



Response to the Recreation Stewardship Panel's report:

A New Management and Funding Model for Fish, Wildlife and Park Recreation

October 15, 2002

from

WILDERNESS TOURISM ASSOCIATION OF BRITISH COLUMBIA

What is the Wilderness Tourism Association of British Columbia?

The Wilderness Tourism Association of British Columbia (WTA) exists to ensure the ongoing viability of our industry through the protection of the nature-based tourism industry's water and land base. The WTA speaks on behalf of 2,000 nature tourism businesses and operators from the following sectors:

1. Adventure Travel: Businesses that use natural settings primarily for recreational purposes. They provide quality, experiential outdoor recreation products for their clients. These products include white water rafting, heli-skiing, kayaking, and backcountry trail riding, etc.
2. Consumptive Recreation: Businesses that include hunting and fishing. Hunting and fishing guides were the first wilderness tourism operators in BC. For decades they have not only taken their guests to the backcountry but have demonstrated a strong conservation and stewardship ethic to ensure that the resources upon which they depend would be sustainable. They continue to contribute to wildlife management and habitat protection and provide many additional wilderness experiences in addition to consumptive recreation.
3. Eco-tourism: Businesses that have a fundamental concern about showing visitors environmentally and culturally important tourism experiences and contributing to the conservation of those resources as part of the experience. These include eco-lodges, wildlife viewing such as grizzly bear and whale watching, and cultural experiences.

British Columbia's spectacular parks with their abundant fish and wildlife resources, along with our Crown Land recreational assets and the province's overall environmental quality, provide the essential 'competitive edge' that allows a variety of BC nature-based businesses to compete well in the global tourism market place. The fundamental growth and prosperity of our businesses depends to a large extent on this 'product'. It is the 'Super' in SuperNatural BC. Any cutbacks in Crown Land recreational opportunities, erosion of parks, fish and wildlife habitat, or loss of conservation values would have a profound and negative impact on our operations as well as on our ability to generate revenue, taxes, and other economic benefits, to the government and citizens of British Columbia.

Why listen to WTA?

Wilderness tourism is the fastest growing segment of BC's \$10 billion tourism industry. In 2002, BC's wilderness tourism sector generated approximately \$2 billion in direct revenues and supported 15,000 full-time jobs¹. This sector is growing by 11% annually². However, world wide nature-based tourism is growing by 20-30%³. This means that as important as BC's nature-based tourism is to the provincial economy, it could grow faster and be of even greater benefit. We could double the revenues of this sector within 10 years, as requested by the Premier, but only if we retain the quality of our land and water resource base and especially their recreational and conservation values. Clearly, the WTA and the Ministry of Water, Land and Air Protection need to work effectively together in order to increase our revenue contributions to the government of British Columbia and ensure our business product – BC's quality nature experience.

Given this, we are pleased to present our responses to the Recreation Stewardship Panel's Draft Recommendations and urge you to consider them seriously.

We are concerned about vague wording and data in the Panel's Report:

As a general preface to our response to the Panel, we have concerns about the vagueness of some of the wording and the incompleteness of the Draft Report Recommendations, which could leave them open to broad interpretation with uncertain implications to BC's parks, fish and wildlife, and our tourism industry.

An example of vague wording can be found in Recommendation 25 that states:

"The panel supports the implementation of a recreation pass for the non-consumptive personal use of Crown land for recreational purposes. ...If a Park Access Pass is implemented, it should be blended with this broader outdoor recreation pass."

This could be construed to mean that a person in rural British Columbia could not take a walk in the woods and most aboriginal people could not walk on band lands without a pass. This wording could be seen as offensive and may undermine fundamental personal rights. This is surely not what the Panel is recommending and is an example of how the meaning of these recommendations needs to be clarified.

As well, the economic data provided to date is very general and does not adequately identify the economic benefits that our parks and fish and wildlife resources are already contributing to the BC economy. The comparison of Ministry expenditures on the provision of recreation services should be compared with total economic benefit to the Province by all associated spending by users of these recreation services. For example, each year about \$148 million is spent in provincial parks by visitors outside of British Columbia and parks bring in \$170 million in tax revenue – five times the annual budget allocated to parks. However these numbers are not cited in the Panel's report.

