



1910 Saskatchewan Avenue W.
Portage la Prairie, MB R1N 0P1
Ph: 204-857-8666
Fax: 204-856-2370
Email: amm@amm.mb.ca
www.amm.mb.ca

October 31, 2019

Disabilities Issues Office (DIO)
630-240 Graham Avenue
Winnipeg, MB R3C 0J7
Via email: access@gov.mb.ca

REQUEST: The AMM requests that this submission be presented in full to the Accessibility Advisory Council (AAC)

To Whom It May Concern,

On behalf of the Association of Manitoba Municipalities (AMM), which represents all of Manitoba's 137 municipalities, I would like to provide some comments regarding the AAC's Discussion Paper for the proposed accessibility transportation standard.

Further to the AMM's previous submissions on the customer service and employment standards, the AMM once again reaffirms its support for greater accessibility for all Manitobans. The AMM believes accessible forms of public transportation are vital to ensuring that people with disabilities can participate in all aspects of daily life – however, ensuring this becomes reality requires a true partnership based on funding provided by the provincial government to municipalities and other community-based stakeholders.

Since 2011, the AMM has repeatedly voiced concerns over the lack of provincial funding to municipalities to support the effective implementation of accessibility standards; in fact, to date no funding has been made available to municipalities to help implement any of the accessibility standards. Local communities in Manitoba cannot be expected to shoulder compliance costs and administrative burdens alone. These concerns have been repeatedly conveyed to the AAC and the Minister of Families as well as to the independent reviewer of the AMA legislation. For your review, please see the enclosed copy of AMM Resolution #41-2017, which was passed with overwhelming support at our annual Convention in November 2017 by more than 800 mayors, reeves, councillors and municipal administrators from across Manitoba.

In regards to the proposed accessibility transportation standard specifically, the draft regulations as currently worded will create additional financial and administrative burdens for municipalities. For instance, requirements for upfront and ongoing training costs for vehicle operators as well as retrofit requirements for conventional transportation and paratransit vehicles will impose significant costs on local governments. Several municipalities rely on cost-





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shared funds with other orders of government as well as limited community resources to purchase vehicles and maintain paratransit services.

In addition, mandating public accessibility meetings (Section 8) and requiring response policies to be displayed in all service vehicles (Section 7) may create additional administrative burdens – the AMM believes these policies and supporting documentation can be posted online or be made available at municipal offices or upon request by individuals. Mandating vehicle drivers to physically assist passengers with disabilities (Section 8) also raises safety issues for the passenger and driver alike as well as liability concerns. Meanwhile, it is not reasonable to expect vehicle operators via regulation to deploy equipment like ramps manually (Section 9) again due to safety and liability concerns. Section 11 regarding alternative accessible methods of transportation and Section 38 related to service delays also do not recognize the realities facing rural Manitoba, given potentially limited access to other modes of transportation, vast travel distances and longer travel times.

Lastly, mandating comparable hours of operation and days of service for conventional transportation services and paratransit services (Section 35) may not be reasonable while the three-hour booking stipulation (Section 36) may not be long enough, especially for rural municipalities. The AMM also encourages the AAC to consult with Manitoba Municipal Relations to determine the scope and implications of Section 42 given the enactment of *The Local Vehicles for Hire Act*.

In closing, thank you for the opportunity to provide these comments. The AMM will continue to advocate for greater accessibility through reasonable standards and practical regulations.

Sincerely,

A handwritten signature in blue ink that reads "Joe Masi". The signature is written in a cursive style.

Joe Masi
Executive Director

cc: The Honourable Heather Stefanson, Minister of Families
Deputy Minister John Leggat, Manitoba Families
Jim Baker, Chairperson, Accessibility Advisory Council

