over aviation, while transferring operational responsibility onto private, non-profit entities. Along with new aviation acts, the creation of the National Airports Policy (NAP) led to the establishment of airport authorities. These *Local Airport Authorities* would assume care and control over airports in the National Airports System (NAS) through lease agreements with the federal government, with regional and small airports being sold or transferred to private or public community-based parties.

As part of the National Airports Policy, the federal government recognized that some newly transferred airports may not have traffic volumes that would support funding levels needed to maintain or improve the safety of airport operations. As such, in 1995 the Airport Capital Assistance Program (ACAP) was implemented, providing funding for airports that are not owned or operated by the federal government, handle at least 1,000 year-round regularly scheduled commercial flights and meet certification requirements. Projects that are eligible for ACAP funding include those that are related to the airside (runway rehabilitation, lighting, visual aids), heavy airside mobile equipment (snowplows, sweepers, equipment shelters), and air terminal building upgrades (sprinkler systems, asbestos removal, barrier-free access). This funding envelope has remained capped at \$38 million since 2000, and annual applications from eligible airports, which, according to a 2023 Transport Canada evaluation of the program, "greatly exceed the annual budget". Between 2021 and 2024 there were approximately 249 airports eligible for ACAP funding across the country, and adjusted for inflation, \$38 million in 2000 would be nearly \$60 million in 2021. While \$60 million annually would likely not be sufficient to close the national airport infrastructure gap, accessing funds collected through lease agreements, which are estimated to total approximately \$419 million per year, could support the effort. A 2023 Transport Canada

evaluation of ACAP also noted that a significant number of eligible airports in Ontario are not submitting funding applications and note that a majority are owned by the MTO who submit applications in a format that is not acceptable by the fund.

While federal aviation was undergoing its evolution in the latter half of the 20th century, Ontario was undergoing its own aviation changes. In 1968, the province passed the Airports Act (Ontario Airports Act R.S.O. 1990, Chapter A.15) which gave them the authority to "acquire, establish, construct, operate and maintain airports and landing grounds to serve any one or more areas in Ontario". This act was intended to work in conjunction with already established federal policy and programming. Over the next 30 years, in partnership with the Ministry of Northern Development (MND, now MNEDG), the MTO carried out the Remote Airport Development Program. This program was tasked with the "construction and maintenance of a public system of airports in remote areas of Northern Ontario" (Ministry of Transportation and Communications Annual Report, 1986). MTO annual reports during this time also describe monitoring federal initiatives related to policy and how they might impact programming carried out at the provincial level. Figure 1 shows a section of the 1985-1986 Annual Report from the Ministry of Transportation and Communications, demonstrating expenditure in airport construction and upgrades.

Overlapping jurisdiction between the federal and provincial governments, along with a lack of clear transportation policy has resulted in a dangerous infrastructure gap at the remote northern Ontario airports. As aviation technology improves, and Transport Canada implements safety regulations in line with international standards, remote airports and small carriers

Remote Northern Transportation Office Airport Construction New Airports

Cat Lake: construction completed.

Muskrat Dam: construction 25 per cent complete.

Ogoki Post: equipment moved to site for major airport expansion.

Kingfisher Lake: equipment and materials moved to the site for new airport.

Total value of work: \$2,161,000

Existing Airport Upgrading

Various activities were carried out for upgrading purposes at 12 airports including:

- construction of gravel pit access;
- water wells;
- upgrading access roads;
- waiting room improvement;
- winter gravel hauls;
- runway lighting systems;
- runway improvements; and,
- security fence

Total value of work: \$571,200
Total value of construction: \$2,732,500

Airport Maintenance

Routine summer and winter maintenance was carried out at 20 remote airports:

Total value of maintenance work: \$2,912,200

Figure 1

become less economically viable and experience preventable reductions to service that can be catastrophic. The negative impacts on First Nations are compounded by the division of political and administrative responsibility between the provincial and federal transportation ministries. While these ministries are largely responsible for correcting the current situation, support from government ministries relating to health, justice, education and social services would be justified as air transport is the primary method for 29 First Nation communities to access these services. The widespread costs associated with delayed and reduced access to government services is unacceptable across the political spectrum and at all levels of government. The extent of transportation infrastructure related interruptions and delays in access to these services experienced by First Nations do not occur in major urban centres. It would be in the best interest of associated federal ministries to ensure that infrastructure shortfalls are not prohibitive to the execution of their programming or efficiency of their resource allocation. A case may also be made to secure funding from the Department of National Defense (DND) as that allocation could

contribute towards the requirement for NATO members to contribute 2% of their Gross Domestic Product (GDP) to defense spending.

High-level estimates suggest that required infrastructure upgrades at each remote Ontario airport will total nearly \$1.5 billion for the region, with a cost of approximately \$50 million per airport. As multiple ministries within both the federal and provincial governments have a vested interest in supporting necessary upgrades, locating this funding amount should not be prohibitive. The logistics of coordinating such a massive infrastructure upgrade project are complicated and will undoubtedly take a significant amount of time and collaboration at all levels of government. In the time that passes before the project is initiated, and longer still until it is completed, infrastructure costs will continue to increase, and First Nations communities will continue to suffer the consequences.