Given such an economic impact, it should be pointed out at the outset that government is already likely not investing sufficient core budget to sustain this benefit. Because BC's parks are the drawing card for many of our tourism visitors and are an essential aspect of our tourism 'brand', a more complete accounting of revenues and expenses should be considered.

¹ Tourism BC

² B.C. Statistics: Tourism BC

³ World Tourism Organization

Therefore, while we recognize that this is a draft report intended for public consultation, we recommend that the Panel become more specific in its wording and more comprehensive and precise in dealing with economic data in its final report.

WHAT DOES THE WTA SUPPORT?

We support many aspects of the report. Indeed, we provide our support to the overall report only on the condition that the following recommendations remain.

Conservation and the maintenance and restoration of biodiversity are imperative.⁴

The WTA's mission statement and Code of Conduct underscores being stewards of the environment and supporting sound conservation.⁵ We therefore agree with this emphasis throughout the Panel's recommendations. It is critical that conservation is the first priority in the management of our parks, and fish and wildlife resources.

The report states *British Columbia's fish, wildlife and park resources are without equal in the world... [They] are deeply valued by British Columbia residents and a drawing card for visitors from around the world⁶*. We agree. Retaining the integrity of the wilderness is crucial to the well being of our businesses. We market BC's high environmental qualities to the world. We operate within and around the parks system and our businesses rely on sustainable fish and wildlife populations. Conservation is essential in ensuring the long-term viability of BC's overall \$10 billion tourism industry. It is important to note that our parks and natural recreational areas are also a major reason why many British Columbians spend their vacation dollars at home, exploring their own province. This benefits both our sector and BC's economy as a whole.

The activities of other users – forest management, mining, etc. – also play a role in our ability to act as stewards of our recreation resources. Stewardship issues cannot be adequately addressed without addressing the activities of other users.

Although only a percentage of nature tourists go into the backcountry, they come to BC because of the backcountry's reputation. These are the SuperNatural qualities – especially as protected in its parks – that are the marketing 'hook' that allows our wilderness tourism industry to attract and hold our market share in the world's largest industry – tourism. For example, backpacking on the West Coast Trail (WCT) is limited to 300 participants per year in order to minimize impact on the land. However as an 'attractor', the world-renowned WCT is worth far more to British Columbia than just economic returns to the operators there, and a small amount of tax to government. Clearly, the pristine nature of our backcountry parks and fish and wildlife populations must be maintained as they are fundamental to our ability to market and compete in the world marketplace.

To increase BC's tourism revenues we must take a value-added approach by providing a higher value product, rather than simply increasing the number of visitors, which can lead to reduced product quality.

Parks' conservation and fish and wildlife stewardship ensure the integrity of our product and how we are viewed in the marketplace. Sustainability is crucial for our continued success. We must provide a higher value product, rather than simply increasing the number of visitors that can lead

⁴ Draft Recommendations. Recreation Stewardship Panel. September 15, 2002. Working Principle 1.

⁵ Code of Conduct. Wilderness Tourism Association of British Columbia. May 23, 2002

⁶ Ibid. page 1.

to reduced product quality. We believe that with careful planning and an emphasis on conservation, government will be able to care for the wilderness while also generating revenues.

Leadership, coordination and planning are crucial.⁷

The Minister's responsibility over parks and fish and wildlife management must be maintained⁸. We do not support delegation to a crown corporation or special operating agency because that would remove electoral accountability and would put our industry at the whim of an arm's length corporation. We represent an extensive industry that depends on this resource remaining in public ownership and it is essential that it remain that way.

The WTA strongly supports having three distinct sub-agencies within the Ministry of Water, Land Air and Parks: parks, fish and wildlife, and outdoor recreation⁹. The parks agency is of special concern because our clientele value the environmental integrity of parks, and they will not travel to BC if they believe we are abusing the land and wildlife. We want therefore to make sure parks are managed as a stand-alone item. As well, linking fish and wildlife in one distinct sub-agency of the Ministry will result in better management of these resources. Finally, we believe that outdoor recreation management should be integrated across government and possibly consolidated into one sub-agency.

