

January 13, 2021

The Honourable Omar Alghabra
Minister of Transport of Canada
<mailto:omar.alghabra@parl.gc.ca>

Subject: Modernization of the Pleasure Craft Operator Competency Program

Dear Minister Alghabra:

I am writing to you today on behalf of my Board of Directors and over 1300 lodges, resorts and outpost camps in Ontario regarding the proposed changes to the Pleasure Craft Operator Competency Program. Specifically, we are opposed to the abandonment of the Rental Boat Safety Checklist (RBSC) as an accepted form of proof of competency to operate a pleasure craft.

Prior to the pandemic Northern Ontario's outdoor tourism sector had an annual economic impact of \$1.6 billion and directly employed 24,000 people. There is no reason to believe that our sector cannot rebound and be a key player in restoring economic prosperity to the regions in which our members operate. We need to be mindful that the forward will be long and winding and we do not need added barriers as we welcome our international guests back into Canada.

Along with our colleagues in the other Provinces through our affiliation with the Canadian Federation of Outfitter Associations (CFOA), we appeal to you to continue with the RBSC for guests at our hunting and fishing destinations.

Boating safety is at the forefront of our operations. Our businesses in the outdoor tourism sector are focused on providing their guests with safe vacations and have a range of tools in their toolkit to help them with those efforts. With regard to boating safety in particular, they have the guide prepared by the CFOA in 2017 entitled *Outfitters and Navigation Regulations*. It covers all applicable regulations for both pleasure craft and commercial navigation, both of which are present in our businesses. Issues such as proof of competency, the role of the lessor, the dangers of cold-water immersion, restrictions on operator age and engine power, and safety requirements are also covered. They also have workshops and sessions at our Northern Ontario Tourism Summit with support from your regional Ministry staff and they have the Rental Boat Safety Checklist.

In 2018-2019, our organization actively participated in Transport Canada's project to promote best practices in the area of boat rentals. This initiative, funded by the *Search and Rescue New Initiatives Fund*, led to the development of a clearer checklist for boat lessors and renters as well as the production of written and video materials for boat lessors and their staff. Our commitment to boating safety and that of our tourism operators in Ontario is obvious in our ongoing participation and use of tools like the RBSC.

As you will see in the attached document, a recent survey of Canadian outfitters demonstrates unequivocally the negative impact of abandoning the checklist as proof of competency. The pandemic has greatly weakened our industry across the country and the elimination of the checklist is likely to further hinder the desired recovery of our businesses by creating additional barriers that our guests from the US will need to overcome for their vacation.

Navigation in waters that are heavily used by commercial shipping, such as the port waters of Vancouver, Toronto or Halifax, undoubtedly requires a particular approach in terms of security. However, almost all of the tourist operators' boats are used in inland lakes and rivers where commercial navigation is absent and recreational boating is very low density.

At our tourism operator locations, the Pleasure Craft Operator Card (PCOC) is of relative use. The absence of buoys, interaction with other boats, and the intimate knowledge of the water body by the tourist operator renting out their client boats make the checklist a tool that surpasses the PCOC in many ways.

Prior to the pandemic, the majority of guests to our tourism operations were non-residents that only participate in angling in Canada once a year or once in several years. With the continuing closure of the border and the push to attract the domestic market, we are now seeing an increase in domestic guests that are experiencing boating for the first time on our waterways. These two groups of guests are ones that we want to ensure have the practical one-on-one training that they need to have a safe angling experience. Adding the requirement of the PCOC will no doubt be a deterrent to anyone who wishes to visit Canada for the experiences our outfitters provide.

We would argue that abandoning the opportunity that this dockside checklist offers to a business owner as well as a guest cannot be replaced by requiring the PCOC be obtained through an online course. We therefore ask that the proposal to remove the checklist as accepted proof of competency to operate a pleasure craft be abandoned.

Thank you for your consideration of this matter. We are open to discuss our concerns with your Ministry staff if more information is required.

Respectfully,

Laurie Marcil
Executive Director