Conclusion

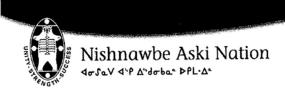
The 29 remote airports operated by the Ontario Ministry of Transportation are critical lifelines for the First Nations they serve. However, decades of underinvestment and the slow pace of modernization have created a dangerous gap in aviation infrastructure and service delivery. The recommendations set out in this assessment—declaring clearways and stopways as runways, implementing interim exemptions from TP312 5th edition, and conducting comprehensive service level assessments—are not just technical or regulatory measures. They are essential steps toward safeguarding the lives, health, and wellbeing of over 50,000 First Nation residents who rely on air travel for everything from emergency medical care to the delivery of food, fuel, and basic supplies.

Upgrading these remote airports will also deliver profound economic and social benefits. Modernized infrastructure will reduce the frequency of cancelled flights and missed medical appointments, allow for more cost-effective transport of goods, and enhance the overall resiliency of northern communities. These benefits will have impacts throughout the region—lowering the cost of living, creating jobs, improving public health, and strengthening economic development on and off reserve.

The urgency is clear. Without immediate action and cross-jurisdictional collaboration, the infrastructure gap will continue to widen, deepening the inequities faced by remote First Nations. The Government of Ontario, alongside federal partners, must seize this moment to commit to a long-term, fully funded strategy for aviation safety and sustainability in the North. The cost of inaction—measured in lives, lost opportunities, and growing disparities—is far too high.

Appendix 1: Resolutions

1.1 NAN Resolution 06/29: Improving Remote Airports



100 Back Street, Unit 200, Thunder Bay, ON P7J 1L2 Tel: (807) 623-8228 Fax: (807) 623-7730 www.nan.on.ca

RESOLUTION - 06/29

IMPROVING REMOTE AIRPORTS

WHEREAS Nishnawbe Aski Nation is interested in improving safety standards for public and commercial air service in our First Nations, such as:

- □ Limited Weather Information Systems (LWIS)
- □ Extending runways
- □ Instrument Flight Rules standards (IFR)
- □ Increased service levels
- □ Review Existing Operation & Maintenance

WHEREAS the Northern Ontario Aviation Committee Proposal outlines approaches to achieving these results; and

WHEREAS improved air service transportation capacity is directly linked to our region's ability to viably engage in economic opportunities.

THEREFORE BE IT RESOLVED the NAN Chiefs In Assembly support the Northern Ontario Aviation Committee Proposal.

FINALLY BE IT RESOLVED that the NAN Chiefs In Assembly request representation on the Northern Ontario Aviation Committee as airport safety is a concern for our First Nations who utilize them on a daily basis.

DATED AT THUNDER BAY, ONTARIO THIS 23rd DAY OF MARCH, 2006.

MOVED BY: Chief Joshua Frogg

Wawakapewin First Nation

SECONDED BY:

Chief Mike Metatawabin Fort Albany First Nation

CARRIED.

Deputy Grand Chief

1.2 NAN Resolution 12/36: Ornge Air Ambulance Incident in North Caribou Lake First Nation



100 Back Street, Unit 200, Thunder Bay, ON P7J 1L2 Tel: (807) 623-8228 Fax: (807) 623-7730 www.nan.on.ca

RESOLUTION 12/36 ORNGE AIR AMBULANCE INCIDENT IN NORTH CARIBOU LAKE FIRST NATION

WHEREAS an incident occurred on October 4th, 2011 when a young man was reported to the North Caribou Lake First Nation nursing station with severe burns, and it was decided by the nursing staff to require an immediate medical evacuation;

WHEREAS the nursing staff requested a medical evacuation at approximately 11 pm, informing the dispatcher that a failure to evacuate the young man would almost certainly lead to his death;

WHEREAS an ORNGE Air Ambulance dispatcher denied the request for an air ambulance citing foggy conditions and an inability to land, despite repeated statements from the nursing staff explaining that the weather conditions on the ground were clear and that an experienced pilot with Weagamow Air was in the community at the time and stated that the fog did not set in until nearly 2:30 am;

WHEREAS no aircraft was dispatched by ORNGE, and the young man succumbed to his injuries at approximately 6:30 am on October 5, 2011;

WHEREAS no clear documents are readily available that outline the ORNGE protocols for dispatching aircraft in emergency scenarios;

THEREFORE BE IT RESOLVED that Nishnawbe Aski Nation (NAN) Chiefs-in-Assembly mandate the NAN Executive Council to further investigate the circumstances surrounding the incident in North Caribou Lake First Nation on October 4, 2011;

FURTHER BE IT RESOLVED NAN Executive Council is mandated to research the existing ORNGE policies and criteria for dispatching aircraft in emergency situations;

FINALLY BE IT RESOLVED that NAN Executive Council shall advocate for improvements in the policies and criteria that define a suitable situation for dispatching a medical evacuation aircraft, including, but not limited to, directing ORNGE to establish in-community contacts to advise on local weather conditions, rather than relying solely on general meteorology reports.

DATED AT COCHRANE, ONTARIO THIS 17TH DAY OF MAY, 2012.