To this end, the WTA strongly favours the development of a comprehensive outdoor recreation strategy¹⁰ that includes other users of the land base. Currently there is a lack of coordination and initiatives are far too dispersed. Government has traditionally organized itself around recreation (commercial and non-commercial) without considering the other users of the land base, and this has resulted in many inefficiencies, inconsistencies, and conflicting management objectives. Parks, WLAP, Forests, LWBC and now MSRM are all involved. The planning of these areas cannot continue to be done in an isolated, piece-meal fashion.

Planning should include all recreation issues across the province's Crown Land base including: MoF recreation sites, trails and roads and LWBC's work defining 'carrying capacities'. On this latter item, we urge government to develop consistent standards in both WALP and LWBC for tourism operations both within and outside of parks, e.g. how tenure is determined, length of tenure, determining carrying capacity, etc.

The Parks Act, other legal agreements, funding and responsibilities should be retained and enhanced.¹¹

We strongly believe that the existing Parks Act should be maintained.¹². The perceived integrity of the Parks system is key in the minds of our clientele. The calibre and security of BC's park system must satisfy the expectations of our clientele from Europe, the U.S. or Canada, that we meet world park management standards, as this is the marketplace within which WTA operators compete.

⁷ Ibid Working Principles 5, 6 and 7.

⁸ Ibid Recommendations 2 and 28.

⁹ Ibid Recommendation 5.

¹⁰ Ibid Recommendation 17.

¹¹ Ibid. Recommendation 16.

¹² Ibid. Recommendation 16.

As far as other legislation being considered by the Panel related to our interests, the WTA believes that:

- To ensure certainty of our wilderness product, the integrity of guided tourism tenures must be maintained to ensure the quality of the resource. All tourism and fish and wildlife tenures must be given better security to encourage investment and the increased development and expansion of world class tourism products. Insecurity and uncertainty about tenure status currently restrain growth of our quality nature-based products.
- The Recreation Panel should also consider Land and Water BC's and the Ministry of Forestry's recreation-related legislation, policies and regulations to identify ways of achieving a more coordinated government-wide approach to recreation management on Crown Lands outside of Provincial Parks. This coordinated approach must recognize that both public and commercial recreation are key components of the Province's nature-based tourism industry, which provides a real economic benefit to local economies, especially rural areas of BC, while funneling many diverse user fee and taxation revenues to the government.

It is critical that government provides adequate conservation funding in the Ministry's core budget.

Advisory groups and consultation mechanisms must include representatives of the nature-based tourism industry and its sectoral associations. They must report directly to the Minister, be mandatory and have strong advisory/consultation powers.¹³

We support Advisory Groups so long as our industry is directly and meaningfully involved. A representative of the WTA or at least one of its affiliate associations must be a member of all advisory panels. Advice to the government made by these bodies impacts directly on our businesses, our ability to attract people from all over the world to BC, and our ability to contribute effectively to BC's economy. Therefore, BC's wilderness tourism operators must have a strong voice in determining how the lands and resources upon which they depend are planned and managed.

For too long the Province has taken the nature-based tourism industry for granted. With no land management input, and no dedicated Ministry to look after tourism interests, tourism operators have had to fight for survival despite policy that is directed solely to the support of the traditional resource industries of logging, mining, and commercial fishing. The tourism industry is just as much a resource-based industry as these troubled sectors, and its growth cannot be taken for granted. We need pristine land and resources with which to host our visitors and to portray the correct global marketing image.

The WTA supports the participation of native groups and their designates in these advisory bodies. Our industry already works closely with numerous First Nations and appreciates their constitutional significance as well as their strong contribution and unique needs.¹⁴

Advisory groups must be supported by adequate staff and financial resources.¹⁵

¹³ Ibid Recommendations 7 and 9.

¹⁴ Ibid Recommendations 3 and 4.

¹⁵ Ibid Recommendation 10.

We strongly urge the retention of Forest Service sites and their overall management by the provincial government.¹⁶ As well, forest roads and trails required by our industry must remain open and suitably maintained.

