



# COVID-19 Vaccination Mandate Policy

## Frequently Asked Questions

**Important Caveat:** Nothing in this document supersedes any requirement or obligation outlined in Transport Canada's Interim Order or the Public Health Agency of Canada's Emergency Orders. It is meant to complement these legal documents and provide guidance on how to understand the requirements.

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## General Questions

### Q1. Who is required to be vaccinated?

**A1.** Effective October 30, 2021, all air travellers who are 12 years and 4 months of age or older flying on a domestic, transborder or international flight departing from a specified Canadian airport will need to be fully vaccinated. In recognition that travellers will need time to get vaccinated, travellers will be able to board with a valid COVID-19 molecular test (taken within 72 hours of travel) until November 29. On November 30, all travellers must be fully vaccinated with very few exceptions.

Non-passengers will also need to be fully vaccinated, unless exempt, no later than November 15, 2021. This includes:

- employees of airlines who operate commercial passenger aircrafts from a specified airport in Canada (identified in Schedule 2 of the *Interim Order*) (*Canadian Aviation Regulations* (CAR) subparts 701 (outbound), 703, 704 & 705), including scheduled and charter flights; and
- employees of airports and other organizations who enter restricted areas of airports (e.g., concession and hospitality workers)

Military flights, aerial work (CAR subpart 702), private operators (CAR subpart 604) and international-to-international travellers are excluded from the policy, unless they are required to access the restricted area of one of the specified airports.

MEDEVAC flights are completely exempt from the policy.

### Q2. Which types of COVID-19 tests are considered molecular tests?

**A2.** A COVID-19 molecular test is defined within Transport Canada's *Interim Order* as "a COVID-19 screening or diagnostic test carried out by an accredited laboratory, including a test carried out by the method of polymerase chain reaction (PCR) or reverse transcription loop-mediated isothermal amplification (RT-LAMP)". For a list of tests that are considered molecular tests, please consult the "Accepted Types of Tests" section that can be found on the following webpage: <https://travel.gc.ca/travel-covid/travel-restrictions/flying/covid-19-testing-travellers-coming-into-canada>.

### Q3. Why is private aviation (CAR subpart 604) or general aviation excluded?

**A3.** The federal vaccination mandate initiative for the air sector is focused on both commercial passenger flights and those working in the airport environment. Private aviation and general aviation do not involve commercial passengers. However, private operators who require access to the restricted area of a specified airport listed in Schedule 2 of the *Interim Order* will have to be fully vaccinated by November 15, 2021, unless exempt.

### Q4. What is the definition of a "restricted area of an airport"?

**A4.** The restricted area of an airport is based on aviation security requirements. Each airport has slightly different restricted areas but, in general, it would include the sterile area of the air terminal

building, the apron next to the terminal, the movement areas on the airside, etc. Certain companies will need to confirm with the airports where it operates if its operations are part of the restricted area.

**Q5. How does this apply to flight schools that operate out of airports?**

**A5.** Flight schools are covered under CAR subpart 406, which is excluded under the policy; however, if the students or others associated with the flight school (e.g., employees, trainers, etc.) are operating in an area where they need to access the restricted area of an airport, they would be covered under the policy for non-passengers and would be required to be vaccinated in order to gain access.

**Q6. Will the vaccine requirements apply to charter flights?**

**A6.** Charter flights are included in the vaccine requirement, including their passengers and employees, if the flights are operated under the [Canadian Aviation Regulations](#) (CAR) subparts 700 series (excluding subparts 702) and are departing from one of the specified airports.

**Q7. Why can't domestic travellers use ArriveCAN that is used for international travel?**

**A7.** ArriveCAN is used only for travellers entering Canada from another country. All travellers, with limited exceptions, must use ArriveCAN (available as a mobile app and online) to provide mandatory travel information before and after entering Canada, including providing information to the Government of Canada about quarantine plans and contact information for post-border follow up. ArriveCAN is therefore not currently suited to use in the context of domestic or international outbound travel.

**Q8. Will the mandatory vaccination requirement apply to all airports in Canada?**

**A8.** The mandatory vaccination requirement applies to passenger flights departing from specified Canadian airports as identified Schedule 2 of the *Interim Order Respecting Certain Requirements for Civil Aviation Due to COVID-19*.

