



## VIA EMAIL

October 23, 2023

Canadian Transportation Agency  
Ottawa ON K1A 0N9

**RE: Request for exemption under ss. 170(4) of the *Canada Transportation Act* from ss.235(1) of the *Accessible Transportation for Persons with Disabilities Regulations* (ATPDR)**

The Canada Border Services Agency (CBSA) places high importance on ensuring accessibility and equal service for all individuals. Our commitment involves removing travel obstacles faced by individuals with disabilities. To achieve this goal, CBSA has already implemented several measures to enhance accessibility for these individuals and remains dedicated to further improvements through the CBSA's Accessibility Plan. One of our primary focuses is making signage information more readily available to everyone in all facilities. These facilities encompass airports, cruise ship and ferry terminals, rail facilities and bus terminals.

When the requirements around tactile signage came into place in June 2021, the CBSA conducted a thorough evaluation of the specifications, seeking the most effective ways to cater to the distinct requirements of individuals with vision impairment. As part of this, the CBSA reached out to the Canadian Standards Association (CSA) to obtain a clear and transparent interpretation of the new signage requirements. Unfortunately, the CSA were unable to provide a consolidated opinion. In further consultation with the Treasury Board Secretariat, it was determined that signage may not be the best vehicle to relay messages, CBSA believes that if a passenger wishes to attain more independence, they should be afforded that choice.

There are different stages a passenger goes through after disembarking the conveyance. They enter the customs hall to present themselves for primary processing, which may be through a Primary Inspection Kiosk (PIK), Nexus e-gate or directly with an officer. In the customs hall there are several signs that list out the items passengers must report or declare and their personal exemptions. This sign contains a great deal of information and may not be accessible to those with visual impairment, whether to locate the sign or be able to read the content. After passing through customs and secondary process, some travelers may need to pay duties and taxes on declared items and the same obstacle is presented where the sign could be located elsewhere or difficult to read. There may be slight variations depending on the facility but this describes the most common processing at large facilities.

To address these challenges, the CBSA has developed an alternative approach to conveying regulatory signage information to passengers with vision impairment in a tactile format. This approach involves the use of a tactile booklet made out of rigid durable material, which is offered to the passenger in the beginning of the primary inspection line and would be taken back at the final point of interaction with the CBSA, which presents all regulatory signage information displayed at the checkpoint in a single

point of reference for passengers to read. It includes large print, raised print and braille versions of each regulatory sign. It also uses a high contrast colour scheme for improved readability that consists of a black background with yellow text for titles and white text for informative descriptions. Passengers may also choose to have the information read to them before entering the checkpoint.

In developing this approach, CBSA consulted with representatives from the Canadian National Institute for the Blind, who worked with our Communications team to refine the concept and develop the prototype. We also consulted with Accessibility Standards Canada, the Canadian Air Transport Security Authority (CATSA) and Treasury Board of Canada Secretariat. All parties consider this alternative a positive advancement in quickly and easily providing regulatory information to those with vision impairment.

Further, an update was recently released to the CSA standard in January 2023 (CSA/ASC B651-23), where clarification has been added to Paragraph 4.6.6.1 relating to tactile signs. Under Note 5 to the paragraph in question, it is now confirmed that “Alternative forms of communication can be considered, specifically for extensive information and guidance that might be issued by an individual enterprise or authority. “

Taking this modification into account, the CBSA kindly seeks a permanent exemption under ss. 170(4) of the *Canada Transportation Act* to paragraph 235(1) of the *Accessible Transportation for Persons with Disabilities Regulations* (ATPDR). We also request approval to implement the new tactile booklet as an alternative solution for regulatory signage that contains substantial written information.

This request for exemption is supported by the stakeholders with whom we have consulted, including CATSA, who supports the CBSA in submitting this request. This exemption would be in the best interest of the public, as the CBSA believes that this booklet would better serve passengers with vision impairment than the current regulated requirement.

Representatives from the CBSA are available for further discussions on the proposal, upon your request.

We thank in advance for considering our request and look forward to hearing from you.



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