

Snorkelling, Scuba Diving & Wildlife Swims

Adventure Activity Standards (AAS)

for
Organisations, Guides & Leaders
Conducting Adventurous
Activities for Participants
(Commercial or Non-Commercial)

Supported by



Government of South Australia
Office for Recreation and Sport



Prepared by Recreation South Australia with the support of South Australia's Outdoor Community

Introduction to AAS

The South Australian Adventure Activity Standards (AAS) have been developed to assist organisations, guides and leaders to plan and undertake outdoor adventure activities with dependent participants. This document should be used as part of your organisation's risk management program.

Participants undertaking adventure activities may already have a degree of skill and experience in a particular adventure activity, and as such may be less dependent upon the group leader for guidance and instruction. In these situations, the AAS should be adapted to reflect the experience of group members and the particular situation of the adventure activity.

Regardless of the extent to which the AAS is adopted, each organisation, guide and leader has a duty of care to its participants to have completed a risk analysis of the activity, and developed a risk management approach to address potential and unexpected situations.

The AAS have been prepared with the involvement of a wide cross-section of South Australia's and Victoria's outdoor industry, and reflects minimal acceptable standards of behavior expected when planning and undertaking outdoor adventure activities with inexperienced and dependent participants.

Acknowledgement

In the development and implementation of AAS in South Australia, Recreation SA acknowledges the work of the Outdoor Recreation Centre Inc. in initiating, coordinating and developing AAS through many outdoor recreation groups within Victoria.

These AAS can now be adapted nationally across a number of outdoor adventure activities, and Recreation SA has reviewed and amended the content, in consultation with South Australian outdoor industry representatives, to reflect South Australia's legal, government, environmental, social, education and industry conditions.

The implementation of the AAS in South Australia is recognition of the State's commitment to national minimum industry standards for outdoor adventure activities.

Important disclaimer

The information contained in this publication has been gathered through widespread industry consultation. All reasonable attempts have been made to ensure that it is accurate, relevant and current at the date of publication. Nevertheless, the Adventure Activity Standards (AAS) are only advisory and general in nature and should not be relied upon to meet individual or specific requirements. They are recommendations for voluntary application to adventure activity providers and participants. They are not binding on any person or organisation and have no legal force.

The AAS will not cover each and every circumstance of an adventure activity. Nor can they, when adhered to, entirely eliminate the risk or possibility of loss or injury. Consequently they should be used as a guide only. Whenever using the information contained in this publication or any AAS, all adventure activity providers should carefully evaluate the specific requirements of the intended adventure activity and the persons participating in it. If necessary, advice should be obtained from a suitably experienced and qualified professional person.

This publication and the information and the AAS it contains are made available on the express condition that the Government of South Australia (Office for Recreation and Sport) and Recreation SA, together with the authors, consultants and advisors who have assisted in compiling and drafting this publication and the AAS are not rendering professional advice to any person or organisation and make no warranties with respect thereto and to the maximum extent permitted by law disclaim all liability and responsibility for any direct or indirect loss, damage or liability which may be suffered or incurred by any person as a consequence of reliance upon anything contained in or omitted from this publication.

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- Department of Education and Children's Services
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- TAFE SA, Adelaide North
- Australian Underwater Federation (SA)
- Scuba Divers Federation of SA

Adventure Activity Standards: why have standards?

AAS are voluntary guidelines for undertaking adventure activities in a manner designed to promote:

1. **Safety** for both participants and providers
2. **Information** for providers against legal liability claims and criminal penalties
3. **Assistance** in obtaining insurance cover.

These AAS are **not** statutory standards imposed by law.

Basis of legal liability

Legal liability for personal injuries or property damage is primarily governed by the law of:

1. Contract
2. Negligence.

Although provisions of statutes such as the *Trade Practices Act 1974 (Cth)* and the *Recreational Services (Limitation of Liability) Act 2002* are also relevant.

Claims in contract

For there to be a claim in contract there must be a legally enforceable agreement (i.e. a contract) between the person who has suffered injury or loss and the provider against whom the claim is being made. For example, there is a contract between a provider and a client, where the provider agrees to provide services for payment. The contract can be in writing or oral, or both. The claim in contract can only be made by one party to the contract against the other party, unlike a claim in negligence, which is not so limited.

Apart from the express terms of the contract, the law will usually imply certain terms into a contract that require a service provider to do a number of things when providing that service. Those implied terms might include a requirement to provide competent guides and instruction, safe equipment, and a general requirement to exercise the degree of reasonable skill and care which is to be expected of a competent provider. Some of these terms will be implied by sections of the *Trade Practices Act 1974 (Cth)* and the *Recreational Services (Limitation of Liability) Act 2002*.

If injury or damage occurs because the provider did not exercise reasonable care in the provision of the service, a Court can find there was a breach of the contract entitling a party to claim compensation (damages) for the loss or injury suffered.

Claims in negligence

Over recent years the law of negligence has undergone substantial legislative change in South Australia. These changes are set out in the *Civil Liability Act 1936 (SA)*.

The essential elements of a claim in negligence are:

1. a duty of care being owed by the provider to take reasonable measures for the safety of their clients/participants

2. a breach of this duty of care
3. the breach of the duty of care being a cause of the harm suffered by the participant.

A successful claim in negligence against a provider will result in an award of damages against that provider to compensate for the loss or injury thereby suffered.

Although the law does not automatically impose a duty of care, it is likely such a duty will be imposed when one party (the provider) assumes responsibility for another in the provision of adventure activities.

The duty of care is a legal requirement imposed by the courts on a provider to take reasonable care to protect a client or participant from foreseeable harm or loss.

