

**THE FEDERAL BRIDGE CORPORATION LIMITED**  
**ACCESSIBILITY PLAN 2023-2026**



Ce document est aussi disponible en français.

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## MESSAGE FROM THE CEO



The Federal Bridge Corporation Limited (FBCL) has developed its Accessibility Plan for 2023–2025, in accordance with the [Accessible Canada Act](#), to meet its responsibilities. This document identifies the priorities and activities that the FBCL will undertake by proactively identifying, removing, and preventing barriers to accessibility for its employees and customers proving that the corporation is strongly committed to a barrier-free Canada. In addition, the FBCL will publish progress reports against this plan on an annual basis and update the plan every three years as the corporation is committed to continuous consultation of people with disabilities and integrating the feedback received into future plans.

Our plan highlights the path forward. The intent is to identify, remove and prevent barriers in employment; the built environment; information and communication technologies; other communications; the procurement of goods, services and facilities; and the design and delivery of programs and services.

Since 2021, the FBCL obtained the prestigious Rick Hansen Foundation Accessibility Certification for its Blues Water Bridge customer-oriented facilities in Point Edward, Ontario. Four out of five buildings assessed were found to certify to the minimum standard set by the Foundation, and just as important, recommendations for improvements were presented to the FBCL to improve the level of accessibility at these facilities and potentially obtain the coveted Gold Standard Certification. We successfully implemented one of the recommendations and continue to work

towards completing the others.

Throughout 2022-23, the FBCL developed its environmental, social, and governance (ESG) model. The social benchmark from the ESG model was evaluated through a great deal of reflection and internal consultation. Our framework includes the need to ensure that Canada's border facilities, owned and operated by the FBCL, are meeting the needs of its users, and are reflective of Canada's population. The FBCL continually deploys a sustained effort to focus on accessibility initiatives and to apply the resources needed for Gold certification at the Blue Water Bridge site.

Our organization takes pride in these achievements. However, there is more work to be done. I have confidence this plan will guide us in the right direction to implement the important activities that need to be undertaken to improve accessibility within our organization. The FBCL is committed to providing all Canadians with access at its border crossing, as well as being an employer of choice for people with disabilities who can contribute to our ongoing success. Our corporation is driven to offer the most open, accessible, and welcoming crossings for all Canadians and visitors.



Natalie Kinloch  
Chief Executive Officer



## GENERAL

### Statement of Commitment

The [Federal Bridge Corporation Limited \(FBCL\)](#) enables bridge crossings in excess of some 6,964,663<sup>1</sup> motor vehicles annually and employs approximately 110 individuals. In delivering its mandate, the corporation is committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion. Further, it is committed to removing accessibility barriers within the corporation. The FBCL wants to ensure an accessible environment for all employees and the public it serves, as well as ensuring that its public information is accessible to all Canadians. This plan reflects that commitment.

### Description of The Federal Bridge Corporation Limited

The FBCL headquarters are in Ottawa and it owns international bridge crossings and associated structures in Ontario in the following cities: Sault Ste. Marie, Point Edward (ownership and operation of the Canadian facilities), Lansdowne and Cornwall. The FBCL's mandate is to provide the highest level of stewardship so that its international bridge crossings and associated structures are safe and efficient for users.

This Accessibility Plan was developed to meet the FBCL's responsibilities, as a parent Crown corporation including its wholly-owned subsidiary, The Seaway International Bridge Corporation Ltd. (SIBC), under the [Accessible Canada Act \(ACA\)](#), the [Accessible Canada Regulations](#), the [Canada Transportation Act](#), and to persons with disabilities.

### Background

The ACA strives to realize a barrier-free Canada by 2040 and applies to federal jurisdiction, including Crown corporations, such as the FBCL. Among other things, the ACA requires federal entities to develop a plan to identify, remove and prevent barriers to accessibility. Plans should list initiatives and commitments to be implemented over three years and updated every three years, starting in 2023, with annual progress reports. Consultations with persons with disabilities and all affected or interested parties are essential to effectively develop an accessibility plan. Further, a mechanism for feedback on the plan, its actions and its progress enable a continuous conversation that greatly assist the overall objective.