MOVED BY: Frank McKay, Proxy, Cat Lake First Nation

SECONDED BY: Chief Bart Meekis, Sandy Lake First Nation

CARRIED

Grand Chief Stan Beardy

Deputy Grand Chief

1.3 NAN Resolution 16/48: Aviation Safety in First Nation Communities



100 Back Street, Unit 200 Thunder Bay, ON P7J 1L2 Tel: (807) 623-8228 Fax: (807) 623-7730

RESOLUTION 16/48: AVIATION SAFETY IN FIRST NATION COMMUNITIES

WHEREAS Nishnawbe Aski Nation (NAN) is committed to the improvement of safety standards for public and commercial air service in NAN First Nations by upgrading current radar systems in remote airports to meet the Canadian standard;

WHEREAS enhanced radar technology would allow aircraft and medivacs to land in most weather conditions, which is currently not permitted;

WHEREAS improved radar technology is directly linked to our territory and people's health and economic development;

THEREFORE BE IT RESOLVED that NAN Chiefs-in-Assembly support the need to advance and enhance aviation safety in northern Ontario First Nation communities through the use of Longitudinal Precision Vertical guidance (LPV) aircraft approaches;

FURTHER BE IT RESOLVED that Chiefs-in-Assembly mandate the NAN Executive Council to demand upgrades to the current radar technology to meet the Canadian standard in our remote communities:

FURTHER BE IT RESOLVED that the Executive Council work with companies and organizations that fly in the communities to ensure that their equipment is in safe operational order and up to standard;

FINALLY BE IT RESOLVED that the Executive Council work with the Ontario Ministry of Transportation and other entities to ensure the airstrips are safe and up to standard.

DATED AT TIMMINS, ONTARIO THIS 19th DAY OF MAY 2016.

MOVED BY: Chief Stan Beardy, Muskrat Dam First Nation SECONDED BY: Proxy Roy Spence, Webequie First Nation

DECISION: CARRIED

Grand Chief Alvin Fiddler

Deputy Grand Chief

1.4 NAN Resolution 25/14 Remote Airport Infrastructure Funding for Required Upgrades



25/14

REMOTE AIRPORT INFRASTRUCTURE FUNDING FOR REQUIRED UPGRADES

WHEREAS the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) contains several rights that are relevant to the urgent need to invest in remote airport infrastructure, and UNDRIP was confirmed by federal legislation in 2021;

WHEREAS airports connect remote First Nations and are critical to the well being of First Nations;

WHEREAS airports are critical to the safety of First Nations, including access to fire fighting and other emergency services;

WHEREAS Nishnawbe Aski Nation (NAN) Chiefs-in-Assembly passed NAN Resolution 16/48: Aviation Safety in First Nation Communities, mandating the NAN Executive Council to work with the Ontario Ministry of Transportation (MTO) and other entities to upgrade remote northern airport technologies and meet national safety standards;

WHEREAS Chiefs-in-Assembly passed *Resolution 06/29: Improving Remote Airports*, mandating improvements to safety standards for public and commercial air service to remote airports serving NAN First Nations, in addition to *Resolution 12/36: Ornge Air Ambulance Incident in North Caribou Lake First Nation*, mandating research of Ornge policies and criteria for dispatching aircraft in emergency situations;

WHEREAS the majority of NAN communities are remote and as such are susceptible to climate change, causing an increasing reliance on air travel in order to maintain and improve community infrastructure and socio-economic prosperity, to address emergency needs, and to access services, including health, education, justice, social programming;

WHEREAS the National Airports Capital Assistance Program (ACAP) is gravely underfunded to address the costly upgrades required for remote airport infrastructure to improve safety and access to remote Indigenous communities;

WHEREAS remote northern airports require runway recertification and technology improvements, including Localizer Performance with Vertical Guidance (LPV) approaches, high intensity runway lighting (HIRL), effective runway lengths, formal de-icing services, additional automated weather observation stations (AWOS), and refueling services available to all carriers - to meet Canadian safety standards and provide safe transportation to members of remote Indigenous communities;



1

RESOLUTION 25/14: REMOTE AIRPORT INFRASTRUCTURE FUNDING FOR REQUIRED UPGRADES

WHEREAS the Transportation Safety Board Recommendation A18-02 directs Transport Canada (TC) to collaborate with air operators and airport authorities to identify locations where there is inadequate de-icing and anti-icing equipment, and take urgent action to ensure that the proper equipment is available to reduce the likelihood of aircraft taking off with contaminated critical surfaces;

WHEREAS MTO remote airports require additional staffing capacity to meet the operational needs of carriers and provide the necessary services for incoming and outgoing aircraft to optimize the current services provided, in addition to addressing the need for more capacity for the infrastructure upgrades being proposed;

WHEREAS the Assembly of First Nations (AFN) did not include airports in their national AFN *Closing* the *Infrastructure Gap by 2030* Report, so urgent action is required to conduct a comprehensive capital needs and operation and maintenance assessment of remote airport infrastructure, to accurately identify the needs and required funding to improve safety and access for remote Indigenous communities;

WHEREAS patients requiring medical care are experiencing significant delays due to a loss in scheduled service resulting from a combination of TC's new Flight Duty Regulations, a lack of airport infrastructure, and a global pilot shortage;

