September 8, 2026

Transport Canada
NCR - Safety and Security, Civil Aviation, Strategy and Emerging Technologies
330 Sparks Street
Ottawa, ON
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Canada

Re: Conservation Ontario's comments on Transport Canada's "Notice of Proposed Amendment, RPAS: Remote Identification, Community-Based Organizations, and Designated Airspace" (NPA 2026-005)

Conservation Ontario is the Association of Ontario's 36 Conservation Authorities (CAs). CAs use Remotely Piloted Aircraft Systems (RPAS), commonly known as drones, for a variety of applications, including environmental research, remote sensing, data collection, monitoring, compliance enforcement, and invasive species management. Drawing on this experience and the operational realities of managing Ontario's watersheds, Conservation Ontario offers the following comments on the proposed regulatory amendments.

These comments are not intended to limit comments submitted individually by CAs on this proposal. A summary of our feedback has been submitted online, as requested, through the official survey.

Conservation Ontario is generally supportive of Transport Canada's proposed amendments to the Canadian Aviation Regulations (Part VI and Part IX, Standard 922). We believe these changes will enhance transparency in RPAS operations, providing greater clarity and accountability for both operators and the public while supporting the safe and responsible integration of RPAS into Canadian airspace.

With respect to the proposed Remote Identification requirement for all RPAS weighing between 250 g and 150 kg, Conservation Ontario recommends limiting access to operator location data and personally identifiable information to authorized law enforcement

agencies only. In addition, we recommend extending exemptions for existing RPAS purchased before the new requirements come into force to minimize the financial and administrative burden associated with upgrading or replacing equipment to achieve compliance.

Conservation Ontario supports the proposal to allow groups to apply for Community-Based Organization (CBO) status and establish Fixed Sites, enabling them to benefit from certain operational flexibilities for RPAS activities in Canadian airspace. Conservation Ontario also recommends that Ontario's CAs be eligible to become CBOs and establish Fixed Sites on CA-owned properties for the benefit of staff, local communities, recreational RPAS users, and model aircraft operators. In addition, we recommend that any fees associated with obtaining CBO status or registering aircraft through a CBO be limited to cost-recovery to help ensure accessibility and encourage participation.

Conservation Ontario supports the proposed changes to Designated RPAS Airspace, Geo-Zones, and Geo-Awareness functions, with several refinements to ensure clear, consistent implementation while maintaining the permissive approach of the Canadian Aviation Regulations. Although the framework appears designed to support expanding commercial RPAS uses, including drone delivery, it should not unnecessarily restrict airspace access for other operators. Conservation Ontario also recommends making Geo-Awareness publicly available through web-based maps and downloadable GIS datasets, with a defined update schedule and clear communications to support awareness, access, and adoption.

Remote Identification

Conservation Ontario broadly supports Remote Identification requirements for RPAS weighing between 250 g and 150 kg, recognizing their potential to improve accountability, safety, airspace integration, and public confidence. Based on feedback from CAs, implementation should:

- **Protect operator privacy and safety** – The RPAS location and numeric identifier should be sufficient to document and report an issue. Owner and operator identities and locations should remain encrypted and accessible only to authorized law enforcement agencies.
- **Restrict** public access to sensitive location information – Public disclosure of controller and operator locations could lead to confrontations or vigilante behaviour by individuals who believe a drone is being operated improperly. This could expose CA staff and volunteers to harassment, violence, or theft.
- **Accommodate limited network coverage** – Many CA operations occur in remote areas of Ontario where Network Remote Identification may be impractical. Although Broadcast Remote Identification provides another compliance option, upgrading or modifying RPAS may be costly.
- **Provide a practical transition for existing aircraft** – Although the proposed phased implementation provides approximately two years before compliance

becomes mandatory, many CAs may need to purchase new RPAS or aftermarket Remote ID modules. A longer grace period for RPAS sold before the changes are approved would help users maximize existing investments and budget for compliant replacements as fleets are renewed.

- **Clarify how the system will operate in practice** – The six information sessions (three in English and three in French) were well attended and appreciated by CAs. However, the busy field season prevented many from attending. Future sessions should be offered on varied dates and at flexible times, recorded, and posted online for later reference.

Community-Based Organizations

Conservation Ontario generally supports Transport Canada's proposal to allow recreational RPAS organizations and educational and research institutions to apply for Community-Based Organization (CBO) status. Conservation authorities see significant value in designated fixed sites for pilot training, certification preparation, equipment testing, environmental research, and the development of innovative RPAS applications. CAs, municipalities, and other not-for-profit organizations should also be eligible where their mandates support educational, research, environmental, or public service objectives.

We support a risk-based approach to administering CBO status. Any exemptions from Part IX of the Canadian Aviation Regulations should be site-specific, subject to appropriate oversight, and limited to defined operating conditions. Higher-risk activities should continue to require suitable safety measures. Application and administrative fees should also be minimized to reduce barriers to participation while supporting Transport Canada's cost-recovery objectives.

Designated RPAS Airspace and Geo-Zones

Conservation Ontario supports the proposal to establish designated RPAS airspace that would temporarily or permanently modify airspace rules for RPAS operations. This approach is expected to improve safety, operational clarity, planning efficiency, and access to airspace information. However, implementation should not unnecessarily restrict recreational or non-corridor commercial operators or give preferential access to large-scale commercial drone enterprises, such as delivery services. Doing so would conflict with the permissive approach of existing RPAS regulations.

Geo-Awareness Tools

Conservation Ontario is generally supportive of the introduction of Geo-Awareness functions and recognizes their potential to enhance safety, regulatory compliance, and operational planning for RPAS users. To support effective implementation, we recommend that the following be considered:

- **Interoperability and open access to data:** As not all RPAS controllers have native user interfaces capable of integrating Geo-Awareness functions, these tools should

be made available through a variety of platforms and formats to maximize their utility for flight planning and operations. This should include, but not be limited to, online mapping applications such as NAV Drone, as well as downloadable and service-based data that can be integrated into commonly used GIS platforms, including Google Maps, QGIS, and Esri ArcGIS Pro.

- **Clear definitions and user education:** RPAS users should have clear guidance regarding where to access the most current and authoritative Geo-Awareness information. Where information is provided through multiple platforms or formats, update schedules should be clearly defined, consistently applied, and communicated to users in a transparent and unambiguous manner.
- **Avoid unnecessarily restrictive manufacturer-based controls:** Geo-Awareness functions should be designed primarily as informational tools that support safe and compliant RPAS operations, rather than as mechanisms that automatically prevent operations within areas of airspace. Operations should continue to be permitted where an operator has obtained the necessary authorizations and approvals, regardless of airspace designation.
- **Apply airspace restrictions using a demonstrable, risk-based approach:** The Canadian Aviation Regulations have established an effective framework that balances aviation safety with operational flexibility through a risk-based regulatory approach. Any new airspace restrictions associated with these proposals should similarly be based on clearly demonstrated risks and should remain proportionate to the safety objectives they are intended to address.

Conservation Ontario appreciates the opportunity to review and provide feedback on Proposed Amendment 2026-06: RPAS: Remote Identification, Community-Based Organizations, and Designated Airspace.

Overall, Conservation Ontario supports the proposed amendments and believes that, with the refinements outlined above, they would help modernize the Canadian Aviation Regulations to reflect the growing use of RPAS and the increasing complexity of RPAS operations. At the same time, the proposed framework should maintain a balanced, risk-based approach that supports innovation while ensuring the continued safety, efficiency, and resilience of Canadian airspace.

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