

# Prince Rupert Grain Ltd.,

## 2024 Accessibility Progress Report

### Section 1 – General

#### 1.1 About Prince Rupert Grain - Executive Summary

Prince Rupert Grain Ltd. (PRG) is an industry owned grain elevator which is located near Prince Rupert B.C. on Ridley Island. Our facility is located on a safety critical industrial site and includes a 600 railcar rail yard, a 330 foot tall terminal elevator, licensed storage space for 200,000 tonnes of grain, a marine loading dock with 3 loading towers, maintenance shop, administrative building and various outbuildings. Our core business is to safely and efficiently receive and unload grain railcars from the prairies, grade, clean & store the grain, then load deep sea vessels destined for grain customers around the world. Our customer / owners include Viterro Canada Inc., Richardson International Ltd., and Cargill Ltd. We also service a small group of local ranchers and poultry barns with animal feed by-product sales.

With a team of approximately 142 employees working on-site, our mission is to provide a quality and cost-effective handling and processing service to producers and customers of Canadian grain. PRG supports a culture that embraces diversity and inclusion in order to provide the highest quality service to industry.

A new law, the *Accessible Canada Act* ("the Act"), came into force on July 11, 2019. Along with other Canadian laws, the Act helps to support diversity and inclusion by directing Canadian organizations to remove and prevent barriers to accessibility. As directed by the Act, PRG began developing an Accessibility Plan in 2022, then published and posted our Accessibility Plan and our Feedback Process in 2023. PRG's goal is for the plan to continuously improve while reducing existing barriers and preventing new barriers for people with disabilities. The plan focuses on priority action areas and identifies organizational goals that PRG has set related to accessibility.

2024 is the first year that PRG has reported our progress under the plan as we work to reduce and remove barriers while, at the same time, striving to make improvements year over year. The following report highlights areas where we have made progress. It also identifies on-going accessibility barriers and what plans have put in place to remove these barriers in the years future.

#### 1.2 Statement of Commitment

The *Accessible Canada Act* ("the Act") came into force on July 11, 2019. Its purpose is to make Canada barrier-free by January 1, 2040. PRG filed and posted our Accessibility Plan and Feedback process in 2023. We remain committed to being an equal opportunity employer and take our responsibility seriously. We also believe all employees play a key role in making PRG more accessible and inclusive.

## 1.3 Progress to Date

Working in Northern British Columbia, we are proud of the progress we are making moving towards a more inclusive organization. Our team endeavors to hire people with diverse backgrounds and abilities, who live locally, and therefore can contribute to their community. Employees of PRG are active in the community and community service is a key value of who we are as an organization. We also understand the importance of continually evaluating opportunities to improve accessibility, acting on feedback, and ensuring there is an opportunity for consultation with any disabled employees. We realize that accessibility is an on-going journey, and we are dedicated to listening and working with people with disabilities in our efforts to advance disability inclusion. We have also learned that involving employees, from diverse backgrounds, provides critical insights and points of view based on their individual experience. This understanding leads to more effective solutions that better meet users' needs.

We have received very little feedback formally from persons with disabilities. However, conversations with employees, customers and stakeholders are on-going to identify and remove barriers. These conversations can occur during interviews, performance reviews, training sessions, break time, or even casual discussions on the shop floor. We understand the importance of continually looking for opportunities to improve accessibility and to make people feel safe and valued sharing their thoughts and ideas. PRG is dedicated to listening as key to our efforts in advancing disability inclusion.

Although we have received very little feedback formally, the organization welcomes suggestions for improvement. By consulting those in the organization with disabilities, and those who play a support role for persons with disabilities, we are working to continuously improve accessibility. Employees and community stakeholders on our site can easily connect with management to share their ideas on how we make the worksite more accessible.

This report identifies areas where we have made progress addressing barriers. It also identifies work that still needs to be done removing barriers in the years ahead. Identifying and removing barriers is a priority for PRG. This involves identifying, removing and preventing barriers in the following key 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).

The actions we've taken thus far include the following:

- Establishing and communicating processes to provide and address feedback on accessibility.

- Developing a website to allow for suggestions and feedback.
- Establishing a plan for meeting requests for alternative formats.
- Reviewing and updating our accessibility plan.
- Reviewing and revising our accommodation policy.
- Seeking assistance and guidance from subject matter experts as it pertains to accessibility and accommodation.
- Reviewing and updating our emergency evacuation process based on the CLC (Part II).
- Monitoring social media to ensure we don't miss community feedback.
- Reviewing accessibility plan when planning and hosting employee meetings and customer events.
- Ensuring site improvement capital projects include accessibility best practice and review.
- Including accessibility training into supervisory skills training.