THEREFORE BE IT RESOLVED that NAN Chiefs-in-Assembly call on federal and provincial partners to equitably invest in remote airports, including the expansion of airport runways, and to work with NAN and regional carriers, given that the lack of investment has impacted the human rights of Indigenous Peoples by inhibiting access to essential services, including those rights confirmed by UNDRIP;

FURTHER BE IT RESOLVED that Chiefs-in-Assembly call on the federal government to amend the National Airports Policy (NAP) to include an Essential Service Airport Standard to adequately fund the required investments in remote airport infrastructure that will improve safety and access for remote Indigenous communities;

FINALLY BE IT RESOLVED that Chiefs-in-Assembly call on all responsible parties, including, Indigenous Services Canada (ISC), Health Canada (HC), NAV Canada, and Provincial and Municipal airport Operators, to work collaboratively to address the significant funding shortfall and infrastructure gaps at remote airports in Northern Ontario.

DATED AT TORONTO, ONTARIO, THIS 21ST DAY OF MAY 2025.

MOVED BY: Chief Marshall Beardy, Bearskin Lake First Nation SECONDED BY: Chief Russell Wesley, Cat Lake First Nation

DECISION: CARRIED

Grand Chief Alvin Fiddler

Deputy Grand Chief

Nishnawbe Aski Nation

2

1.5 COO Resolution 24/12A Remote Airport Infrastructure Funding for Required Upgrades

Secretariat Office

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CHIEFS OF ONTARIO ANNUAL CHIEFS ASSEMBLY June 11-12-13, 2024 RESOLUTION 24/12A PAGE 1 OF 2

SUBJECT: REMOTE AIRPORT INFRASTRUCTURE FUNDING FOR

REQUIRED UPGRADES

MOVER: Chief Lefty Kamenawatamin, Bearskin Lake First Nation

SECONDER: Anna Betty Achneepineskum, Proxy, Wawakapewin First

Nation

DECISION: CARRIED

WHEREAS:

- The Assembly of First Nations (AFN) report "Closing the Infrastructure Gap by 2030" did not include an assessment of national airport infrastructure needs. An accurate Capital Needs and Operation and Maintenance Assessment must be completed immediately;
- Several northern remote Indigenous communities across Ontario and Canada are solely dependent on air travel to access services in urban centers, including: health care, education, justice, social programming, and the increasing need for emergency evacuations and repatriation due to threats of climate change and critical infrastructure failures;
- The national Airports Capital Assistance Program (ACAP) is gravely underfunded in addressing the costly upgrades required to remote airport infrastructure to improve safety and access to remote Indigenous communities;
- 4. Remote northern airports require runway extensions and recertification, Localizer Performance with Vertical Guidance (LPV) approaches, additional automated weather observation stations (AWOS), formal de-icing services, and terminal improvements and/or replacements to improve safety and access to remote Indigenous communities;

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- Provincial and municipal airport operators must work collaboratively with Transport Canada, Indigenous Services Canada, NAV Canada and other relevant partners
 - in addressing the infrastructure gaps at remote airports across Ontario and Canada;
- Remote Airports require the establishment of an Essential Service Airport Standard under the National Airports Policy to allocate the necessary federal funding for infrastructure upgrades.

THEREFORE BE IT RESOLVED that we, the Chiefs in Assembly:

- Call on federal and provincial partners to equitably invest in remote airports across Canada that serve as a lifeline for Indigenous communities, given the lack of investment has impacted their human rights by inhibiting access to essential services.
- Call on the federal government to amend the National Airports Policy to include an Essential Service Airport Standard to adequately fund the required investments in remote airport infrastructure, including but not limited to navigational aids, that will improve safety and access to remote Indigenous communities,
- 3. Call on Transport Canada, Indigenous Services Canada, NAV Canada, provincial and municipal airport operators, and all relevant partners to work collaboratively in addressing the significant funding shortfall for remote airport infrastructure.
- Call on remote airport operators to work collaboratively with government partners in identifying the infrastructure gaps across Canada to accurately identify the monetary need for closing the remote airport infrastructure gap on reserve by 2030.

Certified Copy of a Resolution dated June 13, 2024

Abram Benedict, Ontario Regional Chief

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1.6 AFN Resolution 46/2024 Remote Airport Infrastructure Funding for Required Upgrades

Assembly of First Nations

50 O'Connor Street, Suite 200 Ottawa, Ontario K1P 6L2 Telephone: (613) 241-6789 Fax: (613) 241-5808 www.afn.ca



Assemblée des Premières Nations

50, rue O'Connor, Suite 200 Ottawa, Ontario K1P 6L2 Téléphone: (613) 241-6789 Télécopieur: (613) 241-5808 www.afn.ca

ANNUAL GENERAL ASSEMBLY July 9, 10, 11, 2024, Montreal, QC

Resolution no. 46/2024

TITLE:	Remote Airport Infrastructure Funding for Required Upgrades		
SUBJECT:	Transportation, Health, Emergency Management		
MOVED BY:	Chief Lance Haymond, Kebaowek First Nation, QC		
SECONDED BY:	Isaiah Bernard, Proxy, Potlotek First Nation, NS		
DECISION	Carried; 2 Opposition; 1 Abstention		

