

11 December 2020

Marcia Jones
Chief Strategy Officer
Canadian
Transportation Agency
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Sent via email: OTC.CETA-CEAT.CTA@otc-cta.gc.ca

Re. impacts of COVID-19 on the Accessible Transportation for Persons with Disabilities Regulations

Dear Ms. Jones,

Thank you for the opportunity to submit the following information on the ongoing impacts of the COVID-19 pandemic in relation to the potential for further delays to the coming-into-force of certain provisions of the Accessible Transportation for Persons with Disabilities Regulations (ATPDR).

Marine Atlantic has been working diligently to reduce barriers in accessing our transportation services. We have made significant improvements including the installation of curbside communication devices, new itinerary-based confirmation of services, designation of service animal relief areas and improved options for providing safety information.

Like all transportation service providers, COVID-19 has presented some specific and significant challenges to our operations. In relation to the outstanding requirements of the APTDR, two areas remain outstanding: training and onboard entertainment.

Training

Marine Atlantic has provided a full day of accessibility training as part of its new employee orientation for more than a decade. Nearly 90% of our 1,319 employees have completed this course, which has content that we feel would meet the requirements under Section 16 (2). In addition, 897 employees attended

refresher training in 2019.

We are working to update this training to include additional specific information about the ATPDR and Marine Atlantic's service offerings, as well as considering new methods of training delivery. However, our training and refreshers currently remain designed for in-person, group training which is problematic given the pandemic-related restrictions on travel and group gatherings. Complexity in reaching all employees is added by the seasonal nature of our workforce and the fact that pandemic-related service reductions has meant not all employees were recalled for work this year.

As mitigation, we developed several other communication methods to inform employees per Section 22, including internal newsletter, intranet site, and specific communications presented by direct supervisors in the workplace. We also developed specific communications for managerial and executive level employees to ensure decision-makers in the organization are aware of the regulations and what is required of Marine Atlantic. Many employees will have received this information by the end of 2020. Our intention would be to continue with these communications for any employees currently in the workplace and, for those currently not working, ensure they are refreshed upon their return to the workplace in advance of next year's summer season.

Marine Atlantic reviewed its training content with its Accessibility Advisory Committee in September, which includes members of the disability community and advocacy groups. In general, feedback was positive, but we will work to incorporate the suggestions made as we continue to improve our accessibility training and refreshers.

We request consideration of a further extension of 6 months, until June 30, 2021, for training requirements.

Onboard Entertainment

Marine Atlantic vessels are classed as pre-existing ferries as discussed in Section 164.

We currently provide a limited television service in main passenger lounges as well as in most cabin accommodations. In the main passenger lounge, no sound is broadcast, and passengers use earphones connected to jacks in the seats to access the sound. Cabins that are equipped with televisions have access to a limited number of television channels. There is no current ability to offer closed

captioning or described video in either area.

Replacing our existing systems with accessibility capable systems will require significant time and planning. A project is currently ongoing to upgrade the entertainment system on two of our vessels and, while it is expected to meet all accessibility requirements, the anticipated completion date is mid-2021.

As an alternative, Marine Atlantic continues to investigate options available to provide comparable entertainment content via personal electronic devices as per Section 164. Given the significant impact of the pandemic on time and staffing resources, in addition to a very limited number of options able to be identified. Unfortunately, a solution will not be in place by the current deadline of Dec. 31, 2020.

We request the deadline for compliance with Section 164 be additionally extended until June 30, 2021.

Marine Atlantic takes seriously the responsibility to remove barriers to travel for persons with disabilities and supports the ATPDR. We are proud of our achievements thus far in removing those barriers and continue to work to make our service even more accessible. We also appreciate the understanding of the CTA of the continuing impacts of the pandemic on transportation service providers.

Sincerely,

Natalie Musseau

Manager of Customer Relationships

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