

3 June 2013

The Honourable Christy Clark  
Premier of British Columbia  
By Fax: (250) 387-0087

Re. Systemic Dysfunctions within the Ministry of Environment

Dear Premier:

For the second year in a row, we have been forced to cancel our season in Mount Edziza Provincial Park over Park Use Permit issuing issues. Despite the Province's commitment that permit adjudication would only take up to 150 days, we are still without a permit despite an original application sent to BC Parks in September 2011.

The issue is not the type of proposed activities, as we only intend to offer backpacking trips which have no or minimal environmental impact. Nor formal opposition to our project. The issue simply is the Ministry of Environment's systemic incompetence and contempt towards clients who are not in the business of exploiting resources.

With the exception of Janice Joseph, who has been very efficient, involved, and professional in the processing of our permit, the rest of Ministry of Environment staff has only demonstrated unprofessionalism, complacency, rudeness, incompetence, contempt, and even racial bias since our first dealings with the ministry in the late 1990's.

Planet Explorer, a company we merged with, was first forced to drop Mount Robson Provincial Park from its destinations following the ministry's unwillingness to enforce Park Use Permit requirements. Despite having spent substantial time and resources acquiring a permit and booking camping sites at Berg Lake months in advance, we were forced to interrupt a trip after our reserved spots had been occupied by another operator, that did not even hold a permit, let alone, had reservations. The Park Ranger's response to our complaint, on site, at the time, was that he could not do anything because the other party "had already set their tents". An utterly ridiculous, appalling, and revolting statement considering illegal activities were involved. To be noted that the issuance of our Mount Robson Park Use Permit was itself substantially delayed for no apparent reasons.

In the early 2000's, we expressed interest in Mount Edziza Provincial Park. At issue, however, was that other operators were conducting commercial trips in the park without a permit, which would have placed us, as a potential permit applicant and holder, at a competitive and commercial disadvantage. Despite several complaints, in writing, by telephone, and in person, the ministry never took any regulatory enforcement action, forcing us to explore alternate destination options.



There was also the comment made by a staff member at the Smithers BC Parks Office, whom referred to our francophone staff in a derogatory fashion, and explained delays in our permit issuance as being related to “French people getting under his skin”.

In 2011, we finally decided to operate in Mount Edziza Provincial Park, after an operator that had been offering commercial trips illegally for years finally withdrew from the market. We forwarded an original application to the Ministry of Environment in September 2011, and another application in December 2011, after the first application mysteriously disappeared.

Unfortunately, Elyzabeth Purkiss, Stikine Area Supervisor, never considered our application a “priority”. As a matter of fact, she never even bothered to return our phone calls, or even actually read our application. By the time the 2012 season came, our permit application had not even been looked at, let alone processed. So, we were forced to cancel our 2012 season, planning instead for the 2013 season, under the understanding that the ministry would have close to another year to process our application.

Another year passed, but our permit still did not get issued. A draft was reviewed and approved in late April 2013, and Janice Joseph recommended that our permit be approved. But again, the ministry did not take any action to issue our permit. Ministry staff referred to being “too busy” with “pipeline” and resource exploitation applications.

Mike Neto, Janice Joseph’s direct supervisor, was, as a result, contacted via email. However, as with most Ministry of Environment staff, our file was not a priority for him, and he did not respond to our query. He only called us after a request we made to the Assistant Deputy Environment Minister’s Office. His only explanation with respect to the delays in issuing our permit was that he did not want to “rush” the permit process. An arrogant, insulting, and contemptuous statement considering the 150 days permit adjudication timeline had already been exceeded by about 450 days.

Mr. Neto refused to “expedite” the issuance of our permit, despite his office having taken close to two years to process our application, and despite our very clear representation that we would be forced to cancel another season in the absence of a permit. He rejected any accountability, going as far as claiming that our company was responsible for the situation, as, according to him, we should have never planned trips without first obtaining the permit. Clearly, Mr. Neto didn’t understand the contractual obligation of the ministry when a delay of 150 days is advertised on its web site for the processing of such permit. Nor did he understand the most basic business concepts, including the fact that clients cannot be brought from around the world to BC with a 24 hours notice. For a Ministry of Environment employee, he also demonstrated severe shortcomings in outdoor leadership, by even failing to understand that trips in remote places of Canada require logistics and proper planning, which cannot be arranged in a few hours, when a permit is finally issued, a few days before a schedule expedition.

At this time, we have therefore been forced to cancel, once again, and for the second year in a row, our season in Mount Edziza Provincial Park over yet more delays in our permit issuance. From a marketing, commercial, and financial perspective, this is absolutely catastrophic. Faced with the uncertainty that has been plaguing our business operations in British Columbia for the last two years, we have also postponed the hiring of local permanent staff until 2015 at the earliest, and we have indefinitely postponed the building of a lodge and guest cabins in Dease Lake, which was set to start at the end of the month.

This situation is absolutely distressing. First, although we operate in many countries around the world, we have never experienced such issues with permits. Even in the most lawless and corrupted developing countries. Second, we are very disturbed by the fact that we would have obtained a log-

ging permit in only a few weeks, had we applied for one, when it takes in the vicinity of 2 years to get a hiking permit. Lastly, we are worn out by the ministry's staff behavior towards us, which we see as increasingly abusive. It would even appear at this point that staff is stalling the permit process out of pure despise towards us.

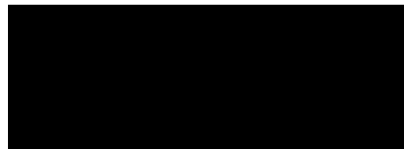
A factor in giving our support to the liberal government years after years was their commitment to decreasing red tape in British Columbia. As it stands, however, and as it relates to Park Use Permits, it appears to be far worse than under the NDP. This is simply an unacceptable situation as it is impeding the province's economic development, and particularly, sustainable economic development. As a matter of fact, undue and unjustified headaches and aggravation with the BC government are the primary factor slowing our growth in British Columbia.

We certainly hope this complete fiasco will get your attention so companies like ours can create sustainable long-term wealth in British Columbia, and are no longer the subject of systemic harassment by public servants who have completely forgotten the very meaning of their work.

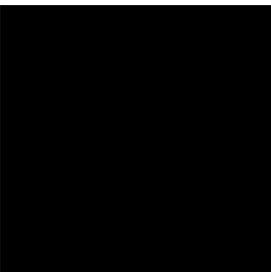
Yours sincerely,



*Chief Executive Officer*




*Chief Operating Officer*



*Senior Vice President*



*Vice President, Safety & Security*



GLH/dk