If a claim is made and a court finds that a duty of care is owed, the court must then decide what is the appropriate level or standard of that duty of care, to determine if the provider has acted reasonably or alternatively has breached the duty of care. The standard of care is determined by all the relevant circumstances and the particular facts of each case. A court will have regard to the experience of the providers and the clients, the conditions at the time, and ultimately may seek the guidance from experts in the field. A court will find that the standard of care has not been met, (i.e. there has been a breach of the duty of care) if the evidence, on the balance of probabilities, establishes that the provider has not acted reasonably in the circumstances. If that conduct has caused loss and damage the provider will be liable to pay damages to compensate the party who has been injured or has suffered a loss.

For example, in an outdoor recreation activity some participants could find themselves in a situation suited to more advanced participants. There may be persons in the group who have been lead to believe by the provider that a certain skill level was not required and enrolled to join a group mis-described as being for 'beginners'.

If an accident occurred due to their inexperience, and these 'novice' participants were injured, it is possible that a legal action to recover damages might be based as follows:

- in the law of contract, against the provider, if it can be demonstrated that the provider incorrectly described the group as being for 'beginners'
- in the law of negligence, against the leader and guide, as well as the provider because of a failure to adequately instruct, advise and perhaps supervise the group.

The duty of care of the provider is higher than that placed on the ordinary citizen because the provider has agreed to provide services for a reward or assumed a responsibility of care for others, e.g. by holding him/herself out as experts or specialists who have agreed to take participants into potentially dangerous or remote situations.

Whilst not an exclusive list the following is a guide to the standards that should be addressed by any provider, guide, instructor, teacher or staff member:

- ensure the activity is appropriate for the skills and experience of the intended participants
- ensure the intended activity is appropriate given the known, expected and forecast conditions

- provide adequate staff/leader supervision
- provide competent and appropriately trained staff/leaders
- provide safe and properly functioning and adjusted equipment
- provide reasonable food and safe shelter (if relevant to the activity)
- provide reasonable guidance, instruction and direction to participants
- depending on the activity, have an adequate knowledge of the area in which it is to take place and be able to provide reasonable first aid, emergency backup and rescue.

The law will require the provider to protect participants from known hazards, but also from those risks that could arise (that is, those that the provider, instructor, teacher or staff member guide should reasonably have foreseen) against which reasonable preventative measures could be taken.

In these circumstances, in order to limit potential for legal liability and to minimise the risk of injury, each organisation needs to implement risk and safety management processes, which have identified foreseeable risks and put in place measures to control such hazards. For the same reasons, all providers, leaders or guides ought, as a minimum, to have completed appropriate first aid and activity specific training.

This is particularly so where the activity is a specialised one. In these circumstances, as a participant will be seen as relying on the expertise of the provider, leader or guide, a high duty of care will be imposed because they will be considered as having a responsibility for the control, guidance and protection of the participant.

Defences against claims by participants

No Negligence

The most obvious defence to a claim in negligence is for the operator to establish that he/she acted with all reasonable care in the circumstances: that is, was not negligent.

In attempting to do so the following questions must be considered:

- was the risk of harm foreseeable?
- was the risk not insignificant?
- would a reasonable operator have taken additional precautions that would have prevented the harm?

In determining whether a reasonable operator would have taken additional precautions a court will consider the following (amongst other relevant things):

- the probability that harm would occur if care were not taken
- the likely seriousness of the harm
- the burden of taking precautions to avoid the risk of harm
- the social utility of the activity that creates the risk of harm.

Voluntary Assumption of Risk

If it can be proved, on the balance of probabilities, that a participant was fully aware of and freely accepted the risk of suffering injury in an activity then this will be a defence to a claim in negligence. It will not be a defence, however, if the injury was caused by the inexperience or incompetence of the provider, defective equipment, inadequate supervision or instruction as it is highly unlikely that any participant would have consented to accept such risks.

If the risk of harm was an obvious one then there is a rebuttable presumption that the person who suffered the harm was aware of the risk.

Duty to Warn

A person who owes a duty of care to another person to give a warning, or other information in respect of a risk, satisfies that duty if reasonable care is taken to give that warning, or other information. This is potentially very important in the context of an Adventure Activity where it may be prudent for the provider to give all participants printed instructions and warnings (where appropriate) and obtain signed acknowledgements.

However, section 38 of the *Civil Liability Act 1936 (SA)* prescribes that there is no duty to warn of an 'obvious risk', or if there is an applicable code of practice in force under the *Recreational Services (Limitation of Liability) Act 2002*. Further to this, the section does not apply if the plaintiff has requested advice or information about the risk from the defendant or if the defendant is required to warn the plaintiff of the risk either by law or pursuant to the code in force under the *Recreational Services (Limitation of Liability) Act 2002*.

Contributory Negligence

If the accident was caused or contributed to by lack of reasonable care on the part of the participant then this will be a partial defence, according to the apportionment of responsibility made by the court between the provider and the participant. In cases of extreme acts of negligence by the participant, contributory negligence can be very high (e.g. 80–90%) and sometimes a complete defence.

Inherent Risks

A person is not liable in negligence for harm suffered by another person as a result of an inherent risk. An inherent risk is a risk of something occurring that cannot be avoided by the exercise of reasonable care.

Waiver to Sue/Exclusion of Liability Agreements

Amendments to the *Recreational Services (Limitation of Liability) Act 2002*, and the *Trade Practices Act 1974 (Cth)* enables providers of 'recreational services' to modify or exclude a duty of care owed to a consumer by the use of a waiver or limitation of liability. This will only apply where there is no registered code in relation to the recreational service. The amendment will only apply until 1 August 2007, after which time the only manner in which liability will be able to be modified with respect to a recreational service will be in accordance with a registered code.

Good Samaritans, Volunteers, Apologies

Good Samaritans

Under the *Civil Liability Act 1936 (SA)* (as amended) an individual who provides assistance, advice or care to another person in an emergency, where there is no expectation of payment by money or other means, will not be able to be sued for any injury or harm he/she causes if acting in good faith without recklessness (provided the good Samaritan's ability was not significantly impaired by alcohol or drugs).

