GREAT LAKES PILOTAGE AUTHORITY

Accessible Canada Act

Multi-Year Accessibility Plan

January 1, 2026 to December 31, 2028

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GREAT LAKES PILOTAGE AUTHORITY

ACCESSIBILITY PLAN

Accessible Canada Act

Background

In July 2016, the government of Canada began their consultations with more than 6,000 Canadians to determine what an accessible Canada means to them. As a result of these consultations, *Bill C-81: An Act to Ensure a Barrier-Free Canada*, was tabled in June 2018. The *Accessible Canada Act*, which aims to make Canada a barrier-free country by January 1, 2040, came into force in July 2019. To attain that goal, we must proactively identify, remove, and prevent barriers in the following seven (7) priority areas:

- Employment;
- The built environment (buildings and public spaces);
- Information and communication technologies;
- Communication, other than information and communication technologies;
- The procurement of goods, services and facilities;
- The design and delivery of programs and services; and
- Transportation (airlines, as well as rail, road, and marine transportation providers that cross provincial or international borders)

Guiding principles

- "Nothing without us": persons with disabilities are involved in the design and implementation of the strategy
- Collaboration: departments and agencies work in collaboration with each other, with bargaining agents, and with other public, private, and not-for-profit organizations
- Sustainability: the strategy prioritizes actions that will have an enduring impact
- Transparency: the strategy is developed and implemented transparently, and departments and agencies will report openly and transparently on their efforts to remove barriers

Goals

Five goals are key to realizing the vision:

1. Employment – Improve recruitment, retention, and promotion of persons with disabilities.
2. Built environment – Enhance accessibility in physical spaces.
3. Technology – Ensure that information and communications technology usable by all.
4. Services – Equip employees to design and deliver accessible programs and services.
5. Culture – Build an accessibility-confident workforce.

The Accessible Canada Act has the following planning and reporting requirements for federally regulated organizations:

- **Prepare and publish accessibility plans:**

    - Develop accessibility plans to identify, remove, and prevent barriers in the priority areas, including:
        - policies
        - programs
        - practices
        - services
    - Update accessibility plans every three years or as specified in regulations, and
    - Consult people with disabilities when creating and updating plans.
- **Set up a feedback process:**

    - Establish a method to receive and respond to feedback about their accessibility.

- **Prepare and publish progress reports:**

    - Produce regular progress reports describing the actions the organization has taken to implement their accessibility plans.
    - Include feedback received and explain how the organization considered that feedback.
    - Consult people with disabilities when preparing their reports.

General

The principal mandate of the Great Lakes Pilotage Authority ("GLPA") is to establish, operate, maintain, and administer a safe and efficient marine pilotage service within designated Canadian waters in the St. Lawrence River and the Great Lakes region. The Great Lakes Pilotage Authority is subject to the Accessible Canada Act, which came into force in July 2019.

Feedback Mechanism
The Accessible Canada Act requires organizations to establish a departmental process for receiving and addressing feedback regarding the implementation of the accessibility plan. The Great Lakes Pilotage Authority will regularly monitor and evaluate feedback and ensure that it is incorporated into future plans when possible.

If you have any questions, feedback, or suggestions, you may communicate with us by mail at:

Great Lakes Pilotage Authority
202 Pitt Street
P.O. Box 95
Cornwall, ON
K6H 5R9

Telephone: 613-933-2991

Email : accessibility-accessibilite@glpa-apgl.com

Alternate formats of this accessibility plan are available upon request. Please contact the Great Lakes Pilotage Authority for information and support.

