



Ontario Association of Fire Chiefs

Firefighter Certification Regulation – Consultation Report

Date: February 25, 2022



Table of Contents

[Introduction](#)

[The Proposed Regulation](#)

[Feedback on Implementation: Barriers to overcome](#)

[Barrier: Office of the Fire Marshal and Emergency Management Capacity](#)

[Solution: Office of the Fire Marshal and Emergency Management Capacity](#)

[Barrier: Training and Testing Processes](#)

[Solution: Training and Testing Processes](#)

[Barrier: Access to Training](#)

[Solution: Access to Training](#)

[Barrier: Funding and Costs Associated with the Regulation](#)

[Solution: Funding and Costs Associated with the Regulation](#)

[Barrier: Recruitment and Retention of Volunteer Firefighters and Chiefs](#)

[Solution: Recruitment and Retention of Volunteer Firefighters and Chiefs](#)

[Other Considerations](#)

[Conclusion](#)

[Sources](#)

[Appendix A – Proposed Changes to the Regulation](#)

[Appendix B – Members Comments and Feedback](#)



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Introduction

Since the Ontario Association of Fire Chiefs (OAFCh) inception, our primary focus has been the fire and life safety of Ontario's firefighters and public. It was for health and safety reasons that the OAFCh led the charge towards the implementation of the Ontario Fire Service Standards in 1993 and then supported the transition towards the internationally recognized National Fire Protection Association (NFPA) standards in 2012.

On January 28, 2022, the Ontario Government released a consultation draft Regulation regarding mandatory minimum training and certification standards for Ontario's fire departments. In response to this, the OAFCh quickly organized a series of all-member townhall meetings and twelve local Provincial Advisory Committee meetings to hear Ontario's Chief Fire Officers' thoughts and concerns on the draft Regulation. This report is a summary of the meetings and discussions that occurred between the OAFCh and approximately 550 of Ontario's Chief Fire Officers.

The OAFCh supports any and all measures designed to improve the fire and life safety of Ontario's firefighters and the public. The OAFCh believes that the intent of this Regulation holds the fire and life safety of Ontarians and its firefighters at its forefront, and it is for this reason, the OAFCh supports the intent of this Regulation. However, the OAFCh and our members have a myriad of concerns that must be addressed if the implementation of this Regulation is to be successful. Should our concerns not be addressed, the OAFCh believes that this Regulation will not work as intended. Furthermore, the OAFCh is also concerned with how this Regulation will impact and affect Ontario's fire departments that are not subject to this Regulation such as First Nations fire departments, industrial fire departments, military fire departments, and airport fire departments as well as the current agreements, contracts, and mutual aid supports they have with neighbouring departments.

Ontario's fire departments are as varied as the people that make up the province. Ranging from full-time departments with over 3,200 full-time staff in Toronto to volunteer departments where the average age of volunteers is 67 years old. One volunteer department's municipality refuses to pay for their volunteer firefighters DZ drivers licenses. These firefighters, therefore, operate without a DZ license using a questionable exemption buried in *Highway Traffic Act, R.S.O. 1990, c. H.8*¹. Additionally, Ontario has First Nation fire departments whose communities are exempt from the Ontario Fire and Building Codes and partially funded by the Federal Government, as well as Northern Fire Protection Program (NFPP) departments who fall under the oversight of the Ontario Fire Marshal and Emergency Management office and partially funded through the Ministry of Northern Development, Mines, Natural Resources and Forestry.

Adding to the uniqueness of Ontario's fire departments is the fact that many of the individuals responsible to manage and deliver fire, rescue, and emergency services, under Ontario statute, can be a volunteer themselves. This also raises an important question, will a volunteer



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

firefighter as defined in the *Fire Protection and Prevention Act, 1997, S.O. 1997, c. 4 (FPPA)* be considered a municipal employee by virtue of the passing of this Regulation? Municipalities have a responsibility to train staff under the under Ontario's *Occupational Health and Safety Act, R.S.O. 1990, c. 01*, but there is no current Regulation or legal obligation for Ontario Municipalities to define their volunteer firefighters as employees.

Simply put, there is no one size fits all approach to any aspect of firefighting in Ontario that can work in every department and mandatory minimum training standards and/or certification is no different. While the draft Regulation allows some flexibility, in order for mandatory minimum training standards and/or certification to be successful in Ontario, the diversity of Ontario's fire service must be understood and taken into consideration.

