

Please share any specific comments or concerns you have about the regulatory proposal.

I believe that regulation is healthy, provided it is conducted in the spirit of partnership. We ALL want to be safe, but if BC Safety treats providers with hostility, I think that would lead to less safety, as providers avoid contact as much as possible. That's not the right way to do it. I should be able to call BC Safety for advice and guidance, without feeling like they will shut me down if I make the slightest error.

Including Portable climbing walls in this seems very unnecessary. There is already ample safety regulation in BC through our liability insurers, and wall/auto belay manufacturers who require annual inspection and servicing. This would just be a redundancy and a money grab for annual permit fees.

Industry is very good at self regulation and safety and operators adhere to the manufacturer's guidelines for annual certification, maintenance and inspections of auto-belay devices and increased regulation increases the costs for small business owners.

I do understand that there is no official recognized standard for many "devices" in BC. However if there is a standard that already exists it should be explored, and adopted if possible. For example ON has adopted ACCT as the standard for challenge courses and climbing walls. I would suggest ensuring that this work has not already been done, or that there might be an existing strong standard. The danger is missing safety situations that are very specific to a device. The ACCT has been inspiration for decades and knows the dangers, inspections, construction, and training much better than could be created in a year or two, let alone months. In addition it is worth noting that our insurance provider required ACCT standards for operation. So creating this standard will not change who regulates, it will just bring in an additional regulator. Even with a new standard we will be forced to meet the standard of ACCT,

We are already regulated by the ACCT, which has decades of experience throughout North America. Since our insurers are satisfied with these standards, why would the government need to step in and duplicate the standards (or do a much less competent job, as they would not come close to the knowledge of the ACCT for many years). I fully support regulations that keep children safe (I direct a charitable children's camp), but I am not in favour of regulation for the sake of regulation (or the cost that goes along with it). We already pay hundreds or thousands of dollars each year to bring in people for inspections.

The fact that your organization hasn't familiarized yourself with the ACCT standards that currently regulate all aspects of challenge course technology including inspection, training, certification, building, maintenance, is a sign that TSBC is NOT the body to govern or regulate this area. ACCT has been an expert in their field for decades.

I am a member of the BC Camps Association. I have been involved in the camping industry for over 25 years. It has been my pleasure to work closely with industry professionals on the design, installation, operation, and maintenance of a number of high ropes courses (challenge courses) and zip lines in a variety of locations. I have also managed climbing walls at camps. The standards for ropes course construction and operation are clear and comprehensive. I have received exceptional training from Adventure Experience and others over the years. I do not feel there are 'gaps'. Please do your research and become acquainted with the ACCT. Camps are very concerned about public safety. We love kids and are committed to their safety and well being. My concern is NOT about being regulated - we are already regulated, and we are pleased to be held accountable to a high standard. My concern is about duplication and additional fees. I would be very interested to learn about statistics surrounding accidents on high ropes / zip lines. I would expect that very few accidents are related to design or equipment failure or to a lack of training. Human error is likely the number one cause. How will the involvement of Technical Safety BC influence this in any way?

As a staff of a camp that is the member of the BCCA (BC Camps Association) and adheres to its standards and the standards of the ACCT what you are requiring is redundant. However, elements outside of summer camp areas (trampoline parks, roller coasters, etc) are outside of my expertise and could very necessarily need regulation.

Concerned that your organization does not what ACCT is - the leader in the field in North America with accepted set of standards that includes inspection, training, certification, building, etc.

TSBC is clearly not familiar with existing standards and regulatory aspects of Challenge course technology, including inspection, training, certification, building, and maintenance. As a result I can only conclude that TSBC is not the body that should be responsible for regulating challenge courses, etc.

