

Preamble:

If a true whole of society approach is needed to strengthen wildfire management in Ontario, work needs to be conducted using a holistic government approach.

**1) Do you support strengthening collective responsibility for wildland fire management in Ontario? What steps can be taken to immediately strengthen collective responsibility for wildland fire management?**

Supporting and strengthening collective responsibility for wildland fire management is a must, but it cannot be done under the current Emergency Management Order-in-Council 1739/2022 (OIC). Effective comprehensive emergency management is not currently being carried out in Ontario. The Wheatley, ON explosion incident in Aug 21, 2021 highlights this, "The Abandon Oil and Gas Well issues in Southern Ontario." The current operational risk governance is not able to address modern and current risks. At one time the MNR was the "expert in all natural hazards". The risk has evolved, requiring the public to have a better understanding of how risk management works and the changes we must make. (*Wheatley Explosion*)

Here are some immediate strengthening opportunities:

In the 1990's, downloading and aggressive amalgamation took place in the province of Ontario, leaving municipalities redesigning their services. Small rural fire services turned into large combination fire services. Risk assessments were not collaborative, they focused on residential fires and did not address things such as: Rural Risks, Rural Equipment, Training, Rural Enforcement.

- The Ontario Fire Marshal (OFM) is now mandating National Association of Fire Protection (NFPA) codes and standards to be followed including, as of July 1 2024, every municipal firefighter to hold an NFPA 1001 Standard Certification. The MNR can leverage this in multiple ways.
  - The OFM, Northern Fire Protection Program, now has a cadre of trained individuals. This gives a capacity for the Ontario Government and MNR to use them in Value Protection Units. Within Manitoba, "Manitoba's Hydro's, Emergency Response Crew members are used in the Manitoba Wildfire Program for Value Protection Units for an example". This would increase employment in the rural areas and may put more people who are attending community college for the NFPA 1001 Certification to work. (*Manitoba Hydro*)
- Have the MNR fire prevention program take more of an active part in the implementation of NFPA 1300, Community Risk Reduction Programming and the Community Risk Assessment. The current Firesmart has seven disciplines. Now The current OFM Community Risk Assessment following NFPA1300 has the 5 E's. "Engineering, Education, Enforcement, Economic Impacts and Emergency Services" (NFPA 1300).

## **2) Do you have suggestions for an approach or model that would support advancing the collective responsibility for wildland fire management.**

With the OFM now adopting: NFPA Codes and Standards which includes Training, Equipment, Education and some Engineering, it's time to modernize collective responsibility for wildland fire management.

- An examination of jurisdictions outside of our boundaries for models must include the United States and Australia. The Department of Forestry and Fire Protection in California (CalFire) is a state led agency that manages both structural and wildland fire suppression efforts. With standardization comes interoperable equipment, training, and command and control.
- The Province of Saskatchewan is having growing pains with its Saskatchewan Public Safety Agency. But the leadership is moving in the right direction. For the public, it is a one window service to any hazard related issue.
- ICS is a command-and-control model. Prior to the announcement of 2024 that ICS was going to be adopted in the Province of Ontario, the province has over 5 Incident Management Models. Pick a single approach and use it. This will build trust and acceptance within users which will lead to compliance and smoother interoperability.
- NFPA Codes and Standards: when looking at the current inventory of equipment across Ontario, it is understood that CIFFC standards are being followed. However, if you're asking communities to participate in risk management, communicate in a language they will understand. Types and kinds of equipment must be explained so the partners are able to request additional resources effectively.
- Does the infrastructure meet the standards for rural fire protection? "Should grants, transfer payments include a minimum standard, such as: properly installed and maintained dry hydrants and escape routes?". Ontario fire and building codes currently does not address, many of the wildland urban interface risks.

## **3) What types of information and tools would help individuals and communities with identifying and understanding wildland fire risk?**

The information that is needed is true situational awareness: "Who is doing the job, where is the work being done"? We live in structures and use the forests. The MNR had a larger presence in the 1980s and early 1990s. The key to understanding is communication of the risk. MNR had small equipment caches that municipalities could draw upon if an event of fire was threatening them "Provincial Forest, Fire Trailers".

- If real community risk reduction is to take place using, Hazard Identification Risk Assessments (HIRA), Community Risk Assessments (CRA), Disaster Risk Reduction (DRR) plans, it needs to be a comprehensive approach using one brand of tool.

- Codes and standards need to be reviewed. It is apparent in the struggles municipalities are having working under the current OIC in the province, and the impacts are to local: health, tourism and travel. Community leaders are aware of failings in risk governance.
  - Risk communication is the key to any program. Why would Canada retire Smokey Bear, prior to not having provincial public communication plans? CIFFC rolled out Firesmart Fox, “Ember”, with little communication. Smokey Bear is a 80 year old tool and is not the message.” Why is Alberta still having such a problem year after year, as they have had Firesmart since the 1990’s, is the message incorrect for the risk and hazard? We need different messages for different hazards and risks.

