

**Ministry of Labour**

Industrial Health & Safety  
Program

Occupational Health and Safety  
Branch  
505 University Avenue  
19th Floor  
Toronto, Ontario  
M7A 1T7

Telephone: 416 326-7904  
Fax: 416 326-7745

**Ministère du Travail**

Programme de santé et de  
sécurité dans l'industrie

Direction de la santé et de la sécurité  
au travail  
505, avenue University  
19<sup>e</sup> étage  
Toronto (Ontario)  
M7A 1T7

Téléphone : 416 326-7904  
Télécopieur : 416 326-7745



November 4, 2009

Chief Chris Powers  
Management Co-Chair  
Fire Service Section 21 Committee  
c/o Whitchurch-Stouffville Fire & Emergency Services  
6392 Main Street  
Stouffville, ON  
L4A 1G3

Mr. Ellard Beaven  
Labour Co-Chair  
Fire Service Section 21 Committee  
c/o Timmins Fire Department  
133 Cedar Street South  
Timmins, ON  
P4N 2G9

Re: Live Fire Training

Dear Chief Powers and Mr. Beaven:

This letter is to clarify the Ministry of Labour position with respect to live fire training that may be conducted by fire departments in Ontario.

The Ministry of Labour cannot specifically require compliance with standards that are not integrated into regulations made under the Occupational Health and Safety Act (OHSA). In the case of live fire training, for example, the Ministry of Labour does not enforce the NFPA 1403 Standard on Live Fire Training Evolutions, 2007 edition.

Where an order is issued to the fire service regarding live fire training under Section 25 (2)(h) of the OHSA, the order is to be written in terms of the identified hazard rather than in terms of the standard. The employer is ordered to take reasonable precautions to address the identified hazard.

The order may be supported by referring to the wording of a standard, or guideline (e.g. Fire Service Guidance Note), as evidence or guidance to the employer of what reasonable precaution the employer failed to take. This reference may be included in the narrative portion of the field visit report. Examples of Fire Service Guidance Notes that can be referenced for live fire training evolutions include GN # 7-1 Health and Safety During Training Exercises; GN # 7-2 Training Requirements; GN # 7-3 Documentation of Training Plus Daily Training Report; and GN # 7-5 Live Fire Training Considerations for Acquired Structures.

Employers should also be aware of their legislated duties to provide information, instruction and supervision to a worker, in accordance with Section 25 (2)(a) of the OHSA, and to ensure that equipment, materials and protective devices are maintained in good condition, in accordance with Section 25 (1)(b) of the OHSA.

I trust that this letter will be of assistance to the Ontario fire service.

Yours truly,

A handwritten signature in black ink, appearing to read 'Wayne De L'Orme', written over a horizontal line.

Wayne De L'Orme  
Provincial Coordinator  
Industrial Health and Safety Program  
Occupational Health and Safety Branch

Cc: Karen Hanna, Provincial Specialist, IHSP