Future Information and Communication Technologies Accessibility Regulations: What we heard

Employment and Social Development Canada

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Contents

List of abbreviations

ACA

Accessible Canada Act

AI

Artificial intelligence

ATM

Automated teller machine

ESDC

Employment and Social Development Canada

EU

European Union

ICT

Information and communication technologies

IT

Information technology

iOS

iPhone Operating System

MS

Microsoft

PoS

Point of sale

PDF

Portable document format

RFI

Request for information

US

United States

VPAT

Voluntary Product Accessibility Templates

WCAG

Web Content Accessibility Guidelines

Summary

Background to the consultation

Employment and Social Development Canada (ESDC) is starting to develop the next set of regulations under the Accessible Canada Act (ACA). These regulations would deal with removing barriers and improving accessibility in the area of information and communication technologies (ICT). ICT covers all the things we use to communicate and do business in the digital world.

Digital products and services are everywhere. But, for many persons with disabilities, access is difficult and even impossible. Accessible ICT ensures that all Canadians can access and use these products and services without barriers.

Future ICT accessibility regulations made under the ACA would apply to federally regulated entities. This includes sectors like banking, pipelines and the Government of Canada itself.

Who was the focus of this consultation

Regulators must consult all implicated stakeholders before developing regulations. Consistent with the Government of Canada's commitment to 'nothing without us', ESDC consulted the disability community. As well, to hear from the broadest perspectives possible, ESDC invited indigenous stakeholders, federally regulated entities from both public and private sectors, and ICT vendors and suppliers to participate in the consultations.

Key findings

ESDC received input and ideas around the following topics:

- barriers to ICT accessibility for persons with disabilities
- challenges faced by federally regulated entities in providing accessible ICT
- best practices to improving ICT accessibility that could inform future ICT accessibility regulations
- current state of readiness and potential for future conformance with ICT accessibility standards

The input we gathered from our early engagement with the disability community and other stakeholders will inform the development of future ICT accessibility regulations.

Introduction

The [Accessible Canada Act](#) (ACA) aims to create a barrier-free Canada by 2040. It focuses on identifying, removing and preventing barriers in several priority areas, including Information and communication technologies (ICT).

Employment and Social Development Canada (ESDC) published its [first set of regulations](#) under the ACA in December 2021. They set out the deadlines and requirements for preparing and publishing accessibility planning and reporting documents. They also include a framework for financial penalties for violations of the ACA and its regulations.

ESDC has begun developing the next set of regulations under the ACA. These regulations would deal with removing barriers and improving accessibility in the area of ICT. The regulations would apply to federally regulated entities. This includes sectors like banking, pipelines and the federal Government itself.

ICT includes everything we use to communicate and do business in the digital world, such as:

- websites
- web applications such as web-based email, web-based online banking
- non-web documents like PDF and Word files, presentations such as PowerPoint
- software such as Windows, iOS, Word and QuickBooks
- mobile hardware such as smartphones and tablets
- stationary hardware such as automated teller machines (ATMs) and self-service kiosks for parking payment
- other hardware such as computers, mice, keyboards, scanners and printers
- assistive technology like screen readers and Braille displays
- virtual meeting platforms like Webex, Microsoft Teams and Zoom

Why we engaged stakeholders

As per the Treasury Board's Cabinet Directive on Regulation, regulators must engage stakeholders as early as possible, and before developing regulations. This helps regulators to better understand potential impacts of the future regulations on the stakeholders as well as the concerns that stakeholders may have.

Early engagement consists of informal exchanges of ideas. It is different from formal consultations which regulators hold after publishing regulatory proposals in Canada Gazette part I.

ESDC is committed to the principle of 'nothing without us'. That is why ESDC has and will continue to engage with the disability community on future ICT accessibility regulations.

ESDC has also engaged with and invited indigenous stakeholders, federally regulated entities (private and public sectors), ICT vendors, and Canadians to provide their input on future ICT accessibility regulations.

ICT accessibility is complex and technical. By engaging broadly, ESDC will better understand the range of potential impacts and concerns that stakeholders may have.

How we engaged stakeholders

To hear the broadest perspectives possible, ESDC engaged stakeholders in multiple ways to give more options for persons with disabilities and other stakeholders to participate. This included an online public engagement, 7 virtual meetings with representatives from the disability community and federally regulated entities as well as bilateral engagement with interested stakeholders, and a request for information (RFI) to engage ICT vendors.