Volunteers

Pursuant to the *Volunteers Protection Act 2001 (SA)* volunteers are protected from liability for injury to another when they are acting in good faith and without recklessness in the course of carrying out community work for a community organisation. This immunity does not operate if the volunteer's ability to carry out the work properly was impaired by drugs or the volunteer was acting outside the scope of activities authorised by the community organisation or contrary to instructions given by the community organisation.

Expressions of Regret

The *Civil Liability Act 1936 (SA)* provides that no admission of liability or fault is to be inferred from the fact that a person expressed regret in respect of the incident relating to the injury.

Limitation on claims for personal injury damages

Pursuant to the *Civil Liability Act 1936* (as amended) an injured person cannot obtain damages for pain and suffering unless the injured person's ability to lead a normal life was significantly impaired by the injury for a period of at least seven days or medical expenses of at least the prescribed minimum have been reasonably incurred in connection with the injury. The assessment of pain and suffering is assigned a scale value on a scale running from zero to sixty, sixty being the most severe form of injury.

The Act also imposes a cap on damages for pain and suffering of a maximum of \$241,500 (indexed annually) together with other limitations in respect of damages for mental harm, and claims for both past and future economic loss.

Applying the Adventure Activity Standards

Having suitable risk management programs and strategies in place, and ensuring the AAS are met, will minimise the likelihood of injury or loss. Evidence of compliance with such programs and the AAS may also assist in the legal defence of claims and in helping to establish that a provider and its leaders have acted reasonably in the circumstances (i.e. were not negligent). It is also likely such programs will assist providers in obtaining more favourable insurance arrangements.

Disclaimer

The above comments on legal liability in Contract and Negligence and defences and limitations thereto, including recent legislative changes, do not purport to be a complete and accurate description of the law on these topics. The State Government of South Australia (Office for Recreation and Sport) and Recreation SA, its servants and agents are not by these comments providing legal advice to any person, company or organisation and make no warranties with respect thereto and to the maximum extent permitted by law disclaim all liability and responsibility for any direct or indirect loss, damage or liability which may be suffered or incurred by any person, company or organisation as a consequence of or in reliance upon anything contained in, implied by, or admitted in this document.

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Activity description**Existing Industry standards for SCUBA diving**

Any organisation(s) undertaking the provision of recreational scuba diving at, or as a part of a workplace, must be accountable to, and operate at least to the standards of, the Australian Standard AS 2299.3.

Where recreational scuba diving takes place independent of a workplace (such as club or other formally organised groups) all participants are expected to dive only if they hold a current and industry recognised entry-level qualification (equivalent to Australian Standard AS4005.1) with the appropriate experience for the dive being undertaken.

For both commercial and non-commercial groups, non-qualified participants may undertake introductory dives but must be accompanied by a suitably qualified instructor.

Industry standards for aquatic wildlife tours (e.g. whales, dolphins and seals)

In South Australia there are regulations in place to provide for the long-term protection of whales and dolphins. Whales, dolphins, seals and sea lions are protected in South Australia under the National Parks and Wildlife Act 1972. They are given special protection in the Great Australian Bight Marine Park and the Adelaide Dolphin Sanctuary.

Swimming with seals around breeding colonies can be dangerous. These seals are often aggressive, and white sharks are known to be present around all South Australian breeding colonies. The white sharks feed on young pups as well as older sick or injured seals. The sharks are mainly attracted during December because of the increased blood/afterbirth in the water.

In non-breeding areas where there are haul out platforms for seals there has been a long history of people interacting with seals with no recorded injuries but care is essential.

Due to these and other complexities regarding snorkelling/diving with wild seals, the adventure activity standards suggest that such activities should only be undertaken with experienced instructors/guides who have a thorough knowledge of the area.

This AAS has been developed to clearly describe accepted industry practice for all organised groups undertaking snorkelling activities in South Australia (commercial and/or non-commercial and including wildlife swims).

This AAS has been documented to consider two distinct types of snorkelling activities:

- **Snorkel swims** where participants primarily swim on the surface of the water, are positively buoyant at all times and are using snorkelling equipment
- **Snorkel diving** where the diver is close to neutral buoyancy* (with the potential to become negatively buoyant) and are able to engage in breath hold diving and swimming below the surface for relatively sustained periods of time.

* With a snorkel in the diver's mouth and wearing a mask, ensuring any buoyancy control device is deflated, the diver should float at eye level.

These AAS are not intended to apply when these activities are conducted in a swimming pool or enclosed areas such as rock pools provided risk assessments and/or existing standard operating procedures are in place (because the risks associated with supervision are significantly altered). There may also be situations where these AAS do not apply to Instructional snorkelling (where the intention is to facilitate skill transfer or development to participants in order that they may act independently or with minimal supervision).

Definition of terms

Organisation: A person or group of persons organised for a particular purpose and assuming the role of providing an activity (Activity provider) of either a commercial (for profit) or non-commercial (not for profit/community group).

Participant: A person whose welfare is the responsibility of a guide or instructor. (NOLRS 'Client')

Instructor: Imparts knowledge and skills to enable the participants to independently participate in the activity. Can work in a controlled site-specific environment or remote areas.

Guide: Takes participants on the experience but only imparts sufficient knowledge for the participants to be able to undertake the activity under direct supervision. Can work in a controlled site-specific environment or remote areas.

Leader: Generic term for someone leading activities in the outdoors: can be a guide or instructor, can be paid or voluntary.

Competency: The minimum industry agreed standard of skill and knowledge necessary for a specific activity being conducted at a specific level.

Emergency medical attention: Definitive medical attention being that of a medically qualified person (paramedic, doctor). This may be getting definitive medical attention to the injured participant/s or by getting the injured participant/s to definitive medical attention.

Neutral buoyancy: With a snorkel in the diver's mouth and wearing a mask, ensuring any buoyancy control device is deflated: the diver should float at eye level.