Over the past three weeks, the OAFCh spoke with over 550 of Ontario's Chief Fire Officers and engaged our membership to solicit feedback on the on the proposed mandatory minimum training standards and/or certification Regulation. From these conversations and meetings, it became abundantly clear that the success or failure of this Regulation lies with the Office of the Fire Marshal and Emergency Management (OFMEM) and the support that office receives from the Ontario Government, and more specifically, the Solicitor General's office.



The Proposed Regulation

The OAFCh would like to thank Fire Marshal Jon Pegg and his staff for the significant work he and the OFMEM team have put into this proposed Regulation. It was clear from the first meeting that Fire Marshal Pegg had already taken into consideration many of the technical and implementation issues that derailed the Certification process four-years ago. The OAFCh supports the intent and the general framework of this proposed Regulation, and we believe that it can succeed, as long as the accompanying concerns listed in this report are addressed.

The OAFCh and our members have several recommendations on the language used in the proposed Regulation to improve clarity and intent, but for the flow of this report, the proposed changes to the language of the Regulation have been listed in [Appendix A – Proposed Changes to the Regulation](#).

Feedback on Implementation: Barriers to Overcome

From the OAFCh's discussions with our members, we identified five main barriers that will affect the successful implementation of the Regulation, they are: OFMEM capacity to meet the demands of the fire service, training and testing, access to training, funding, and recruitment and retention of volunteer firefighters and Chiefs. However, the OAFCh does not believe these barriers are insurmountable, they simply require the provincial government's understanding and assistance to overcome.

Barrier: Office of the Fire Marshal and Emergency Management Capacity

The most significant issue identified throughout our consultation process surrounds the OFMEM and its organizational capacity. Over the past few decades, consecutive provincial Conservative, Liberal, and NDP governments alike have routinely under-resourced and under-supported the OFMEM office and its mandate, affecting its operational capacity. Many Chief Officer's comments discussed a decrease in service levels (over the years) and raised concerns around local OFM Advisors, increased wait times for test results, wait lists for courses, backlogs in updating standards while other NFPA standards are not available for testing, and more. This long-standing concern among Ontario's Chief Fire Officers has resulted in a fractured relationship and a lack of confidence in the OFMEM office.

For this Regulation to be successful, we recommend that the OFMEM office be fully staffed to accommodate not only their current responsibilities, but also the influx of new responsibilities that this Regulation will require of them. Through no fault of the Fire Marshal, it was made abundantly clear from our members that the OFMEM is currently not staffed to appropriate



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

levels enough to address the implementation concerns and potential unintended consequences.

The chronic understaffing of the OFMEM by successive provincial governments has resulted in a backlog in testing results at Academic Standards and Evaluation (AS&E), an inefficient training system and curriculum development at the Ontario Fire College (OFC), an improperly administered Associate Instructor program, a lack of qualified Field Advisors, underfunding and lack of oversight for NFPP departments that has enabled some to self-determine their levels of service leading to fundraising for basic personal protective equipment, 9-1-1 services², and other equipment.

During the OFMEM's technical briefings with Fire Chiefs, CAOs, and Heads of Council, Fire Marshal Pegg assured everyone that he has received confirmation from the Solicitor General's office, that the OFMEM office will be staffed appropriately. However, even if the OFMEM receives enough funding from the province to be appropriately staffed, there is still the challenge of finding enough qualified individuals (curriculum developers, trainers, testing proctors, field advisors, evaluators, quality control, etc.) to fill these positions and who possess the knowledge, skills, and abilities these highly specialized positions require. Will these new hires understand the nuances of Establishing and Regulating By-Laws when compared to the municipality's Community Risk Assessment, levels of service, and training regimen?

Solution: Office of the Fire Marshal and Emergency Management Capacity

The above issues must be addressed if mandatory minimum training standards and/or certification is to be successful. Once again, the historical and systemic reduction in capacity of the OFMEM office is due to a lack of support from successive provincial governments, which has resulted in OFMEM service reductions and an erosion in trust between Ontario's Chief Fire Officers and the institution that comprises the OFMEM.

