



# Facilitating Barrier Free Journeys

ACCESSIBILITY AT CANADA'S AIRPORTS 2024-2030

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# EXECUTIVE SUMMARY

## **EXECUTIVE SUMMARY**

Canadian Airports Council (CAC) and its members recognize the pivotal role that airports play in the aviation and tourism ecosystems. We know that accessibility is a fundamental human right and are committed to creating a barrier-free passenger experience. To achieve a barrier-free future for all passengers, we are committed to and guided by a "Nothing About Us Without Us" philosophy.<sup>1</sup>

Canada's airports have long recognized the importance of accessibility in air travel. Although more attention has been paid to recent changes following the Accessible Canada Act, including more regulations and compliance measures, Canadian airports have sought to go above and beyond legal minimums for quite some time. Airports have recognized the importance of investing in more barrier-free services, products, and facilities.

In early 2024, we began consulting people with disabilities, support persons, and a variety of disability advocacy groups to understand the types of barriers that exist in Canada's airports. These consultations were used to identify ways in which barriers could be eliminated in the future.

This five-year roadmap highlights that while airports have made great progress related to accessible services, facilities, and products there remains significant work to do. Building on what we heard from people with lived experience, we have developed five (5) strategic pillars. Taken together, these five pillars will help guide airports from coast to coast to coast on ongoing consultations, barrier identification, and continuous improvement activities related to delivering better, more accessible services for all passengers.



1 https://www.un.org/esa/socdev/enable/iddp2004.htm



# WHOWEARE: CANADIAN AIRPORTS COUNCIL(CAC)

## WHO WE ARE: CANADIAN AIRPORTS COUNCIL (CAC)

**Canadian Airports Council** (CAC) proudly represents airports from coast to coast to coast to coast. Since 1992, CAC has represented more than 100 airport members, who handle about 90% of all domestic passenger traffic and almost all international traffic. We are the only federal representative for airports in Canada and work closely with members to address important issues, including those related to safety, security, and government regulation.

A key part of our work relates to accessibility for passengers and employees with disabilities. CAC and its members believe in a future in which our air transportation system is truly barrier-free for all passengers. We are committed to achieving this vision by working closely with our members, consulting people with lived experience and their caregivers, and seeking to continuously improve on existing achievements and past work.

While we know airports and the aviation ecosystem have a long way to go, airports have made significant progress in delivering barrier-free services, products, and facilities over the past several years.

Accessibility is about creating barrier-free environments, services, and experiences, and we acknowledge the role that airports can play in supporting the free movement of people across Canada. Yet, we cannot stop based on past success. In doing so, we choose to lose momentum on such important change.

For that reason, CAC has developed this multi-year accessibility roadmap. In 2023, CAC engaged InterVISTAS Consulting, a leader in aviation, tourism, and accessible transportation, to support the development of a forward-looking strategy on accessibility at airports. The roadmap will help guide our airports in their journey to deliver a barrier-free experience for all passengers, employees, and the communities in which they are located from coast to coast coast, which in turn helps drive consistency. This work complements the accessibility plans airports across Canada have developed.



CANADIAN AIRPORTS COUNCIL

# UNDERSTANDING BARRIERS IN CANADIAN AIRPORTS

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## **UNDERSTANDING BARRIERS IN CANADIAN AIRPORTS**

There is a saying that "if you've seen one airport, then you've seen one airport." Each airport is unique, reflecting different architectural styles, designs, age and layouts. Some airport terminals, such as those in Calgary or Winnipeg, are relatively new facilities while others like Whitehorse or Charlottetown are older by comparison. Each has been designed and built according to different building codes and standards at the time of construction, creating various challenges to providing a barrier-free experience.

Canada's airports are invested in the social model of disability. This means that actions are taken on barriers in our environments which prevent full and equal access to, and participation in, activities. Currently, we focus on the barriers that exist in our airports, processes, technologies, and services. We typically categorize barriers in five broad categories:



#### **1. Attitudinal barriers** These barriers result when people think or act based on



#### 2. Systemic barriers

false assumptions.

These barriers include policies, procedures, or work instructions that result in some people being excluded from activities, employment, or other services.



3. Technological barriers

These barriers occur when technology, such as a biometric or smartphone application, cannot be accessed by people with disabilities.



# 4. Information and communication barriers

These barriers are created when information is offered in a format that suits some of the population, but not all people.



# 5. Physical and architectural barriers

These are physical obstacles that prevent access to a facility, room, or other location.



