

# Before the Next One

*Our sector has two ways of getting risk wrong. One of them nearly ended my career.*

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I place permanent hardware in Hong Kong rock that other people's lives depend on.

Nobody questions where it came from. Nobody has ever asked me for a qualification.

A drill is easy to buy. Most of these places are easy to reach. There is no register, no inspection, no licence, no legal requirement of any kind. The next person to arrive at that anchor will clip into it and trust it, and they will have no way of telling my work from something fabricated on somebody's kitchen table.

I know that because I have removed such things by hand. I have shown the hardware to engineers who confirmed it had been made at home. People had been trusting their lives to it.

## The Learning Curve Was Real

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I would like to say my own work was always sound. It wasn't.

Think of driving a nail into a wall. Hit it straight and it goes in clean. That is what happens now. In my early years, working largely alone, one or two nails in every ten would fold under the hammer, bend over, refuse to seat. Those had to come out and be cut away. Of the ones that stayed, some were not my best work.

That rate is now vanishingly small. I very rarely place something that has to come straight back out.

That is a learning curve, and it was a real one. It was also a learning curve I was permitted to have on other people's ropes.

What made it survivable, I used to tell myself, was prior experience, prior qualifications, and my own sense of what I owed to whoever came next.

I no longer think that argument is as strong as it sounded.

# The Knot I Didn't Tie

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Standard practice — not just current practice, but practice from long before my time — is to tie a stopper knot in the end of your rope. It costs three seconds. It is the most basic redundancy there is.

I had done it every single time. Every time, for years.

One day I was rushed. There was a lot going on. I skipped it, for the first time, and I went off the end of the rope. I fell twenty metres. I could not walk for three months. I spent a good part of that time genuinely believing my career was finished.

Here is the part that matters for everything that follows.

The reason skipping it felt survivable was that I had tied that knot hundreds of times and nothing had ever come of it. The practice had never once been tested to its limit. Its uneventfulness had quietly become evidence that it was optional.

It was not evidence of anything. It was luck, holding.

Experience did not save me. Qualifications did not save me. A genuine sense of duty to the people around me did not save me. What would have saved me was three seconds and a system I did not permit myself to skip.

So when I argue that our sector needs guardrails, understand where I am arguing from. Not from the outside. From twenty metres down.

# The Near-Miss Fallacy

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There is a name for what I did to myself, and it comes from aviation.

The near-miss fallacy is the assumption that because nothing has gone catastrophically wrong, the system is safe. Usually it means only that the system is marginally resilient — running on luck as much as design. In 2023, a *New York Times* review of federal aviation and NASA data found runway incursions in the United States running about 25 per cent higher than a decade earlier.

What happened next is the part usually left out, and it is the encouraging part. The regulator issued a safety call to action, moved on air traffic controller staffing, funded detection systems and accelerated alerting technology. Serious runway incursions — the ones where a collision was narrowly avoided — fell to nine in the 2024 financial year. That was the lowest since 2019, down from twenty-two the year before.

The near misses were data. Treating them as data worked.

Our industry is not immune to the alternative. Providers run sessions. Seasons pass without incident. Confidence hardens into complacency. Risk assessments get copied from last year.

Briefings become habit rather than practice. And when something finally goes wrong, the question is rarely *how did this happen* — the warning signs were almost always there. The question is why nobody acted on them.

I know exactly how that feels from the inside, because I did it to myself with a knot.

## The Numbers Are There If We're Willing to Look

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We do not have to look far.

In 2024, Hong Kong's emergency services responded to 588 hiking-related incidents. Fifteen people died. Three hundred and forty-five were injured. The Fire Services Department's special service calls — which cover all outdoor and wilderness emergencies — rose again in 2025, from 39,320 to 42,485, an increase of roughly eight per cent. A dedicated Mountain Search and Rescue Team now operates out of Sai Kung, working with the Government Flying Service on aerial searches.

These are not the numbers of an industry in crisis. They are the numbers of a sector under pressure, and they are moving in one direction.

What should concern us is not only the unprepared public. It is that incidents occur across the full spectrum of provision. Established, well-regarded operators — trained staff, proper equipment, genuine commitment to safety — have needed the air ambulance. Not because they were reckless, but because the environment is unforgiving, the activities carry inherent risk, and no system is immune.

The absence of a serious incident last season is not evidence that the system is sound. It may only mean the margin has not yet been tested.

## Nobody Is Checking

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Hong Kong has no licensing of outdoor activity providers. Nothing equivalent to Britain's Activity Centres Act. A commercial operator can take a school group into the hills tomorrow with no statutory qualification requirement of any kind.

What exists is guidance. The Education Bureau publishes Guidelines on Outdoor Activities, currently the May 2023 edition. They are better than people assume and worth reading. But two things about them need stating plainly.