The online public engagement lasted from November 24, 2022, to January 31, 2023, and included a discussion paper with 2 modules. The first module asked respondents to identify barriers to using digital technologies in their daily lives. It also asked respondents about what areas of ICT are most important when it comes to removing barriers. The second module asked respondents about their current state and their future potential for conforming with ICT accessibility standards such as Web Content Accessibility Guidelines (WCAG).

ESDC held 7 virtual discussions sessions with stakeholder groups from December 2022 to February 2023. ESDC invited disability organizations, indigenous stakeholders, federal private and public sector organizations to participate. Additionally, ESDC met bilaterally with several interested stakeholders.

ESDC also published a request for information (RFI) on November 24, 2022 to engage with ICT vendors and suppliers. The RFI closed on January 31, 2023. It focused on vendors' current state of conformance with accessibility standards and their anticipated timelines to potentially conform with such standards in the future.

Who we heard from

This report summarizes what we heard during our early engagement with stakeholders and the public. As of February 2023, 94 individuals from 69 organizations participated in early engagement activities. We have provided a list of all participating organizations below. Five individuals also provided comments on their own behalf. For privacy reasons, the names of the individuals who provided comments on their own behalf cannot be disclosed.

Disability community

- Alliance for the Equality of Blind Canadians
- Canadian Council on Rehabilitation and Work

- Canadian National Institute for the Blind
- Communication Assistance for Youth & Adults
- Deafblind Ontario Services
- Inclusion Canada
- Inclusion Nova Scotia
- Independent Living Canada
- Manitoba League of Persons with Disabilities
- March of Dimes
- Neil Squire Society
- People First of Canada
- Regroupement des organismes spécialisés pour l'emploi des personnes handicapées
- Réseau québécois pour l'inclusion sociale des personnes sourdes et malentendantes
- Rick Hansen Foundation

Regulated entities in the private sector

- Aeroport de Montreal
- Air Canada
- British Columbia Maritimes Employers Association
- Bell
- Bank of Montreal
- Canadian Bankers Association
- Canadian Wireless Telecommunications Association
- Canadian Imperial Bank of Commerce
- Canadian National Railway
- Desjardins
- GardaWorld
- Greater Toronto Airports Authority
- Halifax Employers Association
- Laurentian Bank
- National Airlines Council of Canada
- National Bank
- Purolator
- Quebecor
- Royal Bank of Canada
- Rogers
- Sasktel
- Scotiabank
- Toronto-Dominion Bank
- Telus

- The St. Lawrence Seaway Management Corporation
- United Parcel Service Canada
- Vancouver Airport Authority
- Vancouver Port Authority
- WestJet

Regulated entities in the public sector

- Canada Border Services Agency
- Canada School of Public Service
- Canadian Air Transportation Security Authority
- Canadian Broadcasting Corporation
- Canadian Food Inspection Agency
- Canadian Museum for Human Rights
- Canadian Museum of Nature
- Canadian Transportation Agency
- House of Commons
- Immigration, Refugees and Citizenship Canada
- Public Service Alliance of Canada
- Public Services and Procurement Canada
- Royal Canadian Mint
- Senate of Canada
- Shared Services Canada
- Statistics Canada
- Treasury Board Secretariat

Vendors and suppliers

- Adele Furrie Consulting
- Allyant
- Binder Dijker Otte (BDO) Canada
- Distribution as a Service (DaaS) Group
- Hewlett Packard Inc
- Information Technology Industry Council
- Microsoft Canada
- TechNation

Barriers to ICT accessibility

What we heard from the disability community

Participants from the disability community highlighted that ICT accessibility barriers are increasingly impacting the economic and social well-being of persons with disabilities.

ICT components creating significant barriers

Participants identified inaccessible websites, web applications and non-web documents as creating significant barriers for persons with disabilities.

Websites are typically developed to be accessible when using a desktop or laptop computer but are not accessible on mobile devices. This causes barriers because an increasing number of persons with disabilities prefer using mobile devices, such as tablets, to access the web. In addition, websites are increasingly using inaccessible pop-up windows, advertisements and automatically installed add-ins or automated chat functions. These create additional barriers for persons with disabilities. In particular, they are problematic for persons who use assistive technologies, or persons with cognitive disabilities.

Web applications, such as those used to access and manage banking and other financial services, are often difficult to navigate. Some persons with disabilities may need help to do so. It is important to note that because often web applications are accessed through web browsers, many of the barriers relating to websites also apply to them.