Summary of abbreviations

AAS	Adventure Activity Standards
DEST	Dept. Education, Science and Training
NTIS	National Training Information Service
ITAB	Industry Training Advisory Board
SRTA	Sport and Recreation Training Australia
NOLRS	National Outdoor Leaders Registration Scheme
CBD	Central Business District
GPS	Global Positioning System
Cth	Commonwealth

1 Planning

The planning section of the activity standards contains the documented protocol, administration and pre-activity aspects of AAS that must be completed before undertaking any activity in South Australian waters.

1.1 Considerations for a snorkelling activity plan

Organisations must carefully select venues that meet the objectives of the activity. To do this, the following considerations must be included:

- Objectives of the activity (desired outcomes)
- Supervision to participant ratio and group size (see 2.6 Ratios)
- Qualifications and experience of available supervision
- Suitability of the location for the age, skill and experience of participants including fitness (beginner snorkellers should not utilise environments that are potentially sensitive to fin damage, trampling)
- Suitability of access and egress with consideration given to environmental impacts
- Prevailing conditions and forecast conditions (waves, wind)
- Potential hazards at venue (rips, submerged rocks, currents and tides)
- Suitability of available equipment (wetsuits, rescue)
- Depth, conditions and temperature of water relative to participant's experience
- Proximity to medical expertise
- Suitability of available emergency communication equipment
- Access and remoteness of venue
- Land managers' requirements (access guidelines, registration, group numbers).

Due to the significant variation in the South Australian coastline, it is essential that the selected venue be appropriately researched.

When selecting the instructors or guides for a snorkelling activity, it is essential to consider that:

- the instructors or guides have the required competency to conduct the activity, effectively manage incidents and to satisfy the planned objectives (see 2.1 Competency of instructors and guides)
- the selected instructors or guides must be familiar with the specific venue being visited and be knowledgeable of the foreseeable variables
- the instructors or guides are knowledgeable about the nature of the environment being used and are able to implement the activity with minimal impact upon the location habitats, animals and plants.

1.2 Minimum pre-activity documentation

Pre-activity documentation is a minimum requirement for adventure activities. There are critical pieces of information that an instructor or guide and/or organisation must be aware of to maximise safety:

- Emergency strategy (including details set out below in 1.4 Emergency strategy)
- Participant's name, address and emergency contacts
- Any medical conditions stated by participants which may be relevant to the activity (for example, asthma (details of management plan required), diabetes, epilepsy, fainting/dizziness, specific allergic reactions, blood conditions which may effect bleeding/clotting, recent or longstanding injuries (e.g. back, knee, ankle), disability, conditions affecting balance, current tetanus and/or other relevant medical conditions (e.g. heart condition, migraines, pregnancy) and medication)
- After a clear pre-activity briefing, signatures acknowledging inherent risks and authorising any relevant emergency treatment by a medical officer must be received from each participant. Where possible, a parent/guardian must provide the signatures if participants are under the age of 18
- All participants over the age of 18 must sign a legal liability disclaimer/waiver to sue form.

All documentation must be readily accessible to the instructor or guide in the event of an incident or emergency and all individual participants requirements must be appropriately accounted for throughout the activity.

1.3 Risk assessment/checklist

The instructor or guide must conduct a risk assessment of the venue prior to any activity and document hazards, changes to expected conditions and how they should be reasonably dealt with. Consideration of risk in relation to marine life (sharks, rays, blue-ringed octopus) and appropriate precautionary considerations in the use of deterrents, shallow water blackouts and exposure should be considered.

As a minimum, a checklist must be completed before initiating any activity to ensure that the following considerations are appropriately accounted for:

- wave height and direction are appropriate
- tide is appropriate for the location
- any rips and currents are identified and accounted for
- wind direction and strength are appropriate for the planned activity
- access and egress are clear in case of an emergency
- sand bars are safe and/or appropriately considered to minimise risk
- other users are appropriately accounted for (including watercraft)
- risk of entanglement (fishing lines, etc.) is accounted for
- risk to the environment can be appropriately minimised.

Where any of the above are not as expected, appropriate strategies must be implemented.

It is recommended that the organisation or activity supervisor keep the checklist as a record of the conditions.

1.4 Emergency strategy

Every emergency strategy must be written to manage incidents and minimise their escalation.

The emergency strategy for a snorkel activity must be specific to each venue and activity session and must contain (as a minimum):

- evacuation plan/routes
- assembly points (where appropriate)
- contact details for key organisations (for example, police, ambulance, land manager, emergency services) and how they are best contacted (mobile phone, satellite phone, radio)
- planned start and finish time of the activity session
- a strategy for maintaining supervision ratios should any changes to the planned activity eventuate (adverse conditions, injured instructor/guide, participant(s) pull out of activity).

Supervisors of snorkel activities and an appropriate external contact, either within the organisation or otherwise, must be fully aware of the emergency strategy and a summary must be provided as a component of the preliminary group briefing.

A copy of the documented emergency strategy must be kept with other documentation and be readily accessible to the instructor or guide in charge and a non-participating contact in the event of an incident or emergency.

The instructor or guide in charge must communicate with the relevant external contact at designated time(s) where appropriate. Upon failure to do so the external contact must then notify the Police.

1.5 Restrictions to participation

Operational restrictions to a snorkelling activity session include extreme weather conditions, equipment, land manager or owner's requirements, type of venue and restrictions dictated by environmental factors as advised by the land manager or otherwise.

Individual(s) must be restricted from participating in a snorkelling activity session if they are deemed to be under the influence of alcohol or drugs, including prescription drugs which may affect performance and to participants who are unable or unwilling to follow instructions.

2 Responsibilities of the leaders

This section includes all aspects of the activity that involve the instructors and guides. This section covers the specific competency required to supervise groups at various difficulty levels and covers requirements of the supervising instructors and guides that form the basis of reasonable duty and standard of care.