They are advisory. The language is *should*, never *must*. The document calls itself a general reference and tells heads of schools to exercise their own judgment. And they are scoped to schools — activities "planned and organised by schools." Operate outside a school engagement and they do not apply to you at all.

Then there is what they cover. Ten activities: excursion, expedition, camping, orienteering, cycling, fieldwork, windsurfing, canoeing, rowing, sailing.

That list has not changed in over a decade. Set the current edition beside the 2015 one and the activities are identical.

There is no chapter on climbing. None on abseiling, coasteering, canyoning or sea kayaking. And — more to the point, because these are the ordinary substance of what most providers actually deliver — nothing on raft building, catapult building, pioneering, initiative tasks, the human knot, blind leads, or any trust activity. Most delivered programme hours in this sector fall into a category the guidance does not acknowledge exists.

Meanwhile sailing gets a supervision ratio of one to six, three swim tests, and instructions on where to position the lead boat.

A school running a blind lead has nothing to consult. A school running a rowing session has a page.

**On qualifications, one thing did change.** In 2015, water activity instructors needed a certificate "issued by related association(s)." The current edition reads "issued by a recognised association." *Related* is permissive; an overseas governing body is plausibly a related association. *Recognised* implies a defined set, and the only set offered is an appendix of seventeen bodies, every one Hong Kong-based. No British Canoeing. No RYA. No American Canoe Association. That was true in 2015 too — what changed is that the door narrowed by one adjective, and nothing was added in exchange.

**And on who wrote it.** I cannot tell you who was in the room. I can tell you what the document shows. Across the whole of it, exactly one item carries an attribution to an outside source: the risk assessment form, credited to a conference presentation given in June 2007. That footnote appears word for word in both the 2015 and 2023 editions, and it is the only external attribution in either. The only visible trace of practitioner input into Hong Kong's outdoor activity guidance is a reference to a talk given nineteen years ago.

In fifteen years of working outdoors here, I have not found anyone who was consulted on it. I have asked, including at long-established providers with decades of operating history. They tell me they were not involved, and that they would like to be.

The teachers are in no better position. The ones I speak to say plainly that when a provider hands over a list of staff qualifications, they do not know what they are looking at. They cannot tell what is relevant, what is current, or what is credible. They sign it off because something has to be signed.

That is not their failure. It is ours.

## The Opposite Failure

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If you want to see what arrives when a sector has not organised itself, look at Texas.

In the summer of 2025, floodwaters rose fast through the Texas Hill Country. Twenty-seven campers and counsellors died at Camp Mystic. More children died at other sites along the Guadalupe River. The camp's co-owner died trying to get people out.

Within weeks the legislature had convened a special session and passed two bills. Emergency operations plans. Enhanced inspections. Cabins removed from floodplains. Weather alert radios. Flood zone disclosure to parents. Most of that is sound, and an honest audit of outdoor programme risk management would probably surface gaps in several of those areas.

And a requirement that every licensed youth camp maintain two internet connections, one of them delivered over end-to-end fibre optic cable.

The intent behind it was defensible. A camp that cannot receive a warning cannot act on one; redundancy means the alert still lands when one channel fails. Stated that way it sounds like the minimum.

What happened between the intent and the instrument is the pattern our whole sector should recognise.

The camps least likely to have fibre available are the remote ones — the wilderness camps, the programmes furthest from infrastructure, which is to say the programmes most connected to the environment outdoor education exists to put young people into. Installation estimates ran from tens of thousands of dollars into the millions. Licensing fees, historically a few hundred dollars, were restructured into thousands. Camps cut their operating hours specifically to fall below the licensing threshold. Rural camps closed. Urban camps reduced activities.

Nineteen operators went to court. In May 2026 the state health department set the requirement aside, accepting cellular, microwave or satellite instead. Licensed camp numbers had already fallen from around 375 to just over 300, with more than a hundred previously licensed camps not reapplying at all. Camp Mystic withdrew its own licence application.

The requirement is gone. Not because the sector was consulted, but because it sued.

We start with what is genuinely needed. Other stakeholders get involved. It gets diluted, then repurposed, and what finally arrives does not fix the original problem — it just looks like something was done.

That is window dressing, and it is not cost-free. While it is being installed, camps close and children stop going outside.

## The Pendulum Always Swings

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This is not a new pattern.

In 1993, four teenagers drowned during a watersports session in Lyme Bay, England. The operator had been warned in writing by his own instructors that this was where things were

heading. He ignored them. The government initially resisted legislating; what changed it was a Private Member's Bill introduced by the MP representing the bereaved parents, which became the Activity Centres (Young Persons' Safety) Act 1995. The licensing scheme built underneath it was developed with the sector, and it raised standards that have held for thirty years. The statute arrived through a campaign. The standards arrived through practitioners.

South Korea shows the other failure mode entirely.