Non-web documents such as PDFs are often inaccessible. This is the case for both documents provided to customers and the documents used by employees of federally regulated entities. For example, participants cited documents providing mortgage and insurance information as examples of inaccessible non-web documents. They also noted that security issues are often cited as a reason for not providing accessible versions of such documents.

Other ICT components creating barriers highlighted by participants were:

- inaccessible features of ATMs, such as access to text to speech features. To access these, users must plug in a wired earphone. Wired earphones are becoming obsolete as fewer smartphones support them
- Point of sale (PoS) devices without audio output which are inaccessible for persons who are blind: a customer, who is blind and has to use a PoS without audio output to do a transaction, cannot know the amount of the transaction immediately. They will have to verify it afterwards on their mobile device
- contactless technologies: such as those used for banking at kiosks, are inaccessible for some persons with cognitive impairments, intellectual disabilities, and mobility issues

- inaccessible software: while web and hardware accessibility receive most of the focus, developers tend to neglect software
- inaccessible virtual meeting platforms: for example, persons who are deaf-blind still experience barriers when using these platforms
- assistive technologies without clear and simple instructions on how to use them: this challenge has only been growing as these technologies improve and developers add new features. However, they seem to test such technologies with users with disabilities who are technologically savvy instead of average users with basic technological knowledge
- lack of alternate formats for instruction manuals of ICT products or services: persons with disabilities must spend a lot of time searching for the right places to find this information. Certain disability organizations have taken up the burden of providing this information

Intersection of ICT barriers with accessibility of other priority areas under the act

ICT barriers and employment

Participants from the disability community indicated that persons with disabilities face many digital barriers in the workplace as well as throughout the recruitment process. More specifically:

- job recruitment platforms, especially those developed in-house by employers, tend to be inaccessible
- employees with disabilities experience barriers when using internal websites and software in their daily work. As a result, they face many additional challenges to advance their careers
- it is often difficult to convince employers to invest in accessible ICT. As well, when employers provide workplace accommodations relating to ICT, it is often not in a timely manner
- accessibility is often not considered when upgrading and replacing ICT products. Systems that were accessible earlier became inaccessible following upgrades

Web and software barriers have been particularly problematic for me in the workplace. It has led to having far fewer options than I would otherwise have had, including losing jobs and failing to gain higher levels of employment due to inaccessible software in the workplace
– participant from the disability community

ICT barriers and customer service delivery

Participants from the disability community also identified several barriers related to customer services that organizations provide digitally. Highlights of these include:

- not considering diverse forms of disabilities. For example, consider the case of banking customer services provided via phone using digital technology. These services ask people to enter their 10-digit card number. Some persons with disabilities are unable to enter this number before their session times out
- lack of familiarity with accessibility and training to be able to provide services to persons with disabilities, particularly those who use specific assistive devices
- complicated and inaccessible forms that are particularly difficult for persons with cognitive disabilities

Emerging barriers as a result of accelerated digitization of services and products

Participants from the disability community also raised concerns with the growing use of artificial intelligence (AI). AI systems use data that inevitably reflect the past. Given the biases of past decisions, which have resulted in significant inequities for persons with disabilities and other underserved groups, use of AI will amplify these inequalities going forward.

They also noted that the increased use of online platforms for accessing services and products is creating inequities. If online platforms are inaccessible, people with disabilities may prefer to make purchases in-person or through an agent. However, products or services purchased in person or through an agent tend to be more expensive than those purchased online.

Participants highlighted that limited internet access and bandwidth in rural areas is a barrier to ICT accessibility.

They also indicated that federally regulated entities and ICT developers rarely test the accessibility of ICT products and services with users with lived experiences. In addition, when entities and developers do user testing that is inclusive of persons with disabilities, it is done with digitally literate individuals. It is important to do user testing with persons with disabilities with basic knowledge of technology.

Improving ICT accessibility

What we heard from the disability community

Priority areas for immediate action

Given the challenges that persons with disabilities face on a regular basis, participants from the disability community identified 3 priority areas for immediate action.

Mobile devices (for example, smartphones and tablets): mobile devices are a priority because they are now everywhere and people commonly use them in their daily lives, particularly for their built-in accessibility features.

Websites: websites are a priority because they are the first point of contact people now have with government and businesses and are key sources of information.

Non-web documents: removing barriers from non-web documents (for example, PDFs, documents in Word, presentation in Power Point) is a priority because persons without access to digital technology and persons who use screen readers prefer non-web documents. They are also important in the employment context.

