



May 21, 2013

Clerk of Committees
Legislative Assembly of Manitoba
251 - 450 Broadway
Winnipeg, MB R3C 0V8

Dear Committee Members:

On behalf of the Association of Manitoba Municipalities (AMM), I would like to provide comments about Bill 26: The Accessibility for Manitobans Act.

The AMM supports the goal of improved accessibility for Manitobans. In fact, many municipalities already pursue increased accessibility in their communities by participating in the Age-Friendly Manitoba Initiative, or through initiatives of their own.

The AMM has made some of the following comments regarding accessibility on behalf of municipalities as a member of the Accessibility Advisory Council and in response to discussion documents released by the Accessibility Advisory Council since it was formed in June 2011.

Since accessibility standards have the potential to add to already increasing municipal responsibilities, the Province of Manitoba should provide funding to compensate municipalities for the costs of new reporting requirements and any additional training and enforcement skills required to upgrade municipal building inspectors. Additionally, it is recommended that the province should develop incentive programs to assist with complications of improving accessibility in older infrastructure. As we have stated previously, the AMM is against downloading of new responsibilities to municipalities without accompanying resources.

The AMM feels accessibility standards should not apply retroactively to existing aspects of the built environment. This is because design limitations may make changes unfeasible. AMM wishes to ensure that a reasonable balance can be reached in order to allow municipalities to reach all their long term plans and goals for infrastructure improvements.

Different sized municipalities will be affected differently by the accessibility standards still to be developed. As a result, the AMM is pleased this has been recognized in principle in Bill 26 through the ability to establish different classes of organization for each accessibility standard based on the characteristics of the organization. However, it will be crucial to incorporate sufficient expertise on a range of different types of municipalities throughout the development of specific accessibility standards to ensure the effects on municipalities are considered.

The AMM also has some concerns about the enforcement of accessibility standards. It is our understanding that inspections will not change from what is currently required under the Office of the Fire Commissioner and Manitoba Building Code. Our concerns lie with the fact that inspectors will have increased work load and therefore more resources will be needed to enforce accessibility standards and other requirements outlined in Bill 26. The AMM has also emphasized the importance of having an appeal mechanism, and we are pleased this has been included in the Bill in section 30.

The AMM would like to encourage coordination of accessibility initiatives with Manitoba's Age-Friendly Initiative, as they share several of the same goals. As a partner in Age-Friendly Manitoba, the AMM feels it continues to have a very positive impact in many communities, and its success can help to strengthen efforts to improve accessibility.

Finally, the AMM would like to encourage responsible application of Bill 26, as unforeseen issues may arise. It is important to maintain flexibility and work in a spirit of cooperation to address the challenges created by barriers to accessibility. The AMM looks forward to working on the development of accessibility standards to improve accessibility for all Manitobans.

The AMM appreciates the opportunity to provide these comments. Thank you for your consideration.

Sincerely,



Doug Dobrowolski
President

cc: Honourable Jennifer Howard, Minister responsible for Persons with Disabilities