

BC Camps Association

Overview

Summer camps in British Columbia care deeply about public safety. The British Columbia Camps Association (BCCA) was formed in 1993 and an accreditation program focused on a range of safety standards was launched soon thereafter. We welcome the opportunity to engage with Technical Safety BC on its proposed regulations for amusement devices and support their initiative to provide oversight to those ropes challenge courses at non-accredited camps and other venues currently operating without adherence and validation of that adherence to the ACCT standards.

A ropes challenge course provides participants with a series of purposefully installed elements built of trees, poles, wood, rope, cable and other materials that require participants to apply physical effort and skill to climb up, over, or across them. The term “ropes course” is derived from the historic use of ropes as the primary building material while the newer term “challenge course” focuses on the opportunity these structures provide for participants to challenge themselves (Speelman et al., 2021). Ropes challenge courses differ from other outdoor recreation activities in that they are constructed facilities – you simply do not stumble across a ropes challenge course in nature. In addition, ropes challenge courses are supervised settings – there is no way to participate without monitoring by trained personnel. Since the 2010s, canopy/zip line tours and aerial adventure parks (sometimes collectively referred to as tree top adventure courses) have become more available to the public as a pay-for-play experience and have caught the attention of regulators.

The Association for Challenge Course Technology (ACCT) is the international trade and standards writing body for the challenge course industry. ACCT grew out of a series of symposia held by challenge course builders and was formally incorporated in 1993. The first standards were published in 1994. ACCT is an American National Standards Institute (ANSI) standards developer and recently published ANSI/ACCT 03-2019 – its 10th edition. There are three chapters designed to work together: Design, Performance, and Inspection Standards; Operation Standards; and Training Standards. ACCT also has an Inspector Certification program.

In 2019 Technical Safety BC considered the province’s current amusement device regulation, its system of oversight, and what criteria should be applied to new, upcoming, and potential amusement rides and devices. Ropes challenge courses were identified as devices to be regulated. Ropes challenge courses, however, are neither new nor novel to summer camps in BC. The earliest record of a ropes challenge course at a BC summer camp is in 1970 (Nyman, 2019). Challenge course standards have been part of the BCCA accreditation standards since 2000 and have referred to the Association for Challenge Course Technology (ACCT) standards since 2011. We wish for this system based on ACCT standards to continue.

Clearer Definitions

In its materials on proposed regulations, TSBC has indicated that it wants to reduce the confusion regarding what is and is not an amusement device. It proposes that the term “amusement device” mean an arrangement of technical systems that produces the desired effect of amusement or entertainment when the patron moves through it or on it primarily by their own action, or any other system that is not an amusement ride.

There are several problems with this definition. First, it is inconsistent with ASTM F747 – the standard that TSBC proposes adopting which views the terms amusement ride and amusement device as synonymous. Second, it is inconsistent with Elevating Devices Safety Reg. [am. B.C. 475/2004, Sch. 2, s. 6] which specifically exempts amusement rides driven by muscular power. This exemption of manual systems is widespread across Canada including in Ontario which has already adopted ASTM in its code (Amusement Devices Code Adoption Document - Amendment 535-18). Third, the definition is overly broad and could reasonably be applied to many outdoor

recreation activities offered at camps including and not limited to mountain biking, horseback riding, and paddle sports such as canoeing, kayaking, stand up paddle boarding, etc. We strongly recommend rewriting this definition so that it more clearly includes trampolines and bungee jumping which depend on the transfer of energy generated by recoil (and which enhance muscular power) and climbing activities that are entirely muscle powered.

The materials on the proposed regulations provide for a number of exemptions. These exemptions seem contradictory with regard to ropes challenge courses. High ropes challenge courses at BC summer camps tend to operate under one of two operating systems. An operating system is the interface between user and structure that establishes how participants are protected if they lose balance (Speelman et al., 2021). In a belay system, a person or team of people other than the climber manage the tension in a life safety rope so that it may be taken in, let out and secured in order to protect the climber. This is the same system used at indoor climbing gyms yet these facilities are proposed to be exempt. This is confusing since camps have both climbing walls and challenge courses which typically use the same equipment and employ staff with the same training to run their programs. In a lanyard-based system, the participant manages a set of lanyards so that their potential free-fall distance is limited and they are able to regain their footing and body position after a fall. A lanyard-based system is also used by via ferrata – mountaineering routes that make use of artificial handholds and footholds and cables to guide a participant along the track yet via ferrata are also proposed to be exempt. We urge that ropes challenge courses that use these same operating systems be offered the same exemptions as climbing walls and via ferrata.

Ropes challenge courses may function under one of three delivery modes: facilitated; guided; and self-guided. In the facilitated model used by almost all camps, participants engage in an adventure-based learning experience designed to lead toward specific outcomes such as teamwork and improved communication. Trained staff are responsible for safety and the group’s learning process (ANSI/ACCT 03 – 2019). These traditional challenge course programs meet the proposed exemption for “professional or sports training with oversight by training or coaching staff and appropriate safety precautions” and should be allowed to continue under the current BCCA accreditation system. We support bringing guided and self-guided ropes challenge courses under greater scrutiny as well as camps not accredited by the BCCA.