WHEREAS:

- A. The United Nations Declaration on the Rights of Indigenous Peoples (UN Declaration) states:
 - i. Article 1: Indigenous peoples have the right to the full enjoyment, as a collective or as individuals, of all human rights and fundamental freedoms as recognized in the Charter of the United Nations, the Universal Declaration of Human Rights and international human rights law.
 - Article 7(1): Indigenous individuals have the rights to life, physical and mental integrity, liberty and security of person.
 - iii. Article 21(1): Indigenous peoples have the right, without discrimination, to the improvement of their economic and social conditions, including, inter alia, in the areas of education, employment, vocational training and retraining, housing, sanitation, health and social security.
 - iv. Article 21(2): States shall take effective measures and, where appropriate, special measures to ensure continuing improvement of their economic and social conditions. Particular attention shall be paid to the rights and special needs of indigenous elders, women, youth, children and persons with disabilities.
 - v. Article 24(1) Indigenous peoples have the right to their traditional medicines and to maintain their health practices, including the conservation of their vital medicinal plants, animals and minerals. Indigenous individuals also have the right to access, without any discrimination, to all social and health services.
- B. The Assembly of First Nations (AFN) Closing the Infrastructure Gap by 2030 Report did not include an assessment of national airport infrastructure needs.

Certified copy of a resolution adopted on the 11th day of July, 2024 in Montreal, Quebec

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CINDY WOODHOUSE NEPINAK, NATIONAL CHIEF

46 - 2024

Page 1 of 2

- C. Several northern remote First Nations across Canada are solely dependent on air travel to access services in urban centers, including health, education, justice, social programming, and the increasing need for emergency evacuations and repatriation due to threats of climate change and critical infrastructure failures.
- D. The National Airports Capital Assistance Program (ACAP) is gravely underfunded in addressing the costly upgrades required to remote airport infrastructure to improve safety and access to remote First Nations.
- E. Remote northern airports require runway extensions and recertification, localizer performance with vertical guidance (LPV) approaches, additional automated weather observation stations (AWOS), formal de-icing services, terminal improvements and/or replacements, and refueling services to be available at all remote airports and accessible to all carriers to improve safety and access to remote First Nations.
- F. Remote airports require the establishment of an Essential Service Airport Standard under the National Airports Policy (NAP) to allocate the necessary federal funding for infrastructure upgrades.
- G. Provincial, territorial and municipal airport operators must work collaboratively with Transport Canada (TC), Indigenous Services Canada (ISC), NAV Canada and other relevant partners in addressing the infrastructure gaps at remote airports across Canada,
- H. Urgent action is required to conduct a comprehensive assessment of northern remote airport infrastructure to accurately identify the needs and required funding to improve safety and access for remote First Nations

THEREFORE BE IT RESOLVED that the First Nations-in-Assembly:

- Call on the federal government, as well as provincial and territorial governments, to equitably invest in remote airports across Canada that serve as a lifeline for First Nations communities, given that the lack of investment has impacted their human rights by inhibiting access to essential services.
- Call on the federal government to amend the National Airports Policy to include an Essential Service Airport Standard to adequately fund the required investments in remote airport infrastructure that will improve safety and access to remote First Nations.
- Call on Transport Canada, Indigenous Services Canada, NAV Canada, provincial, territorial and municipal airport operators, and all relevant partners to work collaboratively in addressing the significant funding shortfall for remote airport infrastructure across Canada.
- 4. Call on remote airport operators to work collaboratively with First Nations and government partners in identifying the infrastructure gaps across Canada to accurately identify the monetary need for closing the remote airport infrastructure gap on-reserve by 2030.

Certified copy of a resolution adopted on the 11th day of July, 2024 in Montreal, Quebec

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CINDY WOODHOUSE NEPINAK, NATIONAL CHIEF

46 - 2024

Page 2 of 2

1.7 Mushkegowuk Council Resolution No. 2015-10-14 Mushkegowuk Council Renews Campaign Against Illegal Drugs and Alcohol

MUSHKEGOWUK COUNCIL

Brix 370

Moose Factory, On. POL. 1W0

Council

Campaign Against Illegal Drugs And

WHEREAS the supply, demand and

use of illegal drugs (including abuse of prescription drugs) and alcohol is the

leading cause of criminal activity in our

WHEREAS illegal drugs and alcohol

continue to be the main cause of

premature deaths and destruction of

families in our communities, and cause

life-long hardship for our elders.

WHEREAS illegal drugs and alcohol

continue to adversely affect our police.

health, child welfare, education and

THEREFORE BE IT RESOLVED that this Mamowihitowin of Omushkegowuk supports efforts of the Nishnawbe Aski Police Service (together with Ontario Provincial Police where appropriate) to increase searches and spot checks of roads (including Weturn Road),

highways, mall service, airports and train stations to combat importation of illegal drugs and alcohol, with due respect to people's rights to not be

excessively intruded on;

Mushkegowuk communities;

innocent children and families;

social services;

Tel: 705-658-4222 Fax: 705-658-4250

Renews

Mushkegowuk Council 30th Annual Mamowihitowin

Resolution No. 2015-10-14

Mushkegowuk

Alcohol

Attowariskar First Nation Moved by:

Chief Bruce Shisheesh Attawapiskat First Nation

Kashechewan First Nation

Seconded by:

Marjorie Cachagee-Lee Chapleau Cree First Nation

Fort Albany.

