



July 28, 2017

Mike Collyer  
 Manager, Stakeholder Relations  
 Consumer Protection BC  
 307-3450 Uptown Blvd.  
 Victoria, BC V8Z 0B9

Re: Consultation: 2018-20 Travel Fee Changes

Dear Mr. Collyer:

On behalf of the Association of Canadian Travel Agencies (ACTA), a national not-for-profit trade association representing over 1200 retail travel agencies and more than 14,000 travel professionals across the country, we appreciate the opportunity to speak on behalf of almost 200 retail travel agency members located in British Columbia on the proposed changes to the 2018-2020 licencing fees and other fee changes.

### **Background**

Consumer Protection BC has the legal authority to set licensing and other fees and charges. In doing so, Consumer Protection BC is required by law to recover costs, to consult with travel agencies and to provide at least ninety (90) days' notice prior to changing or introducing new fees.

### **What is Being Proposed**

- Annual 2% increase for all licence fees and other charges for 2018-2020,
- Reduction in renewal fee if travel agency renews two (2) weeks prior to the expiry of their licence,
- Elimination of the late fee, and
- Implementation of requirement to apply as a NEW licence applicant if the renewal expiry is late.

### **ACTA Response to the Proposed Changes**

Consumer Protection BC is proposing an annual 2% increase for all licence fees and other charges for 2018-2020. This has been the case in the previous three years (2015-2017). Consumer Protection BC has stated that this increase is required to sustain and improve the oversight of the travel sector and recover costs. It is important to note that travel agencies, especially in Western Canada, are still recovering from the economic downturn and other factors that have impacted the travel industry. The travel industry is unique whereby it is susceptible to not only a low Canadian dollar but global matters such as an intentional terrorist threat or a seemingly innocent virus-ridden mosquito like the Zika virus. These factors can dramatically change the financial health of a travel agency. Any increase, even one to address inflation, is not seen as favourable to BC ACTA member agencies.

ACTA does appreciate the step to reduce fees if a travel agency renews two (2) weeks prior to the expiry of their licence. At the same time, the elimination of the late fee is also being proposed. Instead, if a travel agency is late with their renewal, they will have to apply as a *new* licence application, which would

mean starting over with compensation fund contributions, a new registration number, etc. It is the latter of these proposed changes that is of concern to ACTA member agencies. There are a number of extenuating circumstances that could cause an agency renewal to be delayed. Forcing them to apply as a new license applicant, with all the initial requirements, would pose a significant financial burden to the travel agency. ACTA members believe this proposed change to be quite drastic on the part of Consumer Protection BC.

ACTA also noted in the comprehensive document that only 2% of the fees collected are spent on Education and Awareness. ACTA members believe that this activity requires additional funding. If Consumer Protection BC were to increase promotion and awareness to consumers of the benefits of booking with a BC travel agency, this action would go a long way to address any proposed increase in license fees. It would also deal with the expressed disappointment from past consumer awareness campaigns if ACTA and it's member agencies, could assist Consumer Protection BC to bring forward a more positive message to BC consumers.

In conclusion, ACTA has encouraged the ACTA member agencies to submit their feedback via the Consumer Protection BC survey by the August , 2017 deadline. Thank you for opportunity to provide feedback during this important consultation period. . Should you have any questions or concerns to the points our organization has made, please contact Wendy Paradis, ACTA President at wparadis@acta.ca / 905-282-9294 ext. 121 or Heather Craig-Peddie, ACTA Vice President Advocacy and Member Relations at hcraig-peddie@acta.ca / 905-282-9294 ext. 122.

Sincerely,



Wendy Paradis  
ACTA President



Heather Craig-Peddie  
Vice President, Advocacy and Member Relations