2.1 Competency of instructors and guides

Providers of training for instructors and guides of snorkelling activities may include SCUBA diving associations, community organisations, in-house training, TAFE colleges, universities and registered training organisations (RTOs) and sports specific organisations such as AUF.

A snorkelling instructor or guide must be confident of having satisfied a process of skill acquisition and have experience which must be appropriate for the complexity of the activity and at least equivalent to that described by the following.

A statement of attainment for these units is not compulsory. However, the inclusion of this section is intended to provide a suitable benchmark describing the skills that a leader should have as described within the National Outdoor Recreation Industry Training Package.

Snorkelling lookout

Snorkelling activities are generally conducted with the appropriately competent person(s) (as described below) in the water with the participants.

Appropriate supervision also requires a 'lookout'. This must be an adult deemed to be responsible by the instructor or guide in charge of the activity.

There are no requirements for specific competencies or skills, nor experience for a person to act as lookout but they may only undertake this role if they have been specifically allocated the role and they have been carefully briefed on their responsibilities by the instructor or guide in charge prior to commencing the activity.

It is recommended that a lookout for a snorkel diving activity holds a current introductory first aid certificate (equivalent to SRXFAD001A (the old Level 2))

Snorkel guide

This is the competent person responsible for conducting a snorkel swimming activity. (This person may also assist a snorkel dive instructor in conducting snorkel diving.)

Code	Unit name
SRXEMR001A	Respond to emergency situations
SRXFAD001A	Provide first aid
SRXGRO001A	Facilitate a group
SRXGRO002A	Deal with conflict
SRXINU002A	Apply sport and recreation law
SRXOHS001B	Follow defined OHS policy and procedures
SRXRIK001A	Undertake risk analysis of activities
SROOPS002B	Plan for minimal environmental impact
SROOPS003B	Apply weather information
SROODR002A	Plan outdoor recreation activities
SROODR005A	Guide outdoor recreation sessions
SROS NK001A	Participate in snorkelling activities
SROS NK002A	Guide snorkelling

Snorkel Instructor

These units are in addition to those required for the snorkel guide level.

These units describe the ability (skill and experience) expected to conduct a snorkel diving activity. In addition to the knowledge and skills described by these units of competence, it is expected that any supervisor undertaking a snorkelling activity must have an appropriate rescue certificate.

Code	Unit name
SRXEMR002A	Coordinate emergency response
SRXGRO003A	Provide leadership to groups
SRXOHS002B	Implement and monitor the organisation's OHS policies, procedures and programs
SROODR003A	Plan outdoor recreation activities advanced
SROODR006A	Manage risk in an outdoor activity
SROOPS004B	Interpret weather conditions in the field
SROSN003A	Instruct snorkelling skills

As an aid to the guide, AAS recommend that logs should be kept and signed by an appropriate witness after each session.

Details of these units can be accessed by logging on to the Department of Education, Science and Training (DEST) National Training Information Service website at www.ntis.gov.au.

The above units are components of national training courses that encompass the specification of knowledge areas and skills relevant to the outdoor recreation industry and the application of that knowledge and skill to a standard of performance required in the workplace.

2.2 First aid

Decisions on the level of first aid should be based upon the risk assessment and emergency strategy for the adventure activity. Leaders and guides should have the appropriate first aid skills commensurate with the planned activity, the skills of the group and the location of the activity, including remote areas. A comprehensive first aid kit appropriate to the level of first aid training must be accessible at all times. Remote areas may require more advanced first aid skills such as Remote Area First Aid where leader and guides recognise, prevent and treat many illnesses and injuries prevalent in wilderness and remote locations.

The following provides an overview of equivalent first aid training with St John Ambulance and Australia Red Cross.

Level 1: Basic First Aid (Resuscitation) involves basic skills and knowledge in order to recognise and provide immediate first aid for a range of common illnesses and injuries and minimise the severity of injury or sudden illness.

Leaders and guides with Basic First Aid should be able to:

- perform CPR (resuscitation)
- manage breathing emergencies: expired air resuscitation (EAR)

- control bleeding, wounds and bandaging
- manage extremes of heat and cold
- manage injuries to bones, joints and muscles
- manage poisoning, bites and stings

Level 2: Intermediate or Senior First Aid involves skills and knowledge to recognise and provide immediate first aid for a range of common illnesses and injuries and minimise the severity of injury or sudden illness.

Leaders and guides with Intermediate or Senior First Aid should be able to:

- define the principles of first aid
- demonstrate knowledge of basic human anatomy
- recognise and manage both a conscious and an unconscious casualty
- perform effective CPR and expired air resuscitation (EAR)
- identify a range of common illnesses and injuries
- control bleeding and care for various types of wounds
- recognise and manage injuries to bone or soft tissue
- recognise and manage medical conditions that may need emergency care, including heart attack, stroke, asthma, diabetes and epilepsy
- use practical first aid skills using prepared and improvised materials
- demonstrate knowledge of first aid management for a range of common illnesses and injuries.

2.3 Responsibility of the instructor or guide

It is accepted that specific tasks may be appropriately delegated, but the responsibility remains with the instructor or guide who is in charge of the session.

Whenever conducting a snorkelling activity it is the responsibility of the instructor or guide in charge to ensure that the level of knowledge, ability, skill and equipment of each participant is appropriate for the level of difficulty and complexity of the activity and to receive acknowledgement from all participants that he or she has the role of leading the group. Responsibilities include but are not limited to:

- Conduct pre-activity risk assessment to research and plan for likely hazards/incidents/emergencies
- Confirm that the activity plan is appropriate for the group's experience/capabilities and is matched to the activity objectives
- Structure the activity to allow rest when necessary
- Ensure a full pre-activity briefing is carried out and understood by all lookouts, guides and participants (See 2.5 Communication and authority)
- Ensure that environmental values (natural and cultural) of the location are identified and communicated (e.g. no take in Marine National Parks and Marine Sanctuaries)
- Ensure that participants are appropriately protected from the environment (sun, cold, wind with rash vests, sun-cream, wetsuit, etc.)

