



Canadian  
Transportation  
Agency

Office  
des transports  
du Canada



# Summary of discussions about accessibility of small transportation service providers in remote, rural and northern communities

Canadian Transportation Agency

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# Introduction

The Canadian Transportation Agency (CTA) is considering extending elements of the existing Accessible Transportation for Persons with Disabilities Regulations (ATPDR) to small Transportation Service Providers (STSPs) in a second phase (Phase II) of the ATPDR.

Currently, the ATPDR covers larger transportation service providers, such as airlines that transported over 1 million passengers in each of the last two calendar years. (See Annex A for the criteria defining the transportation service providers covered by the ATPDR.) STSPs are not currently covered by the ATPDR.

STSPs are a diverse group of transportation service providers and facility operators providing federally-regulated air, rail, ferry, and bus transportation services. They range from very small carriers that operate in remote, rural and northern communities, to larger carriers that operate to and from cities across Canada and internationally. Many of these STSPs face a number of constraints and operating realities, which are described below.

In the summer of 2022, the CTA established a small advisory committee consisting of representatives of persons with disabilities and small transportation service providers, to develop a consultation plan for a potential Phase II of the ATPDR.

The consultation plan was shared with the members of the CTA's Accessibility Advisory Committee (AAC) for their review and input.

As per the established plan, in April 2023, the CTA initiated discussions with a small group of industry representatives and members of the disability community (see Annex B). The purpose of these discussions was to learn about the experience of persons with disabilities when traveling with STSPs and the operational realities and challenges of these STSPs in delivering accessible transportation services. In the spring and summer of 2023, CTA staff, accompanied by representatives of the communities of persons with disabilities, organized a series of meetings and site visits to gain first-hand knowledge about the operations and current accessibility practices of STSPs.

This paper provides a high-level summary of what we heard during the discussions and site visits.

Please note that the information gathered as part of these discussions represents the views of a subset of representatives of persons with disabilities and the industry. Should a decision be made to proceed with the development of regulations, a comprehensive pre-consultation process will be followed. This process will involve consulting a broad range of stakeholders, including but not limited to Indigenous peoples, Canadians with disabilities, transportation service providers, any individuals who may have interest in the future regulations. This step is an essential and mandatory component of the regulatory development process, and will allow the CTA to refine its policy before pre-publishing its draft regulatory proposal in the *Canada Gazette*, Part I for formal consultation.

## General

### Industry

Transportation service providers stated the importance for them of government funding to improve infrastructure and the need for clear accessibility standards. These measures would significantly assist in making their services more accessible to persons with disabilities.

### Persons with disabilities

Persons with disabilities stated that STSPs generally appeared to make efforts to provide personalized service and, in particular, to assist persons with disabilities. Persons with disabilities explained that they understand that STSPs may not achieve full accessibility in remote, rural and northern areas of Canada, but believe that they should be able to advance accessibility to the extent possible. This goal aligns with the national objective of making Canada fully accessible by 2040.

## Communication

### Industry

STSPs stated that they sometimes face challenges with respect to communication with travelers, especially in smaller communities, due to internet and cell service not always being available, or the service being unreliable. For this reason, travelers seem to prefer landline phones and in-person communication.

STSPs explained that they use websites and social media to communicate information and respond to questions, and some of them also have developed apps for trip planning and check-in purposes, while others are planning to develop apps in the future. However, most STSPs' websites do not currently comply with WCAG, the accessibility standard adopted by the World Wide Web Consortium (W3C).

STSPs also explained that direct communication with passengers can sometimes be difficult given that many trips are booked by third-party healthcare providers or through third-party booking platforms, and the information exchange is filtered through these third parties.

STSPs highlighted that infrastructure for visual announcements is generally lacking and that they need to rely on white boards. They indicated that both visual and audible announcements can be challenging due to language barriers, as some passengers only speak an Indigenous language.

Some STSPs mentioned that they lack resources with respect to producing appropriate signage and do not always know where to turn for support and best practices.

Small bus carriers stated that they face significant challenges in adopting announcement technology, since technology companies do not usually offer affordable products designed for small operators.

## **Persons with disabilities**

Persons with disabilities suggested that providing notices through cellphones would allow persons with visual impairments or who are deaf or hard of hearing to access information independently, and that mobile apps are commonly available and generally used when available.

Various ideas were highlighted that would improve the travel experience, such as allowing colour contrast to be adjusted on STSPs' websites, providing visual cues (lights) to signal that a public announcement is coming, having captioned text in video announcements, and using accessibility apps.

Persons with disabilities explained that they not only experience barriers with announcements but also with the associated services. For example, when a gate change is announced, there are times when no one comes to help them so they may be left stranded and miss their flights.

# Training

## Industry

STSPs often rely on CTA-produced training material and videos in combination with a classroom portion - usually focusing on equipment training - and an assessment. However, their training is mostly provided to front-line staff and not to all employees or decision makers.

STSPs further explain that they lack resources to develop training and do not always know where to find additional support in this regard.

Ferry operators explained that their training is primarily focused on safety, security and emergency situations.