Notwithstanding the above section, the OAFCA has been witnessing a tremendous turnaround at the OFMEM's office under Fire Marshal Pegg. The OAFCA is extremely pleased with Fire Marshal Jon Pegg, Deputy Fire Marshal Tim Beckett, Assistant Deputy Fire Marshal John Snider, Director John McBeth, and their respective teams. The OAFCA applauds the new and open lines of communication Fire Marshal Pegg established through this process and his focus on rebuilding the relationship between the OFMEM office and Ontario's Fire Departments. We are optimistic that the OFMEM, under the leadership of Fire Marshal Pegg and with the support of Solicitor General Jones, will be able to deliver on the commitments made throughout this process.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Barrier: Training and Testing Processes

The capacity and service delivery level of the OFMEM office has had a direct impact on the ability of Ontario's Fire Departments to properly test and evaluate Ontario's firefighters. While some training, testing, and evaluation issues can be easily rectified, such as providing training and testing in both official languages or delivering true testing accommodations for firefighters with learning disabilities or testing anxieties (not just providing additional time), other issues such as timely course updates and online electronic testing (e-testing) will require more effort and funding. Ontario's geography is also a factor as many fire departments lack stable internet connections and even computers affecting their ability to learn and train online.

The need for delegated authority for proctoring and evaluations is one issue the OAFCh heard time and time again throughout our consultations with members. One composite full-service fire department has enough stations in their municipality to train every day of the week, however, the OFMEM does not currently have the capacity to oversee this level of training and testing while also serving other fire services across Ontario. This department has the capacity and capability to provide in-house testing, proctoring, and evaluations internally, they just lack the delegated authority to do so.

The current process, whereby the OFMEM requires three-months' notice and a minimum number of twelve (12) students before a proctor is assigned is overburdensome for many departments. For some of Ontario's smaller, rural, northern, or volunteer departments these two requirements make this process unattainable and impossible to access. Removing the minimum number of students to run courses and testing, especially for in-house course delivery, and allowing neighbouring departments to participate and train together under a Learning Contract would immensely help these and other departments with their testing and training burdens and backlogs.

But for those who can meet the criteria, an OFMEM proctor will then attend, conduct the testing and evaluations, but not provide the results for as long as three-months, resulting in a potentially six-month long process; a process that takes far too long. The OAFCh recommends the reduction of the three-month notice period given to the OFMEM to one-month and the introduction of e-testing provincially, which was promised to the fire service as early as 2014 and again during the Provincial Governments last attempt at Certification in 2017.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Solution: Training and Testing Processes

Implementing online electronic testing, delegating authority for proctoring, and evaluations would put the onus of ensuring proper training on the Fire Chief, who is already responsible for this under Ontario's *Occupational Health and Safety Act, R.S.O. 1990, c. 01*³. This small change, while a cost to the OFMEM and province to initially implement, would help to reduce municipal training costs and time and eventually lead to long-term cost savings for the province as less test proctors and staff would be needed to grade exams. This need is especially true for Ontario's rural, northern, and volunteer departments, where the OFMEM could send an instructor to train the local department on the processes, so that the local department can then start conducting this work on their own. This change would not only help some of Ontario's smallest departments, but largest too.

As we consulted with Fire Chiefs across the province, we noticed a trend of individual departments wanting e-testing; not a single individual was against it. In one meeting, a Chief remembered a claim from the OFMEM "They promised electronic testing back in 2014. Said they were purchasing tablets to bring to use for on-site testing". It has been eight years since that promise and five years since the last time we heard we would be receiving this. In that time, less than half of one percent of Ontario's fire departments were granted this capability and those that were, are still "piloting" it years later. A sufficient quantity of tablets, laptops or other appropriate devices, with the online testing software installed, provided to proctors is a simple solution. E-testing is a low-cost solution that will help resolve multiple issues, reduce wait times, increase student success rates, and reduce the backlog at Academic Standards and Evaluation (AS&E) allowing them to focus on other issues of concern.

Barrier: Access to Training

One obstacle the OAFC and our members believe must be overcome for this proposed Regulation to succeed is access to timely and affordable, training including specialty and high-risk training such as those found in Technical Rescue. This long-standing concern was exacerbated by the Provincial Government's decision to close the Ontario Fire College. While the provincial government's claim that the loss of these training spaces would be offset by increasing the number of Regional Training Centres (RTCs) and the purchase of two live-fire mobile training units, many of the specialty courses that were offered at the College are still unavailable. Moreover, it is unreasonable to believe that two mobile units that can only operate half the year (one of which still is not operational), can effectively service 441 fire departments scattered across over a million square kilometers.

