



## ***Inland Waterways International***

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Ms Dawn Livingstone  
CEO  
Waterways Ireland  
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UK

Ottawa, 28 January 2014

Dear Ms Livingstone,

I am writing on behalf of **Inland Waterways International** (IWI) in response to Waterways Ireland's consultation on [The Draft Canals Act, 1986 \(Amendment\) Bye-laws, 2014.](#)

Inland Waterways International brings together people and organisations that support the conservation, use, development and proper management of inland waterways worldwide. It aims to raise public awareness of the benefits of using waterways for a wide range of activities, from inland water transport to cruising, towpath walking and other recreational uses. It also promotes restoration, where appropriate, of waterways which have become derelict. Its membership includes leading navigation authorities, volunteers, individuals and organizations, museums and commercial companies. Individual members include both users and experts in the various disciplines related to inland waterways. Our membership covers over 20 countries.

First, we would like to commend your organization on the many positive initiatives you have implemented in recent years. You are now recognized as a leading organization in the management of waterways, canals, assets and programs, and we value having you as a corporate member of IWI. We recognize that you are working on minimizing costs while at the same time increasing revenue streams and taking more control over your assets, including the canal banks. This is certainly not a phenomenon unique to Waterways Ireland. It is something we are seeing in many jurisdictions in the UK, Europe and North America. With the economic downturn, governments have put the financial squeeze on government organizations and operations, including canals.

So in this context, we have reviewed the new proposed changes to the canal Bye-laws and read the concerns expressed by others related to these changes. IWI's comments, suggestions and observations related to the proposed changes are as follows (in no particular order):

- We feel that the length of the consultation process is somewhat short considering that other consultations (draft Corporate Plan 2014-2016) are taking place at the same time and have a longer consultation period. It is not inconceivable that users and those interested would want to be reviewing both consultations concurrently and should have the same time for both to ensure quality and timely comments. This does leave the impression that WI may be trying to rush the decision on the Bye-laws.
- The changes to the Bye-laws increase the cost for boaters using the system. It appears that there is a cumulative effect with the large increases across the board. Boaters will not only see an

increase in the cost of their fee to navigate and use the locks, but also an increase in fees for mooring of their vessels. With no private or alternative options, users will either have to pay the increases, move their vessels off the canals or decrease their use of these impacted canals. It is our observation that in such a scenario, use decreases. Not only does it impact on the revenues to Waterways Ireland, but it also decreases the business for companies and communities that are part of the canal support and infrastructure, i.e. marine services (fuel, repairs chandlery), food and pubs, historic sites, museums, etc. Should these increases be required, perhaps a graduated increase over a period of time may lessen any impact. Once the goal is met then increases would match the cost of living index, which is fairly easy for users to support.

- There is also concern about the cost for the dry dock use. While we fully understand the rationale of the increase, and the need to ensure that vessels don't tie up the dry dock for extended periods of time, it does deter those with heritage vessels from using the facility, because their repairs usually take more time. The result is that less of the heritage vessels could be dry-docked because of the additional cost over and above the cost of maintaining these classics and over time they will become lost. Could a special rate be considered for documented and recognized heritage vessels when they need to be dry-docked?
- The ongoing difference in treatment of land-based visitors versus boaters is accentuated with these latest changes. We agree with the premise that boaters should shoulder more of the costs of operating and maintaining the canals and waterways they use. However, the other users also represent a cost to the canal, albeit somewhat less than boaters, e.g. fishers, kayakers, canoeists, walkers and cyclists. IWI is very supportive of these activities taking place along the canals and canal banks as they not only add to the users and supporters of the canals, but the activities are for the most part healthy recreational pastimes important to the communities' health. How to collect from these users is always the key issue and Sweden (Göta Canal) has put into place some ways to see the land-based visitor support the facilities they use. Towpath permits, fishing licences, parking fees are some of the ideas that have been tried elsewhere. The point is that canals and canal authorities need to be mindful of the division that takes place when one group appears to pay for services and the other more or less 'gets a free ride'. Boaters are easy targets because they are a captured users group, but canal operators need to put some time, effort and resources into collecting from the other users of these canals and these changes being proposed highlight the need to do this sooner than later. We suggest a commitment to look into ways to do that as part of these proposed changes to show that WI is listening to those concerns. It also would increase the revenue stream for the canals. This is also noted in the Corporate Plan 2014-2016: *'The organisation's key goal must be to grow and sustain use, both on the water and of the towpath corridors'*.
- It goes without saying and our observation, as we noted earlier, these changes will certainly have a dampening effect on use. The concern always is that over time there will be less use, then less maintenance because the traffic does not support the expenditures and again less use and the cycle slowly descends into an abandoned canal. WI has worked hard at restoring canals and making them a part of the communities they run through. Communities and businesses depend on them as a working operation and are key to the community as an attraction and part of their tourism infrastructure. Nobody goes to see an abandoned canal in the centre of a community, but people are attracted to an operating and animated canal with boats, events and activities in the centre of a community. As you noted, again in the draft Corporate Plan 2014-2016: *'Looking forward, the key challenge facing Waterways Ireland is to increase the use of these waterways and in doing so, further extend the benefits these important public outdoor recreation assets can deliver. The organisation recognises it can contribute to supporting a much more diverse use of the waterways in addition to cruising, which continues to be a very important economic*

*recreational activity on a number of the waterways we manage.*’ So coming back to our earlier point, increasing fees is counterproductive to the above objective. We would suggest a graduated increase to existing fees and introduction of new fees to lessen the impact and allow users to accept the changes over time, and then move to a cost of living increase formula.

- Finally, it is always our view that any changes, increases or new requirements need to be implemented as efficiently and cost-effectively as possible for the administrator and also the user. We would hope that permits and remittances can be issued at the local level or on-line to cut down on the need for additional paperwork, time and expenses. The idea is minimize the bureaucratic processes and in turn additional costs.

Thank you for the opportunity to comment on the proposed Bye-laws. If you would like clarification of our comments or more information please contact us directly.

We look forward to seeing the results, response and outcome of the consultation.

D. J. Ballinger

A handwritten signature in blue ink, appearing to be 'DJ Ballinger', with a horizontal line extending to the right.

President, Inland Waterways International ([www.inlandwaterwaysinternational.org](http://www.inlandwaterwaysinternational.org))  
Partner, The Canals Group ([www.thecanalsgroup.com/](http://www.thecanalsgroup.com/))  
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cc IWAI