**Q9. Who will be enforcing the requirements for the federal vaccination mandate?**

**A9.** Transport Canada will conduct compliance activities using inspections and enforcement tools. Should regulated entities not meet the regulatory requirements it could lead to enforcement action such as Administrative Monetary Penalties.

In addition, the regulated entities will be required to ensure adherence to the requirements within their own organizations.

**Q10. Does the requirement to be fully vaccinated apply to prisoners that are being transported via air?**

**A10.** Transport Canada is aware of the challenges while transporting prisoners and as such has developed a national exemption to address this situation.

## Traveller Questions

### Q1. What is the definition of a fully vaccinated person for domestic or outbound travel?

**A1.** To qualify as a fully vaccinated traveller within or from Canada, you must have received:

- the full series of an authorized COVID-19 vaccine, or an acceptable combination of; and
- your last dose at least 14 full days prior to the day you travel.

Authorized COVID-19 vaccines in Canada are the following:

- Pfizer-BioNTech (Comirnaty, tozinameran, BNT162b2)
- Moderna (Spikevax, mRNA-1273)
- AstraZeneca/COVISHIELD (ChAdOx1-S, Vaxzevria, AZD1222)
- Janssen/Johnson & Johnson (Ad26.COV2.S)

Government of Canada measures continue to apply, so travellers should have no signs or symptoms of COVID-19 and be prepared to wear a mask during their travel.

With respect to provincial or territorial requirements, travellers may be subject to further measures taken by provinces or territories in order to prevent the spread of COVID-19. It is the traveller's responsibility to be familiar with potential restrictions regarding your final destination point. Links to provincial and territorial COVID-19 information can be found at: <https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/symptoms/provincial-territorial-resources-covid-19.html>.

### Q2. What are the restrictions in place for unvaccinated travellers during the transition period (from October 30 - November 29)?

**A2.** Beginning October 30, travellers that are 12 years and 4 months of age or older must be fully vaccinated per Canadian requirements or, for a short transition period, be tested prior to travel. Unvaccinated travellers who are 12 years and 4 months or older between October 30 and November 29 will be required to have either proof of a negative COVID-19 molecular test within 72 hours of travel, or proof of a positive test result taken at least 14 and not more than 180 days before departure. Results from a rapid antigen test will not be accepted. Starting November 30, all travellers will need to be vaccinated unless they meet one of the limited exceptions. More specific details on the requirements and exceptions starting November 30 will be provided in the near future.

### Q3. What are the alternatives for travellers who are unable to be vaccinated?

**A3.** Limited exceptions will be in place for travellers who are unable to be vaccinated. Exceptions will be given to those who are unable to be vaccinated due to medical reasons and religious reasons. In both cases, travellers will be required to provide evidence and documentation supporting this (e.g. a medical note) before being permitted to travel.

During the period of October 30, 2021 to November 29, 2021, the traveller will be required to present a valid COVID-19 molecular test result instead of proof of vaccination. More specific details on the requirements and exceptions starting November 30 will be provided.

**Q4. Do I still need to wear a face mask on board an aircraft if I am fully vaccinated?**

**A4.** Yes. All travellers—even those who are fully vaccinated against COVID-19—are still required to wear a face mask throughout their entire travel journey except for brief periods while eating, drinking, or taking oral medication, or unless otherwise exempt. Some of these exemptions include children under two years old, people who are unable to remove their mask without assistance, and people who provide a medical certificate certifying that they are unable to wear a face mask for medical reasons. Failure to comply with the *Interim Order Respecting Certain Requirements for Civil Aviation Due to COVID-19* could result in a fine of up to \$5,000.

**Q5. How will travellers provide confirmation of vaccination?**

**A5.** Travellers can use a proof of vaccination credential issued by their province or territory, or from their country of vaccination so long as it is a Government of Canada-approved COVID-19 vaccine. All proof of vaccinations must be provided in English or French (or a certified translation) and must meet all data elements identified in the *Interim Order*.

For more information, see: <https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19/vaccines/life-after-vaccination/vaccine-proof.html>.