We strongly support, and in fact require, the continued availability of Ministry of Forests recreation sites, trails and roads for our businesses. We insist that government maintain this responsibility. Ideally we would like these governmental responsibilities coordinated with the management of fish, wildlife and parks and perhaps linked into one agency. Closing these campsites, trails and roads would have a catastrophic impact on our industry and would be counterproductive for government.

In the short term, we are intent on securing our industry and the revenues that it can generate. We are concerned that the Ministry of Forests is talking currently about long-term contracts that might result in the off-loading, downgrading, or closure of Ministry of Forests campsites, roads or trails. We urge government to insist that the Ministry of Forests hold off on their leasing of these systems and renew their commitment to maintain the lands, trails and roads until this Panel has reported its findings and the Ministers of WALP, Forests and SRM have jointly had the opportunity to review the findings and formulate a comprehensive recreation strategy.

The WTA believes that it is economically wise to keep the Ministry of Forest lands, trails and roads open because:¹⁷

- Recreation Site use in BC continues to increase and today these sites receive about 5 million visits a year;
- The government's investment in these sites is small. Ministry of Forests spends less than 1 per cent of its budget managing recreation sites and employs just 45 people who work directly in recreation management (Note: This number will dwindle to less than 10 in the next year if the government's current plans are implemented.);
- Prior to the announcement of cuts, the BCFS Recreation Program was working towards a cost recovery basis and in three years has already generated \$600,000 through campsite levies with an average of 65-70 per cent compliance. This was steadily increasing as people got used to the 'user-pay' system. We believe that with government desire, and tourism industry/public collaboration, the MoF Recreation Site system could not only be financially self-sufficient, but could in fact be a profit centre for government;
- By comparison, the US Forest Service's tourism/recreation program, which operates throughout the National Forest land base – a land base equivalent to that under BC's Ministry of Forests' jurisdiction – employs 22,500 people and creates an economic impact on the US gross domestic product of \$130 billion¹⁸.

Our businesses:

- often provide food and accommodation for guests who utilize the Ministry of Forestry lands,
- use Ministry of Forests' roads to get their clients to the places where they hunt, fish, raft, kayak, etc.,
- use the roads to access their base camps, lodges, and properties, and
- use the trails and marine trails as part of the product they offer their clients.

¹⁶ Ibid General Principle 10. Recommendation 21.

¹⁷ A Response to the Elimination of the British Columbia Forest Service Recreation Program. The Community of Golden, British Columbia. June 2002

¹⁸ US National Forest Service

As well, we are concerned that if the Campsites are not suitably maintained (with clean toilets and proper garbage removal), health hazards could result. We believe that failure to maintain the calibre of MoF Campsites management or road and trail access means that our world-renowned wilderness tourism product will be jeopardized.

In a similar vein, the continued funding of the stocking of key fish lakes in regions such as the Cariboo is important for the well being of our industry.

Nature education is a fundamental role of government.

We believe that nature education is a cornerstone of conservation, and that government plays a fundamental role in its delivery. We also believe that our WTA businesses can play a key role in contributing to nature education and interpretation programs.

Our members also have a long-standing role as stewards of protected and non-protected lands. For example, our Code of Conduct requires that our members hire and train highly qualified guides.¹⁹ We recommend that the Province likewise develops high quality training programs for individuals working in the nature education field.

Many wilderness tourism operators will bear some of the costs associated with nature interpretation and education if they can see a direct benefit, e.g., when tour buses take advantage of an interpretive program in a park, or where a fish and wildlife related business would gain by having an interpretive aspect offered by the parks, fish or wildlife agency to its clients.

We support certain Innovative Funding Approaches.

As for funding mechanisms beyond government-imposed user fees, there are examples where wilderness tourism operators offer their guests the opportunity to voluntarily contribute to a conservation fund (e.g. Grand Canyon Trust). Such a concept can generate significant contributions so long as the monies go into a separate, dedicated fund and are used to finance publicly valued conservation activities in the geographical area where they are collected.

We also see the value of a voluntary check off on tax returns.²⁰ The State of Colorado has used this approach successfully for years to fund conservation and wildlife management.