The proposed regulations have some significant flaws for the Challenge Course operators. The proposed regulations include areas that are already regulated which will cause duplication and a devaluation of quality for the Challenge Course industry. These proposed changes are a GOOD idea for industries that are currently NOT regulated, such as trampoline parks, Zorb balls, etc. For industries that are ALREADY regulated, this is not a good idea as the existing regulations in the case of challenge courses are much more robust and substantial than the proposed ASTM standards. Presently, ACCT standards regulate challenge courses, these have been adopted by ANSI (American National Standards); ACCT standards are on their 8th ed., they were written by industry experts, and have existed for 25 years. ASTM F2783-17 is a new standard that has not been tried and tested, was cobbled together from a global standard to be adopted as the "Canadian" option. TSBC adds no value to what already exists, when a Zipline needs to be inspected by TSBC, TSBC calls the engineer that the operator ALREADY works with the operator as the builder, to inspect and stamp it. This is a middle man move to add something in to show the public the government is regulating something to create assurance, while the reality is it already carefully monitored by the operator, ACCT and BCCA. Operators carry the liability here, not TSBC, and this is not an area that an operator would willingly cut corners. TSBC has done no research into this area and has made decisions that are not grounded in logic. This move is irresponsible for challenge course operators to endorse. Challenge Courses undergo annual professional vendor inspections, training, maintenance by a professional accredited ACCT vendor. ACCT are climbing specialists and provide excellent training and support to operators within this niche market. TSBC is a much more general safety organization that would not be able to provide the same level of support to operators, this proposed change appears to devalue the quality of training and inspections currently being utilized. Not to mention, this will add undue costs and drain on limited resources for expensive administration for something that is already being very professionally operated. Challenge courses are used for outdoor education, team building and learning, they are not commercial amusement ventures. Again, I support and endorse regulating industries that have NO regulation presently. Challenge courses do not fit in this category.

The proposal appears to duplicate what is already being done through the ACCT standards that apply to challenge courses in North America. Further regulations requiring costly licensing could jeopardize the ability for some organizations to continue providing safe quality experiences.

No need to waste time creating these regulations (zip lines/challenge courses). Just adhere to Association of Challenge Course Technology (ACCT) standards. Highest standard in North America for challenge courses etc. You would either be replicating what they already have in place or creating something worse and more confusing for everyone involved.

As I told Cam and Kate, having everyone on the same page is always a good idea, and education is always a good idea. I would also like to see the education/certification applied to contractors who work on slides.

As summer camp accredited by the BC Camps Association (BCCA), our ropes course is inspected annually by ACCT certified professionals. The ACCT and BCCA are diligent in their regulatory efforts around Ropes Challenge Courses, and it is our thought that this proposal will cause unnecessary duplication of regulation and that camp operators will incur undue costs.

How often Pool maintenance team validate license?

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I attended a TSBC information session and it was clear that the team had not reviewed some of the existing regulatory framework in place (ACCT). That was a bit confusing because they said that they were aware of it, and in the process of reviewing it, but had gotten to this stage in the new plan without having considered the scope and quality of the ACCT standards. Yes, enacting the proposed changes would cause duplication, and increase costs, but the more important question is whether there is evidence that the new system would be safer for the end users than a systems currently following ACCT rules. The TSBC team talked about having reviewed a wealth of existing regulations from different jurisdictions but the current plan did not consider the efficacy of existing framework and I don't believe that their scan can be considered thorough or complete. Lastly, there the grouping of amusement devices are overly broad and include devices of significantly different risk levels. The level of regulation for lower risk devices is likely unnecessary.

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The TSBC does not appear to have done much research into existing standards for ropes challenge courses and zip lines. A Google search for "challenge course standards" or "high ropes course standards" will quickly lead you to the Association for Challenge Course Technology. Since 1994, the ACCT has conducted research and developed standards around the design, construction, training and inspection of challenge courses. The ACCT standards are specific to these type of courses and there is an accreditation process in place for certified builders, vendors and inspectors. Unlike the ASTM standard proposed by TSBC this is an existing and widely accepted international standard. I am concerned that the TSBC is willfully ignoring this standard and the procedures in place among camps and businesses who have been using it voluntarily for decades. I fear that the TSBC is planning to impose a new ASTM standard that will do nothing to improve safety in an already well regulated field and will add unnecessary expense and possibly shut down existing safe operations. In the cases of trampoline parks and other new and novel activities that do not have a rigorous foundation then I do support TSBC developing or adopting appropriate regulations.

