



THREE-YEAR PLAN

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# Accessibility Plan

## 2026 – 2029

**Les Investissements Nolinor inc.**  
*operating as Nolinor Aviation*

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In accordance with the Accessible Canada Act (S.C. 2019, c. 10) and the Accessible Transportation Planning and Reporting Regulations (ATPRR, SOR/2021-243)

# Table of Contents

▪ <b>1. General Information</b> .....	<b>4</b>
▪ 1.1 About Nolinor Aviation .....	4
▪ 1.2 Designated Person .....	4
▪ 1.3 Means to Provide Feedback and Request Alternative Formats. ....	4
▪ <b>2. Information and Communication Technologies</b> .....	<b>5</b>
▪ 2.1 Current Status .....	5
▪ 2.2 Barriers Identified .....	5
▪ 2.3 Planned Action .....	5
▪ <b>3. Communication Other Than Information and Communication Technologies</b> .....	<b>6</b>
▪ 3.1 Current Status .....	6
▪ 3.2 Barriers Identified .....	6
▪ 3.3 Planned Action .....	6
▪ <b>4. Procurement of Goods, Services, and Facilities</b> .....	<b>7</b>
▪ 4.1 Current Status .....	7
▪ 4.2 Barriers Identified .....	7
▪ 4.3 Planned Action .....	7
▪ <b>5. Design and Delivery of Programs and Services</b> .....	<b>8</b>
▪ 5.1 Current Status .....	8
▪ 5.2 Barriers Identified (COPHAN recommendation) .....	8
▪ 5.3 Planned Action (COPHAN priority) .....	8
▪ <b>6. Transportation</b> .....	<b>9</b>
▪ 6.1 Current Status .....	9
▪ 6.2 Barriers Identified (including issues raised by COPHAN) .....	9
▪ 6.3 Planned Action .....	9
▪ <b>7. Built Environment</b> .....	<b>10</b>
▪ 7.1 Current Status .....	10
▪ 7.2 Barriers Identified .....	10
▪ 7.3 Planned Action .....	10
▪ <b>8. Provisions of CTA Accessibility Regulations</b> .....	<b>11</b>
▪ 8.1 Accessible Transportation for Persons with Disabilities Regulations (ATPDR, SOR/2019-244) .	11
▪ 8.2 Air Transportation Regulations — Part VII. ....	12
▪ 8.3 Personnel Training for the Assistance of Persons with Disabilities Regulations .	12
▪ <b>9. Feedback Details</b> .....	<b>13</b>

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- 9.1 Feedback Process ..... 13
- 9.2 Feedback Received ..... 13
- 9.3 How Feedback Was Addressed ..... 13
- **10. Consultations** ..... **14**
- 10.1 Internal Consultation 2024 ..... 14
- 10.2 External Consultation 2026 – COPHAN ..... 14

# 1 General Information

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This plan has been prepared in accordance with the six principles set out in section 6 of the Accessible Canada Act, including the right of every person to be treated with dignity, to have barrier-free access and to participate fully and equally in society, as well as the participation of persons with disabilities in the design of services.

## 1.1 About Nolinor Aviation

Les Investissements Nolinor inc. (also doing business as OWG) is a Canadian air carrier operating under the Nolinor Aviation banner, holding an Air Operator Certificate issued by Transport Canada. Our main base is located at Mirabel Airport (Quebec).

Nolinor primarily operates charter flights for industrial, mining, and government clients. We do not operate scheduled public service flights.

Our fleet includes Boeing 737-200, 737-300, and 737-400 aircraft in all-economy configuration, as well as a Bombardier Learjet 45. Nolinor has a fixed boarding ramp for persons with reduced mobility at Mirabel Airport, compatible with Boeing 737 aircraft. Assistance services are also available on request at all airports where we operate.

## 1.2 Designated Person

The designated person to receive feedback on behalf of Nolinor and coordinate the implementation of this plan is:

- Yves Bergeron, Vice-President of Operations

## 1.3 Means to Provide Feedback and Request Alternative Formats

Members of the public may provide feedback on Nolinor's accessibility, request a copy of the accessibility plan, or request a description of the feedback process in an alternative format, through the following channels:

- Mailing address: Accessibility Plan, Nolinor Aviation, 11600 Louis-Bisson Street, Mirabel (Quebec), Canada J7N 1G9
- Telephone: 450-476-0018 ext. 226 / 1-888-505-7025 ext. 226
- Email: [accessibilité\\_accessibility@nolinor.com](mailto:accessibilité_accessibility@nolinor.com)
- In person: Nolinor Aviation offices, 11600 Louis-Bisson Street, Mirabel (Quebec)

The plan is available on request in print, large print, braille, audio format, or electronic format compatible with adaptive technologies. Nolinor will provide an alternative format within 15 days of the request, and within 45 days for braille or audio format.

Nolinor also accepts anonymous feedback and feedback via social media.

This plan is also available in French at [nolinor.com](http://nolinor.com).