The OAFC believes in the potential of the Regional Training Centre (RTC) model. They can be strategically located throughout Ontario helping to bridge the geographic gap between training centres. But during our consultations we heard from many members, including from



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

municipalities that operate RTC's, that the current method of operation and oversight is not sustainable. The question of what point is the RTC market oversaturated has yet to be answered. RTCs are routinely competing for students to fill courses, while at the same time cancelling other courses that don't meet minimum numbers. RTCs have immense difficulties trying to offer specialty courses because they may lack the proper curriculum (such as NFPA 1006), the necessary specialized training equipment, or even a lack of students in the geographic area to fund the course, so they cancel instead. RTC Operators during this consultation process also reported that many are operating with very little oversight which is also troubling. Neither the OFMEM or the Province can force a RTC to stay open if they choose to close shop, nor mandate specific course offerings that the fire service might need, nor is there currently any subsidization of the RTC or students to ensure enough revenue for the RTC to continue operations.

As part of the expansion of firefighter training announcement, online courses, and contracts with individual fire departments, which we understand to be Learning Contracts (LCs) were referenced. The OAFCA supports both of these initiatives; however, not every fire department in Ontario has access to stable high-speed internet connections to utilize online training as an option.

Where Learning Contracts are established, the requirements for minimum numbers of students and the preclusion of allowing other departments to join in on the training session should be dropped. This would increase the rate of certifications and reduce both training costs and times for fire departments, especially rural, northern, and volunteer departments.

Finally, many volunteer Fire Chiefs expressed genuine concerns over the impact that increased training and testing will have on their volunteer firefighter complements. Many volunteer Chiefs feel these changes will result in a loss of volunteer firefighters who do not want to take a test or commit more time to complete additional training. While some volunteer Fire Chiefs who operate multiple fire stations can spread the specialty training across them, others who operate a single full-service fire hall fear they will become the "[farm team](#)" for Ontario's full-service departments, as those volunteer firefighters will be forced to certify to all specialties.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Solution: Access to Training

With the introduction of Next Generation 9-1-1 in the very near future, upgrading fire departments' capabilities to send and receive data is of paramount importance. Every fire department in Ontario should have access to stable high-speed internet connections for training and safety purposes.

Learning Contracts should be expanded to allow the host department to run the course without a minimum number of students, and/or should a minimum number be required, that they are allowed to offer open spaces to other departments. The OFMEM should also consider hiring local training personnel to assist with the field delivery of courses across Ontario to assist with this challenge.

The OAFIC and our members have a lot of questions and concerns with the current RTC structure in Ontario. But even with all these issues, the RTC model can work if more attention is paid to it. Firstly, there must be a detailed comprehensive plan for RTCs that outlines the appropriate number of RTCs throughout the province and their locations. Secondly, a centralized course calendar should be made available to every chief in Ontario. Thirdly, there must be greater oversight to ensure the quality of instruction that is occurring at RTCs.

To assist with solving these issues, the OAFIC wishes to work with the OFMEM on the detailed plan from the January 13, 2021 announcement to modernize firefighter training "through a combination of in-person training at Regional Training Centres, online courses, and through contacts with individual fire departments"⁴ that is affordable, accessible, up-to-date, and available to every type of fire department in Ontario including, First Nations, volunteer, and Northern Fire Protection Program departments.

Barrier: Funding and Costs Associated with the Regulation

The next most common theme among Fire Chiefs during our consultations was a fear over the increased costs associated with this new provincial mandate. While the Fire Marshal has stated that the costs should be minimal for departments so long as they've trained sufficiently over the years, this unfortunately doesn't meet the on-the-ground reality for many fire departments in Ontario.

