



# ALLIED GOLF ASSOCIATION

## BRITISH COLUMBIA

The Allied Golf Association of British Columbia (AGA-BC) unifies multiple provincial golf industry sector organizations and is dedicated to providing one cohesive voice for the golf industry of British Columbia.

*Mission:*

*To provide leadership, collaborative advocacy and a cooperative resource for the British Columbia Golf Industry.*

Golf is a ‘game for life’ – participants range from 4 or 5 years old to 95+ years old! Golf is the #1 sport in Canada by participation with no barriers to entry. Golf has proven health benefits; walking 18 holes of golf will meet the recommendation to accumulate 10,000 steps per day as part of a general physical activity plan and golfers live up to 5 years longer than non-golfers!

Over 300 golf courses can be found in British Columbia, in every region of the province, in communities both large and small. Nearly all are run as community not-for-profits or small businesses. Some are owned by municipalities and considered part of our urban recreational infrastructure while several are well-known resort style properties. Golf is reported as an activity for as many as 1.7% of all international over-night visitors to Canada and 1.5% of all US visitors.

- Golf employs 44,000+ people;
- Golf contributes \$465 million in taxes;
- BC’s golf industry is a long-standing supporter of healthy living and charitable causes;

- Golf courses provide necessary greenspace and habitat in our urban environments;

Statement from the Allied Golf Association of British Columbia:

***“Golf is good for our health, our environment, and the economy of British Columbia.”***

AGA-BC members appreciate and respect WorksafeBC’s role in ensuring workplace safety. The BC golf industry is proud of an excellent track record managing worker safety, understanding potential hazards throughout the entire golf operation including those on the golf course grounds, taking great care in providing accident and injury protection. The game of golf itself has an inherent motivation for improvement, a philosophy and culture we carry through to all areas of golf course operations, from providing smooth greens and fairways to a safe work/play environment.

AGA-BC wants to work closely with WorkSafeBC but feels proposed amendments to the Mobile Equipment regulation will have a wide-reaching (negative) impact to community recreation opportunities and tourism throughout the province.

With the following key points in mind, the Allied Golf Association of BC is asking that WorksafeBC **provides a full exemption for operation of light frame/low speed vehicles** (golf carts, turf care utility vehicles) by golf course employees on golf courses from the proposed amendments to Part 16 Mobile Equipment relating to ROPS, seatbelts and any associated requirements.

### **#1: Engineering Standards Do Not Require ROPS:**

- Robust voluntary industry standards (SAE J2258, ANSI B56.8, ANSI B71.9, ANSI Z130.1, ANSI Z135) do not require ROPS for light frame/low speed vehicles including:
  - golf carts;
  - utility carts;
  - personal transport vehicles.
- Proposed amendments exceed current engineering/availability:
  - major manufacturers have confirmed ROPS are not available OEM;
  - the Outdoor Power Equipment Institute (OPEI) has confirmed no other jurisdiction requires ROPS on golf carts nor are there any other jurisdictions publicly considering this requirement;
  - manufacturers are not expected to re-engineer light frame vehicle fleets to accommodate BC’s relatively small market.
- After-market ROPS and seatbelts (if available) void factory warranty.

## #2: WorksafeBC Injury Statistics Do Not Justify Rollover Protection

- WorksafeBC's rollover statistics **do not support** increased regulatory protection. Extremely low golf industry golf cart rollover injury claim history does not support the need for ROPS or specific location risk assessments:
  - from Jan 1, 2009 to June 19, 2019, there were 134 claims from incidents with ALL mobile equipment at golf courses (includes golf carts, ATV's, cars, mowing machinery, tractors, trucks etc);
  - of these 134 claims, 47 involved a powered golf cart (35%) at an average rate of nearly 5 per year;
  - only 1 golf cart accident was recorded as a roll-over or tip-over (0.7%);
- US golf cart incident statistics are not a good measure of worker risk:
  - reported light frame/low speed vehicle incidents in the US, a key factor in WorksafeBC's judgement that ROPS should be installed on golf carts, do not separate worker injury claims from non-workers.

## #3: Tipover vs. Rollover – Golf Carts Don't Typically Roll

- Proposed amendments differentiate tip-over from roll-over:
  - 16.33 (1) says a tipover "is not a rollover";
  - 16.34 ROPS requirement is based on the risk of rollover not tip-over;
- Due to low centre of gravity and low travel speed, golf cart incidents tend to be tip-overs (up to 90 degrees) rather than rollovers (180 degrees or more).
- ROPS do not offer occupant protection in the event of a tip-over.

## #4: Management Can Better Address Any Perceived Risk

- Intense employee training and supervision is required to ensure safe work procedures are followed and high standards of performance and task quality are met including:
  - general site orientation, training and expectations;
  - specialized task training and supervision;
  - various equipment operation training and supervision through;
    - [manufacturer videos](#) and manuals;
    - hands-on training and monitoring;
    - PPE, safety features/equipment and engineered controls.
- Working on a golf course requires a thorough understanding of:
  - inherent potential golf course and golfer hazards;
  - working outdoors;
  - safe operation of vehicles and various types of equipment;

- golf and golf etiquette;
- a variety of tasks unique to golf;
- care and attention not to damage golf course grounds;
- Any perceived risk to golf course employees can be better addressed through management by focussing on engineered controls such as curbs, fences, GPS, speed controls, regenerative brakes, signage, etc;

## **#5: Economic Burden**

- Proposed amendments create a tremendous and potentially overwhelming economic burden to BC golf course operators:
  - cost to industry for installation of roll bars and seat belts per cart (if available) estimated at \$2000 - \$2500;
  - average of 75 carts per golf course = \$150,000 – \$185,000;
  - estimated at \$30m-\$40m+ total cost to BC Golf Industry.