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I am very unsupportive of changes that would affect camps in BC that are currently accredited by the BC Camps Association (BCCA). I represent a summer camp accredited by the BCCA. Our challenge course is inspected at least annually by Association for Challenge Course Technology (ACCT) certified professionals. Our current inspector is a professional engineer. Because the ACCT and BCCA are diligent in their regulatory efforts in regards to challenge ropes courses, we believe that this proposal will cause unnecessary duplication of regulation and that camp operators will incur undue costs.

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As an operator of Type 2 devices, these proposals will lead to more bureaucracy and hollow written plans for no improvement in safety for users.

I feel that our facility has been well governed by the ACCT and by the approved PVM's. I am concerned that by adding more regulations that what it will do is add more paperwork and not ultimately affect the bottom line efficticness or experience.

As summer camp accredited by the BC Camps Association (BCCA), our climbing wall is inspected annually by ACCT certified professionals. The ACCT and BCCA are diligent in their regulatory efforts, and it is our thought that this proposal will cause unnecessary duplication of regulation and that camp operators will incur undue costs.

There is currently a high standard of oversight, inspection, training, record keeping and safety oversight for challenge courses and ziplines so the proposed changes are reduntant and additional costs for properties already paying for an ACCT inspection and a Manufacturer's inspection. It is not necessary and the high standards of the ACCT need to be respected and acknowledged. The proposed changes need to have some allowance for properties that have ACCT certified courses that the permit fee and all of the requirements are waived.

I like how facilities and companies need to hold the top safety regulations for there clientele. The idea to have a safety management plan and have it reviewed and refined would be a key area to help improve facilities.

I think its important to ensure regulation of fair types rides but not over regulating.

I am always supportive of changes that will improve public safety, but everything that is proposed is extremely vague at this point and I don't understand what changes will happen and how it will affect my business. I don't see any evidence thus far that safety will be increased. I don't understand why some activities are classified as they are, and other not at all (via ferratas, zorb balls). I would like to understand why the changes are being made and how they will increase safety

I think having rides and courses engineered and designed by professionals is always better and especially safer. I don't see a problem with having government safety standards applied to camps in these areas. The ACCT should have input into those standards which I'm sure the government would want so I'm in favour of the regulatory proposal. You can't fight it so just get ahead of the curve and do what is required. I'm actually surprised when I entered the camping world that there isn't government standards in this area. It's a good and necessary step.

Our summer camp's ropes course is inspected annually by ACCT certified professionals. The ACCT is diligent in its regulatory efforts around Ropes Challenge Courses, and this proposal will cause unnecessary duplication of regulation and camp operators will incur undue costs. Of course, smaller camps like ours will be hit hardest by added costs.