During our consultations, not a single Fire Chief believed they wouldn't incur additional costs due to the implementation of this Regulation. Difficulties arise when trying to quantify this figure as each department's expenses will be different depending on a variety of factors, some of which are entirely outside of the Fire Chief's control. One factor outside the Fire Chief's control is the levels of service the current Council chooses when compared to the level of service a new Council may choose after the October 2022, 2026, 2030, etc. elections. Some



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

fire departments will need to hire a new or additional Training Officers, while others will need to add more training dates and sessions which will result in additional compensation costs for students and instructors. Other factors affecting the costs of this proposed Regulation include geographic proximity to appropriate or specialized training centres for the required courses, previous training schedules and the need to train more frequently, the type of department and its staff (full-time vs. part-time vs. volunteer firefighters), how many firefighters are eligible for the legacy provisions, how many new accounts and textbooks need to be purchased or upgraded, and more.

The proposed training Regulation imposes minimum standards for a select portion of service delivery. Yet, this proposed Regulation, if passed, will now also be in competition with other regulated training components already mandated, such as Occupational Health and Safety, Workplace Hazardous Materials Information System (WHMIS), licensing and other core training components beyond the selected minimums. Therefore, the competing timelines to achieve certification compliance will increase training time for the average fire service resulting in additional cost.

Compounding the difficulties in quantifying the costs was the short consultation period and the fact that the first government technical briefing didn't occur until 25% of the consultation period had expired. One full-time fire department calculated their costs to be the hiring of a new Fire Training Coordinator and a new Fire Training Captain with annual base salaries approximating \$170,000 and \$132,000 respectively. Another composite department calculated the costs back in 2018 when certification was last attempted in the following method.

Our 2018 budget for training of 60 Paid on call fire fighters is \$168,500.00. There are 47 possible training sessions each year available for attendance for a total of 94 hours for each fire fighter and officer.

Currently a firefighter spends 60 hours of our current 94 hours of programing time on Standards training.

A new recruit training to NFPA 1001 Level 1 (exterior attack) would have to complete approximately 225 hours of training.

If the new recruit is enrolled in the internship program which provides 24 months, this would equate to approximately two hours of training per week with 52 weeks per year (or approximately nine and a half hours a month) over the course of a two year period.

An additional 90 hours of training is required to be certified to NFPA 1001 Level 2 (interior attack).

The new recruit enrolled in the internship program, would equate to approximately three hours of training per week with 52 weeks per year (or approximately 13 hours a month) over the course of a two-year period.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

We can quickly ascertain that with perfect attendance it would take two (2) to three (3) years to achieve compliance with the certification requirements. This does not include the current ongoing training is still necessary to properly provide service.

One could argue that additional time is needed to be spent to expedite the new requirements. Current funding provides for 60% attendance for all 60 paid on call fire fighters. The above for a new recruit would require 255 additional hours at the current pay rate for training (\$25.00/hr) = \$6,375.00 per new Fire Fighter.

Assuming one new recruit per station along with Instructors for 104 sessions @ \$25.00 per session= \$2,600.00 & \$15,000.00 for safety consideration, resources including classroom materials, training aids etc. This is a total of \$36,725.00 for every three new firefighters over the estimated timelines.

The long-term financial implications this proposed Regulation will have on collective bargaining agreements should also be considered. It would be remiss of us to ignore the potential that in six years once this Regulation is fully implemented, unionized firefighters may be looking to receive contractually negotiated raises based on these new provincially mandated training criteria – criteria and training standards these employees previously did not have to meet (i.e. possibly looking to justify that a firefighter certified as a technical rescuer should be compensated at a higher rate than firefighters who are not).

Solution: Funding and Costs Associated with the Regulation

For this proposed Regulation to be successful, the OAFIC believes additional funding is required for all types of fire departments in Ontario – including those not included in last year's Covid-19 training grant.

The provincial government already partially funds and subsidizes the other two emergency response services (police and paramedics) in Ontario and the consultation process resulted in the majority of OAFIC members communicating that it's time they increased their investing into the fire and life safety of Ontarians. According to Ontario's Auditor General annual reports, the province routinely covers 50%⁵ of the expenses for the administration of the *Ambulance Act, R.S.O. 1990, c. A.19* with the municipality covering the rest, but doesn't enter into any cost sharing agreements with municipalities over their provincial responsibilities under Ontario's *Fire Protection and Prevention Act, 1997, S.O. 1997, c.4*. And while it is true the province doesn't have a similar program under the *Police Services Act, R.S.O. 1990, c. P.15*, the province does give municipalities hundreds of millions in annual and one-time grants for policing programs, such as November 2021's announcement of \$75 million in funding over three years for police services to "combat gun and gang violence"⁶. This grant alone is more funding from the province than Ontario's fire service has ever seen, and it increased provincial



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

investments into combatting guns and gang violence to approximately \$187 million since 2018⁶. During which time the province invested a total of \$5 million in Ontario's Fire Service thanks to last year's Covid-19 grant⁷.

