



PO Box 742
Rossland BC V0G 1Y0
Canada

Phone/fax: (250) 362-2271
www.bigredcats.com

Worksafe BC

Workers Compensation Board of BC
Prevention Policy & Regulation Review Department
Policy and Research Division
P.O. Box 5350 Station Terminal
Vancouver BC V6B 5L5
By Email: Regquery@worksafebc.com
By Fax: 604-279-7599

4th June 2008

Subject: Amendments to regulations relating to Avalanches refer Part 1, Definitions; and Part 4, General Conditions, relating to Avalanches

Dear Sir/Madam,

We feel strongly that the wording in the definitions section (in the above draft regulations) of "Qualified Avalanche Planner" does not currently work for the following reasons:

- 1) The Canada Ski Guide Association ("CSGA") is not mentioned. If the Association of Canadian Mountain Guides ("ACMG") is mentioned then the Canadian Ski Guide Association ("CSGA") should also be mentioned. There are currently about 140-170 CSGA guides currently working in Cat skiing and Heli-skiing in BC. In almost every Cat skiing and Heli ski operation in BC there are CSGA guides currently working. The CSGA is recognized by insurers, by government, by its clients, and by international safety organizations like ICAR.
- 2) The wording of the definition of Qualified Avalanche Planner implies that you have to be a Professional Member of the Canadian Avalanche Association ("CAA") And a certified guide, and a Member of the ACMG. From my discussions with George Matherson (Worksafe BC) he indicated that this was not the intention of the proposed regulations - that it should read that in order to be a Qualified Avalanche Planner that you had to be a Professional Member of the CAA, or a certified guide and a member of the ACMG.
- 3) I would therefore propose the following amendments to the Draft wording of the definition of Qualified Avalanche Planner. I have underlined the proposed amendments in the paragraph

below. Essentially it entails adding 10 more words to the existing proposed definition of "Qualified Avalanche Planner":

Qualified Avalanche Planner

means a person with at least the minimum training and experience qualifications to be a planner for active avalanche safety programs as specified by the Canadian Avalanche Association and who is

(a) a professional member of the Canadian Avalanche Association, or

(b) a certified guide and a member of the Association of Canadian or Mountain Guides or a member of the Canadian Ski Guide Association,

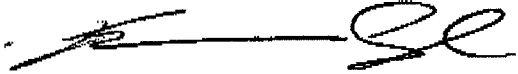
or

(c) a qualified registered professional;

4) Finally we would also submit that there should be a reasonable grace time for these new regulations to be implemented. My understanding is that the CAA has to design and implement a new course for potential Qualified Avalanche Planners to take. This will take time it will also take industry operators like Big Red Cats time to implement these regulations. We therefore suggest that the regulations should not take full effect until April 2009.

Please review these proposed adjustments carefully. Please do not hesitate to call us if you have any questions

Sincerely,



Kieren Gaul
President
Big Red Cats
1 250 362 2271
ski@bigredcats.com

-----Original Message-----

From: WorkSafeBC [<mailto:prevweb@worksafebc.com>]

Sent: Wednesday, June 04, 2008 7:41 PM

To: ski@bigredcats.com

Subject: SPAM: Your submission has been received - #080320

Your submission has been received.

Submission ID: P0B.Y96.0Q2.PQW

Part 1: Definitions and Part 4: General Conditions, relating to avalanches

1. Name: Kieren Gaul

- (a) Feedback is provided: on behalf of
Organization: Big Red Cats - Catskiing operation
- (b) Feedback is provided: from a worker's perspective

2. E-mail: ski@bigredcats.com

3. Feedback:

Section #:4.1.2 refer definition of Qualified Avalanche Planner

Comments:

This definition does not work.

1) wording is not clear - the way that it reads says that you must be a Professional member of the CAA and a certified guide and a member of the Association of Canadian Mountain Guides. My understanding was that talking to George Matherson was that the intention is that instead of reading and it should be read with an "or" That that you can be either a CAA professional Member or a certified guide and a member of the ACMG.

2) The wording fails to mention the Canadian Ski guide certification. at least 1/3rd of the ski guides employed in Canada are certified through the Canada Ski guide Association (CSGA) Insurancers, Government, and internation organisations like ICAR all recognise this certification. If the ACMG (association of Canadian Mountain Guides) is recognised then so should the CSGA.

4. Please indicate your level of support of the proposed amendments:generally disagree

5. If you agree or disagree with the proposed amendments, please provide reason(s):

Section #: 4.1.2

Comments: Only disagree with the wording of the definition of Qualified Avalanche planner.

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