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CANADIAN AIRPORTS COUNCIL

# WHAT WE HEARD: STAKEHOLDER ENGAGEMENT

## WHAT WE HEARD: STAKEHOLDER ENGAGEMENT

A significant part of this work has involved engaging disability advocacy groups, organizations, and people with lived experience to understand the barriers to accessibility encountered by people with disabilities at airports in Canada and ways to improve the passenger experience. InterVISTAS Consulting began the consultation process in February 2024. A series of engagement sessions were conducted virtually from February to June 2024. Individuals from ten organizations across Canada participated in the engagement sessions, some of which took place over multiple days.

The goal was to engage organizations that reflect a broad range of disabilities, experiences, and geographic locations. We wanted to understand the types of barriers that individuals with disabilities experienced and whether the experience differed when comparing airports from coast to coast to coast. Most importantly, we sought feedback on what was most urgent for airports to consider and what may fit better within an airport's mid to long-term plan.

#### **Themes and Key Findings**

Six main themes emerged from our discussions with organizations and people with lived experience. These primary themes include the following:

- 1. National consistency
- 2. Increased focus on non-apparent disabilities
- 3. Closing the gap between large and small airports
- 4. Consultation and remuneration
- 5. Assistance services
- 6. Reconciliation and accessibility in First Nations communities



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# NATIONAL CONSISTENCY

In nearly all consultations, individuals highlighted the need for consistency with respect to training and awareness at airports across the country. While people with disabilities may have a positive experience at one airport or with one airline, they may not know what to expect at another. There is even greater inconsistency between large and smaller airports.

There is a need for increased training and awareness of non-apparent disabilities, which some refer to as hidden or invisible disabilities. It is important to understand that a lack of visual signals does not equate to a lack of disability. We heard that more can be done to increase awareness surrounding the different types of disabilities and barriers that people with disabilities face. This is particularly true as Canada's ageing population continues to grow in line with prevalence of disability.

During consultations, individuals expressed that having options available to provide choice for people with disabilities is welcome. This was particularly strong in relation to the Sunflower Lanyard program, which enables an individual to self-identify as someone who lives with a disability. However, here too, the issue of consistency arises. For instance, the process of acquiring a lanyard as part of the program varies from airport to airport and not all airports participate in the program. Another consideration is that passengers may not be aware that such programs exist. We heard that there is a need for increased public awareness regarding accessibility services offered by airports. We heard that individuals and their families are not always aware of the different services available and assistance that can be provided. There is an opportunity for more to be carried out in terms of awareness campaigns, such as the North American Occupational Safety and Health Week (NAOSH) and the Canadian Airports Safety Week.

Travel planning resources such as familiarization tours of the airport and video series about travel processes were identified as opportunities for reducing barriers. Familiarization tours are offered at select airports in Canada, but often only as a single-day event rather than on a regular and personalized basis.

In preparation for travel, we heard that it can also be difficult to navigate an airport website to submit a request for assistance as the location on the website varies between airports. In terms of website accessibility, some airport websites comply with the latest Web Content Accessibility Guidelines (WCAG) but this is not consistent across Canadian airports. When arriving at the curbside zone, we heard that locating assistance can be difficult at both large and small airports. There is no standardized location or phone number to call at every airport and there is not always an alternative means of communication, such as a text messaging option. Upon entering an airport terminal, passengers face similar difficulties with the "first mile" often described as inaccessible. We heard that some individuals would opt to walk back and forth in hopes that a member of the airport personnel will approach to ask whether they need assistance.

Information and communication barriers can emerge from inconsistency in signage. With differences in communication styles and language barriers, consistent and effective wayfinding solutions are needed. We heard that Indigenous passengers can experience additional barriers based on the lack of local language support at some of the larger airports.

# 2 INCREASED FOCUS ON NON-APPARENT DISABILITIES

Many of the consultations demonstrated a need for more training and greater awareness of non-apparent disabilities. In particular, training was identified for the types of strategies that frontline personnel could use to communicate or engage someone with cognitive, intellectual, or developmental disabilities.

Historically, there has been a specific focus on disabilities associated with mobility. For example, the international symbol of access is a stylized image of a person using a wheelchair, and people often view disability from a limited perspective. We heard that it is important to understand the diversity of disabilities. There is a need for increased training and awareness surrounding nonapparent disabilities and some of the ways in which individuals may communicate, including using alternative and augmentative communication (AAC) devices. In some cases, people with disabilities were prompted to use a wheelchair despite not expressing the desire to use one, which highlights the need to modernize how assistance is delivered at airports. The removal of barriers to accessibility can improve the travel experience for everyone. An example provided during consultations is the benefits of embossed letters and numbers on signage in large print with high contrast in an emergency where smoke reduces visibility for instance (e.g. tactile maps).