First Nation

Moose Crep First Nation

Carried

Taykwa Tagamou Nation

Chapleau Cree First Nation

Certified copy of a resolution passed on October 22nd, 2015

Missanabie Cree First Nation

Jonathan Solomon, Grand Chief

October 22rd, 2015 Missanabie Cree First Nation

Resolution No. 2015-10-14

Page 1 of 2

BE IT FURTHER RESOLVED that this Mamowihitowin of Omushkegowuk directs the Office of the Grand Chief and Deputy Grand Chief to work towards an Emergency Regional Summit for the purpose of developing specific and workable strategies aimed at illegal drugs and alcohol;

BE IT FURTHER RESOLVED that this Mamowihitowin of Omushkegowuk requests the Coroner's Office to provide statistical information on the number of deaths caused by or associated with drugs and alcohol in the past 10 years in the Mushkegowuk First Nations and Mushkegowuk Territory;

BE IT FURTHER RESOLVED that this Mamowihitowin of Omushkegowuk directs the Office of the Grand Chief to request the Ministry of the Attorney General to re-instate the Justice of the Peace Office / Program within the Mushkegowuk region:

BE IT FURTHER RESOLVED that this Mamowinitowin of Omushkegowuk supports the continuing discussions with the province in the Mushkegowuk policing human rights process, whose goal is to develop long term workable steps toward equal police services for the Mushkegowuk communities including for effective enforcement against illegal drugs and alcohol;

THEREFORE BE IT FINALLY RESOLVED that this Mamowihitowin of Omushkegowuk calls on all citizens, organizations and governments in our area, including municipalities, to recognize and support this Resolution.

Resolution No. 2015-10-14

Appendix 2: Letters of Support

2.1 Sioux Lookout First Nations Health Authority Letter of Support

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June 18, 2025

RE: Remote First Nations Airport Infrastructure Advocacy - Nishnawbe Aski Nation Needs Assessment 2025

To whom it may concern,

The Sioux Lookout First Nations Health Authority (SLFNHA) is dedicated to providing services, advocacy and leadership in the health of First Nation people across the Sioux Lookout region. The SLFNHA Chiefs Council of Health, along with local tribal councils, airlines, Ornge Air Ambulance, Weeneebayko Area Health Authority (WAHA) and Nishnawbe Aski Nation (NAN) are working in partnership to advocate for critical aviation infrastructure to address the disparities affecting remote First Nations airports. Substandard infrastructure has a direct association to poor health outcomes from the delayed medical air transports of community members and reduced access to health services delivered within the First Nations communities and their neighboring urban centers.

SLFNHA recognizes and fully supports the important aviation advocacy and research efforts led by NAN. In 2020, NAN completed an Aviation Needs Assessment and have updated this work to further highlight the ongoing challenges posed by inadequate aviation infrastructure at First Nations airports, as well as the persistent lack of government action and funding to address these critical needs. This letter of support reiterates the key points of previous advocacy efforts and renews the request for governments to invest in appropriately funding the infrastructure for remote First Nations airports in our region.

Aviation in remote Northwestern Ontario is the lifeline for the wellbeing of individuals in First Nations communities. The airports in these remote areas provide critical infrastructure - facilities, runways, equipment, operations, and personnel – that support all aspects of healthcare, including emergency, primary care, mental health, addictions services, preventative care, etc. These airports should be officially recognized as "Essential Service Airports" due to their vital role in sustaining these communities.

Despite years of advocacy, the urgent need to meet safety standards, improve accessibility, and enhance efficiency at remote northern First Nations airports remains largely unaddressed. In many cases, these critical requirements have been ignored altogether.

Minimal action has been taken since the Auditor General of Canada's 2017 Report to address the safety-related infrastructure needs, operations, and maintenance of these airports. The gap has only widened since the report was written. Substantial funds are required to finance operational and capital costs. The Transportation 2030 Strategic Plan lacks the aviation infrastructure funding needed to complete critical safety projects at remote airports. Similarly, the Assembly of First Nations' "Closing the Infrastructure Gap of 2030" does not assess national airport infrastructure needs. The Transport Canada/National Airports Capital Assistance Program is underfunded, and unable to support the standardization of remote Northwestern Ontario airports, while the Ontario Ministry of Transportation's funding model overlooks the unique costs associated with these essential service airports. Recent funding efforts have not addressed the long-standing aviation infrastructure deficiencies in these communities. The outdated 1970 model of remote First Nations airports urgently requires attention to improve both infrastructure and operations.

Ornge Air Ambulance's mandate is to provide timely and efficient medical transport, but they are consistently hindered by inadequate navigational aids, a lack of de-icing equipment/supply, and poor runway conditions (including insufficient reporting). These deficiencies can lead to dire outcomes for patient wellbeing. The heavy burden of this shortfall weighs heavily on community members, families, health professionals, paramedics, pilots, dispatchers, and others involved in delivering high-quality health care.

