



31 January 2005

Honourable Shirley Bond
Minister of Health Services
PO Box 9050
STN PROV GOVT
Victoria, BC V8W 9E2

Dear Minister:

On behalf of the BC Recreation and Parks Association, we appreciate the opportunity to participate in the review process regarding changes to the Child Care Regulation proposed by the Child Care Licensing Regulatory Review Steering Committee. We have ourselves consulted extensively with members and stakeholders in our sector about the impact these changes would have on the delivery of recreation programs and services to children and families in British Columbia.

Our response is unequivocal that the proposed revisions to the Child Care Regulation would seriously hamper the ability of our sector to meet the needs of children and families for safe, affordable, activity-based, flexible and short-term recreation programs. Any added regulation and licensing requirements that would make it cost-prohibitive to run affordable and accessible recreation programs for children in the province are unjustified. Further, they do not take into account the uniqueness of structured recreational opportunities.

Recreation programs do not offer continuous care to children while parents work: licensed day care and out-of-school day care fulfill that societal need. Recreation programs play a caring role in the provision of intermittent and flexible leisure experiences to the whole family, from child to parent to grand-parent. They also have in place laws, procedures and accountability measures which make it safe for all to participate in skill-based and socially-based activities.

It is crucial that this distinction in purpose be recognized in the Child Care Act and that community recreation for children be exempted from any stringent regulation that would make it impossible to provide accessible and affordable sport, recreation and cultural opportunities to children of all ages.

The recreation sector supports efforts within your Ministry to promote healthy lifestyles and communities. Our members are 100% behind recent initiatives such as the municipal challenge to increase by 20% by 2010 the number of British Columbians who are physically active. Our organization is working with the Ministry of Health and 2010LegaciesNow to deliver on active

community initiatives and support communities in their efforts to create legacies in community sport and physical activity.

Our commitment to achieve the 20% target requires us to **increase** opportunities for children, youth and adults to engage in physical activity and recreation programs. The proposed Child Care Regulation would have the reverse effect: recreation providers will not be able to maintain the range and number of children and youth programs they currently offer if required to be licensed.

The attached statement describes our position. Again, thank you for inviting our comments. Please do not hesitate to call us if you require further information, or clarification on any of the points in our presentation.

Yours sincerely,



Suzanne Allard Strutt
Executive Director



Doug Henderson
President

cc: Honourable Stan Hagen, Minister of Children and Family Development
Honourable Linda Reid, Minister of State for Early Childhood Development
Sue Bedford, Director of Licensing
Dr. Penny Ballem, Deputy Minister of Health
Marion Lay, President and CEO, 2010 LegaciesNow
Andrew Hazlewood, Assistant Deputy Minister of Health