

January 21, 2025

Emergency Management Policy and Governance Project Team  
Emergency Management Ontario, Treasury Board Secretariat  
315 Front St. W  
Toronto, ON M7A 0B8

**RE: Bill 238, Emergency Management Modernization Act, 2024**

**Legislative  
Services**

10 Peel Centre Dr.  
Brampton, ON  
L6T 4B9  
tel: 905-791-7800

[peelregion.ca](http://peelregion.ca)

To Emergency Management Modernization Act Project Team:

Thank you for the opportunity to provide feedback on Bill 238, *Emergency Management Modernization Act, 2024* (EMMA). Peel Region appreciates having the opportunity to provide comments following the first reading of the proposed Bill.

Peel Region supports the modernization of emergency management legislation and the strengthening of emergency management across all levels of government in Ontario. Based on a review of Bill 238 following its first reading, Peel Region seeks clarification on the following areas of the proposed Bill:

- Peel Region requests clarification related to future program requirements along with details of the provincial planning framework.
  - The current *Emergency Management and Civil Protection Act* (EMCPA) along with *Ontario Regulation 380/04* contain requirements for Municipal emergency management programs which form the basis of annual compliance requirements by municipalities.
  - Similar requirements, including required roles, programs and facilities are not referenced in the proposed legislation (EMMA).
  - Peel Region presumes that further requirements will be identified through supporting regulations and within the provincial emergency management planning framework referenced in the legislation but currently not available for review.
- Clarification is requested related to the manner and scope of directives that may be issued by the Minister in the event an emergency plan does not meet the requirements of the Act.
- With the establishment of the Ontario Corps will other non-government organizations, who current support municipalities through contracted agreements, be encouraged to join the Ontario Corps?
  - Will municipalities be expected to enter into agreements with the Province prior to requesting and receiving the support and services of Ontario Corps resources?
- Clarification is requested related to the extent to which joint emergency programs and plans may be established.

- Under the EMCPA developing joint programs and emergency plans was limited to Counties and not Regions, Districts, or other Upper Tier municipalities.

While the proposed *Emergency Management Modernization Act, 2024* is a needed and welcomed enhancement for emergency management programs, further disclosure of information on supporting regulations and the provincial emergency management planning framework is needed to assess the full impacts and improvements the legislation will have upon existing emergency management programs.

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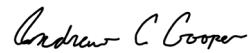
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Peel Region remains committed to the continuous coordinated improvement of both local and provincial emergency management programs. We will continue to support the development of emergency management legislation with our municipal and provincial partners and look forward to future opportunities to advance our shared emergency management responsibilities.

For any questions regarding the Region's above-mentioned comments, or for more information, please contact me at 647-293-5186 or [andrew.cooper@peelregion.ca](mailto:andrew.cooper@peelregion.ca).

Sincerely



Andrew C Cooper  
Manager, Regional Emergency Management & Corporate Security