Remote First Nations airports are integral to the global supply chain that serves these communities. Airport infrastructure is linked to other associated social determinants of health including food security, economic stability and access to preventative health care. To effectively close the aviation and airport standardization gap, all levels of government must fulfill their commitments by investing in the necessary aviation infrastructure for First Nation airports. This will foster healthy, self-sustaining communities, both now and for future generations.

An immediate action plan to support aviation infrastructure for each remote northern First Nation airport must include:

- Immediate additional installation of Automated Weather Observing System (AWOS)
- · Enhanced navigational aids (Runway recertification, LPV approaches), satellite/digital
- · De-icing equipment, heaters, with ground support
- · Enhanced Runway Lighting
- Reliable and complete information/reporting on weather and runway conditions. Increased Human Resource staffing levels and operation hours at airports
- · Equipment: Snow blowers, surface maintenance, fueling and emergency vehicles
- Training and employment for airport operations, from runway/navigational services to passenger services and security operations
- · Reinvestment of Aviation Fuel tax with a sustained revenue source to maintain these runways

Collaboration among aviation transportation partners is crucial to ensuring that First Nation individuals, families and communities have access to high-quality, timely and culturally safe services, while also supporting the development of sustainable, long-term community infrastructure.

This letter reaffirms our strong and ongoing support for the initiatives put forward by our organization, our area partners and NAN to improve technology and resources at remote airports serving First Nations communities. We respectfully urge your immediate attention to the standardization and modernization of all remote Northwestern First Nation airport infrastructure through the necessary operational and capital funding. To advance this critical work, a meeting with the appropriate levels of government must be set to discuss viable solutions, available funding opportunities, and the development of a clear timeline for the prompt implementation of an action plan to address these urgent infrastructure needs.

Sincerely,

Sonia Isaac-Mann

President and Chief Executive Officer
Sioux Lookout First Nations Health Authority

2.1 Ornge Letter of Support



5310 Explorer Drive Mississauga, Ontario Canada L4W 5H8 1.800.251.6543 647.428.2005 **tel** 647.428.2006 **fax**

July 16, 2025

Jennifer Guerrieri Transportation Manager Nishnawbe Aski Nation

Dear Ms. Guerrieri,

I am writing on behalf of Ornge, Ontario's provider of air ambulance and critical care transport services, to offer our support for proposed improvements to remote airport infrastructure and service.

A vital part of Ontario's health care system, Ornge provides high-quality air ambulance and medical transport services to individuals who are critically ill or injured. We own and operate a fleet of fixed- and rotor-wing aircraft, including Pilatus PC-12 airplanes, Leonardo AW139 helicopters, and Crestline land ambulances. Our services are integrated into a province-wide system of patient care that connects hospitals and communities, enabling access to specialized care across Ontario. This is especially crucial in remote communities in Northern Ontario, where air medical transport is often the only means for patients to access timely and appropriate care.

We would like to highlight several key improvements that would provide significant benefit from an air ambulance perspective:

Runways:

Over the next few years, Ornge will be replacing the fleet of older generation PC-12 fixed wing aircraft with the newest PC-12 PRO model. In addition, we will be adding a PC-24 jet to our fleet which is capable of carrying several patients at once and is large enough to assist with multipatient evacuations in First Nations communities. Increasing runway lengths will help support safe operations into these communities with our new aircraft. A paved runway extended to 5000' (from the current average of 3000') would improve aircraft performance and increase the margins of safety.

Weather Reporting and AWOS Infrastructure:

The limited availability of weather reporting and AWOS (Automated Weather Observation System) installations at remote airports significantly hampers our ability to obtain critical altimeter settings and current weather conditions. While we are encouraged by progress in this area over the past few years, we urge that weather reporting infrastructure continue to be prioritized.





De-Icing Capabilities:

The absence of de-icing resources at remote airports continues to affect our ability to provide reliable service, particularly during the winter months. Inadequate de-icing availability is a major contributor to flight delays and cancellations, as freezing precipitation often prevents safe arrivals and departures. We strongly support the creation and implementation of a comprehensive de-icing service model. This should include the provision of de-icing fluid, appropriate equipment, and secure storage facilities at each airport.

• Localizer Performance with Vertical Guidance (LPV):

This technology would replace the outdated non-directional beacon (NDB) and VFR approaches. The impact of this technology would reduce descent minimums from 600-1,500' to 200-300', thereby enhancing landing reliability in poor weather.

High Intensity Runway Lighting (HIRL):

HIRL enhances visibility in low-light and adverse conditions. This is essential for safe approaches at night and in low-visibility scenarios.

Fueling Infrastructure:

The current lack of standardized fueling services limits flight operations. This hinders both scheduled and emergency service delivery.

• Workforce Capacity:

Most airports are staffed only on weekdays (typically from 08:00 to 17:00). These hours are insufficient for off-hours air ambulance transports and emergency operations.

In closing, we fully support your efforts to enhance infrastructure at Ontario's remote airports to ensure Ornge patients continue to have timely access to critical healthcare services when they need it most. Please don't hesitate to contact me should you require additional information.