As Canada's ageing population grows, it is important to note that not all



individuals who experience barriers to accessibility at airports identify as someone with a disability despite the Accessible Canada Act and associated regulations defining disability as such. It is important to note that not all individuals who identify as someone with a disability want to disclose this information, particularly if it is unclear what services are guaranteed by doing so. There can also be differences in willingness or comfort with disclosure between the individual and a care person. We heard an example of a person travelling through security whose care person discreetly showed a card to the personnel to raise awareness that the individual has a non-apparent disability and would appreciate extra patience.

While there is no definitive consensus, we heard that the use of other terms such as "hidden" or "invisible" are less preferred due to negative connotations associated with one's disability. This also highlights a lack of consistency in terminology used across airports in Canada with variations of "non apparent disabilities" used.

# 3 CLOSING THE GAP BETWEEN LARGE AND SMALL AIRPORTS

Like other parts of the airport system, there remains a significant gap between large airports and smaller, regional airports. Smaller airports are compliant with regulatory requirements but going above and beyond legal minimums to provide an improved passenger experience can prove challenging. This is more apparent in northern and remote airports, where funding and services available are extremely limited. More work needs to be done to ensure programs, services, and awareness are consistent across airports from coast to coast, irrespective of size.

We heard suggestions to focus on the design of the built environment with tactile design elements and considerations for lighting over the use of technology-based solutions for smaller airports.

In some cases, people with disabilities who depend on travelling via smaller or regional airports highlighted greater inconsistencies in the services available emphasized by the limited funding available to these airports." progress in terms of the built environment and accessibility, some smaller airports struggle to do more with fewer resources to serve passengers with disabilities more effectively.

## 4 CONSULTATION AND REMUNERATION

Several organizations expressed concerns about the influx of requests for consultation and the challenges related to remuneration for people with disabilities. The latest regulations, called the Accessible Transportation Planning and Reporting Regulations (ATPRR), require airports and all federally-regulated organizations to consult people with disabilities. As one individual put it, this means that a small, not-for-profit disability advocacy organization may be asked to consult with up to 100 federally regulated companies, often as volunteer opportunities without pay.

Moreover, the construct of consultation requirements fails to regard that the very same individuals with disabilities have significantly greater investments in time and coordination planning to commit to in-person consultations.

Our engagements emphasized the importance of fair compensation for time, expertise, and experience. This is particularly true of an often under-employed or unemployed demographic. This raises important questions about the capacity of communities, organizations, and the place of paid work among individuals with disabilities. We also heard that consultation for smaller, regional airports can be particularly challenging given the geographic locations of some organizations.





# 5 ASSISTANCE SERVICES

When it comes to assistance services at an airport, some individuals expressed a desire for more flexibility and personalized assistance services. This would enable people with disabilities to browse retail offerings, purchase food and beverage products, and use facilities such as the restroom. We heard that many passengers receiving assistance services are not offered this flexibility while waiting to depart and need to be vocal about their needs once at the airport. With the number of handoffs and transfers from the curbside zone to boarding the aircraft, the experience becomes characterized by waiting to be moved instead of being able to enjoy the airport experience. Airlines also provide assistance services so it can become confusing in terms of who is responsible for what part of the journey.

We received some recommendations on facility designs and features to support care persons while moving through the passenger journey at an airport. For example, adult changing tables that go beyond existing Canadian standards known as CSA/ASC B651:23. We heard that separation from family and/or care persons during the travel journey can be a traumatic experience. For many people, it may be their first time travelling by airplane or navigating an airport, which be a scary and stressful experience. Opportunities for familiarization tours ahead of travel can be useful for pre-planning purposes but are not always available or practical for an individual to access if they do not live near an airport. One individual recommended better use of digital tools to provide familiarization tours by virtual reality or simulator.



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# RECONCILIATION AND ACCESSIBILITY IN REMOTE AND NORTHERN COMMUNITIES

We recognize that people in remote and northern communities rely on air transportation. We also recognize that these communities continue to face additional barriers for equal access to services. For people with disabilities in remote and northern communities, access to air transportation is essential for life-saving therapies and supports.

During our consultations, we heard about additional barriers that Indigenous peoples face when travelling and often transiting through airports in Canada. In particular, we heard about communication barriers in both the language and the method in which in-airport information is delivered.