The OAFCh is formally requesting from the province the following:

- a) A one-time grant in 2022 in the immediate term to help offset the expected increase in training costs for fire departments to begin implementing this regulation, that is available to every type of fire department in Ontario including, First Nations and Northern Fire Protection Program Departments – those not included in last year's grant.
- b) Beginning in 2023, a predictable and meaningful annual grant for all fire departments to ensure sustained training through the duration of the implementation timelines of this Regulation. This funding should be based on the size of the department, number of firefighters, and the number and level of fire protection services provided. Funding could be conditional on submitted training plans, training documentation, completed community risk assessments and achieving letters of compliance and/or NFPA certifications.

The OAFCh also recommends that the provincial government be open to exploring other types of grants, bursaries, or subsidies for the fire services. Options include:

- a) Open the Second Career Ontario Program to the fire service. Opening this program, or a similar one in nature to the fire service, would help alleviate many concerns shared by Ontario's rural, northern, or volunteer departments.
- b) Allow fire departments to participate in similar programs offered by Skilled Trade Ontario to offset some of the costs associated with training apprentices.
- c) Utilize the bulk buying power of the province to have the OFMEM purchase training accounts (such as Jones and Bartlett or IFSTA accounts) for all Ontario firefighters.
- d) Utilize the bulk buying power of the province to purchase enough tablets, laptops, surfaces, or similar electronic devices to provide e-testing for every department.
- e) Remove the \$65 Ontario College Fee for training conducted outside the College.
- f) Subsidizing Regional Training Centre's to lower student costs
- g) Hiring OFMEM Fire Service Trainer's and assigning them to Northern Ontario. These individuals should be available to attend Northern Fire Department's (including NFPP departments) to provide on-site training in areas where geographical boundaries make RTC access a challenge.
- h) Provide, where possible, additional one-time grants in future years to be used by fire departments to purchase equipment and supplies specifically intended to support training programs (i.e., forcible entry doors, on-line training programs, technology, training supplies etc.).
- i) Open up existing municipal grants (infrastructure grants, program grants etc.) to enable Fire Department application. Currently many of these grants do not apply to Fire Departments which leaves Fire Department budgets with minimal increases while Public Works, Recreation etc. benefit from a larger variety of grant opportunities.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Barrier: Recruitment and Retention of Volunteer Firefighters and Chiefs

Another long-standing concern affecting 93% of Ontario's fire departments, is the recruitment and retention of volunteers. In Ontario, 410 of the 441 municipal fire departments, rely on nearly 19,000 volunteer firefighters to respond to emergencies and to protect and promote the fire and life safety in their communities. Ontario is already facing difficulties with volunteer recruitment drives, as evidenced by the launch of the Ministry of Citizenship and Multiculturalism's new "Volunteer Corps Ontario"⁸ and the fire service is no different.

Many Chief Officers overseeing volunteer or composite fire departments expressed concerns that some of their current volunteer members would choose to resign from the department, rather than taking on additional training or testing. In many of these departments, these are experienced members who have served their communities for years and bring immense value to those departments. The OAFCh heard from many Fire Chiefs that manage smaller departments state "I have less than 1,000 residents in my community, I take what I can get".

The Fire Chief of smaller departments oftentimes wears multiple hats including the Fire Prevention Officer, Fire Inspector, and Fire Training Instructor for their department, all while being part-time or volunteering themselves and still liable for the health and safety of their employees. There is only so much one can ask from a volunteer before it becomes too great a burden on their full-time job, family life, friendships, or other relationships, and they eventually stop volunteering. Volunteer firefighters and Chiefs are like any other volunteer - everyone has their breaking point. But when you include the traumatic events, they often witness, many times in smaller communities affecting people the firefighters know and have a relationship with, can be devastating on the mental health of the individual and adds to the difficulties of retaining volunteer firefighters.

