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Manitoba Accessibility Office
630-240 Graham Avenue
Winnipeg, MB R3C 0J7
Via email: MAO@gov.mb.ca

To Whom It May Concern,

On behalf of the Association of Manitoba Municipalities (AMM), which represents Manitoba's 137 municipalities and is a member of the Accessibility Advisory Council (AAC), I would like to take this opportunity to provide some comments regarding the Accessibility Regulation Standard for Employment in accordance with *The Accessibility for Manitobans Act (AMA)*.

Firstly, the AMM would like to reaffirm its support once again for a barrier-free Manitoba that is accessible and inclusive for all through proactive identification, removal, and prevention of accessibility barriers. We also believe that accessible employment is important to ensure all Manitobans have equitable access in and around their communities.

For over a decade, the AMM has repeatedly voiced concerns over the lack of provincial funding to municipalities to support the effective implementation of accessibility standards. Since local communities have been shouldering compliance costs and administrative burdens, we welcome the government's recent announcement of a third intake under the \$20-million Manitoba Accessibility Fund (MAF), which provides grants of up to \$50,000 to municipalities and other organizations to eliminate accessibility barriers.

While the funding provided is appreciated, it is important to recognize that municipalities are not the sole beneficiaries, as the MAF is open to various other applicants. This reduces the overall support available to help municipalities address accessibility barriers within their communities. This is especially concerning, as expressed during a recent meeting with a municipal focus group held in collaboration with the Province of Manitoba and our organization at the end of August, municipalities highlighted the significant financial and administrative impacts of implementing the *Accessible Employment Standard*.

Many municipal buildings are outdated and not equipped to meet current accessibility requirements, despite being expected to last for decades. Retrofitting these buildings is particularly challenging, as certain accessibility standards are difficult to integrate. In the past, we have been informed that building upgrades are not eligible for support from the Manitoba Accessibility Fund (MAF), which is currently focused on the three standards implemented so far. However, as discussed during the focus group, upgrading facilities is essential to meet the *Accessible Employment Standard* and achieve compliance.

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Additionally, as the Government of Canada advances a national approach to accessibility, it is crucial that provincial standards align to avoid a fragmented system. Municipalities have voiced concerns over frequent updates to standards, making it harder to keep up with evolving requirements. Aligning provincial and federal standards could not only streamline compliance but also open access to federal funding, further easing the financial burden on municipalities in addressing employment related accessibility barriers. Greater financial assistance and incentives for accommodations would be especially beneficial.

While the *Accessible Employment Standard* has raised awareness and prompted positive changes, its implementation presents challenges. Many municipalities, particularly smaller and rural ones, would benefit from clearer guidelines and scalable solutions that reflect their unique contexts. Although municipalities are committed to compliance, varying levels of resources and training capacity make it more difficult for some to fully meet the standard's requirements. Ensuring all municipalities have access to the necessary support will help drive lasting improvements. Further challenges identified include limited financial resources for necessary accommodations, a lack of expertise in accessible employment practices, and the need to balance compliance with other operational demands. Rural and remote municipalities face additional hurdles in adapting facilities to create accessible workplaces.

Lastly, the AMM thanks the Province for including our organization on the AAC, ensuring municipal concerns are voiced in this forum. We believe it is essential for the AAC to prioritize education over punitive measures to more effectively support municipalities in complying with accessibility standards. Additionally, creating endorsed language or tailored templates for municipalities to use when promoting inclusive workplaces and ensuring job postings reflect appropriate accessibility wording would be a valuable step forward.

We also appreciate the collaboration with the Manitoba Accessibility Office (MAO) in delivering webinars, presenting at our Spring Convention, and providing resources to support compliance. Moving forward, we encourage the MAO and the Province to further strengthen collaboration between our organization and municipalities to more effectively identify and address barriers. Increasing funding for accommodations, streamlining the process of implementing accessibility changes, and providing ongoing support to municipalities in meeting the standard are critical steps.

Thank you for the opportunity to provide these brief comments.

Sincerely,

Denys Volkov
Executive Director

cc: Hon. Nahanni Fontaine, Minister of Families, Minister responsible for Accessibility, Minister responsible for Women and Gender Equity
Hon. Ian Bushie, Minister of Municipal and Northern Relations