Canadian Air Transport Security Authority

Unclassifed

VIA EMAIL

July 6, 2023

Canadian Transportation Agency

Ottawa ON K1A 0N9

**RE: Request for exemption from paragraph 235(1) of the Accessible Transportation for Persons with Disabilities Regulations (ATPDR)**

Accessibility and equal service for all Canadians is a priority for the Canadian Air Transport Security Authority (CATSA), and we are committed to eliminating travel

barriers for passengers with disabilities. To this end, CATSA has taken a number of

steps to improve accessibility for passengers and is continuing to do so through our

Accessibility Plan. Making signage information more accessible is one of the key

priorities for this year.

When the requirements around tactile signage came into place in June 2021, CATSA

assessed the specifications and looked at how we could best address the unique needs

of passengers with vision loss. Unfortunately, because CATSA’s regulatory signage

contains a lot of information, changing every sign into tactile format would create

challenges for those passengers. First, many of the signs would be too high and large

for passengers to read. Second, airport configurations differ from city to city, which

makes it difficult for passengers with vision loss to know where to find relevant signage

at each security screening checkpoint.

To address these challenges, CATSA has developed an alternative approach to

conveying regulatory signage information to passengers with vision loss in a tactile

format. This approach involves the use of a tactile booklet, 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. Passengers may also choose to have the information read to them

before entering the checkpoint. A copy of a prototype was shared with the CTA in

February 2023.

In developing this approach, CATSA 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. CATSA also consulted with Accessibility Standards

Canada, the Canada Border Services Agency (CBSA) and Treasury Board of Canada

Secretariat. All considered this alternative a positive advancement in quickly and easily

providing regulatory information to those with vision loss.

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*. “

Based on this change, CATSA respectfully requests a permanent exemption to

paragraph 235(1) of the *Accessible Transportation for Persons with Disabilities*

*Regulations* (*ATPDR*), with approval to implement the new tactile booklet as an

alternative solution for regulatory signage that contains significant text. This request for

exemption is supported by the stakeholders we have consulted with, including the

CBSA, who supports CATSA in submitting this request.

This exemption would be in the best interest of the public, as CATSA believes that this

booklet would better serve passengers with vision loss than the current regulated

requirement.

Please know that representatives from CATSA are ready and able to make themselves available to further discuss the proposal, if and when requested.

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

Sincerely,

Lisa Hamilton

Vice-President,

Corporate Services,

General Counsel and Corporate Secretary