# INDUSTRY EFFORT AND INVESTMENT

### **INDUSTRY EFFORT AND INVESTMENT**

In 2021, several airports joined forces to create the country's first industryspecific accessibility committee. Since then, the committee has grown to 22 airports from across the country and represents airports of all sizes and scales. The goal of the committee aims to drive national consistency in how many of Canada's airports approach accessibility and support barrier-free travel. This includes programs, positions on policy, training, and many others. The following is a non-exhaustive list of initiatives that airports have committed to and have undertaken to support a more barrier-free travel experience.



#### NATIONAL ACCESSIBILITY TRAINING

A key area in which airports have invested, and continue to invest, is training. As our engagement has highlighted, training and awareness are among the most commonly cited opportunities

for improvement. In 2022, CAC members engaged a specialist in training design, as well as people with lived experience to create a national accessibility training module that not only meets the minimum requirements set out by the Accessible Transportation for Persons with Disabilities Regulations (ATPDR) but exceeds them.

This serves the dual purpose of improving national consistency in awareness and training, as well as ensuring that updates to training modules in the future are made evenly across our vast geography.

#### PASSENGER REHEARSAL PROGRAMS

Passengers across the world are increasingly demanding more personalized experiences. We recognize that preplanning tools and preparation well in advance of one's travel journey are important for airports to offer. Some

airports have invested in the creation of passenger rehearsal programs. These programs enable an individual with a disability and their support person or care giver to "rehearse" the airport experience prior to their scheduled departure. These programs are welcomed by people with lived experience. Additionally, it allows passengers to engage directly with the airport and stakeholder personnel to ask any questions that may be unique to the individual.

In addition to these one-on-one, personalized passenger rehearsal programs, many airports host regular events to support people with lived experience and their families. These are often held in concert with airline or government partners and provide plenty of opportunities to inquire about specific processes and understand the requirements at the airport.





Prior to the requirement for airports to provide curbside assistance in 2020, assistance services were managed and delivered by the airline. The ATPDR created the requirement to transfer a

passenger requiring assistance between airport and airline personnel. Most often, passengers who require assistance will typically indicate their request at the time of booking. This means that information about requests for assistance remains within airline systems and is not typically shared

with airports. Without a requirement to share information, airports are not equipped with information on the number of passengers requiring assistance which limits their ability to effectively plan. As a result, passengers may not receive adequate services to which they are entitled.

Despite the barriers imposed due to the inability to share information, airports nonetheless have invested heavily in creating assistance programs, which includes adding new personnel and technology-based solutions to curbside areas. Additionally, this has required new processes and transfer points between curbside zones, airline check-in, boarding gates, and baggage reclaim areas.



HIDDEN DISABILITIES SUNFLOWER PROGRAM We recognize the importance of training and awareness, as well as the various types of disabilities that a passenger may have. As Canada's ageing population grows and people become more aware of non-apparent disabilities, it is imperative

that we provide ways for passengers to self-declare or disclose that they may require additional time or support.

The Hidden Disabilities Sunflower program, which was established first in the United Kingdom (UK) and now recognized at dozens of airports worldwide, is one such way that passengers can choose to identify as someone with a non-visible disability by wearing a lanyard. While not yet consistently adopted by all airports across Canada, we believe that providing this option for passengers is helpful to both individuals with non-apparent disabilities and to airport personnel.



#### ACCESSIBILITY ADVISORY COMMITTEES

As not-for-profit organizations, Canadian airports have long sought to reflect the diversity of the communities in which they are located and the people they serve. Airports have decades of

experience when it comes to community engagement and consultation on issues like noise or environmental concerns. Consultation is our social license to grow responsibly. When it comes to accessibility, some newer terminal facilities have engaged "universal design" committees to support design and development of new spaces. These committees included people with lived experience to highlight barriers in specific designs, passenger processes, and facilities.

Many Canadian airports have established distinct committees whose goal is to consult people with disabilities in everything they do. While new regulations compel airports to consult people with disabilities, Canadian airports have recognized that enhancing accessibility is a co-managed endeavour. Many airports across the country have dedicated accessibility advisory committees instead of a subset of another committee or working group.



WE RECOGNIZE THERE IS MORE TO DO While these initiatives provide just a snapshot of some of the programs and services that airports have introduced, we recognize that there is much more work to be done. These initiatives, and others, provide a solid foundation on which to build upon over the next five years.

