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March 8, 2018

The Honourable Marie-France Lalonde  
Ministry of Community Safety and Correctional Services  
George Drew Building, 18th Floor  
25 Grosvenor Street  
Toronto, Ontario M7A 1Y6

Debbie Conrad, Assistant Deputy Minister  
Ministry of Community Safety and Correctional Services  
Strategic Policy, Research and Innovation Division  
25 Grosvenor Street  
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**RE:** Comments on Draft Fire Regulations (Proposal No: 18-CSCS002 & 18-CSCS004)

Dear Minister Lalonde and Assistant Deputy Minister Conrad:

On behalf of the Rural Ontario Municipal Association (ROMA), I would like to share our best advice on three draft regulations to the *Fire Protection and Prevention Act, 1997* (FPPA), that were recently released by the Ministry of Community Safety and Correctional Services (MCSCS):

1. Firefighter Certification;
2. Community Risk Assessment; and
3. Public Reports.

Rural municipal governments are in general supportive of the efforts to modernize the FPPA and enhance the professionalism of the Fire Services that serve Ontario communities. However, we have serious reservations about a number of matters. ROMA fully supports the AMO position on this issue.

Concerns about fiscal impacts are significant in rural areas. Already small local governments are strained to provide services. We hear rural municipal governments talking about a 14% raise in property tax to cover training and the draft expectations. We cannot support the idea that requirements or standards would so exceed fiscal capacity, especially when the actual need for fire suppression continues to decline. These requirements as proposed will result in decisions where staff training could be paid for but there would be insufficient funds for operational costs such as equipment.

Additionally, there are some barriers in rural and remote areas with a volunteer force that make these proposals unworkable. Volunteers would be challenged to find 40 hours for additional training given that they work full time. Time to travel would require taking

vacation time from a full time job. There may be challenges in the ability to complete these new expectations even though they are knowledgeable and competent.

We trust that the Ministry appreciates the rationale behind why these key amendments are needed, and will recognize the significant burdens and impacts these regulations will have, especially on small, rural and northern municipalities if the fiscal, risk management, timing, and technical aspects are not resolved well.

Further, we strongly recommend the proposed Public Reports regulation not go forward at this time and the following key amendments or provincial commitments, prior to the proposed Firefighter Certification and the Community Risk Assessment regulations, be approved.

Finally, we question the wisdom of inserting “fire med” provisions when recent history shows there is no government support for this model.

In short, we provide this advice:

- Provincial commitment to fund new firefighter certification costs so that it is not an unfunded mandate for municipal governments;
- The Province provide, in legislation, liability indemnification for all municipal governments who certify their firefighters to the standards in the Firefighter Certification regulation and that this is done at least 12 months before this regulation comes into force;
- The proposed Firefighter Certification regulation does not come into force any earlier than January 1, 2020;
- Technical amendments to the draft Firefighter Certification Community Risk Assessment as per the attached appendix in the AMO submission as well as those provided in the OAFRC submission;
- The draft Public Reports regulation be held and not approved until Ontario’s Standard Incident Response (SIR) framework, system improvements, and implementation strategies are discussed and consensus is achieved at the Table; and
- Medical responses are not included in any future reporting requirements for municipal funded fire services.

Without proper gap analysis and fiscal impacts analysis it seems unreasonable to press forward with these proposed changes at this time. We would need continued consultation on these matters to ensure that a workable, practical direction forward be found.

Sincerely,



Ron Holman  
ROMA Chair