



Elephant's Nest Bed and Breakfast
127 Pleasant Drive
Gaetz Brook, Nova Scotia, Canada
B0J 1N0

27th September, 2007

The Honorable William Dooks
Minister of Tourism, Culture and Heritage
Department of Tourism, Culture and Heritage
P.O. Box 456
Halifax, NS
B3J 2R5

Dear Minister,

References: A. NSBBA letter to the Honourable Len Goucher dated 27 September 2007 (attached)
B. Minister Goucher response dated 10 October 2007 (attached)

As President of the Nova Scotia Bed & Breakfast Association (NSBBA), an Association representing upwards of 180 small, independent business operators (and voters) throughout the Province, I sent to your predecessor a letter outlining the NSBBA position on several issues critical to the health of the B&B community in Nova Scotia. While I appreciate that the contents of our 27 September letter may have been briefed to you when you assumed your new portfolio, I want to ensure that the concerns of our membership are passed directly to you and want to reinforce how important we feel it is that each issue be addressed effectively and quickly. I would add further that the positions outlined below were endorsed unanimously by our membership at the NSBBA Annual General Meeting in Lunenburg this past weekend.

The University Issue

The NSBBA is strongly opposed to the way universities have been allowed to participate without restriction in the Tourist Accommodation Industry in Nova Scotia. We do not consider it appropriate that universities are renting to tourists, rooms highly subsidised by government at rates far below market value. Essentially, universities are dumping rooms at predatory prices into a very sensitive tourist accommodation marketplace. The fact that the universities are also exempt from charging HST on their rental income adds further to our concern. That this practice is not only condoned but also in fact supported by the Department is untenable. We request that the entire policy around this issue be reviewed and some equitable solution found. We do understand that this review will take some time. In the interim, we request that the Department exclude university accommodations from the 2008 Travel Guide and website and prohibit them from booking rooms through the provincially contracted "Check-Ins" system.

Mandatory Rating System

The NSBBA is adamantly opposed to any form of mandatory participation in any rating system, either for licensing or for participation in any Government sponsored marketing initiatives such as, but not limited to, the Doers' and Dreamers' Guide. Participation in a rating program is a personal business decision that clearly should be left to each accommodation property operator to make based on his/her individual business and marketing objectives. Misguided Government interference in this decision is unacceptable.

Definition of Bed & Breakfast.

The root of many of the NSBBA concerns is the fact that no clear definition of a "Bed and Breakfast" exists within your Department. This lack of any clear definition is not only detrimental to the individual accommodation property owners, but is extremely confusing to the traveling public. At our meeting with your predecessor on 11 September 2007, NSBBA offered to provide the Minister with a clear definition acceptable to the Industry. The following definition, already approved by Government and utilized in the Assessment Act, defines a Bed & Breakfast as follows:

"Bed and breakfast establishment means a private home in which the owner resides and provides accommodation to the traveling or vacationing public of a maximum of four bedrooms and a common living room and serves breakfast of which the cost is included in the price of the accommodation."

NSBBA recommends that this definition be accepted throughout Government and be included in all major tourism publications including, but not limited to, the Doer's and Dreamer's Guide.

Unlicenced Properties.

For at least the last five years NSBBA has been pressing the Department to deal with the issue of unlicenced properties operating with impunity throughout the Province. Unfortunately, infractions continue unabated and the number of unlicenced properties appears to be on the rise. The situation is becoming untenable and many legitimate licenced operators are starting to question why they themselves bother following the rules. The NSBBA is strongly opposed to unlicenced and unregulated fixed roof accommodation properties operating in Nova Scotia. We would request that the Department address this issue as a priority.

Tourist Accommodations Act Review.

Having been forced to provide our individual and collective opinion on the Tourist Accommodations Act Review within a ridiculously short one-month time frame, the NSBBA and its members are appalled at the inordinate length of time the Department is taking to complete this review. Additionally, we are completely taken aback by the Department's decision not to take the final changes back to Industry before moving forward to the Legislature for approval. We believe that a final plan that is not clearly endorsed by the accommodation industry that it affects is doomed for failure.

I hope that the above comments serve to make the NSBBA position on these important issues clear. Thank you for taking the time to consider our concerns. We wish you well in your new position as Minister and hope that I and the Executive of the Association have an opportunity to meet in the not-too-distant future.

Sincerely,



John D Meehan
President,
Nova Scotia Bed & Breakfast Association

Information:

Ms Michele Raymond, Tourism Critic, Nova Scotia NDP
Mr. Harold (Junior) Theriault, Tourism Critic, Nova Scotia Liberal Party
Mr. Lloyd Banfield, Executive Director for Tourism, Nova Scotia DTCH

Mr. Bob Book, Director, DTCH
Ms. Susan Tilley Russell, Chair TIANS Board of Directors
Ms. Darlene Grant Fiander, President TIANS
Ms. Mary Dempster, Chair HANS
Mr. Peter Sheehan, Chair IGNS