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February 28, 2022

The Honourable Sylvia Jones
Solicitor General of Ontario
George Drew Building, 18th Floor
25 Grosvenor St.
Toronto, ON, M7A 1Y6
VIA: Email sylvia.jones@pc.ola.org

RE: Firefighter Certification

Dear Solicitor General Jones,

The Northwestern Ontario Municipal Association (NOMA) is writing you in response to the draft regulations posted on January 28, 2022, regarding firefighter certification. NOMA supports the creation of firefighting certification in Ontario, and we believe this the right direction. However, we do not support the current proposed standards as they will likely have a negative impact on many of the Municipalities in Northwestern Ontario.

The time period provided for review and consultation was too short to adequately understand the implications of the proposed firefighter regulations. NOMA has some concerns with the proposed standards and we and our municipal members require more time to achieve a comprehensive understanding of how the regulations will impact municipal governments in our region. We request that additional time is provided for consultations to review and discuss this matter to ensure that the firefighter certification is done properly, and municipalities are not adversely burdened, particularly small and rural municipalities with volunteer and composite firefighting teams.

It is our understanding that the proposed standards for the Ontario Seal will be aligned with the National Fire Protection Association (NFPA) professional qualification standards without requiring the NFPA certification. NOMA is concerned that the NFPA certification will not align with how full-time volunteer fire departments operate. While NFPA will work for some municipalities, many smaller municipalities have volunteer and composite fire departments, and this certification will require additional training and costs to operate fire services in municipalities. For most small municipalities in our region, it is not an option to secure full-time firefighters as municipal budgets are already stretched thin and there is no room to finance this level of fire service. Therefore, it is important that the firefighter certification does not hinder volunteer and composite fire fighting teams and that the Ministry propose measures to support volunteer recruitment and composite fire services to become compliant. We understand there are provisions in place to ensure municipalities are not burdened with unnecessary costs for retraining firefighters who have already been trained to a suitable level determined by Council. However, provisions must also include measures to attract and retain volunteer firefighters to serve their communities. NOMA stresses that additional training measures and certification must not hinder those who wish to volunteer as firefighters.

It is critical that funding accompany the firefighter certification requirements for those municipalities that will experience a financial burden to implement the changes required under the proposed regulations. We request that the Ministry provides financial support to municipalities adopting the new firefighting certification. The level of financial support should be based on the needs of the municipality. Further consultations with municipalities could provide the Ministry valuable insight as to what the training needs, expected impacts, and time requirements to compile this information are for each municipality. This information can then be used to design a means of providing financial support for small, rural, northern, volunteer, and composite fire services (or any service disproportionately burdened by certification).

Furthermore, NOMA is concerned that the proposed time frame for implementation to have each department's members meet the "qualified" fire training is too quick and may result in small community fire departments struggling to meet the deadline. We request that the Ministry extend the timelines for certification of existing Fire Department personal to 2026 as the proposed deadline is a problem for small municipal with 100% volunteer fire departments.

Therefore, while NOMA does support the creation of firefighter standards, we believe the province should create standards specific to Ontario while remaining cognisant of the needs of volunteer fire departments in small rural communities now and in the future. We request that more consultation take place to ensure municipalities will not be negatively affected and that the Ministry provides financial support for small and rural municipalities with volunteer and composite fire services. Lastly, we request a meeting with the Hon. Solicitor Jones to discuss the concerns outlined in our letter and how to move forward.

Please contact our Executive Director, Andrea Strawson, at admin@noma.on.ca to organize a meeting time.

Thank you for your time in this matter and we look forward to discussing this matter further.

Sincerely,



Wendy Landry, President, NOMA
Mayor, Municipality of Shuniah

CC Association of Municipalities of Ontario (AMO), Rural Ontario Municipal Association (ROMA), and NOMA clerks and CAO's