



***Canadian Camping Association
Association des camps du Canada***

Pre-Budget 2017 Consultation Submission

to the

House of Commons Standing Committee on Finance

by the

Canadian Camping Association

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Executive Summary

The Canadian Camping Association (CCA) is a not-for-profit, national association of provincial camping associations representing nearly 800 accredited camps across Canada. Day and overnight camps provide a large variety of enrichment programs and experiences for campers. Canadian camps are generally small businesses, with a century-long history in Canada of providing a wide array of recreational and cultural summer experiences for youth.

Over 600,000 children and youth attend Canadian camps every year. Camps employ approximately 30,000 staff, close to 90 per cent of whom are Canadian. We represent a \$1 billion industry in Canada. Of this, nearly 20 per cent is generated by international campers and by international staff.

Camps have been enrolling international campers and hiring international staff to provide multicultural experiences for as long as there have been camps in Canada. Camps hire international staff for their notable cultural, social and economic impact; they fill gaps and meet needs that cannot be filled or met exclusively by Canadian staff.

For over seventy-five years, CCA camps encountered very few issues regarding hiring and bringing in international staff. Changes to the Temporary Foreign Worker Program (TFWP) introduced a few years ago have brought significant challenges to the industry's ability to hire staff, threatening many camps operations. Camps have adapted to the various mechanisms established by the federal government to facilitate work permit acquisition. However, inconsistencies with immigration regulations and border controls have created increased volatility for these small business owners.

Clear and concise immigration regulations for this unique industry will help the industry expand, innovate and reach its goals, contributing to economic growth in tourism, recreation and arts and culture. To avoid future challenges, we believe that it would be best to create a camp specific category to better facilitate the acquisition of international camp staff work permits. A permanent solution to hiring seasonal international staff would avoid uncertainty as individuals arrive in Canada and would ensure that young Canadian campers can fully enjoy the social and cultural benefits that international staff bring to our camps.

Introduction

The Canadian Camping Association (CCA) is pleased to engage in the pre-budget 2017 consultation process with the House of Commons Standing Committee on Finance (“Committee”). The Committee’s consultation is an important instrument of public outreach and offers us an opportunity to engage in a policy discussion that affects the lives of Canadians, above all our youth.

Our submission addresses a number of the issues the Committee has asked Canadians to offer input on, including labour mobility, labour market information, assisting Canadian businesses in meeting their goals, arts, culture, recreation, tourism, training, and helping urban, rural and remote communities contribute to economic growth.

Who We Are

The CCA is a not-for-profit, national association of provincial camping associations representing nearly 800 accredited camps in communities across Canada. Day and overnight camps provide a large variety of enrichment programs and experiences for campers. Canadian camps are generally small businesses, with a century-long history in Canada of providing a wide array of recreational and cultural summer experiences for youth.

Over 600,000 children and youth attend Canadian camps every year. Camps employ approximately 30,000 staff, close to 90 per cent of whom are Canadian. In fact, the camp industry is often a first employer for many young Canadians.

We represent a \$1 billion industry in Canada. Of this, nearly 20 per cent is generated by international campers and by international staff who typically spend their money earned at camp during their post-camp employment travels through Canada.

The CCA is seeking a long-term solution for hiring international staff that would provide certainty and stability to the industry. Many camps are small businesses operated by camp owners. Labour mobility issues and barriers to accessing international staff threatens their business operations. Eliminating this threat would enable camp owners to make long-term business plans and achieve their growth goals.

Canadian camps have a commitment to the education of youth and to benefitting their local communities. Camps are located across the country, often in rural areas. The camping industry provides a unique opportunity to attract staff and campers to these areas, supporting local tourism, recreation and arts in the neighboring small communities. Furthermore, camps provide unique skills training for youth as campers and staff, thereby offering opportunity for youth to develop their skills and contribute to the country’s future economic growth.

Providing a safe environment for young campers is our highest priority; this can require special skills, including qualifications to care for children with special needs and/or medical conditions. Moreover, for summer 2016, the CCA is pleased and proud to offer 350 free spots to refugee children in Canadian summer camps across the country. Canadian camps also continue to offer free and discounted spaces for thousands of Canadian families across the country.

International Camp Staff

Camps have been enrolling international campers, and hiring international staff to provide multicultural experiences, teaching campers cultural empathy and leadership skills, for over one hundred years. This has had, and continues to have, a powerful and positive impact on our industry. Mature, skilled and diverse staff are required to provide safe and culturally rich summer camp experiences for over 600,000 children and youth at summer camps across Canada. Moreover, international camp staff create economic growth potential for the whole industry by attracting foreign campers because of their bilingual or multilingual abilities.

