Sea Kayak Guides Alliance of British Columbia
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March 3, 2011

The Honourable Chuck Strahl
Minister of Transport, Infrastructure and Communities
Tower C - 330 Sparks St.
Ottawa, Ontario, Canada
K1A 0N5

Re: Canada Shipping Act 2001 – Small Commercial Vessel Registration – Sea Kayaks

Honourable Chuck Strahl,

The implementation of the Canada Shipping Act 2001 (CSA 2001) may have significant consequences for the safety and economic sustainability of the commercial sea kayaking industry in British Columbia. As such, the Sea Kayak Guides Alliance of BC (SKGABC), requests clarity regarding this issue. The confusion surrounding this issue, and the added administrative burden, is creating considerable economic concerns for our members.

Since 1994, the Sea Kayak Guides Alliance of BC has strived to promote safety and best-practices on an industry wide basis. Today, the SKGABC is proud to represent over 700 individual and company members accross the country. Through training, certification, and on-going professional development, the SKGABC has always promoted safety and compliance to local, provincial and federal regulations.

As per the CSA 2001, we understand there are a number of new requirements for commercial vessels, and guided kayak trips. While some aspects of the Act currently fall within industry standards and should cause little additional administration for our members, we do have serious safety concerns relating to the registration of sea kayaks, and other onerous requirements.

As our membership comprises professional sea kayak guides, it is our understanding that the boats our guides operate from will have to be registered. As a company may employ a number of guides, and guides may operate from various vessels depending on group composition, this encompasses a large number of boats. It is conceivable, that in order to ensure compliance, the combined fleet of vessels to be registered, from within our membership alone, may number several thousand.

The sea kayak industry provides employment opportunities to individuals in many communities across the BC coast. Many small sea kayak businesses operate in rural areas providing much needed employment to local residents. Increased levels of paperwork will hinder the economic sustainability of these businesses, and limit the ability for entrepreneurs to start an enterprise.

It is the opinion of the SKGABC that some aspects of the CSA 2001 will cause excessive hardship to the professional sea kayak industry in Canada without significant increases in safety. The additional "Red-Tape" will add significant fiscal and administrative cost to small-business owners, and individuals. While we will always advocate for the safety of the industry, we encourage the Ministry of Transport to reconsider how the CSA 2001 will be applied to sea kayaks.

On behalf of the Executive of the Sea Kayak Guides Alliance of BC,

Liam McNeil
Executive Director
Sea Kayak Guides Alliance of BC