

PROPOSED SUBMISSION FROM Resolution 18-059, February 22, 2018

Re: Proposed Regulations for Mandatory Training & Certification, and Mandatory Community Risk Assessments under the *Fire Protection and Prevention Act, 1997*

At its regular meeting of February 22, 2018, the Council of the Municipality of Temagami reviewed proposed regulations to the *Fire Protection and Prevention Act, 1997*. The Municipality of Temagami believes the provisions contained within the Consultation draft regulations will negatively impact small rural volunteer fire departments within the province of Ontario.

Mandatory Training Certification

While fully supportive of reasonable measures promoting the safety of **all** firefighters, the Municipality objects to the proposed process for mandatory certification of training for new recruits (2 years to NFPA level 1 & 2), or for firefighters or officers with years of experience to undergo entry level NFPA 1001 Levels 1 and 2 training, including mandatory certification processes as a prerequisite for further training and advancement opportunities. For current firefighters, this measure could exclude experienced individuals from advancing into leadership roles within the department, negatively impacting on a fire department's ability to effectively plan for the future. As a recruiting tool, this measure will exclude individuals willing to give a few hours a week to help their community from joining the volunteer fire service. Mandatory certification to NFPA 1001 for new recruits within 2 years of joining, in addition to other mandated training requirements, will be seen by many as a commitment of personnel time that is more than they have/are willing to give.

The Municipality strongly feels that the proposed regulation must be re-visited and revised to include:

1. Considerations for volunteers to train to a standard without mandatory training certification timelines.
2. If mandatory certification will be a requirement, extend the timelines in which the training for new recruits will be achieved. Extend similar timelines to individuals advancing into leadership roles within the department.
3. If mandatory training regulation is legislated, provide specialized ongoing funding to municipalities with volunteer departments to support implementation of the mandatory training regulations,
4. That the regulation not come into force until at least January 1, 2020, to allow municipal councils and their fire services to make all the necessary training funding decisions.
5. That the OFMEM must ensure timely access to free testing for departments, including all associated costs of the practical skills testing /accreditation for firefighters.
6. A number of fire fighters did not take advantage of the grandfathering in 2013/14 as firefighters saw no need to seek certification at that time. If the government believes in fair play and grandfathering is to be opened, it must be opened to all departments, not just the departments that chose not to submit during the 2013/14 grandfathering opportunity.

Mandatory Community Risk Assessments

The MCSCS is proposing that municipalities be required to conduct a standard risk assessment every five years focusing on key profiles in their communities (e.g. demographics, geography, past fire loss and event history, critical infrastructure, building stock profile within the community, etc.). Small rural communities experience little change over 5 years and it appears onerous and unrealistic to expect small departments complete risk assessments every 5 years.

1. We recommend the time interval be extended to a minimum of every 10 years.
2. In addition, specialized funding should be provided to Municipalities completing the assessments, based on the extent of support and assistance small rural and northern municipalities in completing the Community Risk Assessments the OFMEM provides.
3. We further recommend the Ministry consider revisions to the following sections in Schedule 1:
 - Section 2 – difficulty in reporting based on building stock profile and the state of compliance with the fire code. We suggest using MPAC data, and deleting the requirement for code status.
 - Section 3 & 5 : Appears to duplicate information required by Emergency Management, - remove duplication requirements
 - Section 9 (2): Our community does not provide fire protection services to approximately ½ our tax base, the majority being water access properties
Comparison of the community experience to other “like” communities may be extremely time consuming, and difficult to achieve – remove or compare to provincial trends.