The FBCL's accessibility plan for 2023 to 2025 represents its commitment to ensuring greater accessibility for its employees and all Canadians. The Government of Canada website includes background on the ACA and various activities the government is undertaking to create communities, workplaces and services that enable everyone to participate fully in society without barriers.

### Contact Information and Feedback Process

You may communicate with us with feedback about this Accessibility Plan or accessibility in general. Feedback may be submitted anonymously, if preferred. Your feedback will improve accessibility within FBCL operations and will inform the next accessibility plan and annual progress reports.

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<sup>1</sup> Pre-Pandemic 2019 Data

Mail:

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A person may make a request to access the FBCL's Accessibility Plan in print, large print, Braille, audio format or an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities. The FBCL will receive acknowledgment of receipt in the same means by which the request was received. Anonymous requests will be reviewed but not be responded to.

Large Print: A large font printed copy of this plan is available within 15 days of the request.

Braille: A braille copy of this plan will be available within 45 days of the request.

Audio: An audio copy (an audio file with a person's voice reading the text) of this plan will be available within 45 days of the request.



## AREAS DEFINED UNDER SECTION 5 OF ACCESSIBLE CANADA ACT

### Employment

The FBCL and its wholly owned subsidiary, the SIBC, are equal opportunity employers, who promote a culture of inclusion and diversity and employ approximately 110 individuals at three locations in Ontario: Ottawa, Point Edward, and Cornwall. Since 2021, 33% of the workforce has worked from home on a hybrid basis.

The FBCL is committed to an inclusive, safe, barrier-free workplace and embodies values of respect for people, respect for democracy, integrity, stewardship and excellence in its actions and decisions. It has in place modern Employment Equity, Diversity and Inclusion (EEDI) and Duty to Accommodate policies to support these principles. Accommodations are available throughout the staffing process and can be requested at any time from individual People Leaders or the assigned human resources representative.

INITIATIVES	TIMELINE
<p>The FBCL will:</p> <ul style="list-style-type: none"> <li>• conduct a comprehensive workforce analysis following implementation of a self-identification process.</li> </ul>	<p>2023-24:</p> <ul style="list-style-type: none"> <li>o Complete workforce analysis based on self-identification process;</li> <li>o Finalize Pay Equity Plan;</li> <li>o Develop people leader training program; and,</li> <li>o Develop new training and development policy.</li> </ul>
<ul style="list-style-type: none"> <li>• train all employees on accessibility, disability awareness, diversity and inclusion, unconscious bias and digital and communications principles.</li> </ul>	<p>2024-25:</p> <ul style="list-style-type: none"> <li>o Enhance employee onboarding program; and,</li> <li>o Build capacity to consult, develop, design, deliver and evaluate accessible and inclusive programs and services.</li> </ul>
<ul style="list-style-type: none"> <li>• complete an employee equity plan, including an employment information systems review, with an accessibility lens.</li> </ul>	<p>2025-26:</p> <ul style="list-style-type: none"> <li>o Establish training partnerships;</li> <li>o Establish a scent-free environment with proper controls;</li> <li>o Implement a mentoring initiative; and,</li> <li>o Complete Pay Equity Plan implementation.</li> </ul>



<b>BARRIERS:</b>	<ul style="list-style-type: none"><li>• Workforce profile is incomplete preventing fulsome employee needs assessment;</li><li>• Employee knowledge and awareness of accessibility is limited, thus preventing an effective application in policies and operations; and,</li><li>• Policies, procedures and systems use outdated language, approaches or practices that could contribute to systemic barriers to accessibility and inclusivity.</li></ul>
<b>LEAD FUNCTION:</b>	<ul style="list-style-type: none"><li>• Human Resources, with support from Information Technology and Communications.</li></ul>
<b>PLANNED OUTCOMES:</b>	<ul style="list-style-type: none"><li>• Raised awareness of accessibility and inclusion by all employees.</li><li>• Improved quality of personnel management.</li><li>• Barriers removed for employees and individual needs accounted for.</li><li>• Perceptions, policies, and practices provide a more equitable workplace.</li></ul>





## The Built Environment

The FBCL’s portfolio of assets includes 49 buildings, including three Canada Border Services Agency (CBSA) operational facilities and five investment properties on four international crossing plazas. Members of the public have access only to a limited number of buildings as the remainder are secured sites for the purposes of the international bridge operations. The FBCL also leases commercial and residential spaces to independent tenants.