## 2 Information and Communication Technologies

*Legislative reference: s. 60(1)(a)(i) – paragraph 5(c) ACA. ATPDR, ss. 4, 5, 8, 9.*

### 2.1 Current Status

The nolinor.com website is compliant with the Web Content Accessibility Guidelines (WCAG) 2.0 AA. The website and booking systems are the main digital interfaces used to communicate information to the public.

### 2.2 Barriers Identified

No major barriers have been identified in this area. Nolinor is committed to maintaining WCAG 2.0 AA compliance for its website and to monitoring the accessibility of its digital platforms on an ongoing basis.

### 2.3 Planned Action

Action	Timeline	Responsible
Maintain WCAG 2.0 AA compliance of the website and monitor accessibility of digital platforms	Ongoing	IT + Comm.

## 3 Communication Other Than Information and Communication Technologies

*Legislative reference: s. 60(1)(a)(iii) – paragraph 5(c.1) ACA. ATPDR, ss. 6, 10, 57.*

### 3.1 Current Status

Staff are trained to use plain language and to provide information in an accessible manner. Pre-recorded announcements are available in both official languages. Verbal communications on the ground and on board take into account the needs of persons with disabilities.

Supplemental safety briefing cards are available on board each aircraft in four formats: English, French, English braille, and French braille. Special needs passengers receive an individual safety briefing prior to departure, as per Nolinor's Flight Attendant Manual (FAM).

Without using information and communication technologies, Nolinor also communicates the information relating to its other priority areas – information and communication technologies, procurement of goods and services, design and delivery of programs and services, and transportation. This information is provided verbally by trained staff, through signage and printed materials at the Mirabel base, and on request in an accessible alternative format.

### 3.2 Barriers Identified

- Procedure for providing information in alternative formats on request (s. 4 ATPDR) not formally documented for general passenger communications

### 3.3 Planned Action

Action	Timeline	Responsible
Document the internal procedure for providing information in alternative formats on request, in accordance with s. 4 of the ATPDR	June 2027	Comm. + Ops

## 4 Procurement of Goods, Services, and Facilities

*Legislative reference: s. 60(1)(a)(i) – paragraph 5(d) ACA.*

### 4.1 Current Status

Nolinor has integrated accessibility criteria into its procurement processes. This includes the purchase of equipment (ramps, on-board wheelchairs), the establishment of ground handling service contracts, and the assessment of new facilities.

### 4.2 Barriers Identified

- Accessibility criteria not systematically documented in procurement specifications

### 4.3 Planned Action

Action	Timeline	Responsible
Integrate accessibility considerations into significant procurement decisions	Ongoing	Procurement

## 5 Design and Delivery of Programs and Services

*Legislative reference: s. 60(1)(a)(i) – paragraph 5(e) ACA. ATPDR, ss. 15-23, 35.*

### 5.1 Current Status

Passenger service agents and cabin crew receive ongoing training focused on accessible transportation, in accordance with ATPDR requirements (ss. 20-23). The design of our programs and services takes accessibility into account for all clients.

### 5.2 Barriers Identified (COPHAN recommendation)

- Training primarily focused on regulatory procedures and insufficiently on hospitality and attitudes

### 5.3 Planned Action (COPHAN priority)

Action	Timeline	Responsible
Enhance staff training program with a module on welcoming persons with disabilities, drawing on OPHQ and Kéroul resources	December 2027	Training + Ops

## 6 Transportation

*Legislative reference: s. 60(1)(a)(i) – paragraph 5(f) ACA. ATPDR, ss. 18, 34-43, 49-62.*

### 6.1 Current Status

Nolinor has a fixed boarding ramp for Boeing 737 aircraft at Mirabel Airport, enabling boarding for persons with reduced mobility. At other airports, Nolinor coordinates with ground service providers to ensure accessible transportation to and from terminals.

### 6.2 Barriers Identified (including issues raised by COPHAN)

- Risks of damage or loss of mobility aids during boarding and deplaning
- Dependence on third-party airport infrastructure for ground accessibility

### 6.3 Planned Action

Action	Timeline	Responsible
Review internal mobility aid handling procedures and integrate this issue into ground staff training	December 2027	Ground Ops

## 7 Built Environment

*Legislative reference: s. 60(1)(a)(ii) ACA – limited to aircraft, aerodromes, and passenger terminals only. ATPDR, ss. 69-76.*

### 7.1 Current Status

Mirabel Airport is Nolinor's main base of operations. The fixed boarding ramp is maintained in good condition. Boeing 737 aircraft are configured in accordance with applicable ATPDR requirements (Part 3). Safety measure cards comply with applicable requirements.