Sincerely,

Peter Cunnington

Chief Aviation Officer



2.2 Wasaya Airways Letter of Support - request



201 Kelner Place Thunder Bay, ON P7E 6V3 807-473-1200

21 July 2025

RE: Support for the 2025 Nishnawbe Aski Nation Aviation Needs Assessment

To whom it may concern,

I am writing to express my strong support for Nishnawbe Aski Nation's (NAN) 2025 update to its Aviation Needs Assessment. This important and timely report reflects NAN's continued commitment to enhancing the wellness, connectivity, and prosperity of First Nations across Northern Ontario through aviation infrastructure and service improvements.

Aviation is not a luxury in the Far North—it is a lifeline. For many remote First Nation communities, air transportation is the only reliable, year-round mode of travel, essential for access to health care, food, emergency response, education, and other critical services. The 29 airports operated by the Ontario Ministry of Transportation (MTO) play a vital role in sustaining community life, yet they continue to lack the investment and modernization found in southern or urban transportation hubs. Even brief service disruptions can have far-reaching consequences, impacting lives and undermining community wellbeing and sovereignty.

The original 2020 Needs Assessment served as a valuable reference point in identifying gaps in infrastructure, operations, and services. The updated 2025 version builds meaningfully on that foundation, incorporating current data, emerging technologies, regulatory changes, and the lived experiences and priorities of First Nations. It presents a strategic and inclusive vision for aligning aviation planning with economic development, safety, reconciliation, and long-term sustainability.

Nishnawbe Aski Nation has demonstrated leadership and foresight in coordinating this assessment, fostering collaboration across sectors, and advocating for meaningful, community-led solutions. Their continued efforts to ensure safe, reliable, and culturally appropriate air transportation deserve recognition and broad support.

I urge all levels of government and relevant stakeholders to give serious consideration to the recommendations in this updated assessment. Investing in aviation infrastructure in the North is not only a matter of public safety—it is an investment in equity, economic opportunity, and reconciliation with Indigenous peoples.

Please feel free to contact me should you wish to discuss the assessment or its recommendations further.

Sincerely,

Wasaya

Rob Fox Director of Flight Operations

Phone 807-473-1215 ext.7864 Cell | 807-252-5983

Email | rfox@wasaya.com 201 Kelner Place Thunder Bay, ON P7E 6V3

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Every Child Matters.

www.wasaya.com

wasaya.com

References

- ADB SAFEGATE. (2023). RELIANCE Runway Edge, Threshold and End, L-861(L), L-861E(L) and L-861SE(L)

 Omnidirectional elevated [Brochure]. https://www.airportlights.com/wp
 content/uploads/2023/03/3813 7923c9fd-da92-4b9c-9742-128d9d129ec5.pdf
- Dion, Joseph P. (2002). Airports in Transition. *Library of Parliament Parliamentary Research Branch*Science and Technology Division. https://publications.gc.ca/collections/Collection-R/LoPBdP/PRB-e/PRB0241-e.pdf
- Emmerson, David & Meades, Randall. (2015). *Connecting Canada's Transportation System to the*World. Pathways, Volume 1. https://tc.canada.ca/sites/default/files/migrated/ctar_vol1_en.pdf
- Fiddler, Willow. (2019). Evacuation of Pikangikum to Continue Friday Ahead of Forest Fire. *APTN National News*. https://aptnnews.ca/2019/05/30/evacuation-of-pikangikum-to-continue-friday-ahead-of-forest-fire/
- Galloway, Gloria. (2015). First Nations Health Care: The System Failed My Son. *The Globe and Mail Canada*. https://www.theglobeandmail.com/news/national/first-nations-health-care-the-system-failed-myson/article26020926/
- Government of Canada, Office of the Auditor General of Canada. (2017). Report 6-Civil Aviation

 Infrastructure in the North-Transport Canada. 2017 Spring Reports of the Auditor General of

 Canada. https://www.oag-bvg.gc.ca/internet/English/parl_oag_201705_06_e_42228.html
- Government of Canada, Transport Canada. (2010). Airports Capital Assistance Program: information for applicants. *TP12313*. https://publications.gc.ca/collections/collection-2011/tc/T22-103-2010-eng.pdf

- Government of Canada, Transport Canada. (2023). Evaluation of the Airports Capital Assistance Program.

 https://tc.canada.ca/en/corporate-services/transparency/corporate-management-reporting/evaluation-reports/evaluation-airports-capital-assistance-program
- Transportation Safety Board of Canada. (2018). *TSB Recommendation A18-02 De-icing and anti-icing*equipment. https://www.tsb.gc.ca/sites/default/files/2025-04/A1802-ENG-2025.pdf
- Transportation Safety Board of Canada. (2018). *TSB Recommendation A18-03 Compliance with Canadian Aviation Regulations subsection 602.11(2).* https://www.tsb.gc.ca/sites/default/files/2025-04/A1803-ENG-2025.pdf
- Transportation Safety Board of Canada. (2020). *TSB Recommendation A20-01 Landing minima in Canada*. https://www.tsb.gc.ca/sites/default/files/2025-04/A2001-ENG-2025.pdf
- Transportation Safety Board of Canada. (2020). *TSB Recommendation A20-02 Landing minima in Canada*. https://www.tsb.gc.ca/sites/default/files/2025-04/A2002-ENG-2025.pdf