**Q6. What if a proof of vaccination issued by a Province or Territory does not contain all the required data elements as per the *Interim Order*?**

**A6.** A transition exemption will be in place for a limited time in order to allow air carriers to board travellers if they show proof of vaccination from their respective Province or Territory (or designated entity who issued the proof of vaccination), even if their proof of vaccination does not contain all of the necessary data elements as required by the *Interim Order* (i.e. name, issuing body, type of vaccine, and date the final dose of the regimen was administered).

However, in these cases, air carriers are going to be required to report on the number of instances where a traveller showed their proof of vaccination and it did not meet the requirements set out in the *Interim Order*, what data elements were missing and the contact information for the traveller.

**Q7. Will unaccompanied minors be able to board their flight should they be unable to complete a confirmation of eligibility?**

**A7.** If an unaccompanied minor is between the age of 12 years and 4 months and 15 years old (up until the day before they turn 16), the minor will be able to board their flight without having to confirm their eligibility. Unaccompanied minors over the age of 12 years and 4 months must, however, still be able to show proof of their eligibility to board (proof of vaccination or valid molecular COVID-19 test). While it is strongly encouraged that the minor has a parent or guardian complete the confirmation on their behalf, the minor does not need to be denied boarding due to a lack of confirmation (which is not legally possible due to age), but rather should be subject to verification of proof of eligibility documents instead.

**Q8. Who will be responsible for verifying that travellers are vaccinated?**

**A8.** Commercial air carriers (for scheduled or charter flights) will be responsible for the verification of the vaccination status of travellers. In Phase 1 (October 30 to November 29, 2021), for airports

with CATSA security screening, CATSA will also be supporting air carriers with the verification process.

Travellers will be responsible for declaring their vaccination status prior to boarding their flight in Canada and will be required to carry either proof of vaccination status or their molecular test result with them during their trip.

**Q9. What will the consequences be for travellers who falsify information?**

**A9.** There will be serious consequences for travellers who falsify information. Travellers could be fined up to \$5,000 per violation under the *Aeronautics Act*.

**Q10. What about Canadians and/or permanent residents, who have a right to re-entry, coming back from overseas that aren't vaccinated?**

**A10.** The Government of Canada's Emergency Orders-in-Council, made pursuant to the *Quarantine Act*, will continue to govern the entry requirements for international inbound travellers.

All Canadians returning to Canada should visit: <https://travel.gc.ca/travel-covid>.

Unvaccinated Canadians or permanent residents will be allowed to continue on with their domestic connection to their final destination if they can demonstrate a continuous journey from their last point of departure or direct flight to Canada. In practice, an unvaccinated Canadian or permanent resident will be allowed to board their domestic connection after entering Canada as long as no more than 24 hours has elapsed since they boarded their flight to Canada.

**Q11. Will unvaccinated foreign nationals (e.g., temporary foreign workers, international students, etc.) who have been allowed into the country be allowed to continue on with their domestic connection after coming into Canada? Will they be able to leave the country?**

**Q11.** Unvaccinated foreign nationals will be allowed to continue on with their domestic connection to their final destination if they can demonstrate a continuous journey from their last point of departure or direct flight to Canada. In practice, an unvaccinated foreign national will be allowed to board their domestic connection after entering Canada as long as no more than 24 hours has elapsed since they boarded their flight to Canada. Unvaccinated foreign nationals will require a pre-departure molecular test if they plan to leave Canada between October 30 and November 29, 2021.

Starting November 30 there will be limited exceptions to being fully vaccinated in order to board an aircraft departing from the specified Canadian airports. Limited exceptions will include unvaccinated foreign nationals who don't reside in Canada and who were allowed to enter Canada under the Government of Canada's Emergency Orders-in-Council, made pursuant to the *Quarantine Act*. These foreign nationals will be allowed to depart Canada with a valid COVID-19 molecular test result.

**Q12. What about Temporary Foreign Workers or international students who may be allowed to enter Canada without being vaccinated first?**

**A12.** The Government of Canada's Emergency Orders-in-Council, made pursuant to the *Quarantine Act*, will continue to govern the entry requirements for international travellers.