Executive Summary:

Great Lakes Pilotage Authority's accessibility plan reflects the input, views, and suggestions provided by employees across the organization. This section summarizes the results from the consultations. The following barriers were identified and used as the basis for the development of this plan:

- The level of accessibility of the website is not known;
- The current procurement process does not include consideration for accessibility;
- No training has been provided on creating accessible documents;
- An ergonomic assessment for office staff has not been completed in some time;
- There are known accessibility issues with the washrooms

Based on the priority areas identified in the Accessible Canada Act, the Great Lakes Pilotage Authority has identified several actions to work toward the elimination and prevention of these barriers. These actions will have a direct impact on creating a culture of inclusiveness that raises awareness of accessibility at the Great Lakes Pilotage Authority. Additionally, the Great Lakes Pilotage Authority will measure and report on progress related to the implementation of these actions.

Accessibility Statement

The Great Lakes Pilotage Authority strives to be barrier-free, accessible, and inclusive to all. The Authority is committed to providing accessible and inclusive services for all employees, clients, and other stakeholders. The Great Lakes Pilotage Authority will continue to review and develop its programs, policies, goods, and services with the intent of continually improving accessibility.

Multi-Year Accessibility Plan

A. Priority areas identified by the Act

1. Employment

The Great Lakes Pilotage Authority is committed to fostering an inclusive and accessible workplace that reflects government-wide initiatives and increases the representation of persons with disabilities across all occupational groups and levels. We aim to remove and prevent barriers throughout the employment lifecycle—recruitment, onboarding, retention, promotion, and separation—while ensuring compliance with the Accessible Canada Act and the Employment Equity Act.

To achieve this, the Authority will implement proactive accessibility measures, structured accommodation processes, and accountability mechanisms. Accessibility will be embedded in our culture through mandatory training, inclusive policies, and engagement initiatives.

Barriers

- Limited action plans promoting employment opportunities to increase representation of persons with disabilities across employee groups.
- Current accommodation practices are reactive and lack standardized procedures.
- Recruitment and HR systems require enhanced digital accessibility and inclusive outreach.

Actions

1. Workforce Analysis

- Conduct a comprehensive workforce analysis to identify representation gaps for persons with disabilities.
- Apply an intersectional lens to review job classifications and career progression patterns for systemic barriers.

2. Policy & Practice Review

- Audit recruitment, onboarding, and promotion practices to ensure inclusivity and compliance with the Employment Equity Act and Accessible Canada Act.
- Update job postings and descriptions to include inclusive language, accessibility statements, and alternative formats.

3. Inclusive Recruitment Strategies

- Ensure all recruitment platforms and HR systems meet WCAG 2.1 AA standards.
- Implement accessible application processes (e.g., screen-reader compatibility, alternative submission formats).

4. Training & Awareness

- Provide mandatory accessibility and inclusion training for employees, including leadership, to foster a disability-confident workplace culture.
- Develop awareness campaigns and engagement initiatives promoting diversity, inclusion, and accessibility as organizational values.

5. Accommodation Framework

- Establish a proactive accommodation process with documented procedures to ensure timely and consistent support for employees with disabilities.

2. Built Environment

The Great Lakes Pilotage Authority recognizes the importance of an accessible built environment. As such, the Great Lakes Pilotage Authority will continue to work with employees, building owners, and the Government of Canada to achieve the highest level of accessibility within the current office.

Barriers:

1. The current office includes some accessibility features; however, the washrooms are not fully accessible.
2. The Great Lakes Pilotage Authority is relocating to a new office at the end of Q1 2026. The new location, formerly a federal institution, is compliant with accessibility standards for office environments.

The new site includes:

- Wheelchair-accessible ramps
- Elevators
- Accessible washrooms
- Wide corridors and doorways
- Other features designed to meet or exceed federal accessibility requirements

This move will ensure that employees and visitors experience a barrier-free environment that supports inclusion and meets the requirements of the Accessible Canada Act.

3. Information and Communication Technologies (ICT)

As part of our commitment to accessibility, the Great Lakes Pilotage Authority has taken significant steps to remove barriers in digital communication and information sharing.

Barriers

1.The level of accessibility of the entire website is not known.

