

February 10, 2025

Department of Employment and Social Development Canada
165 Hôtel-de-Ville,
Gatineau, QC K1A 0J9

Reference: OSPE Submission on Proposed Amendments to the Accessible Canada Regulations (Canada Gazette, December 21, 2024)

Submitted as a comment submission at the Canada Gazette

On behalf of the Ontario Society of Professional Engineers (OSPE), I am writing to express both our support and constructive feedback regarding the proposed amendments to the Accessible Canada Regulations, published in the Canada Gazette on December 21, 2024.

As advocates for inclusivity, equity and accessibility within the engineering profession, OSPE recognizes the significant progress these amendments represent, particularly the requirements for accessible web pages, mobile applications, and digital documents. However, we believe there are opportunities to strengthen the legislation to ensure its long-term success and inclusivity.

What We Support

1. **Mandatory Accessibility Standards:** Introducing requirements for web content, mobile applications, and digital documents is a crucial step toward inclusivity.
2. **Training Initiatives:** Requiring organizations to train employees on accessibility standards is forward-thinking and essential for building internal capacity.
3. **Transparency and Accountability:** Publishing accessibility statements and assessing procured technologies ensures that accessibility becomes a fundamental part of organizational practices.

Constructive Feedback and Recommendations

1. **Expand Support for Smaller Organizations:**
While exemptions for small businesses and First Nations band councils are understandable, providing financial assistance, technical resources, or advisory support would help these groups transition toward compliance.
2. **Clarify Standards and Implementation:**
To ensure consistency, we recommend explicitly referencing recognized standards such as WCAG 2.1 AA. A phased implementation plan with clear milestones would further guide organizations.

3. Strengthen Training and Awareness:

Training programs should be comprehensive, ongoing, and tailored to address emerging technologies. Collaboration with accessibility experts and persons with disabilities will enhance the effectiveness of these initiatives.

4. Engage Indigenous Communities:

Collaborate with Indigenous political and advocacy organizations, such as the Assembly of First Nations, Chiefs of Ontario, and the Ontario First Nations Technical Services Corporation, to co-develop accessibility strategies. This approach ensures that solutions are culturally relevant and address unique challenges effectively. Additionally, provide adequate funding to support these organizations in facilitating meaningful partnerships and collaboration.

5. Facilitate Feedback and Continuous Improvement:

To ensure effective implementation create regular audits or self-assessments to monitor compliance, with incentives for early adopters and penalties for non-compliance. To ensure continuous improvement create feedback platforms to report challenges and refine regulations based on input.

6. Provide clarification around digital advertising:

Digital advertising is now a standard feature across most webpages, mobile applications, and physical spaces through digital billboards. However, unlike website or billboard owners, advertisers are not always subject to the same content standards, particularly when it comes to flashing imagery designed to attract attention but posing serious risks to individuals with photosensitivity. Because digital advertisements on billboards and webpages are beyond users' control, they cannot be turned off or easily avoided, creating unintended health risks for individuals with conditions such as epilepsy, migraines, or visual sensitivities. We urge the Government to establish standards for digital billboards and online advertising that prioritize accessibility and public safety. By implementing guidelines that protect photosensitive individuals, we can ensure that all citizens can navigate their daily environments without unnecessary health risks.

OSPE commends the Government of Canada for prioritizing accessibility and ensuring equitable access to digital technologies. These amendments reflect a commitment to fostering an inclusive society where all individuals, including those with disabilities, can thrive. By addressing the recommendations above, we believe the legislation will achieve even greater impact and sustainability.



Thank you for considering our input. We look forward to working with you to further develop these recommendations. If you have any additional questions, please contact Paola Cetares, OSPE Public Affairs Director, at pcetares@ospe.on.ca or 416-223-9961 ext. 225.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Carnegie', enclosed within a light blue rectangular box.

David Carnegie, P.Eng., MBA
President and Chair
Ontario Society of Professional Engineers

A handwritten signature in black ink, appearing to read 'Sandro Perruzza', enclosed within a light blue rectangular box.

Sandro Perruzza
Chief Executive Officer
Ontario Society of Professional Engineers