After a 2022 school trip in which a pupil died and the supervising teacher was convicted and given a suspended custodial sentence, teachers began withdrawing from off-campus activity. No ban was issued. None was needed. In Seoul, the proportion of elementary schools running single-day field trips fell from 98.8 per cent in 2023 to 51.1 per cent in 2025. Nationally, a teachers' union survey found only 53.4 per cent of schools still ran overnight trips. A quarter had shifted to day trips, one in ten to on-campus activities only, and 7.2 per cent had stopped experiential learning altogether.

That is what unchecked risk aversion looks like at scale. Not a dramatic shutdown — a slow erosion, school by school, teacher by teacher, trip by trip. The children who lose those experiences will never know what they missed.

Korea has since started to reverse it, moving to shield teachers from liability where they have met their safety obligations. Texas dropped the fibre rule. Both corrections are welcome.

Both took years, cost the sector heavily, and arrived only after the damage was done.

## Somebody Will Write Them

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Singapore did it the other way round.

The sector association there published its own standard of practice in 2018, before any tragedy. When a fifteen-year-old died on a high-element course in 2021, that association led the review, working with the national outdoor school and other stakeholders. The work became a national standard, prepared by a working group co-convened by practitioners, and a national council followed with members drawn from government, providers, academia and industrial safety.

Sector writes the standard. Tragedy occurs. Sector leads the review. Government adopts it.

The practitioners who led that work have also been honest about the cost. Some providers welcomed the code as overdue; others worried about what compliance would take, particularly the smaller operations. That honesty is part of why it holds.

I should declare an interest here, because it bears on everything I have just argued.

I am a director of the Hong Kong Outdoor Learning Association. It was founded on precisely this principle — that the sector should not leave government to make decisions about our work without us in the room. So when I argue that practitioners must write their own standards, I am

not a neutral observer. I am someone who helped build one of the vehicles for doing it, and I would rather tell you that than have you find it out afterwards.

## Creativity in a Closed Box

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Here is the part I find genuinely difficult, and I do not think there is a clean answer.

The same vacuum that let me place hardware unchecked is the vacuum that lets this industry take on young, curious, promising people and train them properly on the job. People who have been through the experiences they are now facilitating, rather than people railroaded through a certification pipeline into one approved way of thinking. Someone who holds an outdoor qualification is not the same thing as someone who works outdoors. I have met a great many of both.

Close the gap completely and you lose that. You lose the exploration, the new terrain, the person good enough to be trusted before a certificate said so.

But we already know how to hold this tension, because we do it every working day.

When we set a group a challenge, we do not tell them how to solve it. We would destroy the whole point. We want the invention, the argument, the wrong turn that teaches more than the right one. So we do not railroad them.

We also do not abandon them in an open field. We set the frame. What is out of bounds, what the resources are, what happens if it fails. The frame is what makes the creativity possible rather than what constrains it. A group with no constraints does not innovate; it mills about.

That is what our sector needs and does not have. Not a regime designed to eliminate uncertainty — that would not make outdoor education safer, it would make it impossible. If young people cannot meet genuine challenge, appropriate to their age and held by competent practitioners, they cannot develop the thing we claim to develop.

The objective was never zero risk. It is managed risk, understood risk, and the judgment to tell a systemic failure from an isolated one, a design problem from a resourcing problem, something needing better process from something needing better policy.

Guardrails, not rails.

## What This Means in Practice

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1. **Review your systems now** — not when an auditor asks, not after an incident. If nothing has gone wrong for three seasons, that is a reason to look harder, not to relax.
2. **Log the near misses and treat them as data** — the aviation lesson is not that regulators ignore warnings; it is that acting on logged close calls demonstrably works. Write them down, review them, change something.
3. **Protect the practices you never skip** — the ones that have never yet been needed are the ones most likely to feel optional under time pressure. That is precisely when they are load-bearing.
4. **Document your decision-making, not just your outcomes** — if it went well, can you explain why? If it went differently to plan, is that captured anywhere someone else could learn from it?
5. **Know what your qualifications actually certify** — and be able to explain it to a client who cannot evaluate it. If a teacher cannot tell whether your award is relevant, credible or current, that is our failure, not theirs.
6. **Connect with your professional body** — HKOLA, IOL, AEE, whichever is yours. Standards are not bureaucratic imposition. They are the sector's collective intelligence, organised and made legible to the world outside it.
7. **Lead the conversation before you are summoned to it** — with government, with schools, with the public. When something goes wrong somewhere in the world, be able to say clearly: here is what we do, here is why it works, here is what separates a well-run programme from a poorly run one.

The next tragedy is coming. Not because we are careless, but because the environment is unforgiving and the numbers are moving. What remains genuinely ours to decide is whether the response is written by people who understand the work, or by people responding to grief and public pressure with the most visible instrument to hand.

We can write the standards now, or we can live with the ones written for us afterwards.

*Nobody has ever stopped me. That is the argument, and it is also why I am the one making it.*

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