Outcomes promoted by the future ICT accessibility regulations

Participants from the disability community are hoping that the future ICT accessibility regulations will result in the following outcomes:

- shifting towards the culture of accessibility by design or inclusive design
- promoting user testing and
- improving accountability and transparency

Shifting towards the culture of accessibility by design or inclusive design

Participants from the disability community hoped that the future ICT accessibility regulations would promote a greater commitment to accessibility. Rather than accessibility being an afterthought, the future ICT accessibility regulations would result in accessibility being an integral part of the ICT lifecycle. Accessibility would play an important role from the design phase, to testing, to implementation and to updates.

Participants cautioned that complying with a set of accessibility standards doesn't make a product or service automatically accessible. There is need for a range of solutions and accommodations, including alternate ways of communicating information to users. In particular, organizations should provide a way for customers to have access to and communicate with employees when they encounter difficulties using their online platforms.

There should be several options according to individual needs. There should be equitable access rather than equal access
– participant from the disability community

Promotion of user testing

Participants from the disability community hoped that future ICT accessibility regulations would promote user testing. User testing involves getting end users and customers to test and evaluate an ICT product or service before it has made available to the public. This allows product developers to discover accessibility issues or other challenges to using their product they might not have thought about when designing it.

Participants highlighted that organizations should perform user testing with persons with diverse disabilities and different levels of digital literacy. Currently, organizations tend to test their ICT products with higher literacy users, which may not reflect the needs of persons with disabilities.

In addition, user testing should also happen throughout the product management cycle. Involving more persons with disabilities in user testing could also create employment opportunities.

It is not possible for something to be 100 percent accessible
for 100 percent of users 100 percent of the time
– participant from the disability community

Improving accountability and transparency

Participants from the disability community highlighted that the burden is often on persons with disabilities to demonstrate that a product or a service is inaccessible. To address this issue, they hoped that the future ICT accessibility regulations would help improve accountability and transparency.

For example, organizations could develop accessibility roadmaps that will transparently outlines how organizations will identify accessibility gaps. These roadmaps could also include timelines for addressing these gaps and identify solutions that would help address the gaps. The results of this could also encourage vendors and suppliers to adopt inclusive practices and improve accessibility of their ICT products and services.

What we heard from federally regulated entities

Priority areas for immediate action

Participants from federally regulated entities and organizations identified 3 priority areas for immediate action:

- websites
- web applications and
- non-web documents

Accordingly, these 3 areas are the most common means of communication used by regulated entities. In addition, organizations have resources, knowledge, guidance, and capacity on how to make these 3 areas accessible.

Both federal public and private sector participants flagged that there are currently limited availability of resources on making other ICT components accessible. However, this should not be a reason to ignore those other components. They also raised concerns that organizations are often buyers of these products (not developers), and therefore, have limited control over accessibility of such products.

Current best practices to improve accessibility

Participants from both the federal public and private sectors shared some best practices their organizations have used to remove ICT accessibility barriers. Highlights of these best practices include:

- awareness raising: improving awareness of ICT accessibility among employees, including senior management
- education: providing technical training for employees on ICT accessibility, especially IT staff
- recruitment: recruiting employees with disabilities, and those with expertise in both accessibility and IT
- accessibility by design or inclusive design: considering accessibility in all stages of development, design and purchase of new ICT products and services. This also means including persons with disabilities as part of efforts to improve ICT accessibility
- accessibility roadmaps: putting into place accessibility roadmaps that give timelines and mechanisms for testing, finding accessibility gaps, removing barriers and maintaining conformance with accessibility standards over time
- accessibility support tools: creating an ICT accessibility hub, which gathers existing standards, best practices and guidance materials on ICT accessibility

In addition to the best practices identified above, participants stressed the importance of:

- leveraging the use of automated ICT accessibility tools (for example, web accessibility assessment tools)
- focusing on usability as the same time as accessibility. Testing with end users throughout the product lifecycle
- consulting early-on with suppliers to determine the accessibility of their solutions, which helps reduce procurement timelines
- including ICT accessibility by default as a condition in tendering opportunities
- providing plain language explanations of technical compliance requirements for developers, and clear definitions of technical terms

- establishing effective governance mechanisms so that decision-makers consider accessibility

Considerations for potential timelines for conformance with accessibility standards

Participants from both the federal public and federal private sectors identified the following points as important considerations for potential timelines, for conformance with accessibility standards.

Consideration should be given to distinguishing between new and legacy ICT. Legacy ICT will require more time to make accessible because there is so much of it. As well, upgrading or replacing old systems is very complicated and time-consuming.