## 1.4 Feedback Process

PRG is continuously seeking feedback from our employees and members of the public about on-site accessibility to improve this plan. We review all feedback and use it to help identify and address barriers that are identified improving accessibility.

We accept feedback on the barriers that may be identified or experienced when on-site or that will help to formulate and improve our Accessibility Plan. Please be descriptive in your feedback to help guide us. We will do our best to address issues that are identified and that can be accommodated on our industrial site in a practical manner. The feedback we receive will be considered in our future progress reports.

## 1.5 How to Provide Feedback

Commenters can provide feedback anonymously or include their name and contact information. Feedback can be given on our website, by mail or by calling us directly and asking to speak with our Manager of Finance, Administration & Systems.

**Email address:** [accessibility@prgrain.bc.ca](mailto:accessibility@prgrain.bc.ca)

**Website:** <https://prgrain.ca>

**Telephone number:** 250-627-8777

**Mailing address:**

PRG Accessibility Feedback  
P.O. Box 877, Prince Rupert, B.C.  
V8J-3Y1

PRG will respond to confirm that our Office has received the feedback and will respond the same way we received the feedback (by mail, email, website or phone). For example, if someone mails us a letter, our office will mail our response. PRG will not be able to send a confirmation response to comments made anonymously.

## 1.6 Alternative Formats of Communication

### 1. Alternative Formats of Communication

The following formats of our Accessibility Plan are available upon request within the timeframes indicated below:

- Print – 15 business days
- Large print – 15 business days
- Braille – 45 business days
- Audio format – 45 business days

## 1.7 Contact Us

by MailATTN: Accessibility and Inclusion  
Prince Rupert Grain Ltd.  
PO Box 877  
Prince Rupert, BC V8J 3Y1

by Phone Mon – Fri, 8:00am – 4pm  
250-627-8777

by Email [accessibility@prgrain.bc.ca](mailto:accessibility@prgrain.bc.ca)

by Website <https://prgrain.ca>

## 1.8 Definitions

**Accessibility:** The design of products, devices, services, environments, technologies, policies, and rules in a way that allows all people, including people with a variety of disabilities, to access them.

**Accessible Canada Act (ACA):** Legislation that came into effect on July 11, 2019. The legislation was enacted with the goal of removing barriers and achieving accessibility within areas of Federal jurisdiction on, or prior to, January 1, 2040.

**Accommodation:** Means steps to eliminate barriers and disadvantages against specific employees or applicants on a temporary or permanent basis. It may involve making changes to

the workplace or working conditions in a way that ensures the employee is not unfairly excluded based upon a protected characteristic of prohibited ground of discrimination.

**Barrier:** Anything that might hinder people with disabilities' full and equal participation. Barriers can be physical, architectural, technological or attitudinal, based on information or communications or can be the result of a policy, practice or procedure.

**Disability:** Any impairment or difference in physical, mental, intellectual, cognitive, learning, or communication ability. Disabilities can be permanent, temporary or can change over time.

## Section 2.0 – Priority Areas Addressed (Section 5)

To reach our objectives, PRG has set specific goals for each priority area in our Accessibility Plan. Each of these goals has helped us target activities to advance our objectives.

### Employment

Goal 1 – Create a culture of accessibility, where respect and inclusion are embedded in all aspects of the workplace and where all employees are empowered and supported to achieve their full potential.

#### 2.1 Accessing Employment

PRG is proud of our culture that promotes a safe, respectful and inclusive workplace. We have made progress creating a safer workplace when executing work and promoting accessibility. We have a robust workplace injury prevention program and encourage employees to recover at work in the event an injury does occur. In many cases, Managers can make accommodations for restrictions or limitations the injured employee may have. As such, we have seen improvement in our health and safety performance in 2022 – 2024.

Improving representation is also important to PRG. We discuss barriers to accessible services and have taken steps toward achieving this goal. We are committed to hiring people in an equitable and fair manner and are an equal opportunity employer with a diverse team of employees (some of which self-identify as having disabilities). There are also likely more unidentified individuals with challenges who prefer to keep their affairs private. This makes it more important for our organization to identify and address barriers that may limit or prevent current or future employees of being hired.

