

28 April, 2022

To: Ministry of Justice

From: Colby Brokvist, Chair Polar Tourism Guides Association

Regarding: Comments on Proposals:

- *Proposal for amendment of Svalbard Environmental Protection Act – and regulations/orders given with authority in this Act from the Norwegian Environmental Agency, with reference 2021/9496*
- *Proposal for substitution of “Regulations Related to Tourism” with “Regulations Related to Field Safety” and the proposal to apply the Package travel Act in Svalbard, from the Norwegian Ministry of Justice and the Ministry of trade and industry, with reference 21/4952 – MAKO*

To Whom it May Concern,

Thank you for providing the opportunity for public commentary. We at the Polar Tourism Guides Association (PTGA) appreciate that a growing tourism industry is a concern for Svalbard. We understand that an exploration of best management practices is vital to the protection and preservation of Svalbard’s wild places and wildlife. We also appreciate the significant value of tourism operations within Svalbard in regards to the economic empowerment of local communities, in messaging the importance of conservation and management initiatives to tourists, and for professional-level operational and risk management oversight during tourism activities. PTGA’s concern, as an ISO-accredited guide standards and assessment association, is chiefly with the proposed guide standards measures in their current form.

PTGA is supportive of a guide standard and certification system in Svalbard. We commend the Norwegian Ministry for a proactive approach to empowering guides and field staff to be safe and effective whilst working in Svalbard. However, our position is that the current guide standards proposal put forth by the ministry is lacking in key considerations that will ensure its success. The following are our suggestions.

We believe any fair guide standard regulations need to be:

- A. **Practical** in terms of making training and assessments readily accessible for guides.
- Lengthy training and coursework within Svalbard itself (as currently proposed) are very time-consuming and expensive, and they take guides away from meaningful opportunities to work and make money.
 - It does not make sense that all training must take place in Svalbard. A significant portion of current Svalbard guides do not reside in Svalbard and they can find training and assessment opportunities elsewhere that fit better with their personal schedules.
 - Workplace-based training and assessments is a practical and viable solution, and these can take place in Svalbard during trip operations. This places a mandate on operators to adapt their current training systems toward Svalbard compliance, and removes some of that burden from the Ministry.
 - Additional thought needs to be given to recertification status for guides who continue to work for many years. Svalbard must have achievable systems defined and in place.
 - Furthermore, we feel that the standards would benefit from better definitions. Objectives can be more clearly defined, for instance, and more consideration given to qualifications needed for a summer versus winter guide, for ship-based versus land-based guides, for example.

- B. **Time Appropriate** in terms of defining a grace period for guides and operators to obtain compliance whilst still operating trips.
- Compliance by the stated January 1, 2023 is impossible and will surely result in both failure and an overburden of grievances.
 - Operators must be allowed an appropriate amount of time to train and certify guides without incurring the loss of ability to operate in Svalbard.
 - Loss of economic benefit to Svalbard residents as well as the Norwegian government should be minimized as the new standards are realized, which is achievable via a multi-year grace period for guides and operators.
- C. **Compatible** with the current needs of the Norwegian Government as well as with equivalent existing standards in other polar tourism destinations.
- It makes sense that standards of competency in one area are harmonious with operating standards in similar environments. Svalbard guides are polar guides, many of whom work in several destinations within the arctic and Antarctic throughout the year. Therefore, the Svalbard standards should match existing polar industry standards in other locations.
 - Special considerations for Svalbard can exist within site-specific guidelines where applicable (not in the guide standards themselves).
 - Examples of compatible full guide certifications include PTGA, ANG, UNIS Courses, Naturguideforbund. Additionally, there are many international equivalencies for sub-skill specialities relevant to guiding in Svalbard such as mountain guiding, zodiac piloting, sea kayak guiding, hill walking, nature interpretation etc.
- D. **Transferrable** in terms of equivalency and reciprocity, whereby compatible professional qualifications will be readily accepted.
- It makes sense for Svalbard to accept other professional-level guiding qualifications in order to provide multiple pathways for achieving compliance quickly and easily. Many certificates already exist for various polar guiding skills as described above. For example, Svalbard Qualifications would be acceptable to work in Canada or PTGA's qualifications are acceptable to work in Svalbard.
 - It is financially and logistically impractical for full-time, year-round polar guides to hold multiple overlapping certifications in every country. Currently, it appears there is little capacity within Svalbard to provide training and assessments for the entire guide complement within the industry. So it makes sense to take advantage of existing equivalent systems that can aid in achieving objectives more efficiently.
 - The current proposal appears to dismiss the high level of competence and experience of currently working polar guides and operators. These capacities were clearly demonstrated on the recent joint guide survey by SGA/AECO/PTGA. We feel that the education available in Svalbard would not be inherently superior to an education that one could obtain in other venues (or have already obtained), such as in the workplace or through training at independent academies. So accepting other forms of training and assessment makes sense, and will lead to faster implementation and lower costs while achieving the main goal of certifying guides.
 - Pathways for achieving compliance through secondary parties need to be made clear.
- E. **Cost-effective** for guides and operators alike.
- The goal of guide standards is to elevate skills competency in the workplace and ensure a base level of safe operational capability. Every effort should be taken to provide multiple avenues

for training and assessment that will minimize or remove the financial burden on individual guides and operators.

- The above suggestions for workplace-based assessments and transferability of other certifications will greatly reduce the financial burden on guides and operators.
- The above suggestions for outsourcing training and assessments (at least in part), and systematizing the transferability of other certifications will greatly reduce the financial and operational burden on the Ministry.

Given all that is at stake regarding these standards, we recommend halting the rushed implementation of the proposed standards until a more practical and complete system is designed – one whose ease and success are more guaranteed. There is an incredible amount of experience within the polar tourism industry in regards to training and assessment of guides and other field staff. We strongly encourage the Ministry to include these voices as the Svalbard guide standards are created. We have the experience to help. PTGA, for instance, has already developed a robust set of polar-specific standards and qualifications directly relevant to Svalbard as well as a robust framework for assessing guiding skills in the workplace.

With a more detailed and considered plan in place that the polar community has helped to create, the ease of implementation and likelihood of success will surely be strengthened.

Thank you for your consideration.

Sincerely,

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