Unvaccinated temporary foreign workers or international students will be allowed to continue on with their domestic connection to their final destination if they can demonstrate a continuous journey from their last point of departure or direct flight to Canada. In practice, an unvaccinated foreign national will be allowed to board their domestic connection after entering Canada as long as no more than 24 hours has elapsed since they boarded their flight to Canada. Unvaccinated foreign nationals will require a pre-departure molecular test if they plan to leave Canada between October 30 and November 29, 2021.

Starting November 30 there will be limited exceptions to being fully vaccinated in order to board an aircraft departing from the specified Canadian airports. Limited exceptions will include unvaccinated foreign nationals who don't reside in Canada and who were allowed to enter Canada under the Government of Canada's Emergency Orders-in-Council, made pursuant to the *Quarantine Act*. These foreign nationals will be allowed to depart Canada with a valid COVID-19 molecular test result.

**Q13. What about remote communities that depend on air transport to access essential services?**

**A13.** At the moment, flights from remote airports are not part of the list of specified airports. This means that travellers departing from an unlisted airport are not captured under the *Interim Order* and the requirements to prove eligibility.

Travellers, however, should consider their entire journey and which Canadian airports they are flying from, as well as their return journey home.

For this reason, modified requirements will be in place for travellers from remote airports communities in order to obtain essential services in support of their medical, health, or social well-being, and to return safely to their homes. Exemptions are currently in place for a modified approach to address challenges for those transiting from a remote community through a specified airport or for the return journey. This includes allowing for a special self-testing process.

**Q14. What happens if a flight departs from an airport that is not on Schedule 2 of the *Interim Order* but is diverted to an airport that is listed on Schedule 2?**

**A14.** Travellers who are diverted from an airport that is not on Schedule 2 of the *Interim Order* to an airport that is on Schedule 2 due to a safety-related reason such as adverse weather or an equipment malfunction will not be required to be fully vaccinated or to have a COVID-19 molecular test, as long as they board an aircraft for a flight not more than 24 hours after the arrival time of the diverted flight.

**Q15. When will Canadians receive a pan-Canadian proof of vaccination certification for international travel?**

**A15.** The Government of Canada is collaborating with the provinces and territories to develop a standardized proof of vaccination to facilitate cross-border travel. The vast majority of provinces and territories are expected to issue these credentials by October 30, 2021.

Any specific questions should be directed to the province or territory in question.

For more information, see: <https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19/vaccines/life-after-vaccination/vaccine-proof.html>.

**Q16. What happens if a traveller's name on their proof of identification does not match the name on the proof of vaccination?**

**A16.** There may be circumstances in which the name on the proof of identification does not match the name on the provincial or territorial proof of vaccination. For example, in the Province of Quebec a female's name at birth may appear on the proof of vaccination, while their married name may appear on a federal identification document such as a passport. Other examples includes those from remote or Indigenous communities where formal identification can be more challenging.

In these cases, the air operator has flexibility to accept a proof of vaccination that does not perfectly match a traveller's identification documents. So long as the traveller is able to establish their vaccination credential through other means (e.g., health card or letter from indigenous community leader), air carriers will not deny boarding to the traveller.

**Q17. Does a traveller have to complete their traveller confirmation (to confirm that they are either fully vaccinated or have a valid COVID-19 molecular test or meet a limited exception) using a paper form or can the air carrier incorporate this confirmation into the check-in process?**

**A17.** The traveller confirmation process will be carried out in accordance to *Operational Bulletin - SUPPLEMENTARY BULLETIN - INTERIM ORDER RESPECTING CERTAIN REQUIREMENTS FOR CIVIL AVIATION DUE TO COVID-19*; however, Transport Canada strongly recommends that the confirmation be done digitally, well in advance of the traveller physically entering any of the specified airports. This will ensure a smoother travel and less logistical issues for the air operator (e.g., rebooking flights, baggage reconciliation, etc.).

**Q18. Are international to international travellers (those transiting through Canada) required to be fully vaccinated or to provide a valid COVID-19 molecular result?**

**A18.** International to international (ITI) travellers are able to proceed to another country without the requirement to be fully vaccinated or to have a COVID-19 molecular test as long as they remain within the sterile transit area of a Canadian airport and do not enter through a border entry point.