Some barriers that have been identified that make it a challenge to be hired at our facility include:

- Hiring conditions into the union environment which only allow persons to be hired into the general laborer pool due to union seniority constraints.
- The location and lack of public transportation to the facility.

- The nature of the industrial site with safety critical tasks and concerns for health and well-being also poses barriers to individuals with certain disabilities.

Progress has been made accommodating individuals who may require it given we operate in a safety sensitive environment on a complex industrial site.

## Employee Development

PRG has assessed internal information and knowledge gaps to do with accessibility including identification of barriers and improving hiring practices. Improvements have been initially directed at our leadership and supervisory teams and will eventually include all staff.

Using feedback received from employee consultations, PRG has begun improving existing training and safety modules.

- To promote awareness, respect in the workplace training was developed, in consultation with the safety committee, and delivered to all employees. We prepare a newsletter every week with safety tips and information for employees that can be used to promote our culture of inclusion. Employees are encouraged to learn about the topics discussed.
- Management have also been exposed to “Don’t Be a Bystander” training material developed by unions and waterfront employer’s which reinforces “saying” something if employees “see” something as it relates to behaviors unacceptable in the work place. We are currently sourcing additional training in the field of accessibility. The goal for these sessions is to support a culture of curiosity, respect, and inclusion and to empower the team to achieve their full potential.
- Senior Managers work directly with 3<sup>rd</sup> party experts to understand the employer’s Duty to Accommodate (DTA) and ensure that PRG is compliant with the Canada Labour Code (CLC). Access to these resources help us to support a culture of understanding and inclusion.

## Goal 2 – Ensure that PRG management is sufficiently equipped to deliver accessible programs and services.

Supervisor skills training is also being enhanced and we are sourcing modules that include topics such as unconscious bias, making documents accessible, and removing barriers to accessibility. This skills training focus is a work in progress and supervisors are encouraged to take these courses as part to their on-going supervisory skills training curriculum. Focusing on continuous learning equips our employees to deliver accessible programs and services.

Fairness is a core value of the organization, and supervisors continuously share information to ensure fairness with employee coaching, feedback and work opportunity. Fairness requires understanding that unconscious bias exists and can play a role in fair decision-making. Supervisory skills training ensures that they understand the needs of employees, including those with disabilities, and know how to reduce barriers and enhance accessibility at work.

## Inclusive Workplace

### 2.2 The Built Environment (buildings and public spaces)

**Goal 5 – Create a workplace that minimizes physical barriers to improve the working environment for all PRG employees.**

PRG is an industrial site physically located on Ridley Island which is approximately 15 km from the coastal city of Prince Rupert. Accessibility is part of the scope of work for all our new project designers as we make changes to our working environment. Office cubicles & workstations have been adapted for mobility aids and equipped with adjustable sit-stand desks where appropriate. Employees are also empowered to request appropriate equipment as required.

We are currently planning a capital project to provide additional office space and improve employee facilities. As we continue with the workspace design project, we will include accessibility as a key consideration for design criteria. If approved, we plan to begin this next phase of work in 2026 which will commence with a review of the current planned design. We have prioritized making our current administration building more accessible in the initial phase of the plan, where public access is more prevalent and where accommodations for individuals are more likely to be needed. We will continue to identify and improve accessibility throughout the facility in future plans.

The following actions are being taken to reduce barriers:

- In consultation with community members, we have identified improvements that can be made in the short term in-regards to washroom, lunchroom, and meeting facilities.
- We have utilized 3<sup>rd</sup> party professional guidance to determine accessibility standards in new spaces.
- We have reviewed our emergency response plan.

**Goal 6 – Ensure that all employees have a safe environment to work in.**

PRG incident responders ensure they are aware of any employees or people in the office who require assistance in case of an emergency. We provide on-site orientation, with all those visiting the site, and can schedule additional meetings for anyone requiring further assistance or information. Our EHS manager will explain emergency and evacuation procedures, as well as the roles and responsibilities of everyone involved and works closely with the Incident Commander.

### 2.3 Information and Communication Technologies (ICT)

**Goal 7 – Provide accessible technology to ensure that all staff have access to the tools and platforms they need to perform their work and can easily access information.**

Our ability to share information and knowledge with the public and our employees is key to helping support them. We want to make sure everyone has easy access to the information so they can

be well informed and thrive. The following on-going actions will help everyone access information communicated by PRG:

- PRG is exploring the use of accessibility features embedded in internal systems and tools.
- PRG encourages IT staff to increase their knowledge on how to provide accessible solutions for employees and others.

