



March 14, 2011

Accessibility Directorate of Ontario
Ministry of Community and Social Services
777 Bay Street, Suite 601a
Toronto, Ontario M7A 2J4

Re.: Proposed Change to Ontario Regulation 429/07, Customer Service

Thank you for the opportunity to comment on the proposed change to Ontario Regulation 429/07, Customer Service under the *Accessibility for Ontarians for Disabilities Act, 2005* (AODA). The following comments are being submitted for your consideration on behalf of Conservation Ontario, which is the network of Ontario's 36 Conservation Authorities (CAs).

Conservation Ontario applauds the aim of the Province to make Ontario fully accessible by 2025 and appreciates the need for and value of, the standards proposed under the AODA. Attached for your reference are our comments pertaining to our October 17, 2010 submission regarding the Proposed Integrated Accessibility Regulations. Those comments focused on concerns with the proposed Regulation and areas where additional clarity or guidance is requested. These comments included the potential financial impacts of the Regulation; a desire for the Province to provide appropriate guidance, tools and training to implement the Regulation; questions regarding the clarity of how to address a complaint against an organization; and reasonable timelines to provide information in a modified format.

Conservation Ontario supports the desire of the Province to make customer service standards under the AODA enforceable. We caution however that additional information and support is required to ensure that Conservation Authorities are able to successfully make the transition to fully accessible customer service. In addition to our comments outlined in our October 17, 2010 letter, below are specific comments related to the proposed amendment to the Ontario Regulation 429/07, in relation to the proposed Integrated Accessibility Regulation.

Section 3- Establishment of Accessibility Policies

Conservation Ontario supports an update to the "Compliance Manual: Accessibility Standards for Customer Service, Ontario Regulation 429/07" prepared October 2008 by the Ministry of Community and Social Services and encourages that any updated manual should include templates for the establishment of accessibility policies.

Section 82.2 (3)- Amount of Administrative Penalty

Greater clarity is sought in how the number of contraventions which has occurred is determined for the

purpose of determining an appropriate administrative penalty. For example, if an organization had omitted to post a “Notice of Temporary Disruptions” for the duration of the disruption, would that be considered one contravention or would it be considered a contravention every day that the Notice was not posted?

Thank you again for the opportunity to provide comments on the proposed change to Ontario Regulation 429/07, Customer Service, resulting in the standards being enforceable through the Integrated Accessibility Regulation. Conservation Ontario supports the aim of the Province to make Ontario fully accessible by 2025. If you have any questions or require additional information please contact me at (905) 895-0716 ext. 231.

Sincerely,

Don Pearson
General Manager

c.c. Conservation Authority General Managers/CAOs