In the short-term (typically less than 2 years), many entities can ensure that new web content they develop is accessible.

In addition, in the short-term, the priority should be on assessing the current state of ICT accessibility. This would allow entities to establish a baseline and identify areas to improve. In the medium-term, the focus could be on making plans to improve accessibility of existing systems.

Timelines should also consider an organization's technical and financial capacity. Some entities have less capacity and knowledge and are only just starting their ICT accessibility journey.

Perfect conformance at all times is not possible due to the ever-evolving nature of ICT. For example, entities constantly update and revise their websites. Every time this happens, there is an opportunity for bugs and unintended errors. Therefore, it will be important to consider a flexible approach to determining conformance.

Some aspects of digital accessibility can be addressed by conformance to standards; however, other aspects also require a culture shift within the entirety of an organizations. For example, creating non-web documents such as PDFs. Every single employee, and not just those who are ICT experts, must step up and apply an accessibility lens when creating these documents.

Document accessibility is another game altogether.
Organizations can set expectations, but it comes down to the individuals and organizational change
– participant from the federal private sector

Challenges to making ICT accessible

Participants from federally regulated private and public sector entities identified a number of practical challenges to providing accessible ICT. Most of these fell into 3 broad categories:

- lack of awareness and limited availability of knowledge resources
- dependence on vendors and third-party service providers and
- financial costs

Entities also highlighted a number of technical complexities that make building for digital accessibility challenging and time-consuming.

Lack of awareness and limited availability of knowledge resources

Participants highlighted a lack of awareness regarding the benefits of ICT accessibility among senior leadership. Some entities highlighted the necessity of organization-wide cultural change to raise awareness and reinforce organizational commitment to accessibility.

They also noted a lack of centralised approach or common resources that can help entities to audit accessibility conformance. Participants felt that self testing and audits for conformance can be inconsistent.

Several participants noted there is a lack of uniform understanding of ICT accessibility requirements because it is an evolving field. As a result, there is a lack of information about how to make ICT accessible and to test for it.

Participants also noted that organizations do much less accessibility testing outside of web and generally not in a consistent way.

Dependence on vendors and third-party suppliers

Some participants reported limited interest from ICT vendors to supply accessible solutions where there is no legal requirement for accessibility or a large-scale demand for accessibility. For example, a smaller business highlighted the difficulties it faced to buy an accessible reservation system. Since the larger businesses in its industry are not using them, vendors had no interest to supply them with an accessible solution.

Entities reported facing challenges with the accessibility of internationally used systems and platforms such as recruitment platforms and enterprise software. They depend on changes made elsewhere. As well, many vendors are US-based and tend to follow US standards. Some can be reluctant to comply with other international standards.

Implementation timelines also depend on current contracts with vendors. They also depend on the current state of technology and what accessible solutions are available today in the market.

However, some public sector entities noted that, taken together, Canada's federal public and private sectors have considerable purchasing power. If entities start demanding accessible ICT solutions, industry will respond, even if it takes time.

> If everyone pooled and channelled their resources, maybe vendors would see the opportunity and dedicate resources to making their products and services accessible
> – participant from the federal public sector

Major cost drivers

Participants from the federally regulated entities highlighted that implementing ICT accessibility improvements is labour-intensive. It also requires qualified staff trained in IT and accessibility. There is a limited number of such individuals, so recruitment and labour costs can be very expensive. Contracting out is also expensive as external service providers command high prices for the same reasons. Participants noted experiencing this challenge for all categories of IT staff, including existing and new employees, IT professionals and content developers. Its also expensive to train existing IT staff on ICT accessibility.

Accessibility audit or assessment costs can be significant and occur throughout the product management lifecycle. This is because updates to certain ICT products, such as websites, web applications and software happen very frequently. Every time an organization updates or changes its ICT, it is an opportunity for accessibility to break down. This is why organizations must continuously audit or assess their ICT to ensure it is accessible.

Entities highlighted the large amount of ICT legacy content. It is very time consuming and therefore expensive to make all legacy content accessible.

Smaller entities also highlighted that it is expensive for them to conduct consultations, such as surveys and focus groups.

Technical complexities

Participants flagged that it is very challenging to make certain old complex systems accessible. This is because of their size, complicated functionality, other regulatory requirements and impacts on their operations. From their perspective, it would be better to replace them with new accessible solutions upon reaching end of life. For example, 1 entity said that they structure their IT systems to protect the integrity of their data. They did this to ensure uninterrupted service to their customers and comply with other regulatory requirements. It would take significant planning and time to change their existing system while ensuring data integrity and complying with other regulations. Any

change in their systems would also require updating the entity's operational policies and processes, which requires time to retrain front-line staff.