PRG wants to ensure that all staff have access to the tools and platforms that they need to perform their work. Employees who require adaptive or ergonomic equipment are not required to provide a medical note. We also equip employees with ergonomic accessories, such as office chairs, elevated desks, larger monitors, sound, wrist rests etc.

### Goal 8 – Acquire and implement technologies that ensure employees can access programs and services.

We are currently upgrading our plant control system technology which includes our Information Technology (IT) team and small operations teams to ensure we leverage technology as it relates to accessibility. These are sources of new and important knowledge on technology and accessibility as automated processes reduce equipment accessibility issues. We update our IT practices and tools on an ongoing basis to make sure they meet accessibility requirements.

Consultations are currently taking place for accessibility-related improvements to specific software and technologies, such as captioning of Teams meetings. Training on accessibility related to technology is part of our IT team's ongoing learning.

## 2.4 Communication, other than information and communication technologies (ICT)

Our ability to share information and knowledge with the public and our employees is key to helping support them. We want to make sure everyone has access to the information so they can be well informed and thrive.

- PRG will continuously work to improve its website content to be more accessible.
- PRG creates content which is posted in common areas and on bulletin boards with a focus on clear, concise, and plain language.

### Goal 9 – Ensure that communications products are developed within an “accessibility by design” culture, where staff at all levels are aware of accessibility requirements.

Clear communication, including using plain language, is essential to delivering our services.

### Goal 10 – Share knowledge and best practices to reduce barriers.

We have reviewed other accessibility plans to find best practices and share ideas on how best to improve. These best practices are being implemented in our plan.



## 2.5 Procurement of Goods, Services, and Facilities

PRG has not yet identified any goals in order to reduce barriers related to the procurement of goods, services and facilities. We will however continue to look at this segment to see if barriers exist such that they will be actioned as part of the plan going forward.

## 2.6 The Design and Delivery of Services

PRG's main customers are our three owner organizations to which it provides the bulk of handling services. PRG consults with our ownership group to see if and when improvements can be made in order to reduce barriers in the reporting and communication structure used in the delivery of those services.

## 2.7 Transportation

PRG does not provide employee transportation services, as such no goals have been made at this point. We do not offer public access to our buildings.

We do encourage carpooling initiatives for employees to commute to the site.

## Section 3 – Consultation

People with disabilities, and those who assist, were consulted as possible to gain their perspective and help formulate our accessibility plan. We continue to seek out and meet with people, who identify as having disabilities in the community, as well as people with experience identifying accessibility barriers to help us improve. In 2026, an employee questionnaire is being considered to help us gain additional feedback and information.

Some of the feedback also suggested that our employees are not always aware of the specific progress we are making to remove barriers and improve accessibility as it is happening. We will endeavor to address this by committing to improve and promote communication about accessibility in the workplace. We will be mindful of our employees' feedback as we plan for future accessibility initiatives.

We are grateful to our employees and to all those who share their opinions with us, and we will continue to incorporate their feedback into our work.

## Section 4 – Feedback

This year, we have not received any feedback from our website but will continue to message the site as a resource. In conversation, most people seem reluctant to share and offer very few details. We have received some feedback, however, through individual discussions.

## Section 5 – Progress Summary & Conclusion

Customers around the world rely on Canadian farmers and PRG plays an important role in getting their products to market. As such, we need to be accessible to our customers, the industry we serve, our employees and stakeholders so all can perform to their very best. Inclusion, development and accessibility are key parts of our vision to deliver the best service level possible.

We are committed to continuously improving accessibility and have made progress to date. Inclusion and belonging are key to our culture and we've identified ways to improve our accommodation program and established a process to provide and address feedback on accessibility. We have seen improvement in our plant health and safety performance in 2022, 2023 and 2024.

In 2025 and beyond, PRG will ensure accessibility guidelines are part of our renovation plan when we execute on our building upgrades, we will establish a quiet workspace for employees to do training, we will share best practices with other organizations, and we will continue to encourage feedback and consultation processes.

As we uncover areas to improve and make plans to reduce barriers to accessibility, our goal is to include those who live with disabilities in our success and continuously improve.

## Lessons learned

Building a culture of accessibility requires ongoing training and awareness. These commitments are essential to sustaining a culture of inclusivity and ensuring that all team members understand their role in promoting accessibility.

Smaller, incremental improvements also help keep up momentum and provide lasting benefits of their own.