## Non-Passenger Questions

**Q1. What are the alternatives for non-passengers who require access to the restricted area of an airport who are unable to be vaccinated?**

**A1.** Similar to the federal public service, there will be limited exceptions for employees in the federally regulated air transportation sector. These limited exceptions apply to those employees who are medically unable to be vaccinated or those unable to be vaccinated due to religious reasons.

Should an employer agree to accommodate an employee, non-passengers should complete one of the following forms:

- Religious Exemption Request Form
- Medical Exemption Request Form

If a non-passenger is partially vaccinated, but has not completed the second dose or the interval subsequent to a final dose, they should fill out the “First Dose Exemption Request Form” for approval of their employer.

**Q2. How will employees provide confirmation of vaccination?**

**A2.** Employers will determine what type of confirmation of vaccination is acceptable. This may be in the form of an employee attestation with the right to see further documents, or a proof of vaccination credential issued by the province or territory.

**Q3. Who will be responsible for verifying an employee’s proof of vaccination prior to entering the restricted area?**

**A3.** Federally regulated air carriers will be required to validate vaccination status of employees in their workplaces. In addition, airport authorities and the Canadian Air Transport Security Authority (CATSA) will have added responsibilities for verifying that workers going into the restricted area of the airports have been fully vaccinated.

Employers also play a role to ensure that their employees are vaccinated in accordance with their internal vaccination policies.

**Q4. Does the vaccination requirement apply to foreign crew members?**

**A4.** The requirements that come into effect on October 30, 2021 will not apply to foreign crew members during the transition period (up to November 29, 2021). More specific details on the requirements effective November 30 will be provided at a later date.

**Q5. What will the consequences be for employees who falsify information?**

**A5.** Transport Canada will conduct compliance activities such as inspections and enforcement. Regulated entities who do not meet the regulatory requirement could be subject to Administrative Monetary Penalties.

There will be serious consequences for employees who falsify information. For example, in the air sector, employees could be fined up to \$5,000 per violation under the *Aeronautics Act*, and operators could be fined up to \$25,000 per violation.

**Q6. As of October 30, the Government of Canada is requiring employers in the federally regulated air sector to have policies in place that require employees to be vaccinated. How soon must they have the policies ready, and when do employees need to prove they are vaccinated?**

**A6.** The following entities are required to have a vaccination policy in place by October 30, 2021:

- the operator of an aerodrome listed in Schedule 2 of the *Interim Order*;
- an air carrier operating a flight departing from an aerodrome listed in Schedule 2, other than an air carrier that operates a commercial air service under Subpart 1 of Part VII of the Regulations; and
- NAV CANADA.

The following persons would be required to show either proof of vaccination or proof of an exemption by November 15, 2021:

- an employee of the entity;
- an employee of the entity's contractor, agent or mandatary;
- a person hired by the entity to provide a service;
- the entity's lessee or an employee of the entity's lessee, if the property that is subject to the lease is part of aerodrome property; or
- a person permitted by the entity to access aerodrome property or, in the case of NAV CANADA, a location where NAV CANADA provides civil air navigation services.

**Q7. How does the policy apply to contractors working at airports?**

**A7.** Should a contractor require access to the restricted area of an airport, they will need to be vaccinated in accordance with the vaccination mandate. In addition, airports may have more stringent vaccinations policies in place and so contractors are encouraged to verify with the airport authority.

**Q8. Do the air carriers have to keep the attestations from the passengers or track the verifications?**

**A8.** No, there is currently no requirement for the air carriers to keep passenger attestations. The requirement on the air carrier is to ensure that the passenger has made the attestation.

**Q9. What if a non-passenger entering the restricted area is not yet fully vaccinated on November 15, 2021?**

**A9.** Non-passengers who need to enter the restricted area and are only partially vaccinated on November 15, 2021 should check with their employer. Should the employer's policy allow for it (or that of the broader airport authority's policy), the non-passenger should complete the form "First Dose Exemption Request Form" for their employer's approval. Partially vaccinated includes those who have had a single dose of a two-dose vaccine, or those who have had their final dose, but have not yet completed the 14 day interval following the vaccination to be considered fully vaccinated.