

#	Para	Comment Provider	Comment / Justification	Response	Resulting Text
1.	4.3.6.3 (d)(3)	TMA	<p>This is review of NPRM 2025-12 related to ASC AIR OPS-01.</p> <p>1. 4.3.6.3 (d)(3): <i>For flights operated without a destination alternate aerodrome, the required fuel must be sufficient for 15 minutes of holding at 450 m (1500 ft) above the destination aerodrome in standard condition</i></p> <ul style="list-style-type: none"> • Content: The regulation introduces an extra 15-minute holding fuel if no destination alternate aerodrome is planned • Justification: Our current fuel policy includes final reserve fuel, which is used if diversion is needed due to weather or operational changes. The new requirement to carry an additional 15 minutes of holding fuel is not practical in our operation. It would: <ul style="list-style-type: none"> ○ Increase fuel and aircraft weight unnecessarily ○ Limit passenger and cargo capacity ○ Not reflect the nature of VFR seaplane operations with short flight durations and real-time routing decisions <p>TMA intends to retain the current fuel policy and will request to propose for a change to this requirement. Else, we will have to request an exemption from the 15-minute holding fuel requirement later.</p>	<p>Noted.</p> <p>Refer to the response to comment No.1 to CRD – MCAR Air Operations-Issue 6.</p>	N/A

Terminology

Accepted	The CAA agrees with the comment and any proposed amendment is wholly transferred to the revised text
Partially accepted	The CAA either agrees partially with the comment or agrees with it but the proposed amendment is only partially transferred to the revised text.
Noted	The CAA acknowledges the comment but no change to the existing text is considered necessary.
Not Accepted	The comment or proposed amendment is not shared by the CAA.