Code Update

Technical Safety BC is proposing that CSA Z267 which is no longer being updated be replaced with ASTM F2783-17. ASTM F2783-17 includes ASTM F2959 which was first published in 2012 and was a collaborative effort between ASTM International and ACCT to address ropes challenge courses specifically intended for concession, commercial recreation or amusement purposes (*ASTM International collaborates*, 2012). More recently, ASTM F2959 created a harmonization task group to review both ACCT and ASTM standards and identify gaps, with the goal of listing differences and making revisions in an effort to harmonize (Kahl, 2018). We ask that in accordance with the Safety Standards Act, ANSI/ACCT 03-2019 Standards be accepted as providing an equivalent safety approach for ropes challenge courses.

Proposed regulatory framework - Categories of Rides and Devices

Technical Safety BC’s proposed new regulatory approach would establish categories of rides and devices. We support this approach as different ropes challenge course elements have different hazard profiles. We would like this classification system to differentiate between manual systems that only employ muscle power to generate motion and mechanical systems such as zip lines where motion occurs without continuous muscle power. Additionally, we suggest that gravity brake zip lines which bring riders to a stop by using the drape in the cable to decelerate riders on the uphill portion and having them continue to roll backward and forward until they come to an ultimate stop somewhere in the belly of the cable be categorized separately from zip lines that use any other type of brake. This would reflect the different hazard profile associated with gravity brake zip lines operated by trained staff as part of camp programs.

Certificate of Qualification

Technical Safety BC is proposing that all operators of amusement rides and devices have a certified Qualified Individual who after a physical inspection, declare that the applicable amusement rides and devices are compliant with the Act, regulations, and code. We propose that TSBC recognize ACCT certified inspectors under contract with the BCCA accredited camp as fulfilling this role.

Additionally, we suggest that TSBC allow ACCT certified inspectors to act as Field Safety Representatives (FSR) similar to a system which is in place for electrical work in the province. ACCT certified ropes challenge course inspectors would be able to sign off on acceptance and annual inspections. TSCB would provide 'audit' oversight to ensure that the inspectors and camp operators are adhering to regulations and standards.

Safety Management Plan

The ropes challenge courses found at BC summer camps consist almost entirely of manual rather than automated systems. The use of humans to perform tasks that might otherwise be performed by a machine requires a different approach to training. We recommend an ACCT training affidavit be added to the requirement for continued BCCA accreditation visits.

Design Registration

The existence of BCCA accreditation and its adoption of ACCT standards mean that summer camps complying with these requirements have already undergone a design review. In addition, the age of most ropes challenge course at summer camps means that they also already meet the ASTM definition of service-proven -- an amusement ride or device that has been in service to the public for a minimum of five years and has done so without any significant design related failures or significant design related safety issues that have not been mitigated (ASTM F747-15). This could easily be verified by TSBC by asking for the accreditation history of the camp or the previous five years of professional inspection reports to ACCT standards. We recommend that existing ropes challenge courses that are not BCCA accredited and do not have a five year history of professional inspections to ACCT standards be subject to the proposed design review process prior to re-opening. Engineering review should be required for new elements that use mechanical systems including zip lines and Giant Swings.

Fees

Summer camps in BC consist predominantly of mission-driven non-profits where the ropes challenge course experience is bundled with other services including and not limited to meal service and accommodation as well as other outdoor recreation activities. The fees being proposed are not recoverable by increased throughput – the camp is “full” when its cabins are full and it is rarely feasible to add a camper on day 3 of a week-long camp session. As a consequence, we urge the TSBC to consider a fee structure comparable to other camp regulatory fees such as dining hall and water system. These annual operating permits tend to cost in the neighbourhood of \$250.

We also urge the TSBC to consider a ropes challenge course at a camp as a single 'device' regardless of the number of elements it includes. Additionally, the fee structure should be the same regardless of whether elements are clustered in a single cluster or consist of several standalone structures.

Timing

The timing of the provincial state of emergency created by COVID-19 has affected summer camps at a crucial part of their year – immediately ahead of their primary operating season. At this time, it is unknown whether camps will be able to operate this summer and what the consequences of a shortened, modified, or absent camp season may be for camps' abilities and resources to comply with new regulations affecting just one aspect of their operation. We ask for these regulations to not be rolled out to camps until at least 2023.

Conclusion

Ropes challenge courses at BC camps have a long history of providing unique experiences with strong connections to the broader field of outdoor recreation. The manual systems used in these facilities are different from those used in most other amusement rides and devices. We are encouraged by many aspects of TSBC's proposed regulation changes and voice our support for regulations that enable ropes challenge course operators to provide an equivalent level of public safety based on ACCT standards.

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