Numerous entities noted that when it comes to accessibility, there is no one size fits all solution. Solving the problems for 1 kind of disability can sometimes cause problems for people with other disabilities. Some participants also believed it may not be possible to make some software fully accessible to everyone given today's technology. This is especially an issue for some software that entities develop in-house.

Some participants flagged that requirements like anti-fraud and security can create challenges for accessibility. This is in particular relevant to biometrics, which are seeing an increase in use in IT security processes.

What we heard from ICT vendors and suppliers

ESDC asked ICT vendors and suppliers to speak about their awareness and current state of conformance with international ICT accessibility standards such as Web Content Accessibility Guidelines (WCAG) and the European standard EN 301 549. In addition, we sought input about their future plans for conforming with existing accessibility standards. ESDC also asked vendors to describe the best practices they use when developing digital products and services. We received responses from 8 vendors and suppliers, and we've provided a summary of their responses below.

Current conformance with ICT standards

Most ICT vendors and suppliers said they build toward and test products and services against globally recognized accessibility standards. These standards include the Web Content Accessibility Guidelines (WCAG), Section 508 of the *U.S. Rehabilitation Act* and the European standard EN 301 549.

The majority of vendors and suppliers indicated they are already able to supply products and services that will meet the European Standard. Several ICT vendors and suppliers also said they exceed recommendations of existing guidelines and standards.

ICT vendors and suppliers said that they already prepare accessibility conformance reports using different Voluntary Product Accessibility Templates (VPATs). They maintain VPATs for all their products and services.

ICT vendors and suppliers noted that they prioritize providing accessibility conformance reports for bid opportunities. Some ICT vendors and suppliers make their conformance reports publicly available. This makes it easier for customers to access this information and helps them to make procurement decisions.

Conformance reports are available in a number of languages, including English and French. ICT vendors and suppliers rely upon accessibility experts to provide conformance reports that are accurate, repeatable and transparent.

Future plans for conformance with ICT standards

Vendors highlighted that they have started the process of identifying conformance issues. They are also developing strategies to resolve such issues in a timely manner.

Some vendors mentioned that they need 1 to 2 years to supply ICT products and services that conform to the EN standard.

Engaging persons with disabilities in the development of ICT

Most vendors and suppliers said they conduct 'product and user experience studies' throughout the product development lifecycle. These studies include individuals with disabilities and age-related limitations.

Vendors said 'product and user experience studies' help to make sure that the benefits of technology are available to all. It also supports their diversity and customer experience objectives.

Accessibility requires lived experience. Empathy cannot always replace lived experience; people who have been through something know the nuances of dealing with it.
– ICT vendor

Considerations for accessibility standards

Most ICT vendors and suppliers believe that harmonization of ICT accessibility standards across jurisdictions will promote innovation and interoperability. It will also reduce costs to governments, businesses, and consumers. It would allow Canadian technology companies to build once and sell worldwide.

Vendors and suppliers offered the following considerations regarding the European standard (EN 301 549):

- EN 301 549 is the most up to date and comprehensive ICT accessibility standard. Since its initial publication in 2014, it has gone through several updates to reflect evolving technology. A wide array of stakeholders, including persons with disabilities, are participating in the process to update the standard
- Accessibility Standards Canada serves as an observer to the committee that updates the EN 301 549 standard. This gives Canada the opportunity to participate in deliberations and submit contributions to this important work
- EN 301 549 is now widely adopted, including in all 27 European Union (EU) Member States. As well, Norway, Serbia, Albania, Macedonia, Switzerland, Australia, India, Japan, Kenya, and Mexico have also adopted it. Canada would

benefit from aligning with this international consensus by better accessing accessible ICT from around the world. It would also help avoid fragmentation of the global market for accessible products and services

- involving user experience teams and ICT testing experts from the very beginning of a digital project is extremely important. This brings significant efficiencies compared to remediating accessibility barriers at the end of the project
- a shared, centralized database for accessible ICT solutions would make it easier for entities to procure accessible ICT

Next steps

Our early engagement with the disability community and other stakeholders is now completed. ESDC will now work on developing future ICT accessibility regulations considering what we have heard to date. We will then publish the proposed regulations in part I of the Canada Gazette for formal consultations. This will give Canadians, the disability community and federally regulated entities an opportunity to review and comment on the proposed regulations.