- Ensure a practice session is conducted, skills are imparted and ongoing coaching of technical skills occurs where necessary
- Check first aid kit and communication equipment prior to activity
- Confirm head count before, regularly during and immediately following the activity
- Ensure that supervision ratios are maintained so that participants are supervised at all times
- Appropriately designate responsibility to guides and lookouts
- Appoint external contacts to notify Police, etc. if not contacted by designated times
- Notify external contacts of safe return/completion
- Check condition of all group equipment on return
- Ensure that any incidents are documented and reported

2.4 Assistants to the instructors or guides

When activities are conducted with more than one instructor and/or guide, the instructor or guide in charge must be responsible for the entire activity session.

All guides assisting the instructor or guide in charge of the activity session must support and assist according to the activity plan and manage any incident or emergency according to the emergency strategy if the instructor or guide in charge becomes injured or incapacitated (See 1.4 Emergency strategy).

When a lookout is involved in the supervision of a snorkelling activity, the lookout must be:

- present for the whole of the snorkelling activity
- observing snorkellers as they enter and exit the water
- continuously scanning and observing people who are snorkelling in the designated area
- keeping people within the designated snorkelling area
- able to perform a rescue or direct another person to perform a rescue
- sufficiently fit to perform a rescue if allocated that responsibility
- able to perform first aid in an emergency, or be able to direct another person to perform first aid (for snorkel diving this must extend to include resuscitation)
- using aids to enhance vision of the snorkelling area, such as binoculars and sunglasses
- continuously monitoring the snorkelling area, looking out for potential hazards, snorkellers, adverse change in conditions and responding appropriately
- wearing clothing that is identifiable
- able to communicate with instructors, guides, participants and appropriate emergency contact personnel at all times.

2.5 Communication and authority

Participants and leaders in all outdoor recreation and adventure tourism activities must use an agreed and understood system of communication. It is therefore essential that this system be devised before the trip and agreed as a component of the pre-activity briefing.

The most fundamental communication requirement is a clear full pre-activity briefing. This may be delivered differently according to organisational preference but must include and is not limited to:

- introduction of activity coordinator, instructors, guides, lookouts and objectives (explaining bright tops or easily identifiable clothing for activity supervisors where applicable)
- basic information about the venue, location, conditions
- the nature of the activity, inherent risks, emergency response (emergency strategy, emergency communication)
- explanation of designated areas (flags, banners)
- explanation of signals (calls, hand signals, whistle)
- explanation or demonstration of the buddy system and related emergency response (where used)
- expected conduct of participants
- equipment and clothing including detailed explanation of correct equipment use and fit
- strategies for environmental conservation including flora, fauna and rubbish removal
- confirmation that participants' clothing, hair and jewellery are appropriate for the planned activity
- confirmation that participants are free of the effects of alcohol or drugs
- confirmation that participants have understood the pre-activity briefing
- verbal health check for participants to voice concerns about their capabilities
- explanation of required documentation including completion and signing of waiver (Section 1.2 Minimum pre-activity documentation).

2.6 Ratios

Variables such as weather, venue (remoteness, conditions, difficulty) and the group (experience, competence, fitness and available equipment) will affect the supervision ratios. So there are clearly situations where your judgement will dictate the requirement for smaller numbers of participants per supervisor. Land managers and other snorkelling organisations may also suggest ratios that differ from AAS and where these are within AAS they must be regarded as minimum standards.

Regardless of these factors:

- **Ratio for any snorkel swim:** The ratio of supervision (Competent guide and/or instructor:participants) for any snorkel swimming activity must never exceed 1:10.

- **Ratio for a snorkel dive using the buddy system:** The ratio of supervision (Competent guide and/or instructor: participants) for any snorkel diving activity must never exceed 1:10, provided that the participants are organised to use a buddy system incorporating one up/one down.
For larger groups, the remaining ratio may be made up with competent snorkel guides so that one snorkel instructor and two snorkel guides may supervise up to 30 participants provided the conditions are appropriate and the buddy system is used.
- **Ratio for a snorkel dive with no buddy system:** If conducting a snorkel dive activity and for any reason it is not practicable to implement the above buddy system, a ratio of one instructor to four participants must be adhered to.

2.7 Group size

Any group of greater than 30 participants must be split, and each group must independently adhere to AAS.

AAS also recommend that, as it is far easier for one leader to supervise 10 participants than for three leaders to supervise 30, each group split into groups of 10 participants where possible. AAS acknowledge that this is not always practical or possible.

3 Equipment

Equipment requirements vary with the objectives of the trip plan and the environmental conditions likely to be endured. When planning equipment requirements for a snorkelling activity it is important to consider all possible eventualities.

3.1 Equipment used by the group

Equipment available to the group is to include:

- a comprehensive first aid kit
- a blanket or means for keeping a hypothermic participant warm and sheltered
- an appropriate communication device (mobile phone, radio) to immediately seek assistance in the event of an accident/incident
- dive flag (Alpha) where appropriate
- where snorkel diving more than 50 metres from a shore, boat or platform a safety float should be available for emergency and this should have a dive flag

Consideration should be given to the potential need for oxygen administration. This consideration will involve remoteness and availability of a suitably competent person.

3.2 Equipment used by the participants

All equipment supplied for recreational snorkelling must be:

- suitable for the type of recreational snorkelling being undertaken and of sufficient quality to ensure it performs effectively in the water
- checked before recreational snorkelling starts to ensure it is in safe working condition
- cleaned and kept in good repair
- all participants must be adequately protected from the exposure to the environment (sun, heat or cold): this may involve the use of sunscreen and wetsuits. If snorkelling in greater than 1.5 metres of water, participants must wear wetsuits

- where weight belts are used by participants (snorkel diving only) they must be fitted with a quick release mechanism and be weighted so that the participant is slightly positively weighted.

