VIA EMAIL

April 19, 2024

Canadian Transportation Agency

**OTC.CETA-CEAT.CTA@otc-cta.gc.ca**

Dear Canadian Transportation Agency:

**RE CONSULTATION ON REQUEST FOR CONDITIONAL EXEMPTION FROM THE ACCESSIBLE TRANSPORTATION FOR PERSONS WITH DISABILITIES REGULATION BY THE CANADIAN AIR TRANSPORT SECURITY AUTHORITY (CATSA) AND THE CANADIAN BORDER SERVICES AGENCY (CBSA)**

Thank you for inviting the Council of Canadians with Disabilities (CCD) to provide input into the exemption request made by CATSA and CBSA regarding the requirement by the ATPDR to provide tactile signage for security screening and border clearance. We understand that CATSA and CBSA wish to provide a tactile booklet for those who cannot read print signage rather than making the existing signage accessible for all passengers.

Please be advised that CCD takes the position that it must strenuously object to the requested exemption. Our objection is based on the following grounds:

* We have not had the opportunity to review the tactile booklet in question and are unable to determine if it is the best option. No description of the booklet has been provided nor do we have information as to how the booklet will meet all the accessibility needs of blind and low vision passengers.
* Based on the background information provided, it appears that CATSA staff will determine who should be offered the booklet. In CCD’s opinion, this approach does not in any way, shape or form, guarantee the type of access required by the ATPDR. Employing a subjective judgement as to who will be offered accessibility on an individual basis is a paternalistic, offensive and significantly outdated notion of accessibility and is unacceptable in light of current human rights law.
* We have not received any information regarding all the options that were considered and why the tactile booklet was chosen as the preferred option. and
* Most importantly, CATSA and CBSA made no effort to consult with the actual passengers who will have to use the booklet. We note that CATSA and CBSA did consult with certain organizations, however we wish to stress that none of these organizations represent blind and low vision passengers. This failure flies in the face of the cornerstone of the Accessible Canada Act – “nothing about us without us”. We do note that CATSA worked with the Canadian National Institute for the Blind to develop the tactile booklet but again we wish to point out that the CNIB is a service provider and does not represent all blind and low vision persons in Canada. From what we can discern CATSA and CBSA engaged the technical knowledge of the CNIB to develop the booklet which we submit cannot be regarded as any form of meaningful community consultation. We are disappointed that CATSA did not make an effort to reach out to the broader community of blind and low vision persons who are the ones who will have to rely on such a booklet. Indeed a tactile booklet might be the best option, however, without proper consultation and the provision of all relevant background information, CCD cannot say with any certainty that this is truly the best option.

In light of the above points, CCD urges CTA to reject the exemption request by CATSA and CBSA. We further urge the CTA to advise CATSA and CBSA that they must engage in informed and meaningful consultation with the community of blind and low vision persons before any further exemption requests are considered.

Finally, CCD wishes to express its serious concern with the way that CTA has managed this request for an exemption. We find it baffling and disturbing that the CTA would accept a request for an exemption from parties that made no attempt to consult with the very community who are the deemed beneficiaries of the ATPDR. In this regard, CCD is requesting to meet with the CTA so that we can better understand the process and criteria used by the CTA when considering requests for exemptions.

Respectfully yours,



Heather Walkus

CCD Chairperson



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RE

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