2.Currently, no one is trained or aware on how to create accessible documents

Actions:

Website Accessibility:

- In Q4 2025, GLPA upgraded its website to meet WCAG 2.0 standards, ensuring that online content is accessible to all users, including persons with disabilities. This improvement enhances navigation, readability, and compatibility with assistive technologies.

Document Accessibility:

- Another key action is a document format review as part of the implementation of our Quality Management System, scheduled for 2027. This review will ensure that all internal and external documents are available in accessible formats, supporting compliance guidance on Accessible Canada regulations promoting simple, clear, and concise language.

4. Communications other than ICT

The Great Lakes Pilotage Authority is dedicated to ensuring that all communications, both internal or external, are accessible. This includes ensuring that our communications are written in plain language when appropriate.

Barriers:

1. There is no existing process to provide alternative formats, and communication supports upon request by a user or employee.
2. Technical and/or sector-specific language is used in public facing reports and documents.

Actions:

1. Develop a process and information for providing alternative formats and communication supports.
2. Create standards for public-facing communications to be written in plain language, in line with Accessible Canada regulations promoting simple, clear, and concise language.

5. The Procurement of Goods, Services, and Facilities

Procurement plays a critical role in advancing accessibility at the Great Lakes Pilotage Authority. GLPA integrates accessibility principles into procurement policies, rules, and practices to ensure that goods, services, and facilities meet accessibility standards and support an inclusive environment.

Barriers:

1. The previous procurement policy did not include explicit consideration for accessibility.

Actions:

- Policy Revision: In Q4 2025, GLPA revised its procurement policy to include accessibility considerations when procuring services, equipment, or real estate.

- Training: In 2026, GLPA will provide targeted training for employees responsible for procurement on accessibility principles and best practices. This will ensure that accessibility is embedded in all purchasing decisions.

6. The Design and Delivery of Programs and Services

The Great Lakes Pilotage Authority must consider accessibility in the delivery of its programs and services. Meaningful accessibility improvements are fundamental to achieving this.

Barriers:

1. No assessment has been conducted on current programs and services to evaluate their level of accessibility.
2. Accessibility is not consistently considered when new programs and services are put in place.

Actions:

1. Conduct a thorough review of current programs and services to determine the current level of accessibility in 2026.
2. Ensure accessibility features are incorporated into all new programs and services prior to implementation in 2026.
3. Ensure that all future programs and services take accessibility into consideration.

7. Transportation

This priority area under the Act is not applicable to Great Lakes Pilotage.

Great Lakes Pilotage Authority - Action Plan at a Glance

Action	Timeline	Roles and Responsibilities
Conduct a comprehensive workforce analysis to identify representation gaps for persons with disabilities and other designated groups applying an intersectional lens. Report findings with recommendations for targeted recruitment strategies.	Q-3 2026	Director HR
Review job classifications and career progression patterns for potential systemic barriers.	Q-3 2026	Director HR
Audit recruitment, onboarding, and promotion practices to ensure inclusivity and compliance with Employment Equity Act. Develop corrective actions.	Q-2 2026	HR Coordinator
Update job postings and descriptions to include inclusive language and accessibility statements.	Q-2 2026	HR Coordinator
Implement accessible application processes (e.g., screen-reader friendly platforms, alternative formats).	Q-3 2026	HR Coordinator
Provide mandatory training for hiring managers and leadership on bias-free recruitment and accommodation processes.	Q-3 2026	Director HR
Develop awareness campaigns promoting diversity and inclusion.	Q-3 2026	Director HR
Ensure move to new office space is barrier free and meets the requirements of the Accessible Canada Act. Conduct pre-occupancy accessibility audit, including ergonomics analysis, and publish compliance report.	Q-2 2026	QHSE Manager
Complete a document format review as part of the implementation of the Quality Management System, scheduled for 2027 to ensure that all internal and external documents are available in accessible formats,	Q-4 2026	QHSE Manager
Develop a process and information for providing alternative formats and communication supports.	Q-3 2026	HR Coordinator
Create standards for public-facing communications to be in plain language in line with the Accessible Canada regulations promoting simple, clear and concise language.	Q-2 2026	HR Coordinator