Since 2021, the FBCL possesses the prestigious Rick Hansen Foundation Accessibility Certification for its Blue Water Bridge customer-oriented facilities in Point Edward, Ontario. Recommendations for improvements were presented to the FBCL to improve the level of accessibility at its facilities. The FBCL is addressing these recommendations in this plan.

The FBCL is committed to incorporating barrier-free design for accessibility in the new construction or major rehabilitation of its facilities and public spaces. Where emergency or unplanned repairs or changes are made to the built environment, the FBCL endeavours to plan for a longer-term remediation inclusive of accessibility requirements.

INITIATIVES	TIMELINE
<p>The FBCL will:</p> <ul style="list-style-type: none"> <li>• achieve Rick Hansen Foundation Accessibility Certification (RHFAC) status on existing buildings. All new construction or retrofits will target the higher Gold level certification.</li> </ul>	<p>2023-24:</p> <ul style="list-style-type: none"> <li>o Address 35 of 83 recommendations from the 2021 RHFAC report at FBCL facilities.</li> </ul> <p>2024-25:</p> <ul style="list-style-type: none"> <li>o Address 34 of 83 recommendations from the 2021 RHFAC report at FBCL facilities.</li> </ul>
<ul style="list-style-type: none"> <li>• develop, publish, and circulate emergency evacuation plans for employees with disabilities.</li> </ul>	<p>2025-26:</p> <ul style="list-style-type: none"> <li>o Address remaining 14 of 83 recommendations from the 2021 RHFAC report at FBCL facilities.</li> </ul>
<b>BARRIERS:</b>	<ul style="list-style-type: none"> <li>• Physical access to certain facilities are limited increasing safety risks and reducing employment opportunities.</li> </ul>
<b>LEAD FUNCTION:</b>	<ul style="list-style-type: none"> <li>• Engineering and Operations, with support from Security.</li> </ul>
<b>PLANNED OUTCOMES:</b>	<ul style="list-style-type: none"> <li>• Enhanced accessibility and inclusivity of FBCL facilities and public spaces.</li> <li>• Enhanced safety and security of all individuals.</li> </ul>

## Information and Communication Technologies (ICT)

The public interacts with the FBCL through its website ([www.federalbridge.ca](http://www.federalbridge.ca)), its subsidiary SIBC's website ([www.sibc.ca](http://www.sibc.ca)), and through an online toll customer portal. FBCL employees use a variety of technology hardware, software systems and cellular telephones in the conduct of their work.

The FBCL is dedicated to improving the accessibility and inclusivity of its technologies. As digitalization increases in the work environment, considerations of accessibility and usability must be top of mind.

INITIATIVES		TIMELINE
<p>The FBCL will:</p> <ul style="list-style-type: none"> <li>• update its website and intranet to ensure compliance with the Treasury Board Secretariat Web Accessibility Standard.</li> </ul>		<p>2023-24:</p> <ul style="list-style-type: none"> <li>o Stabilize existing web tools.</li> <li>o Complete assessment of current software solutions.</li> </ul>
<ul style="list-style-type: none"> <li>• assess all software solutions for compliance with the Treasury Board Secretariat Web Accessibility Standard and develop a strategy to resolve partial and non-compliance.</li> </ul>		<p>2024-25:</p> <ul style="list-style-type: none"> <li>o Upgrade and update website format and align with standards.</li> <li>o Implement action plan for any accessibility gaps in software solutions.</li> </ul>
<ul style="list-style-type: none"> <li>• develop a technology architecture standard for accessibility.</li> </ul>		<p>2025-26:</p> <ul style="list-style-type: none"> <li>o Complete development of accessible technology architecture standard.</li> </ul>
<b>BARRIERS:</b>	<ul style="list-style-type: none"> <li>• Digital communications available on the website and intranet as well as certain software solutions, do not fully meet the Treasury Board Secretariat, Web Accessibility Standard.</li> </ul>	
<b>LEAD FUNCTION:</b>	<ul style="list-style-type: none"> <li>• Communications and Information Technology.</li> </ul>	
<b>PLANNED OUTCOMES:</b>	<ul style="list-style-type: none"> <li>• Raised awareness of accessibility and inclusion by all employees.</li> <li>• Enhanced accessible and inclusive principles for employees and the public.</li> <li>• Accessible and inclusive elements integrated in new technologies adopted.</li> </ul>	

