



February 6, 2009

Accessibility Directorate of Ontario
Outreach and Compliance Branch
Ministry of Community and Social Services
777 Bay Street, Suite 601
Toronto ON Canada
M7A 2J4

RE: Proposed Accessible Information and Communications Standard

Dear Sir or Madam,

Thank you for the opportunity to comment on the Accessible Information and Communications Standard (Standard) being proposed by the Accessible Information and Communications Standards Development Committee. The following comments are being submitted for your consideration based upon a review of the proposed Standard by Conservation Ontario and the Grey Sauble Conservation Authority.

Conservation Ontario represents the common interests of Ontario's 36 Conservation Authorities. Conservation Authorities were created in 1946 by an Act of the Provincial Legislature; they are local, watershed management agencies that deliver services and programs that protect and manage water and other natural resources in partnership with government, landowners and other organizations. The legislated responsibilities of Conservation Authorities include the development and maintenance of programs that will protect life and property from natural hazards such as flooding and erosion. Conservation Authorities also provide opportunities for the public to engage with, learn from and enjoy Ontario's natural environment.

Hence, Conservation Ontario applauds the aim of the Committee to make Ontario fully accessible by 2025 and appreciates the need for, and value of, the proposed Accessible Information and Communications Standard.

Conservation Authorities are non-governmental public service organizations that are largely funded by their member municipalities. To come into compliance with the proposed Standard Conservation Authorities will have to levy their member municipalities for the funding required. Due to our unique funding structure, we are respectful of the positions of our member municipalities and we urge the Province to give any comments they or their provincial organizations may submit careful review and consideration.

As Class 3 organizations under the proposed Standard, Conservation Authorities would have to be in full compliance by the end of 2011. We caution that this timeline may be too aggressive in

light of the limited cost impact assessment that has been completed by the Province. The consultation material for the proposed Standard includes a cost impact analysis commissioned by the Government and undertaken by KPMG. KPMG states in their executive summary that “The cost impact assessment is a high-level assumption driven analysis (page 6)”, and, “there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future (page 6)”. Based upon these statements it would appear that neither KPMG nor the Province have any reasonably accurate information costs for this proposed Standard.

Since the mid 1990s Conservation Authorities and their member municipalities have had to absorb a significant reduction in provincial funding. In response, Conservation Authorities have had to reduce services, find ways to self-generate additional revenues and increase municipal levies in order to maintain basic services and carry out their legislated responsibilities. The substantial cost to come into compliance with the proposed Standard will be levied by Conservation Authorities to their member municipalities. Each Conservation Authority will have to prepare a detailed business case to request the funding needed to come into compliance with the Standard, and for the associated ongoing costs. Therefore, it is critical to Conservation Authorities’ business that they be able to provide their municipalities with an accurate estimate of the costs involved, so as not to risk the further restriction of the important public services they provide, including the carrying out of their legislated responsibilities. To impose a Standard that would result in additional costs of such magnitude on organizations with limited financial resources without a complete and accurate cost assessment would be unwise, especially during these difficult economic times and within the timeframe proposed.

Therefore we urge the Province to conduct a more fulsome and accurate cost impact assessment before regulating the proposed Standard. Once more accurate estimates of the costs of implementation have been obtained the timelines for implementation should be revisited, as KPMG noted in their report that the longer organizations have to comply with the proposed Standard the better they can mitigate the financial and resource challenges associated with compliance.

We also wish to caution against what may be an unnecessarily broad scope within the Standard, which does not focus on utilizing current and new technologies to assist the disabled. To reduce unnecessary burden on organizations, we suggest the Standard focus on accessible formats and methods that utilize new and current technologies, and which are, or are likely to become, widely used, rather than require forms of communication or information be readily available for which there will be a relatively low demand.

Some sections of the proposed Standard require clarification. For example, it’s unclear whether Section 2.7 (Training) requires organizations to have staff trained in sign language. If that is so, must they be on the premises during all working hours? A minimum of two staff members would be required to be trained due to vacation, sick days, etc. Similarly, does Section 5.7.2 require that if a person arrives without an appointment the organization must be able to communicate with them using sign language? We also question why it is necessary for an organization to inform persons with disabilities that accessible communication and information are available if accessibility is legislated to the degree proposed.

Thank you again for the opportunity to provide comments on the proposed Accessible Information and Communications Standard. Conservation Authorities provide important services to the public; we recognize the need identified by the Province to make our communication and information fully accessible to people with disabilities, whether they be employees of

Conservation Authorities, residents of our watersheds or visitors to our watersheds. However, we urge the Province to implement such standards in a manner that will ensure that Conservation Authorities do not have to further restrict services or risk the ability to carry out their legislated responsibilities in order to comply. Again, due to our unique funding structure, we are respectful of the positions of our member municipalities and we urge the Province to give any comments they may submit careful review and consideration.

If you have any questions or require additional information please contact myself at (905) 895-0716 ext. 231.

Sincerely,

A handwritten signature in black ink, appearing to read 'Don Pearson', written in a cursive style.

Don Pearson
General Manager

c.c. All Conservation Authorities General Managers/CAOs
Bonnie Fox, Conservation Ontario