GLPA will provide targeted training for employees responsible for procurement on accessibility principles and best practices.	Q-2 2026	HR Coordinator
Launch annual digital accessibility audits of HR systems and websites to maintain WCAG	Q-3 2026	HR Coordinator
Conduct a thorough review of current programs and services to determine the current level of accessibility in 2026	Q-3 2026	Director HR
Ensure accessibility features are incorporated into all new programs and services prior to implementation 2026	Q-3 2026	Director HR
Establish a proactive accommodation framework with documented procedures, timelines, and escalation paths for consistent support.	Q-3 2026	Director HR
All new programs and services created in the future will have consideration for accessibility	Q-3 2026	Director HR

B. Consultations

One of the guiding principles of this strategy is the statement "*Nothing without us*" which affirms that persons with disabilities must be involved in the design and implementation of this plan at every stage. Persons with disabilities offer unique and valuable perspectives and GLPA's goal is to ensure that no barriers prevent their full participation in the workplace or the community it serves.

Methodology
This plan was prepared by first completing an environmental scan to ensure understanding of central agencies' and other government departments' accessibility initiatives and to review existing related policies and procedures. The exercise helped identify existing practices and initiatives that could be adopted as a best practice across the organization.

The Great Lakes Pilotage Authority consulted with persons with disabilities regarding the current state of accessibility at the GLPA and with employees who provide services. The consultation was conducted in three parts:

1. Key Staff members

   Key staff members at Great Lakes Pilotage Authority were consulted in facilitated focus groups. Internal stakeholders with knowledge of employment practices, procurement, facilities, digital resources, communications, and the design and delivery of good and services were consulted in small focus groups. Questions regarding accessibility barriers, current accommodation practices, and priorities for remediation were discussed and responses have been used to inform this plan.

2. Accessible Canada Act Review Committee

The Accessibility Plan was also reviewed by Acede Canada's standing Accessible Canada Act Review Committee. Consultation Group members are individuals with a variety of lived experience with disabilities, and knowledge of a range of accessibility issues. Consultation was conducted November 17, 2025. The committee consists of members who self-identify with a disability including mobility, vision, learning disability, mental health disability and hearing loss.

3. Committee members were provided an overview of the functions at Great Lakes Pilotage Authority and an advance copy of the draft Great Lakes Pilotage Authority Accessibility Plan. They provided comments on the plan's format and readability, accessibility actions, suggested timelines for actions, and specific barriers that could be encountered. Their feedback has been incorporated into this plan.

C. Implementation, Monitoring and Reporting

To ensure that accessibility remains a constant priority within the government, the *Accessible Canada Act* dictates that regulated entities prepare and publish annual progress reports on the implementation of their accessibility plans. Similar to our accessibility plan, progress reports must be prepared in consultation with persons with disabilities. The progress reports must also present the feedback that we received (if any) and how that feedback was taken into consideration.

Great Lakes Pilotage Authority 's next progress report will be published 12 months after the publication of this accessibility plan. This progress report will include updates on the actions Great Lakes Pilotage Authority has taken. As specified in the regulations, organizations must publish a revised plan every three (3) years. As such, the Great Lakes Pilotage Authority's first revised accessibility plan will be published in December 2028.

D. Glossary

Barrier

"means anything—including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice—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."

Disability

"means 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."

ICT (information and Communication Technology)

"an extensional term for information technology (IT) that stresses the role of unified communications and the integration of telecommunications (telephone lines and wireless signals) and computers, as well as necessary enterprise software, middleware, storage and audiovisual, that enable users to access, store, transmit, understand and manipulate information."

Web Content Accessibility Guideline (WCAG)

"The WCAG documents explain how to make web content more accessible to people with disabilities. Web "content" generally refers to the information in a web page or web application, including:

- natural information such as text, images, and sounds
- code or markup that defines structure, presentation, etc."