WHAT AREAS ARE OF SIGNIFICANT CONCERN TO WTA?

WTA members would be willing to consider new user fees, but only if specific criteria are met.²¹

In general the nature-based industry must be part of any user fee decision-making process when it is directly affected. Our operators cannot survive if the fees are too high for the marketplace, or if applied in an unfair, inefficient or unnecessary fashion. To do so would result in an overall revenue loss to us, and a tax loss to government. However we believe, for example, that a slight increase in provincial camping fees might contribute significantly to provincial revenues without adversely affecting campground operators. This could enable Park Facility Operators to keep their operations viable and make necessary improvements.

¹⁹ Code of Conduct. Wilderness Tourism Association of British Columbia. May 23, 2002.

²⁰ Ibid Recommendation 23.

²¹ Ibid Working Principle 12. Recommendations 15, 22, 29, 30 and 31.

Our businesses may be willing to consider new user fees if the following criteria are met:

- Any user fees that affect our industry must be associated with a clear and demonstrable benefit to our operators and members (e.g. the provision of required or valued conservation/recreation services).
- Fees must be fair, effective and efficient.
- Fees must be market driven and sensitive.
- Fees must consider overall 'value' of the vacation/visit – looking at fees in isolation of the total cost of coming to British Columbia may result in a deterioration of the perception of value and cause non-residents to choose other destinations.
- Fees must go to a fund that is dedicated to stewardship, conservation, and recreation, not into general government revenue.
- In-government work needs to be done to co-ordinate ministries and agencies, fees and permits. For instance, a consistent approach has to be applied both inside parks (by WLAP), and beyond parks on Crown Lands (by LWBC) for businesses such as river rafters, guide-outfitters etc.
- Fees must be proposed well in advance so that operators have enough lead time to plan, budget and market their product appropriately.²²
- Fee policies, regulations and other management aspects must be consistent for various sectors, e.g. sea kayaking or white water rafting, across the province.

In general, BC's wilderness tourism operators need to be able to encourage clients to come here and use our services, and government needs to make a fair and reasonable level of revenues. We believe that this is realistic and attainable. But to do so, our industry must be involved in the establishment of these fees in order to ensure that they are manageable for our operators. As well, fee structures and processes should not unfairly result in one sector of our industry being unfairly penalized or subsidized relative to another (e.g. both Park Facility Operators and Private Campground Operators should be equitably treated.)

The nature-based tourism industry must also be part of the decision making process to allocate the spending of these fees. If it is to have ongoing industry support, the government must be responsive to our advice in this regard. The Habitat Trust Fund²³ might be used as a dedicated fund to receive such user fees as the Panel suggests, but only with a stronger understanding of the needs of the tourism industry in the application of the funds collected.

If all the criteria mentioned above are met, we believe that our operators and their guests would be willing to entertain possible fee revisions and applications.

We feel strongly that the use of our fish, wildlife and parks must be sustainable.²⁴

We are concerned about ensuring that unsustainable use of fish, wildlife, and parks should not result as a consequence of government's desires to raise cash. As we said at the outset, the viability of our industry, of the resources, indeed of 'SuperNatural BC' requires that conservation come first. We are very concerned that parks should not be overly exploited and our product needlessly degraded in a drive to expand the industry simply to increase government revenues. Were this to happen, parks could be gripped in a 'gold rush mentality' that draws ever-increasing numbers of people to a rapidly degrading resource. The result would be a 'rush to the

²²Ibid Recommendation 31.

²³ Ibid Recommendation 27.

²⁴ Ibid. Recommendations 22 and 26.

bottom' where parks and wildlife, our market reputation, our businesses and our revenues would suffer, perhaps irreversibly. To do so would perhaps achieve short-term gain for long-term pain.

To use a financial analogy, the WTA believes that wilderness is the principal and our businesses should thrive on the interest generated by the principal. Sound, sustainable business practices require that we protect this principal by safeguarding our wilderness, fish, wildlife and parks. We must not reduce the principal that we depend upon by degrading our parks, our fish and our wildlife.