Airport operators explained that the level of training for their staff is often limited as all equipment used is owned by air carriers and services for person with disabilities, including curbside assistance, are also provided by air carriers.

## Persons with disabilities

Disability community representatives stated the importance of ensuring that staff is aware of what it is like to travel as a person with a disability. For example, implementing experiential training, where staff can experience being in a wheelchair in an airport, can be very helpful.

# Mobility aids

## Industry

Some small air carriers explained that they do have methods to protect smaller aids, for example wrapping them with protective materials, however they experience challenges when it comes to loading larger mobility aids onto smaller aircraft. They often encounter the dilemma of deciding whether to leave baggage behind in order to accommodate a mobility aid.

Bus carriers stated that they faced difficulties in accommodating passengers who use a wheelchair, particularly during breaks and stops. In remote areas, bus stops often have inadequate infrastructure to accommodate a wheelchair. Moreover, the limited

timeframe of 15-20 minutes for bus stops poses a challenge for bus drivers to assist individuals who use wheelchairs with deboarding and boarding.

Ferry operators stated that some vessels have a restriction regarding the number of persons using a wheelchair on board, for safety reasons.

## **Persons with disabilities**

Persons with disabilities emphasized that a person's mobility aid is an extension of themselves, and it is important that STSP employees understand this fact. They also stated the importance of the mobility aid remaining with them to the extent possible.

Some people noted challenges when they require assistance while waiting for a flight or at the end of the trip, and emphasized the importance of having an employee check in with individuals.

## **Additional seating**

### **Industry**

Air carriers generally noted that they do not offer complimentary seats for support persons, but they do have provisions to accommodate such requests through various means. Some carriers manage this issue through medical fare classes available to support persons, while others rely on contractual fares through health centers or community agreements with local leaders. Although these accommodations are not part of formal policies or publicly advertised, some carriers often grant discounts or free ticket on a case-by-case basis when individuals provide appropriate documentation or when specific needs are identified by community leaders. Smaller railway operators stated that having a support person travel at no cost is financially challenging as many operate seasonally. Onboard staff will, however, do their best to assist persons with disabilities. Most STSPs stated that they accept service dogs and will offer space, which could include a second seat, at no additional charge.

Small air carriers noted that they require advance notice when a person is travelling with a personal attendant or a service animal, need a second seat, or use a wheelchair.



## **Persons with disabilities**

Persons with disabilities stated that some STSPs offer a reduced rate for an attendant, and most offer a free seat for a service dog.

# Annex A – Transportation Service Providers covered by the ATPDR

Canada's federal transportation network includes airlines; passenger railway companies and buses that cross a federal or provincial border; ferries that travel from province to province or from Canada to a foreign country; the terminals that serve them; the Canada Border Services Agency; and the Canadian Air Transport Security Authority.

Under Part V of the *Canada Transportation Act*, TSPs in the federal transportation network are required to provide accessible services to persons with disabilities up to the point of undue hardship. Compliance with regulations is an important part of this obligation.

The ATPDR apply to the following, with some exceptions:

## Air

Large airlines - airlines that transported a worldwide total of at least 1 million passengers in each of the two preceding calendar years - operating within Canada, from Canada to a destination in a foreign country or from a destination in a foreign country to Canada;

## Rail

VIA Rail and Amtrak (operations in Canada);

## Ferries

Ferries of at least 1,000 gross tonnage that operate across national, provincial or territorial borders **and** that offer on-board services for passengers;

## Buses

Megabus operations in Canada; and

## Terminals

Airports located in a national, provincial, or territorial capital or that have served more than 200,000 passengers during each of the preceding two calendar years; Canadian

transportation terminals used by the above rail, ferry and bus carriers; and Canadian ports used by cruise ships.

In addition, certain requirements related to security screening and border clearance, training and communication apply to the CBSA and the CATSA.

While the ATPDR apply broadly to all modes of transport, there are some exceptions:

- The service requirements apply to both Canadian and international carriers, but communications, training and technical requirements apply to Canadian carriers only;
- The technical requirements for Canadian airlines apply only to aircraft with 30 or more passenger seats;
- Only the technical requirements apply to ports in Canada that serve cruise ships (given that services to persons with disabilities are provided by cruise ship personnel); and
- The provision of an additional seat at no charge to a person with a disability who needs more than one seat because of the nature of their disability only applies to domestic travel.

# **Annex B – Industry representatives who participated in discussions**

The following STSPs participated in at least one discussion.

## **Air**

- Air Inuit
- Air North
- Air Transportation Association of Canada (ATAC)
- Calm Air
- Northern Air Transportation Association (NATA)
- Perimeter Aviation
- PAL Airlines
- Rise Air

## **Rail**

- Rocky Mountaineer
- Tshiuetin Rail Transportation
- Railway Association of Canada

## **Ferries**

- SPM Ferries

## **Buses**

- Kasper Transportation
- Maritime Bus
- Ontario Northland
- Rider Express

## Airports

- Canadian Airport Council
- Government of Nunavut
- Kativik Regional Government
- The Pas Airport
- Prince Albert Airport
- Sioux Lookout Airport
- Yukon Government