While many Chief Officers of volunteer departments share this concern, we should note that other Chief Officers of volunteer departments expressed the opposite point of view. When these Chiefs started down the path of Certification, they noticed an improvement in their recruitment drives, as some new recruits saw certification as an incentive to volunteer. However, one key caveat to this, is that the firefighters incentivized by certification may be seeking a job as a career firefighter and will be using the volunteer department for free education and leave the community once they've achieved certification. Furthermore, the issue of full-time firefighters who volunteer off-shift, on their own time (i.e., two-hatters), while addressed by this government, is unfortunately not a closed file.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Solution: Recruitment and Retention of Volunteer Firefighters and Chiefs

The issue of volunteer recruitment and retention is a long-standing concern amongst Ontario's fire departments and while the OAFCh does not have a 'fool-proof' solution to this issue, we have many ideas that can help lessen its impact on departments.

Some of steps that can be taken to address volunteer firefighter recruitment and retention issues include:

- Updating the Volunteer Firefighter Recruitment and Retention Guide.
- Determine whether fire departments can utilize a "hybrid" model of service. The "hybrid" model could entail some firefighters being trained and certified to perform interior fire attack, while others in the department train only to exterior fire attack and receive a letter of compliance through the legacy provision.
 - i.e., A firefighter who is part of an interior attack level of service department but performs only non-interior roles (apparatus operator, support functions, scribe etc.) and qualifies only for the role(s) they perform (and are properly identified and the department has operating guidelines identifying their use) so the department doesn't lose a qualified individual and their service entirely.
- Confirm that those previously grandfathered are considered certified for the purpose of this regulation.
- Consider re-opening the grandfathering process (at the very least for fire departments who didn't previously participate).
- Provide Chiefs with assistance with implementing compliance to this Regulation, especially where the Chief Officers are volunteers themselves.
- The creation of a provincial tax deduction/credit for volunteer firefighters similar to the Federal tax credit and/or the Nova Scotia tax credit.



Other Considerations

Another concern that has been routinely raised since the proposed Regulation was posted is how it will affect non-municipal fire departments or departments that do not fall under provincial jurisdiction such as airports, military bases, and especially First Nation communities. The biggest concern over this is in respect to the Regulation's effect on current and future mutual aid agreements with these entities.

The OAFCh is recommending that the language be updated in provincial mutual aid agreements with non-municipal partners to say that non-municipal partners must adhere to, and train to, the levels of service outlined in the Regulation and/or mutual aid agreement. The OAFCh would support an inclusionary process whereby the departments entering into the agreement, must include and be approved by, the OFMEM office.

Additionally, the OAFCh would like to see the language changed to allow for non-municipal fire department partners to access funding and RTC's similar to their municipal fire department counterparts in Ontario.

Other items that the OAFCh heard during the consultation process which should be considered to help make the implementation of this regulation a success include:

- The OFMEM restore the previously held Chief Officer Executive Seminar that used to be held at the Ontario Fire College (at an alternate location) to provide Chief Officers on-going training supports on items such as establishing levels of service, updating Establishing and Regulating By-laws, implementing certification and more.
- There is a need to ensure that all NFPA standards covered under this certification have course content developed and ready immediately; and that they be immediately available for testing for all departments– this is not yet the case for NFPA 1006 disciplines.
- All training and testing materials must be available in both English and French.
- The OFMEM should immediately develop and deliver training for Chief Officers and Council's on establishing the levels of service and updating Establishing & Regulating By-laws.
- In many of Ontario's Fire Department's the Chief Officers are the primary incident commanders and while the NFPA 1021 curriculum includes some incident command content, however it is minimal, and the regulation really does not capture the necessary training related to strategy and tactics. It is recommended that additional Incident Command and Strategy and Tactics training be offered, by the OFMEM. This could include, but not be limited to, Principles of Modern Fire Attack, Reading Smoke, and Blue Card Command. The training should focus on modern fire sciences (NIST/UL



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

research) and ensuring that current Incident Commanders have the appropriate knowledge and skills to manage modern incidents.

- Once this regulation has been implemented, consideration should be given to assessing the feasibility of further future action to include additional components that are not currently captured. These can include, but are not limited to, the following:
 - NFPA 1002 Apparatus Operator Chapter 6 – