

AMO Response to Wildland Fire and Emergency Management Modernization

RESPONSE TO ERO# 019-8756 AND ERO# 019-8860

AUGUST 23, 2024

Executive Summary

The Association of Municipalities of Ontario (AMO) is a non-profit, non-partisan association that has been representing the interests of municipal governments across Ontario since 1899. AMO addresses common challenges facing our members and provides meaningful advice to the government on practical solutions that meet the needs of all Ontarians.

AMO is pleased to respond to the Wildland Fire Modernization (ERO 019-8756) and Modernization of the *Emergency Management and Civil Protection Act* consultations (ERO 019-8860). AMO is consolidating its response to both consultations as municipalities are often impacted by wildland fires and captured under emergency management programs and legislations.

AMO agrees that there is a role for everyone in preventing, mitigating and responding to emergencies. These emergencies, such as forest fires, flooding, pandemics, and cyber security attacks are projected to increase due to impacts of climate change, technology and globalization.

Municipalities are on the frontlines of emergencies that are increasing in frequency and complexity, but many do not have the resources required to effectively respond, mitigate and prevent them. Municipalities, the province, and key partners need to collaborate on a comprehensive, cohesive and inclusive approach to emergency management to ensure we are helping keep all Ontarians safe.

One of the best ways to respond to or mitigate future emergencies is to focus on prevention. For example, rehabilitating key infrastructure can help avoid or mitigate the impact of extreme weather events. This requires adequate support from other levels of government to ensure costly infrastructure is resilient and adaptive. Effective emergency management, whether due to extreme weather events or cyber security or pandemics, requires provincial resources and coordination that match the magnitude of the problem – which impact both municipal and provincial priorities such as adapt to climate change, ensure the health and safety of Ontarians, as well as protect the economy.

To support an informed response, AMO engaged with a range of stakeholders including elected officials, senior municipal staff and community emergency management coordinators.

Wildland Fires

AMO supports the intent of the Ministry of Natural Resources' (MNR) proposal to enhance forest fire mitigation, response and education. MNR firefighters put their lives in peril for Ontarians under extreme circumstances and a starting point for wildland modernization should be on ensuring that it is a choice that comes with safe equipment and stability. MNR firefighters have expert forest fire knowledge versus structural firefighters (or other forest firefighters from other jurisdictions) and understaffing can put pressure on municipal residents and resources to fill gaps. Many communities in the Fire Region are smaller municipalities that do not have the adequate resources or expertise to fight forest fires. AMO recommends that MNR provide resources to address challenges with recruitment and retention of its firefighters. This recommendation includes considering full-time MNR firefighters and safe equipment a *key* focal point of the strategy.

When a wildland fire creates road closures, the province could also explore improving the maintenance of logging roads to allow them to become viable alternate routes. This is particularly important in northern Ontario where there can be limited roads that allow people to move around safely during a forest fire.

AMO supports proposals for the Minister's authority or scope of agreements to clarify mitigating (prescribed burns) or remedying (e.g., rehabilitation of a forest) efforts – especially if it results in better forest fire planning and prevention in consultation with municipalities. However, AMO strongly cautions the use of provisions that would result in any downloaded responsibilities, costs or burdensome requirements on municipalities.

Finally, AMO encourages MNR to play a leadership role on education, guidance and awareness, including strongly promoting Fire Smart programs or providing clear guidelines, or resources for some, on Forest Fire Emergency Plans.

Emergency Management

AMO believes that there is an opportunity to outline clear roles and responsibilities in legislation for all partners and participants, including Emergency Management Ontario. Currently, the framework sets out expectations for municipalities and other ministries, but the province has levers to bring other partners to the table to conform to standards. For example, much of Ontario's core infrastructure (e.g., telecommunications, energy, and health etc.) are not delivered by municipalities. The legislation could be used as a tool to ensure that these critical community lifelines are appropriately managed during an emergency.

It is clear from speaking to a range of municipalities across the province that a "one-size-fits-all" approach to emergency management isn't working. Different sized municipalities have different needs for emergency response. AMO has heard from some municipalities that the requirements under the legislation are challenging to resource with small populations. On the contrary, some of Ontario's most populous municipalities have complex emergency management programs and feel like they may need unique requirements and more support from the province as they work diligently to keep most of Ontarians safe. A revised approach to the framework that takes the diversity of population sizes, needs and local conditions into account.

Emergency management at both levels of government function as a stand-alone function that is rarely integrated into other lines of business. Emergency management programs are frequently treated more as a "last resort function." The location of emergency management staff varies, with many working amongst first responders (fire or paramedics), while other municipalities have integrated this work into chief administrative offices. Regardless of their location, there is little cross-functional collaboration required through legislation to tie lines of municipal or provincial business to better emergency management outcomes.

For example, how could provincial-municipal partnerships better leverage existing requirements, such as asset management plans under the Ministry of Infrastructure be used to improve the quality of Hazard Identification and Risk Assessment (HIRA)? AMO is concerned that if a HIRA is prepared by a fire department, it may be isolated and not aligned with opportunities to improve built infrastructure to support safety outcomes.

AMO understands that part of the challenge around emergency management integration is a lack of professionalization across the sector. There are no standard requirements for individuals acting as a community emergency management coordinator, impacting consistency and outcomes across the province. AMO recommends that Emergency Management Ontario consider both the type of people that should be doing this work and the skills they need as the complexity and frequency of emergencies increases across the province.

Conclusion

Emergency Management requires the province, municipalities and key partners to work together to prevent, prepare, mitigate and respond. The bulk of response cannot be left to municipalities alone. While not all emergencies can be prevented – all levels of government could be doing more to support prevention - specifically municipalities would like to see more funding available to invest in infrastructure upgrades to prevent, prepare for, and mitigate future emergencies, especially as they face an increase in emergencies due to extreme weather events.

AMO appreciates the opportunity to participate in these consultations. We hope to continue to be a productive partner in a safe and prepared Ontario.