Masks must:

- be made with tempered glass or other scratch/shatter proof material
- fit the snorkellers properly
- have adjustable straps that are secure during snorkelling
- be disinfected prior to use by another person
- be clean and in good condition so that they do not leak
- have snorkel keepers in place.

Snorkels must:

- be available in the correct size for the participants
- be of such a design so that they can be easily secured in the correct position during use
- be disinfected prior to use by other people
- be inspected prior to use to ensure that the valves are in working condition
- have mouthpiece lugs in place, be clean and free of mould, tears and any sign of perishing
- have straps that are not splitting or perishing and are able to be secured.

Fins should be:

- available in the correct size for the participants
- free of tears and not perishing.

Selecting and using snorkelling equipment

The instructor or guide in charge of the activity session must ensure that snorkellers are advised how to select, fit and test the use of their equipment correctly.

3.3 Equipment used by the supervisors

All instructors and guides supervising a snorkelling activity session must ensure that as a minimum they have the same equipment listed under section 3.2 Equipment used by the participants above.

All supervisors (including the lookout(s)) must wear easily identifiable clothing and must have a suitable whistle (pea-less so that it can work when wet) on their person to communicate with the group.

3.4 Equipment condition, maintenance and storage

All equipment used in snorkelling activities must be:

- used, maintained and stored according to manufacturers' specifications where applicable
- checked before and after each activity
- provided in a clean and serviceable condition.

4 Environment and conduct

Marine National Parks and Marine Sanctuaries are areas of the coast and sea areas that are reserved under the National Parks Act for conservation of South Australia's unique and diverse marine and coastal environments. They are designed to protect marine and coastal life in the same way that National Parks protect terrestrial biodiversity.

Activities that involve removing animals (including fish), plants, artefacts or parts of the environment within that system are prohibited by law.

The leader, guide and organising body should be satisfied that participants are aware of their responsibilities (as members of the group) to ensure areas of scenic or recreational significance, special scientific or archaeological sites, and the natural environment are respected, and that the requirements of land managers are adhered to.

While recreational activities such as snorkelling and diving are encouraged, it is also important for operators of activities within these areas to:

- minimise the impact that their activity is having on the marine and coastal environment
- take active steps to inform participants of the natural and cultural values of the Marine National Park or Marine Sanctuary
- promote strategies to reduce human impacts on the park and the marine and coastal environment
- obtain a permit from the Department for Environment and Heritage for the activity if it is commercial in nature
- report inappropriate or illegal activities within the park to the Department for Environment and Heritage.

The following strategies for minimising impact of in-water recreational activities are relevant to all marine and coastal environments.

Disturbance to animals, plants, cultural values, and geology: many natural and cultural values can be compromised by activities that are poorly managed. Strategies which effectively minimise disturbance to natural and cultural values include:

- During any introductory briefing sessions participants must be informed about the natural/cultural values of local environment, any conservation overlays that apply (e.g. is it a Marine National Park or Marine Sanctuary?), and need for care through the activity
- Opportunities to provide some environmental learning as a part of the adventure activity should be sought by group leaders
- If there are any birds in sight, keep well clear and continue past where they are
- Leaders should actively gain knowledge regarding what species (beach-breeding shorebirds, roosting birds) breed on beaches in the area and respect these animals as, if they have chicks or eggs, their lives are at risk
- If doing activities near shorebird feeding areas (low-tide, mud-flats, etc.), ensure you will not disturb their crucial feeding times
- Never feed birds on beaches and remove all litter (your own and any you find).

Some equipment can have the potential to impact on environment through incidental damage. Strategies which effectively minimise disturbance to natural and cultural values include:

- Entry and exit points must be relatively free of plants/animals to avoid trampling
- Beginner snorkellers or divers should practise basic techniques in environments which are not likely to be adversely affected by fins, bodies, equipment, etc. impacting on marine plants or animals. Sandy areas or areas of bare rock are much more suitable for beginners than reefs with extensive algal/invertebrate cover
- Snorkellers or divers should be taught to keep fins and equipment (e.g. cameras, torches, hoses and regulators) well trimmed and away from dragging on benthic (bottom dwelling) animals and plants
- If using power boats, find out what types of animals are in the water with you. If penguins, be aware that propeller injuries are a possibility and reduce speed and look out for birds.

Individuals seeking isolation experiences are often confronted with large groups. This is an important issue for instructors and guides. For this reason instructors and guides of group activities should be mindful of other coastal users and make efforts to minimise disturbance to other users.

There are significant impacts caused by large numbers of people and frequency of visits on habitats. Strategies which effectively minimise disturbance to natural and cultural values include:

- taking reasonable steps to use a variety of locations for activities (if not location specific) in order to minimise long term change to areas being used for activities
- using only formed pathways where provided for access to and from the beach
- avoiding trampling of plants (including seaweeds and dune plants) and animals while accessing the water for snorkelling or diving
- instructors and guides should monitor signs of impact and where appropriate make changes to programs to reduce impacts
- ensuring that you do not visit feeding areas when birds are in the area because:
 - migratory shore-birds rely on maximum time for feeding per day to ensure good weight for migration
 - nesting birds with chicks will not let chicks eat when humans present: chicks will starve if people present all day.

Handling will often create unnecessary stress to organisms. Strategies which effectively minimise disturbance to natural and cultural values include:

- All animals and plants that are collected for observation should be handled with care (kept wet if from the water) and returned to the same environment from which they were collected
- Buckets and tubs should be used to provide good short term holding areas to allow observation of local marine life before releasing it back to the water. Ideally there should be **no** handling of organisms to minimise risk of injury to animals (bacteria on human skin, etc).