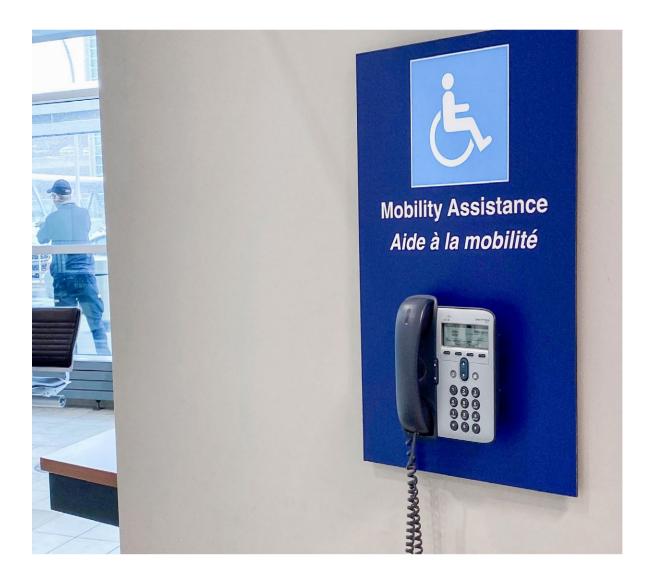




# **STRATEGIC PRIORITIES:** 2024-2030

## **STRATEGIC PRIORITIES: 2024-2030**

Airports are part of a system, and as such, consideration needs to be given from individual task-based work to strategic change. As we look to create a future in which air travel is barrier-free, Canadian airports will focus on five strategic priorities. Each priority plays an integral role in supporting barrier identification, removal, and prevention. Importantly, they help standardize and harmonize approaches to accessibility across our vast transportation system. Together, these five priorities will enable decision making on issues related to accessibility and support our vision to create barrier-free airports by 2030.







#### **Priority 1: Collaborate and consult**

Canada's airports are deeply committed to ongoing collaboration and meaningful consultation with the disability community and people with lived experience.



#### **Priority 2: Accelerate consistency**

We recognize that differences exist across Canada's airport system. We are committed to addressing inconsistencies in accessibilityrelated services between large and small airports.



#### **Priority 3: Dignity and empowerment**

Canada's airports recognize that safety is non-negotiable and achieving a barrier-free experience means ensuring a safe, effective and inclusive environment that supports people with disabilities and their caregivers. Our airports provide services and facilities that recognize and respect all user needs, and that empower people.



#### **Priority 4: Continuous improvement**

Accessibility is a continuous journey. In our journey of inclusion, airports are committed to continuous improvement. Whether this be through identifying, preventing, and removing barriers, or exploring new ways of meaningful access for all through innovation and collaboration from coast to coast to coast.



#### **Priority 5: Advocate for change**

Reduce the burdens of costs, as well as consider a fund for remunerating representatives to meet federal obligations for consultations. Establish an accessibility-focused advisory council similar to the Canadian Aviation Regulation Advisory Council (CARAC) to align across industry and ecosystem.

# The **Voice** of Canada's Airports®





# MEASURING SUCCESS

# Mobility Assistance *Aide à la mobilité*

## **MEASURING SUCCESS**

While Canada's airports have invested into various programs and initiatives to create a more barrier-free experience, it does not mean that the journey is over. We need meaningful inclusion grounded in stakeholder engagement, consultation, and alignment across the aviation sector.

So how do we measure success at Canada's airports over the next five years? How success is measured when it comes to accessibility can sometimes be a challenge, particularly as some passengers may not be able to express feedback regarding their experience. This may be true of someone with a cognitive, intellectual, or neurological disability.

While compliance with regulations is one way we can measure success, we see compliance as simply the legal minimum standard—not the optimal standard.

To maintain oversight at our airports, we are committed to gathering insight into passenger metrics in relation to service quality and satisfaction specifically on accessibility related programs and services. Measuring success, therefore, revolves around three main areas:

- 1. Passenger insights and service quality
- 2. Compliance and public accountability
- 3. Community and stakeholder engagement



# CALL TO ACTION

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## **CALL TO ACTION**

Accessibility is a human right. Airports are fundamental to enabling the freedom of movement and to support our economies. Canadian airports are committed to a barrier-free vision and will deliver on that guided by our strategic priorities.

We recognize there is so much more work to be done. While we have made progress, we must maintain the momentum.