I will be to the point. We already have an excellent (tried and proven) organization doing their job in this area. ACCT is competent and they have been giving leadership within the industry of high ropes courses, wall climbing, and zip-lines for a long time. As to who they are, here is a quote from their website. "ACCT and its members engage in government relations, address regulatory issues, and help develop and promote best practices and standards. We work in collaboration with relevant bodies within ASTM International (formerly the American Society for Testing and Materials) and ANSI (American National Standards Institute) to help create standards for designers/builders, inspectors and operators of challenge courses. We offer certification for individuals who conduct course inspections, and accreditation for vendors who provide design, build, inspection and operational training services that meet or exceed ACCT standards. Starting in 2019, ACCT will offer an industry accreditation for operators to acknowledge their adherence with ANSI/ACCT standards. We also engage in regular outreach to our membership and industry, keeping them abreast of news and developments related to challenge course operations, and offer an annual international conference with more than 100 professional development workshops each year." TSBC is trying to create provincial regulation for the sake of provincial standards, but without knowledge or competence in the industry. I took part on the online discussion during the summer, and I was not impressed for more than one reason. 1. You began the process by saying that you were wanting to hear from camps and other organizations who have knowledge in the industry and that you were not trying to force things on us without our say. This is all polite rhetoric, and while I decided to trust it in the beginning, you have since only raised my doubts. 2. You were asked various times about ACCT and you ignored the questions. When you finally answered the member who decided to move past the text method and opened his mic, you showed that you knew nothing about ACCT, and had not checked into them at all. Very disturbing! 3. I took a long look at your website prior to the online discussion. The website showed extensive work in preparing regulation in four key areas, and also the required actions and annual fees for each area. This was no easy task. But then to hear during the discussion that you didn't even know of ACCT, means that you didn't do your homework? Can that really be true? And if you really care about organizations doing due diligence according to well set industry standards, which I can prove we do to any court, then why wouldn't you show more interest to camps who already have this information? 4. Were you aware that camps are deep in the thick of work during the summer, and many camps would not be able to give that time during the time you decided would be best for this online discussion? What it looks like, is that TSBC doesn't want to take the lead from those with competency, but wants to set their own, so that you then have the power to charge accordingly. Our current annual budget for inspections and other regulatory concerns for the operation of our climbing wall and zipline is about \$2000. This includes the transportation and hotel and car rentals required to bring someone from south BC to our location once a year. The fees to be collected by TSBC will at least triple this amount. We are not in this for the money. We are not open to public use of our zipline, in the sense of stop, pay, and participate. Rather our line and wall are used by registrants in our weekly or weekend programs. We are non-profit. Your approach might work for businesses that are in this industry for the means of financial gain. Some of these may try to get around regulation... so as to save finance. We want basic inflatables should only have to be inspected hazards such rips or tears or entanglement points. basic inflatables shouldn't have to be subject to audits, safety mgt plans, or assessments

Regulating Trampoline Parks is essential because they give gymnastics and trampoline programs that follow proper training and safety training a bad reputation

Current Risk level listed as Low for inflatables E.g., Inflatable devices, such as bouncy castles, and obstacle courses. Inflatables located on water should be listed a high to medium. Size, location, water depth, distance from shore, pool walls, ages and ability of guests as and features s such as slides climbing structures and trampolines.

Though I agree with things like the safety plan, for Regulated Devices I don't think there should have to be a designated individual on the contractor license.

More clarity/ stronger definition between aquatics and dryland. For example, we have two WIBITs they go in the water. Would they be affected by this or is this policy only speaking to things that are attached to hard ground?

Not sure what the effect would be on a indoor waterslide.

I think you need to do as much as possible to bring a consistent specific regulations to amusement rides.

I find Technical Safety unreasonable and hard to reach or contact.

I support the Safety management plan. This is appears to be similar to a pool safety plan that is required to operate a pool.

I have been heavily involved in the industry in Ontario and the US and welcome better practices as well as Canada wide improvements in safety.

Over reach by BC. Our courses are already inspected by the licensed engineer who designed our courses and we already have an approved ACCT PVM inspect our challenge courses annual. We also do formal day, weekly and monthly inspections. This proposed regulation just adds another duplication of work and expense and provides no additional safety.

I have been in the industry for 30 years. I have operate in several provinces and have seen where things have not run smoothly. The biggest issue in other regions when launching is in regards to the process of engineer drawing for infaltable bouncers already in use and obtaining new drawing. This became a huge drain on small business both in time and financially. I sincerely hope that in B.C. this is done as a partnership with operators. Our company fully supports the need to increase safetv in the industrv

Offer assistance with requirements for compliance based on new code and standards.

Must provide reasonable lead-time for operators to obtain new Certifications and to develop Safety Plans and Maintenance records according to new standards. As an established regulated amusement facility, we are concerned that costs of new regulation will be significant and would be passed on to operators. This is difficult to accept for operators like ourselves who have already attained a high compliance record and low incident frequency.

1. The safety representative should be able to train out other staff to inspect and open the slide. 2. with the move away from physical assessments, we would prefer if we were able to continue to get inspections following significant plumbing or mechanical work