To this end, the WTA is working with LWBC to ensure that the definition of 'carrying capacities' ensures good conservation so as to avoid overuse of resources and conflict among users. We encourage the Recreation Stewardship Panel to adopt this work.

We believe that new major, intensive style tourism facilities should be located outside of Parks, not within them.

We believe that situating new major intensive style tourism facilities works best environmentally and economically when they are located outside of parks – possibly on the perimeter – but not within them. Therefore, we do not support the Panel's recommendation of allowing up to 100 ha. of intensive tourism facilities in parks, system-wide.

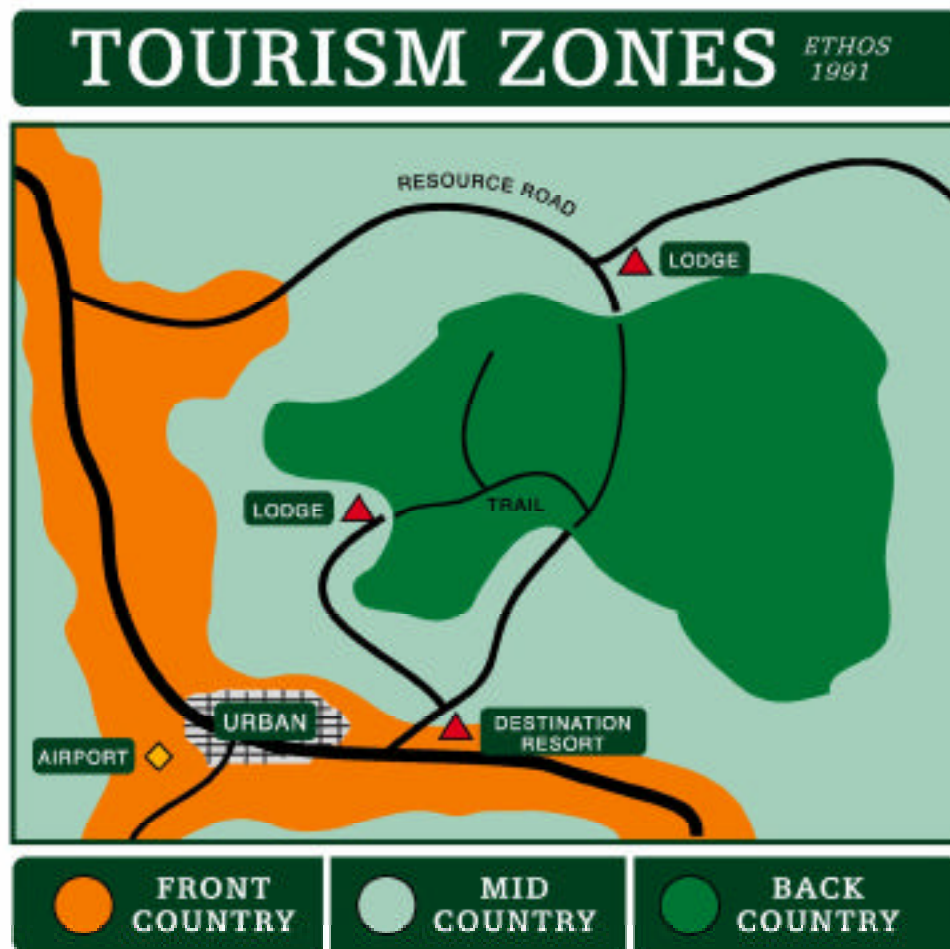
There are several reasons for this:

1. Such an approach is likely to contravene the Panel's overriding principle that conservation comes first.
2. Once a new major, intensive style built facility has been allowed within the parks system it is unlikely that it could be capped at 100 ha. Rather, once this precedent of intensive development was allowed within the parks, the subsequent pressure to raise the cap could be continual and intense.
3. Work done in BC and elsewhere shows that allowing an intensive new facility within a park may be financially good for that operator, but it is likely to degrade the value of the product for other eco and adventure/consumptive operators using the park for its natural pristine attributes.
4. The risk of market backlash to BC's nature tourism industry at a time when certification is fast developing could damage our industry's reputation if government encouraged new major facilities in our parks. Issues like the long-running Cypress Bowl controversy and the major opposition to the proposal to build Village Lake Louise in Banff National Park some years ago demonstrates the volatility of this issue.

