



NACC

National Airlines
Council of Canada

CNLA

Conseil national des lignes
aériennes du Canada

**National Airlines Council of Canada Submission to
Office of the Privacy Commissioner of Canada**

**Draft Guidance for Processing Biometrics -
For Organizations**

12 January 2024



Biometric Solutions for Aviation

Introduction

The National Airlines Council of Canada (NACC) appreciates the opportunity to provide comments on the Office of the Privacy Commissioner of Canada's "*Draft Guidance for processing biometrics – for organizations*".

NACC represents Canada's largest national and international passenger air carriers: Air Canada, Air Transat, Jazz Aviation LP and WestJet. It promotes safe, sustainable, accessible, and competitive air travel by advocating for the development of policies, regulations, and legislation to foster a world-class transportation system. Pre-pandemic, our members collectively carried over 80 million passengers annually, directly employed over 60,000 people and served as a critical component of Canada's overall air transport and tourism sector, which supported more than 630,000 jobs.

There has been much attention on the need to improve the air passenger experience in Canada, and NACC member airlines firmly agree with the goal to improve the resiliency and efficiency of Canada's air travel system and that leveraging the use of biometrics is key towards accomplishing this goal.

NACC would like to reinforce the important potential that the use of biometrics in Canada's aviation system presents, and requests that the draft Guidance for processing biometrics emphasize a contextual approach to assessing the appropriateness of the use of biometrics.

Benefits

Biometric solutions use facial recognition to verify the identity of passengers and eliminate the need for manual checks and physical documentation. These solutions have a number of potential uses in an aviation context and can offer several benefits throughout an air travel system for passengers and airlines, including but not limited to:

- **More secure identity confirmation:** Biometric solutions offer a more secure way to confirm a passenger's identity, and can reduce the possibility of identity fraud, while reducing potential unintended bias.
- **Greater efficiencies:** Biometric solutions can streamline various processes, including at check-in, boarding, and others, by eliminating the need for passengers to frequently present their passports, boarding passes, or other documents. This can improve the passenger experience and reduce operational costs and delays.
- **Enhanced customer service and convenience:** The use of biometrics can also provide for reduced wait times/ queuing, a touchless experience, more flexibility and choice for passengers to use self-service kiosks, mobile apps, or other digital platforms to manage their travel.

Speed and convenience are top priorities for passengers. Each of these benefits would contribute towards a more modern and efficient air travel system in Canada. Additional benefits would result for airports via optimizing space efficiency and alleviating pressure on in-terminal infrastructure as a result of reduced queues, and for government, by the strengthening of border security and improved facilitation by receiving

accurate passenger info, including biometrics in advance, and the opportunities to combat human trafficking and other cross-border criminal activities.

Beyond these benefits, the use of biometrics in Canada's air travel system will also be important for our global competitiveness. In fact, the use of biometrics in aviation is growing globally, and are implemented, or are being tested, by airlines and other aviation stakeholders in countries like the US, Singapore, Germany, the Netherlands, and others. As such, its use in Canada will be important to ensure Canada's air travel system remains world class.

NACC members are very sensitive to privacy and have longstanding experience and expertise in protecting sensitive information, and agree with the principle to always provide customers who choose to opt-out of its use, with alternative options where applicable.

Conclusion

NACC maintains that the purposes described above are pressing and substantial for an industry that is committed to improving the air passenger experience in Canada and upholding safety and security as its utmost priority. Accordingly, NACC respectfully requests that the draft "*Guidelines on the processing of biometrics – for organizations*" emphasize a contextual approach to assessing the appropriateness of the use of biometric solutions.

NACC and our member airlines look forward to the government's continued engagement with airlines and the wider aviation industry on these issues. For more information on this submission, please contact: Suzanne Acton-Gervais, Vice-President Stakeholder Relations and Regulatory Affairs, National Airlines Council of Canada at sactongervais@airlinecouncil.ca