Example:

Pulp Mill Town: *“You could loose more then the forest, it could be your job”*

Central Ontario: *“Burning leaves can ignite your neighbour’s interest”*

- One size doesn’t fit all when it comes to information and tools to communicate risk. Adding or broadening the scope of risk assessments needs to be considered. With a collective effort, Emergency Management Ontario (EMO), Ministry of Natural Resources (MNR), Ministry of Environment (MOE), Ontario Ministry of Agriculture Food and Rural Affairs (OMAFRA) and Ontario Fire Marshall (OFM) all need to be on the same page and theme when it comes to wildfire risks.
- “Old wine new bottles”: Current high school Geography Curriculum in Ontario includes Natural Hazards. It has been said many of times, in risk communication “Get the Kids, You Get Adults”. The early years of forest fire risk communication included the program; Focus on Fire and Focus on Forests. This was delivered by MNR staff across the province in the 90’s. This was an opportunity to hear from experts and open a dialogue and pathway to careers in the MNR, this option could be revisited.

#### **4) Industrial activity can cause wildland fires. Many types of industrial activities are already subject to various fire prevention rules and regulations. Do you have suggestions about how to improve the approach to preventing and preparing for wildland fires caused by industrial activity?**

- The need to once modernize the language and terms. Examples of this include: “Industrial should change to Critical Infrastructure following Public Safety Canada verbiage”. Fire prevention rules and regulations need to advance alongside the language.
- The Province of Saskatchewan’s Wildfire Act, Part 6. It includes the ability for the public safety agency to review and comment on new industrial developments in and around crown land. (Sask Wildfire Act)

- Conducting a specific type of Community Risk Assessment for the community you're dealing with, will give the opportunity to plan for industrial activities. It has been said that every disaster is local, so should be the risk assessment then. The current roles of staff need to change to include internal education on the various risk assessment types. The United Nations, Organisation for Economic Co-operation and Development has great references for the specific hazards and risk analysis. (*OECD Guide*)

**5) What resources and support are necessary for municipalities and industry to enhance wildland fire management planning that comprehensively addresses wildland fire risks?**

To enhance resources and support for municipalities and industry, the MNR as a whole needs to be an active member of the, Community Risk Reduction process this includes:

- Cutting edge training material.
- Access to multi-role resources: Ontario Government, July 29, 2024, announcement, 5 new helicopters. Could these multi role aircraft be specked out for, water bucketing of Out of Fire Region Fires? This would reduce government from siloing of resources and increase public safety. (*New Helicopters*)
- Ontario has many Municipal, Federal and Provincial lands within the Out of Fire Region (OFR). If these lands burn, it will cause a significant problem in suppression based on current geographical response boundaries. Agreements don't go far enough. (*OFR Fires*)
- MNR has a fleet of "Engines". Can the next iteration of these trucks be built to meet NFPA standards to run a longer fire season and support municipal mutual aid plans and programs? Once again parts of the province are moving to standards and best practices, other ministries should follow them.

**6) How can we foster collaboration among individuals, municipalities, industry, Indigenous communities, and other emergency partners to build capacity, invest in, and take proactive measures for wildland fire prevention and mitigation?**

Wildland Fire Prevention and Mitigation conjures up ideas of MNR fire rangers in a parade, giving a presentation to cottage associations or handing out stickers at street fairs. Those are all still necessary. Internally the government needs an overarching modern public safety strategy which includes Climate Adaptation and effective modern risk assessments. The MNR can't be teaching courses to communities when other groups are filling the void.

- The Union of International Association of Fire Fighters, MNR, NFPA, ICS, are all providing wildfire mitigation and education in Ontario, can these courses be incorporated in the following areas of offer:
  - High Schools / Ontario Community College / OFM / MNR collaborations.
  - Risk Assessment Training for Hazard Specific Communities not just a HIRA and CRA.
  - A working provincial common operating picture, that any trusted agency can feed into.

## **7) What innovative approaches can we explore to collectively fund prevention and mitigation activities?**

These approaches come with unique challenges. It's going to require creative thinking that will lead to these new funding opportunities.

- Buy-in for Public, Private, Partnerships, P'3, is always a challenge. However, changing the verbiage from: prevention and mitigation to "Climate Adaptation" becomes more inclusive.
  - Under the current OIC, natural hazards fall under MNR. If we look to the States, we see large scale partnerships with private companies, leveraging, retailers to endorse the programs, by making it geographically local, Home Depot is one example.
  - Be specific in your efforts, what works on the James Bay Coast doesn't work in Bancroft.
  - Ontario Parks have been using a P3 model for years, leverage their experience, like contracts with PepsiCo.