#### To accomplish that, we have the following calls to action:

Priorities	Actions	Timeframes
Priority 1: Collaborate and consult Canada's airports are deeply committed to ongoing collaboration and meaningful consultation with the disability community and people with lived experience.	<ol> <li>CAC's Accessibility Working Group will liaise with disability advocacy groups and people with lived experience to ensure we are contributing to accessibility in tangible ways.</li> </ol>	6-12 months
	2. The Accessibility Working Group will consider and propose options to develop a national collaboration framework to ensure that engagement is occurring at a functional operational level.	24-36 months
	3. Accessibility Working Group members will explore participating in business groups engaged in accessibility initiatives (i.e. the Accessibility Business Group identified by the Chief Accessibility Officer).	18 months
	4. CAC and Airports will attend industry conferences and trade shows (i.e. the Rick Hansen Accessibility Professional Network, or Open Doors) to stay apprised of developments and advancements to incorporate into planning and prioritization.	6-12 months



<ul> <li>Priority 2: Accelerate consistency</li> <li>We recognize that differences exist across Canada's airport system.</li> <li>We are committed to addressing inconsistencies in accessibility-related services between large and small airports.</li> </ul>	<ol> <li>Tier 1 airports will enroll and participate in ACI World Accessibility certification.</li> <li>For non-tier 1 airports, the Accessibility Working Group will initiate a cost-shared a recommended practices guide for smaller airports to provide voluntary consistency nationally.</li> </ol>	36 months 36 months
	<b>3.</b> Building on the collaboration framework identified in Priority 1, the Accessibility Working Group will expand consultation to include third-party providers to further enhance the outcomes and evolution of the Accessibility Roadmap.	24 months
	<ul> <li>Explore the standardization of accessibility information across participating airport websites, consideration given to modeling IATA's "One Click Away" initiative. https://www.iata.org/ contassets/7b3762815ac44a10b83ccf5560c1b308/ one-click-away-best-practices.pdf</li> </ul>	12 months
Priority 3: Dignity and empowerment Canada's airports recognize that safety is non-negotiable and achieving a barrier- free experience means ensuring a safe, effective and inclusive environment that supports people with disabilities and their caregivers. Our airports provide services and facilities that recognize and respect all user needs, and that empower people.	<ol> <li>Through Priorities 1 and 2, we will ensure that feedback is received, acknowledged, considered and actioned where deemed appropriate in order to improve the passenger experience.</li> </ol>	12 months
	2. A baseline of services and recommended good practices will be established by the Accessibility Working Group, identifying the minimum requirements for promoting dignity and empowerment.	24 months
	<ol> <li>Collaborate with partners, researchers and industry to create a design guide for airports to reference when constructing quiet and/or sensory rooms.</li> </ol>	36 months
	4. Work together with partners, researchers and industry to create a guide of recommended airport practices to improve the experience of airport users living with dementia.	12 months

Priority 4: Continuous improvement Accessibility is a continuous journey. In our journey of inclusion, airports are committed to continuous improvement. Whether this be through identifying, preventing, and removing barriers, or exploring new ways of meaningful access for all through innovation and collaboration from coast-to-coast-to- coast.	<ol> <li>The CAC Accessibility Working Group will strengthen relationship with research groups, universities, colleges to identify barriers to travel and where possible, coordinate solutions.</li> </ol>	6-12 months
	2. CAC website will have links to all airport Accessibility Progress Reports and Accessibility Plans as well as an up-to-date list of services at each airport.	18 months
	3. CAC Accessibility Working Group will compile and maintain an information resource of available certifications open to Canadian Airports.	12 months
	4. As called for by Canada's Chief Accessibility Officer and the Accessibility Task Force, CAC members to evaluate suggested measures (i.e. stand alone Accessibility Committee, committed accessibility program budget; training at the highest level of the organization; implementation of mystery shopping) to ensure that continuous improvement is possible.	24 months
Priority 5: Advocate for change Within the CAC, establish an accessibility-focused committee to align practices and efforts across industry and ecosystem.	<ol> <li>Within the CAC Accessibility Working Group, we will be champions for change through education, meeting with management, and sharing of good practices across Canada.</li> </ol>	12 months
	<ol> <li>Evaluate ways to provide consistent consulting and renumeration engagements with accessibility organizations and experts.</li> </ol>	36-48 months
	<ol> <li>Following the success of Airport Safety Week and Airport Workers Day, CAC to actively participate in National AccessAbility Week (NAAW)</li> </ol>	36 months





# The **Voice** of Canada's Airports®



We would like to thank the following organizations for their participation:





CETTE VOIX QUI EST LA NOTRE

#### **Alzheimer** Society BRITISH COLUMBIA



#### **Alzheimer** Society ONTARIO





