Association of Canadian Sea Kayak Guides

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Sébastien Marcoux Visitor Safety and Prevention Advisor Visitor Experience Branch - Parks Canada sebastien.marcoux@pc.gc.ca

January 24, 2017

Dear Mr. Marcoux,

Thank you for your email dated November 29, 2016.

The Association of Canadian Sea Kayak Guides (ACSKG) believes the operating standards currently approved by Pacific Rim National Park Reserve increase the potential for another incident similar to British Columbia's 1993 guided kayak tour fatality.

The ACSKG believes it is appropriate for licensed tour operators in Canada's National Parks to operate using the highest relevant industry standards.

Your email mentions that you are looking at this issue from a visitor safety and search & rescue perspective, while others are looking at legal implications.

The information contained in this letter, including the additional information accessed by the four links provided herein, is intended to assist you and others in reaching a timely and appropriate decision concerning commercial operating standards for Pacific Rim National Park Reserve.

Answers to frequently asked questions regarding the ACSKG's position on this issue are available online: acskg.ca/prnpr/faq

The ACSKG is willing to work toward reaching an industry consensus on operating standards, yet it is unlikely we would consider lowering our standards. High standards are a hallmark of our organization. Lowering our standards to appease another organization holds little interest amongst our certified guide membership.

One of the motivating factors behind the ACSKG's steadfast defence of higher standards can be found in the Transportation Safety Board of Canada Marine Investigation Report M93W0008: acskg.ca/tsb

In this report, the term "group discipline" is referenced several times. The report indicates that one of the causes of the 1993 guided kayak tour fatality was the fact that group discipline was not enforced.

On overnight kayak trips in open coastal waters, ACSKG standards require guides to ensure that clients remain between two certified guides, and within vocal range of the guides, while on the water. Meanwhile, the standards promoted by the Sea Kayak Guides Alliance of British Columbia permit one unassisted guide to lead groups in open coastal waters.

Clearly, group discipline can be managed *much* more effectively with two guides.

A precedent for sea kayak operating standards was established on Canada's west coast in 1994, when Gwaii Haanas National Park Reserve and Haida Heritage Site endorsed the ACSKG's standards. As a result, other kayak guide organizations seeking Parks Canada approval are required to meet or exceed the ACSKG's standards when operating in Gwaii Haanas.

In Gwaii Haanas, Parks Canada selected the highest relevant standard and declared it the benchmark. This decision resulted in consistently higher professional standards for *all* sea kayak tour operators licensed by Gwaii Haanas.

Comparing ACSKG guide-to-client ratios with ratios promoted by the Sea Kayak Guides Alliance of British Columbia (SKGABC) will confirm that the ACSKG upholds higher standards. A closer inspection of standards will confirm that the SKGABC's operating standards meet the higher ACSKG standards *only* in Gwaii Haanas.

A revealing synopsis outlining several aspects of these differing standards and their origins is available online: **acskg.ca/synopsis**

Additional fundamental differences between the ACSKG and SKGABC become illuminated by reading about our history: acskg.ca/about

It seems unlikely that an ACSKG - SKGABC operating standards consensus will be achieved in the foreseeable future. Awaiting such an unlikely event would cause an inordinate delay to implementing appropriate operating standards for Pacific Rim National Park Reserve.

ACSKG standards have been endorsed by Parks Canada as the Gwaii Haanas benchmark for well over twenty years. The SKGABC has a long history of selectively raising their operating standards in order to qualify for Parks Canada approval.

The Association of Canadian Sea Kayak Guides suggests the same proven model is now utilized for Pacific Rim National Park Reserve.

We ask that you please reply to confirm receipt of this letter. Thank you.

Sincerely,

Gord Pincock

Gord Pincock ACSKG Director

CC:

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