## **8) How should MNR better prepare and respond to wildland fires?**

It is this author's opinion that MNR needs to do 4 things to better prepare.

1. Separate Wildland Fire Management from community protection. Stop the overlapping of efforts, ex. Risks Assessments (CRA, HIRA, FireSmart), Training and Equipment.
2. Build the trust back into communities: One incident command system, one comprehensive risk assessment.
3. Base Fire Region boundaries on risk not geographical lines.
4. Respect staff: they are not "Summer Students" they are Firefighters, treat them as such! OHS equipment and training need to be brought into the modern standards. "Challenges around communities like Geraldton, will continue to result in staffing issues as other industries pay more." (*Staffing Fire Rangers*)

## **9) How could individuals, Indigenous partners, organizations and other governments better prepare and respond to wildland fires and how could capacity be enhanced?**

- Develop a single window into natural hazards, with effective resources. No use training a system, conducting an assessment and making plans, if each ministry has it's own interpretation of the topic.

- Develop real resources for the province. Eg: sandbags are not the solution for all flooding. Setting internal standards that only can be met by internal staff doesn't make sense.
  - Since 1997 Firesmart has been used in Canada. We need more than a book on a desk. Bring other proven, Fire Adapted Community Programs to the province.
  - As the OFM moves to NFPA bring in building codes based on risk.
  - The government started with All Hazard Incident Management Teams, where is that program.? It seems Public Safety ministries, have short memories as we are not learning from the past and each other.

**10) What is needed for MNR and other emergency services, Indigenous partners, municipalities, and industry/ businesses to improve coordination and sharing roles and resources?**

To improve coordination and sharing roles and resources, MNR needs take the lead on the ICS system, type and kind of equipment, develop abilities for other agencies to call in resources.

- Based on the current OIC, local municipal resources are left to Mutual Aid Plans.
- A robust Common Operating Picture that works.

**11) Are these proposals the appropriate enforcement and compliance measures to support compliance?**

DO NOT WISH TO ANSWER THIS QUESTION

**12) What additional measures or authorities should be considered to effectively encourage compliance with the Act or the regulations?**

This author feels the development of a more robust permitting system is needed. Changing the multiple acts OFM, MOE, OMAFRA and MNR will increase situational awareness.

- Bring back the Fire Patrols / Fire Wardens; local Public Safety employees that can issue permits and speak confidently on local community risk reduction strategies and issue permits onsite as part of the process. Ideally this would be an all-year-round position, revenue generating programs. Drawing students from various university or college programs such as: Natural Resource Management, Climate Change, or Environmental Communication.

**13) What further consequences should be contemplated for individuals, organizations and companies that fail to comply with the Act or the regulations?**

Fines issued for failure to comply with the Act can not be considered as *"Part of doing business."*

- Make a scaled penalty system example:

Individual:

- First time offence in the Calendar year set amount fine increases for every offence.
- Cost recovery for suppression is a must.
- Second offence court summons, with loss of use from crown land and parks, cost recovery, and seizure of property or equipment for set time TBD.
- As it's extremely hard to find a person guilty of the charge of Arson, suspension of privileges of use of crown land and/or notification and fine under Off Road Use.
- If fines are not paid suspend MTO driving privileges.
- For every person found acting in part of the offence on crown land or parks or within so many meters of crown forest charged with set fine, plus cost recovery and/or restoration.

Organization:

- Set fine with ability for cost recovery of lost market value.
- Suspension of use of crown lands and parks
- Seizure of property and equipment for a prescribed time TBD.
- Seizure and sale of property and or equipment on second offence, with restriction of use of crown land including parks.
- Every person found acting in part of the offence or negligence on crown land or park within so many meters of crown forest be summoned. *(Much like a Bartender who over serves. The owner, the company and fellow staff can be charged)*

Company:

- Set fine related to area burned. Fire set 1ha : \$10000 fine in a form of a ratio or time.
- Seizure of, property, equipment and/or lands.
- Cost recovery is a must for a company found committing and recovery and restoration costs based on fair market value.
- Prescribed time suspension from use/work of crown land and parks.
- Having everyone found committing or having a part in the offence, minimum jail time or set fines.
- Restitution to the crown in the form of payment to Prevention Programs on top of things like victim surcharge.

## Conclusion:

The repetitive nature to the answers provided signals that there is a connection between, solutions. However, the themes that have emerged are not new. Learning from the past and each other will only reveal a path to move forward.



## Reference:

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