There is a very real potential for spread of pest plants or animals by transporting equipment to different venues. For this reason, every effort should be made to ensure that all equipment be cleaned after use and dried adequately before transport to other areas. Support vessels used for snorkelling or diving should be inspected after use (especially if left in the water for extended periods) and any attached animals and plants should be removed. Water should be drained from craft and the vessel washed in fresh water and dried thoroughly before transport to a new area.

To minimise the disturbance of breeding areas, particularly for birds:

- known animal breeding sites should be avoided during the critical times of the year
- clients/participants should be informed of the significance of breeding sites
- roosting and feeding areas should also be avoided where possible.

To minimise litter and other forms of visual or non-visible pollution, instructors and guides should ensure that no materials are left behind after activities and check areas used for signs of litter after activities and remove any materials left. Anything like string or twine is a hazard for birds, through entanglement. Pick up any fishing line, etc. too, whether it is yours or just there!

Feeding of animals can lead to behavioural changes resulting in less fear of humans than is appropriate, aggressive behaviour in seeking out food (this can be true of fish as much as of emus and kangaroos), lack of care for young animals, and the promotion of mouth infection and disease. For this reason, it is essential that groups never feed animals or encourage others to do so, and leaders should explain why it is inappropriate to feed wildlife and actively discourage this activity.

The following are recommended minimal impact approaches for SCUBA divers

Dive operators and their staff shall take reasonable steps to:

- ensure that excursion sites are suited to the training and experience of all snorkellers/divers, i.e. that the skills of the participants are appropriate to the sensitivity of the dive location
- promote awareness and understanding of the value of highly protected marine environments
- deliver key conservation messages in relation to trips to Marine National Parks and Marine Sanctuaries
- ensure that all gear is well trimmed to avoid entanglement of objects
- promote good buoyancy control to avoid collisions with biota
- promote activities that have no impact such as observation and photography
- maintain records of animals and plant sightings and contribute to knowledge of local areas where possible
- promote opportunities to learn about South Australia's marine life and Marine National Parks and Marine Sanctuaries.

The following strategies, which effectively minimise disturbance to natural and cultural values, represent acceptable conduct for the long-term sustainability of both the activity and the environment.

Waste

Rubbish: It is the responsibility of the group leader to ensure that no rubbish or introduced matter is left as a result of the group's activity in an area. This particularly applies to all food or drink packaging, food scraps and activity equipment. Leaders should plan to carry rubbish receptacles sufficient to enable all group-generated rubbish to be removed from the area. Where practicable, leaders should encourage participants to remove rubbish left by previous users.

Human waste: Faecal wastes are to be managed and disposed of in line with environmental regulations and land manager directions. This means that where toilet facilities are provided, these must be used. Where camping is permitted and no toilet facilities are available, toilet wastes must be buried at least 100 metres from a watercourse. If it is not feasible to bury wastes or to bury them at least 100 metres from a watercourse (e.g. narrow river valley, cliff areas), group leaders should plan to use equipment (e.g. 'poo-tubes') that enable the wastes to be removed and disposed of at a facility designed for this purpose.

Fire

Fire Bans: In most parks, the fire danger season in South Australia usually extends from 1 November to 30 April, depending on seasonal conditions. No wood fires are permitted in parks during this time. Some parks have year round bans on wood fires. Open flames are banned in all parks on days of extreme fire danger. These are declared by the Country Fire Service (CFS). Parks may be closed to visitors on Total Fire Ban days. The onus is on the leader to check the fire ban status for the area they are visiting. Phone or visit the Department for Environment and Heritage or CFS office for more details.

Camp Fires: Native vegetation within reserves is protected. In non-reserve areas, dead trees and fallen logs play an important role in the environment. In some parks, wood fires are prohibited or restricted. Gas or liquid fuel stoves are preferable. Where fires are permitted they must be:

- lit in existing fireplaces where possible or in a properly constructed fireplace or pit (minimum 30cm deep and a maximum of one metre wide) and returned as closely as practicable as it was
- cleared of flammable vegetation for at least three metres around the fireplace or pit
- kept to a minimum size necessary for cooking, minimising disturbance to the surrounding area
- attended at all times
- extinguished with water
- avoided if fuel is scarce
- avoided if at all unnecessary or where doing so will not comply with the minimal impact approach.

Camping

- Camp at established campsites where possible
- Make campsites away from water resources (at least 20 metres from any stream) and allow animals undisturbed access

- Use floored tents with poles
- No trenches around tents
- Use toilet facilities where available
- Avoid using any soaps or detergents. If they must be used, use only biodegradable soaps and detergents. Dispose of washing water at least 50 metres from any water source
- Wash all soil from camping and personal equipment and vehicles before leaving home or moving between locations, in order to avoid transporting seeds or soil-borne pathogens such as phytophthora.

In addition, walkers are also expected to:

- try to avoid tracks and other areas which will be intrinsically more prone to erosion, especially with larger groups
- use boot washing and or hygiene stations to assist in the prevention of phytophthora
- make reasonable efforts to minimise the impact of the group on others
- assist other parties in difficulty providing this action does not adversely effect the safety of the group
- be diplomatic with other groups and other recreational users of the area
- try to minimise noise.

5 Further information

Scuba diving: Scuba Divers Federation of SA www.sdfsa.net and the Diving Industry Association of SA www.scubadivesa.com.au

National guidelines for whale watching:

www.deh.gov.au/coasts/publications/pubs/whale-watching-guidelines-2005.pdf

South Australia's aquatic wildlife:

www.environment.sa.gov.au/animalwelfare/aquatic.html or contact the Department for Environment and Heritage, 1 Richmond Road, Keswick, SA 5035, (08) 8124 4900

Adelaide Dolphin Sanctuary: www.environment.sa.gov.au/coasts/ads/ and www.parliament.sa.gov.au/Catalog/legislation/Acts/a/2005.5.un.htm