

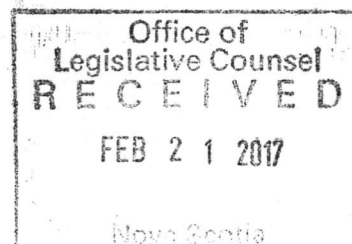
# **CBRM**

*A Community of Communities*

**Cape Breton Regional Municipality**

February 10, 2017

Office of Legislative Counsel  
CIBC Building  
Suite 802  
1809 Barrington Street  
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Halifax, N.S.  
B3J 2X1



By email: [Legc.office@novascotia.ca](mailto:Legc.office@novascotia.ca)

**RE: Accessibility Act before the Law Amendments Committee**

Please provide this written submission to the Law Amendments Committee currently reviewing the proposed Bill No. 59 known as the Accessibility Act.

First of all CBRM would like to acknowledge the work of the Minister's Advisory Panel on Accessibility Legislation and to provide our endorsement behind the creation of this important and far reaching legislation as we believe it to be important to improving the health, well-being and independence of persons with disabilities.

CBRM is fully committed to the improved well-being of all our citizens and we believe it is important to provide the Law Amendments Committee (LAC) with our comments to be considered in the final draft of this Bill.

CBRM currently struggles to find the necessary resources to meet the ever increasing needs of our citizens while dealing with a declining population and our limited financial resources. Our only real means of revenue is from taxes and fees which our citizens tell us are currently too high now. We feel the cost of implementing a fully barrier-free municipality is currently beyond our economic means and we do hope that the Act and Standards will recognize and provide economic help to the municipality to help us comply with the proposed Act and standards.

The proposed Accessibility Act will affect the municipalities of Nova Scotia dramatically. It is the municipalities that will be expected to:

- provide its employees and citizens with access to information in accordance with this act,
- communicate with its employee's and citizens in accordance with the act,
- provide public transportation to its citizens in accordance with this act
- provide client services to its citizens in accordance with this act,
- provide education and training to its employees and citizens in accordance with this act,
- provide employment opportunities to its employees and citizens in accordance with this act, and
- provide the built environment to its employees and citizens in accordance with this act.

This act does not affect any other public sector body nor anyone else affected by this legislation as it does the municipalities. It is municipalities that provide all the services as listed above, not the federal government, not the provincial government and not the business community or any other prescribed organization.

Specifically to the Act before you and the future standards we offer the following comments:

- There has been little to no consultation with the municipalities. We would ask that the act be re-written to explicitly state and include municipal representation on the Accessibility Advisory Board, and as well, on each of the Standard Development committees;
- There needs to be funding and resources made available to the municipalities to offset the costs of implementing the Act and Standards and this should be explicitly stated in the Act and standards as they are developed;
- There needs to be a generous timeframe to allow the municipalities enough time to phase in the Act and standards and this should be explicitly stated in the Act.
- The requirement for public sector bodies to update its accessibility plan every three years is a bit onerous and should be changed to require it be updated every 5 years.
- Prior to the various standards being fully developed and in the terms of "Universal Design" it should be stated that any infrastructure work going forward should meet the current standards of "Universal Design" as they exist now so that municipal units can begin to implement these standards now and not be considered non-compliant should these standards change in the future (ie. Conform to Ontario's standards for barrier-free sidewalk design and construction).

In closing CBRM would have liked to have been involved in this important endeavor from the beginning and we are now advocating that the municipalities be given the same standing and consideration the disabled community has been given as this Act affects them as much as it affects us. The only way this will be truly successful is through fully consulted and funded Act and standards. Once this Bill becomes a law there is no turning back.

Thank you for the opportunity to provide these comments to you and we look forward to being part of the board and committees and to improving the quality of life for the disabled community.

Sincerely,

A handwritten signature in black ink, appearing to read "Malcolm Gillis". The signature is fluid and cursive, with the first name "Malcolm" written in a larger, more prominent script than the last name "Gillis".

On behalf of ...

**CBRM Accessibility Act Review Committee**

Malcolm Gillis, Director of Planning,

Mike MacKeigan, Manager of Utilities

Paul Burt, Manager Building, Planning & Licensing Laws

Bill Wadden, Engineering Technologist

Louis Ferguson, Manager Public Works North

Sgt. Joe Farrell, CB Regional Police Services Traffic Authority