### 7.2 Barriers Identified

- Variable accessibility across terminals at third-party airports where Nolinor operates

### 7.3 Planned Action

Action	Timeline	Responsible
Coordinate with airport authorities regarding accessibility facilities at terminals of airports where Nolinor regularly operates	Ongoing	Ops

## 8 Provisions of CTA Accessibility Regulations

*Legislative reference: s. 60(1)(b) ACA – the plan must address provisions of the regulations made under subsection 170(1) of the Canada Transportation Act that apply to the entity.*

Nolinor Aviation, as a regulated air carrier, is subject to the following Canadian Transportation Agency accessibility regulations:

### 8.1 Accessible Transportation for Persons with Disabilities Regulations (ATPDR, SOR/2019-244)

The ATPDR sets minimum standards for large transportation service providers. Nolinor complies with the following provisions:

#### Part 1 – Requirements Applicable to Transportation Service Providers

- S. 4 – Alternative formats: Information made available to the public is provided in formats compatible with adaptive technologies. Upon request, information is provided in large print, braille, or electronic format, without delay.
- S. 5 – Information to be published: Nolinor publishes on its website a notice stating that the ATPDR applies, the services offered to persons with disabilities, and the complaint resolution services.
- S. 6 – Communication: Personnel who interact with passengers communicate with persons with disabilities in a manner that takes into account their needs.
- Ss. 8-9 – Telecommunication systems: Telecommunication systems and the website are maintained in accordance with requirements.
- Ss. 15-23 – Staff training: Nolinor maintains an initial and refresher training program for staff regarding assistance to persons with disabilities, in accordance with ss. 20-23.

#### Part 2 – Requirements Applicable to Carriers – Services

- Ss. 32-35 – Services on request: Priority boarding, assistance with boarding and deplaning, baggage stowage assistance, and transportation of mobility aids.
- Ss. 49-51 – Transportation of mobility aids: Nolinor transports mobility aids in accordance with regulatory requirements.
- S. 57 – On-board announcements: On-board announcements are provided in accordance with requirements.

#### Part 3 – Technical Requirements – Aircraft

- Ss. 69-70 – Ramp and equipment: Nolinor has a boarding ramp at Mirabel and ensures boarding accessibility.
- S. 76 – Safety cards: Safety measure cards comply with applicable requirements.

## **8.2 Air Transportation Regulations – Part VII**

Part VII of the Air Transportation Regulations establishes additional accessibility requirements for air carriers. Nolinor complies with the applicable provisions of this part.

## **8.3 Personnel Training for the Assistance of Persons with Disabilities Regulations**

This regulation sets requirements for staff training of transportation service providers. Nolinor's training program covers the elements required by this regulation, including boarding assistance, awareness of different types of disabilities, and the use of accessibility equipment.

Nolinor is committed to complying with any regulatory updates to these regulations within the prescribed timelines.

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## 9 Feedback Details

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*Legislative reference: s. 61 ACA; ATPRR.*

### 9.1 Feedback Process

Nolinor has established a feedback process enabling members of the public to provide comments on the accessibility of its services. Feedback may be provided through all channels described in section 1.3. Anonymous feedback is accepted.

The description of the feedback process is published with this plan, at <https://nolinor.com/plan-daccessibilite/>, and is available on request in an alternative format.

### 9.2 Feedback Received

During the period covered by the previous plan (2023-2025), no formal accessibility complaints were received from passengers through the feedback process.

### 9.3 How Feedback Was Addressed

All feedback received is analyzed by the designated person and used to continuously improve our services. The results of this analysis are integrated into the preparation of progress reports and subsequent plans.

## 10 Consultations

*Legislative reference: s. 60(4) and 60(5) ACA.*

### 10.1 Internal Consultation 2024

In January 2024, Nolinor conducted an internal survey of its 285 employees, including employees with disabilities, to gather their observations on the accessibility measures in place.

### 10.2 External Consultation 2026 – COPHAN

In preparing this plan, Nolinor consulted the Confédération des organismes de personnes handicapées du Québec (COPHAN), a provincial organization representing over 50 associations of persons with disabilities.

#### Consultation Method

- Invitation date: April 8, 2026
- Response date: April 15, 2026
- Format: written questionnaire of 10 questions covering the areas of the ACA
- Respondent: COPHAN's project management
- Number of participants: 1 organization (representing over 50 associations)
- Acknowledgment preference: organization name only

#### Questions Asked and Responses Received

The questionnaire covered the following themes: barriers to accessibility in air transportation, improvement priorities, staff training, accessible communication, mobility aids, built environment, and feedback process.

#### Key Recommendations and Integration into the Plan

- Staff training (priority #1): Train cabin and ground staff on welcoming persons with disabilities. Suggested resources: OPHQ videos, Kéroul training. → Integrated into section 5 (planned action December 2027).
- Mobility aids: Incidents of damage and loss of mobility aids reported as a major issue in the industry. → Integrated into section 6 (procedure review).
- Accessible communications: Establish an alternative format policy. → Safety briefing cards are already available in braille on board; on-request procedure to be documented (section 3).
- Website: Compliance with WCAG standards recommended. → The nolinor.com website is already WCAG 2.0 AA compliant (section 2).

Nolinor is committed to consulting persons with disabilities when preparing each subsequent plan and progress report.