## Other Communications Other Than ICT

The FBCL communicates with the public through its main website, direct email customer messages, social media platforms, and the publications of reports and other documents. FBCL employees communicate with one another regularly through multiple communication tools in writing, online and in person.

The FBCL is committed to communicate in an accessible and inclusive manner with all individuals.

INITIATIVES	TIMELINE
<p>The FBCL will:</p> <ul style="list-style-type: none"> <li>• conduct benchmarking review on signage with accessibility lens and develop an action plan to address gaps that were not within scope of the 2021 RHFAC assessment.</li> </ul>	<p>2023-24:</p> <ul style="list-style-type: none"> <li>o Complete review of signage and identify accessibility gaps.</li> <li>o Implement revised communication plans for emergency and business continuity plans, as recommended in RHFAC assessment.</li> </ul>
<ul style="list-style-type: none"> <li>• review and update communication of emergency and Business Continuity Plans tailored for employees with disabilities.</li> </ul>	<p>2024-25 and 2025-26:</p>
<ul style="list-style-type: none"> <li>• update policy and communications on accessibility accommodations for Access to Information and Privacy (ATIP) requests.</li> </ul>	<ul style="list-style-type: none"> <li>o Complete update of signage gaps.</li> <li>o Update internal ATIP policies.</li> </ul>
<p><b>BARRIERS:</b></p>	<ul style="list-style-type: none"> <li>• Wayfinding inadequacies may impact autonomy and increase safety risks; and,</li> <li>• Emergency and Business Continuity Plans may not be easily accessible, which could impact employee safety and operational awareness.</li> </ul>
<p><b>LEAD FUNCTION:</b></p>	<ul style="list-style-type: none"> <li>• Operations, Information Management, and Communications, supported by Information Technology.</li> </ul>
<p><b>PLANNED OUTCOMES:</b></p>	<ul style="list-style-type: none"> <li>• Standardized wayfinding accessibility standards at an optimal level and broadened accessibility and inclusivity of FBCL facilities and public spaces.</li> <li>• Enhanced safety and security of all individuals.</li> </ul>

## Procurement of Goods, Services and Facilities

The FBCL procures various products and services that support its international bridge operations and employees. It has in place prescribed policy and guidelines to ensure best value for Canadians, pre-eminence of operational requirements, enhances access, competition and fairness to suppliers; and, stands the test of public scrutiny.

The FBCL is dedicated to ensuring meaningful consideration to accessibility and inclusivity in all of its procurement activities, to progressively remove existing barriers and prevent future ones.

INITIATIVES	TIMELINE
<p>The FBCL will:</p> <ul style="list-style-type: none"> <li>include accessibility considerations in its procurement policies, processes and templates (where appropriate) and ensure that procurement documents are available in electronic formats allowing for use of accessibility aids.</li> </ul>	<p>2023-2024:</p> <ul style="list-style-type: none"> <li>Complete accessibility-focused update of procurement policies, processes and templates.</li> </ul>
<p><b>BARRIERS:</b></p>	<ul style="list-style-type: none"> <li>Lack of accessible designs and procurement result in limitations to employment, full economic participation and access to facilities; and,</li> <li>Lack of availability of procurement documents in multiple forms limit economic participation.</li> </ul>
<p><b>LEAD FUNCTION:</b></p>	<ul style="list-style-type: none"> <li>Finance, along with support from Operations and Engineering.</li> </ul>
<p><b>PLANNED OUTCOMES:</b></p>	<ul style="list-style-type: none"> <li>Increased consideration of accessibility and inclusiveness in FBCL procurement processes and practices.</li> <li>Expanded economic access to FBCL procurement opportunities.</li> </ul>