Research shows that the best solution economically and environmentally is to locate major, intensive style facilities (such as destination resorts) outside of the parks, perhaps near existing gateway communities, and to focus on sustainable, guided tourism trips within the parks. Such a combination enables the development of more intensive facilities that can benefit the local community and industry without running down the integrity and quality of parks resources. This approach also enhances the value-added nature of visitors actually using the park, while ensuring conservation comes first. (We have appended a paper on Tourism Zonation – Front/Mid/Back country to provide further details on our position about this concept.)

To summarize, we believe that major, intensive style built facilities placed within a park adversely affect the pristine experience that other operators are trying to give their guests. We believe that the focus within the parks should be on guided backcountry adventure, hunting/fishing and eco-tourism – all high-value activities. And we believe that intensive development should occur outside and perhaps adjacent to the parks (as occurs at Radium, Golden or Whistler). By taking this approach, parks can be used as a marketing magnet to attract visitors to BC (and the gateway communities) while allowing higher value/lower impact

adventure, hunting/fishing, and eco-tourism within parks. Thus conservation values can be retained at the same time tourism revenues are generated.



We have concerns about the over concentration of corporate involvement in the management of parks, and fish and wildlife.

While the WTA definitely sees businesses being involved in the delivery of parks services, we are concerned that this could lead to large-scale and consolidated corporate involvement²⁵ because there may be a shift towards revenue-generation at the expense of resource stewardship and conservation. We strongly support the concept that businesses with a demonstrated commitment to stewardship and conservation should be responsible for the maintenance of local sites. We support private recreation service providers contributing to the maintenance of our natural and cultural heritage values, but in a fashion that demonstrates stewardship.

²⁵ Ibid Recommendations 13 and 14.

CONCLUSION

The Wilderness Tourism Association is pleased to respond to the Recreation Stewardship Panel's report *A New Management and Funding Model for Fish, Wildlife and Park Recreation*. While we recognize that this is a draft report intended for public consultation, we recommend that the Panel become more specific in its wording and more comprehensive and precise in dealing with economic data in its final report.

We support many aspects of the report. In fact, we provide our support only on the condition that these recommendations remain:

- Conservation and the maintenance and restoration of biodiversity are imperative.²⁶
- To increase BC's tourism revenues means we must take a value-added approach by providing a higher value product, rather than simply increasing the number of visitors which can lead to reduced product quality.
- Leadership, coordination and planning are crucial.²⁷
- The Parks Act, other legal agreements, funding and responsibilities should be retained and enhanced.
- Advisory groups and consultation mechanisms must include representatives of the nature-based tourism industry and its sectoral associations. They must report directly to the Minister, be mandatory, and have strong advisory/consultation powers.²⁸
- We strongly urge the retention of Forest Service sites and their overall management by the provincial government.²⁹ As well, forest roads and trails required by our industry must remain open and suitably maintained.
- Nature education is a fundamental role of government.
- We support certain Innovative Funding Approaches.

We also have some serious concerns and are strongly opposed to some recommendations. We believe that these recommendations must be changed and that change will prove to be healthy for the province of British Columbia:

- WTA members would be willing to consider new user fees, but only if specific criteria are met.³⁰
- We feel strongly that the use of our fish, wildlife and parks must be sustainable.
- We believe that new major, intensive-style tourism facilities should be located outside of Parks, not within them.
- We have concerns about the over concentration of corporate involvement in the management of parks, and fish and wildlife.

We wish the Panel well in their endeavors and congratulate them on their work to date. We are optimistic that these issues can be resolved and look forward to working collaboratively in the future.

²⁶ Ibid. Working Principle 1.

²⁷ Ibid Working Principles 5, 6 and 7.

²⁸ Ibid Recommendations 7 and 9.

²⁹ Ibid General Principle 10. Recommendation 21.

³⁰ Ibid Working Principle 12. Recommendations 15, 22, 29, 30 and 31.