Camps do not only hire international staff for the notable cultural, social and economic impacts they contribute to our industry. We also hire these staff as there are not enough Canadian applicants to fill all of the over 30,000 seasonal position that camps fill each year. Although international staff only make up approximately 10 per cent of CCA-accredited camps’ work force, this group of staff are hired to fill key roles that simply cannot be filled by the Canadian labour market, despite our best efforts.

Camps require very skilled staff for many positions and staff are required to work in a variety of roles as they teach, supervise and mentor children of different ages and skill levels. Many camps also only work with special needs campers. There is a shortage of Canadian staff available to fill these positions. Further, many international staff have previously been campers in Canada and are attracted by that experience to return to Canada to work. If camps do not have a clear path to hire international staff, our industry would struggle to attract international campers. These campers would choose camps and other educational opportunities in countries where they could have the opportunity to return as employees and share their experiences with campers.

The 2016 Camping Season

Since the Temporary Foreign Worker Program (TFWP) changes were introduced a few years ago, camps have relied on the Labour Market Impact Assessment (LMIA) exemption for staff of charitable or religious camps to hire international staff. The restrictive wording and subjective interpretation of the LMIA process created significant inconsistencies as staff tried to enter Canada. Consequently, Canadian camps faced serious challenges hiring the staff necessary to provide a safe and enriching experience to young campers.

To address the inconsistencies in the interpretation of the charitable or religious worker LMIA exemption, Immigration, Refugees and Citizenship Canada worked to clarify the charitable or religious worker exemption for international camp staff for the 2016 camping season. Program Delivery Instructions (PDI) were released in April, 2016 and further clarification of the PDI was released in May, 2016 based on additional concerns brought forward to the government by the CCA. This provided a temporary solution for this season but it did not decrease anxiety levels of camp operators who had no certainty that their staff would be permitted to enter Canada in time for the start of the camping season. It is clear that a permanent solution directed specifically at this unique industry is required.

Federal Measures: Seeking a Permanent Solution

All CCA-accredited camps work to educate children and youth and could be considered to fall under the C50 LMIA exempt category in the International Mobility Program. A significant number of CCA-accredited camps are also religious. In addition, it is important to note that international camp staff also fall into other LMIA exempt categories in the R205 Canadian Interests section of the International Mobility Program, namely C10 (Significant Benefit) and C20 (Reciprocal Employment).

(a) Significant Benefit

The LMIA exemption category C10 R205 (a) Significant Benefit is applicable to the camping industry, namely because being able to hire international staff has a profound economic impact on our industry. Of the \$1 billion generated by the Canadian camping industry, nearly 20 per cent of these monies come from international campers and their parents/caregivers and by international staff who spend their money earned at camp during their travels through Canada. International campers graduate from a camp's leadership program and because of their positive experiences in Canadian camps many seek to be hired onto the camp's staff.

In addition to the economic benefits, the cultural and social benefits that occur as a result of camps hiring international staff is a powerful component of camp programming. International camp staff bring a variety of experiences, skills and teaching practices from their countries which adds tremendous educational value to campers and is an important component for the professional development of our local Canadian camp staff. Young Canadians and communities across the country realize significant economic, social and cultural benefits from the international staff that we hire.

(b) Reciprocal Employment

There is a strong history of reciprocity in the camping industry. On average, 650 Canadians work at camps in the USA each year and many more Canadians work in the camping industry in other countries. A summary of the reciprocity that exists between the US and Canadian camping industries is outlined in two documents issued by the CCA and the American Camp Association which can be provided at your request.

Conclusion

The ability for international workers to seasonally work in Canadian camps is essential to the safe and culturally enriching experiences of our youth and is crucial for the economic growth of the camping industry. Our industry will be able to grow and continue to maximize its economic potential.

It is important to note that every individual in the Government of Canada with whom we have met over the last two years has acknowledged the unique circumstances of the seasonal, cultural and educational-focused camping industry. We have experienced considerable goodwill as we work with the government to find a permanent solution.

The camping industry is vibrant, youthful and full of dedicated small business owners that provide unique economic value to the Canadian economy. Your Committee's support of the camping industry in finding a permanent solution for hiring international staff would be greatly appreciated. Thank you for your consideration.