



January 16th, 2024

Good day Patrice Bellerose:

Thank you for your response to our exemption request and follow-up questions on behalf of the Secretary of the Canadian Transportation Agency. Please find below our responses to your questions.

1. A detailed description of the information contained on the CBSA's regulatory signage which would be challenging for passengers to read in tactile form due to the amount of information it conveys:

These signs comprise messages informing the public on what they must declare: firearms, currency exceeding \$10K, agricultural products and cannabis. Additional messages include privacy notice for closed-circuit television (CCTV) surveillance, exemption rates for alcohol and tobacco, the right to search and the mandate to declare goods to the CBSA. Specific images can be found in the document titled *CBSA Accessibility Signage – Alternative Format*.

2. Confirmation of what signs, exactly, the booklet will provide an alternative for:

The alternative product will contain sign messages pertaining to declaration, CCTV and the right to search. Refer to document *CBSA Accessibility Signage – Alternative Format*.

3. A description of why the amount of information is more challenging for persons who use tactile reading than for those who use visual reading

For signs containing larger bodies of text, messages must be in both *Official languages*. Combined with braille, also in the two languages, and raised text at the appropriate letter height, large message signs would be double to triple their original size. Mounting heights for signage are 60 inches from the ground to the middle of the sign. At such enlarged sign sizes, with the braille positioned at the bottom of the sign, the public would not have ready access to the braille being lower to the ground in these instances.

In cases where the existing non-tactile signage is currently large, adding raised text and braille results in the sign being fabricated in pieces butted together, as the material is unavailable in oversize. This could result in distortion of the message and an unfinished appearance.

At CBSA ports of entry, specifically in the public queuing area, signage is posted on perimeter walls. Most of the signage pertains to mandatory reporting messages. As the public queue in this CBSA controlled area, they are cordoned off from the perimeter areas. Therefore, they do not have physical access to the signage. Because of this, the CBSA is developing an alternative product in the form of a tactile booklet that contains the mandatory messages, to be made available in the queuing area.

4. A description of why the amount of information is more challenging for persons who use tactile reading than for those who use visual reading

For visually impaired individuals, reading through tactile signage can be a slower process than it would through visually scanning text, because they have to scan each character/letter at a time. There can also be some space constraints when compared to printed text which may make it more challenging to communicate elaborate content. Whereas, a sighted person could determine where the important information is just by looking.

5. A description of how passengers will know to identify themselves or request the booklet, and where and how passengers will be provided with the time and space to read it. In other words, is there always an officer stationed at the beginning of the line for primary processing in facilities, and if not, how would a person access the booklet in such situations?

Many transporters will often aid a visually impaired traveller to the special assistance primary line in the CBSA area. Alternatively the traveller can tell us that they are visually impaired and we would offer them either to have the information be read to them or we would guide them to a special assistance Primary Inspection Line where it would be a quieter area to make it easy to communicate. This is where the binder would be provided in case the visually impaired person wanted to read for themselves in Braille. Braille users differ in the way they read, some are more efficient than others where they prefer using two hands instead of one. As a result, the binder would be required to be placed on a desk or a raised platform to accommodate two handed reading, along with all the traveler's personal belongings.

6. In situations where a passenger prefers that the information be read to them, how will a person know to request this service?

The Border Service Officer (BSO) would offer the traveler options once they know that the traveler is visually impaired. Current training and information products that the CBSA has developed to inform BSOs of their responsibilities under the *Accessible Transportation for Persons with Disabilities Regulations* (ATPDR) will be revised to include information regarding the new alternative product and outline its use. The CBSA will also ensure that public-facing web content is updated and reach out to transporters through established working groups to inform them of this new product available to visually impaired travellers and encourage them to share this information with their passengers.

7. A description of how the booklets will be introduced: will all facilities receive it at the same time, or will certain facilities be prioritized?

The plan is to introduce the booklets to all CBSA facilities that have been identified as requiring them, at the same time. There will be two copies printed in each language so that each facility has 2 English booklets and 2 French booklets, ensuring there is always a back-up copy that can be used while a replacement copy is ordered in the event one is lost or damaged.

8. Will the implementation plan of the tactile booklet be accompanied by training and reflected in the CBSA's Standard Operating Procedures?

The CBSA currently has a mandatory training course, Accessible Transportation Obligations, that provides participants with the knowledge of what their responsibilities are in regards to the ATPDR, including the awareness of a set of specific and legally binding accessibility requirements on services, technical standards for equipment, communications, training, and security and border screening. This course is currently up for review and the CBSA will update the course to include specific information regarding the booklets and their use. There is an opportunity to include details in multiple sections of the course as it pertains to identifying and assisting travellers who are visually impaired. Prior to the booklets being distributed an Operational Bulletin will be distributed to all BSOs to make them aware of the booklet and how it is to be used. In addition, the CBSA Standard Operating Procedures, currently located in the People Processing Manual, Part 1 Chapter 4 section regarding assisting persons with visual impairment, will be updated to outline the use of the booklet.

9. A copy of any supporting letters the CBSA has to substantiate the statement that the Canadian National Institute for the Blind (CNIB), Accessibility Standards Canada, the Canadian Air Transport Security Authority and the Treasury Board of Canada Secretariat considered the tactile booklet to be “a positive advancement in quickly and easily providing regulatory information to those with visual impairment”.

Attached are letters of support from the Treasury Board of Canada Secretariat, the Canadian Air Transport Security Authority and Accessibility Standards Canada. Though the CNIB is supportive of the product created in consultation with them and has stated “we believe the booklets are a great addition in enhancing signage”; however, they have also stated that they do not support an exemption from the regulations and have not provided a letter of support for our exemption request. The CBSA will continue to work closely with CNIB on alternative options and value their input.

Attachments:

Letter of Support Treasury Board of Canada Secretariat
Letter of Support Canadian Air Transport Security Authority
Letter of Support Accessibility Standards Canada
CBSA Accessibility Signage – Alternative Format



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