## Design and Delivery of Programs and Services

The greatest public exposure to the FBCL is through the prepaid lane tolling, as well as entering into CBSA-controlled facilities for the purposes of entry into Canada. After reviewing its policies, programs, practices and services, the FBCL has integrated related accessibility consideration within the information and communication technologies section of this plan, both for FBCL-controlled web services and those administered by the FBCL's tolling provider.

Physical accessibility has been reviewed at the Blue Water Bridge using the robust standards from the Rick Hansen Foundation Accessibility Certification, in which the FBCL's Maintenance and Facilities personnel participated to ensure continuous improvement to this standard through ongoing maintenance programming.

## Transportation

After reviewing policies, programs, practices and services, this area does not apply to the corporation's activities and operations.





## BUDGET AND RESOURCE ALLOCATION

All initiatives outlined in this accessibility plan have been integrated within the approved FBCL operating and capital budgets as presented within its Summary of the Corporate Plan 2022-23 to 2026-27. Further, these initiatives are being captured as an integral part of each department's planning and detailed action plans.

## CONSULTATIONS

The foundational principle in the ACA of “Nothing without us” recognizes that persons with disabilities are equal participants in all areas of life. People with disabilities are in the best position to tell us about the barriers they face. This principle informs the way the FBCL approaches its responsibility under the ACA and its regulations and guides the way we identify, remove and prevent barriers, develop accessibility plans, receive and respond to feedback, and measure our progress.

### Consultation Process

Throughout the evolution of this plan, the FBCL will consult with employees with disabilities and community groups knowledgeable about accessibility. Additionally, all departments of the FBCL had the opportunity to input into its development.

These consultations helped us to identify existing barriers and prioritize actions to remove and prevent barriers based on participants' feedback.

The FBCL sought out comments from a few accessibility experts in the field related to our planned initiatives and the design elements we should be considering for our public-facing documents. We have addressed some recommendations within the plan and others will be addressed by management throughout the implementation of the three-year plan. As the FBCL continues to learn and evolve throughout the implementation of this plan, as will our publications and our tools to mitigate accessibility issues.

### Future Consultations

The FBCL issued a self-identification survey to all employees early in 2023 that allowed individuals to identify as a person with disabilities, if applicable. This information is confidential and will be managed by The FBCL's Human Resources division. Human Resources is planning to invite those that have identified as an individual with a disability to participate in accessibility team consultations. These consultations will help further the FBCL's identification of barriers that exist and potential mitigation strategies.

The FBCL will also consult accessibility advocacy groups in Sarnia, Ontario, to discuss ways of improving accessibility for employees of the FBCL and the Canadian public it serves.

## APPROVAL

This plan has been reviewed and recommended by the FBCL's Senior Management Team and approved by the Chief Executive Officer.

## GLOSSARY

**Accessibility** refers to the design of products, devices, services, environments, technologies, policies and rules in a way that allows all people, including persons with disabilities, to access them.

**Accommodation** refers to the design and adaptation of the work environment to the needs of as many types of persons as possible and, according to the Supreme Court of Canada, refers to what is required in the circumstances of each case to avoid discrimination.

**Barrier** refers to anything physical, architectural, technological or attitudinal that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation or obstacle.

**Designated groups** refer to four categories: 1) women; 2) Aboriginal peoples, 3) persons with disabilities; and, 4) members of visible minorities.

**Disability**, as defined by the *Accessibility Canada Act*, is any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment, or a functional limitation, whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.

**Self-identification questionnaire** is a survey that all employees complete upon hire. The self-identification information collected is used to compile statistics on the composition of Employment Equity groups in the FBCL workforce.

**Workforce analysis** is a workforce profile showing the number of employees by designated groups and non-designated groups, as defined by the Government of Canada [\*Employment Equity Act\*](#).

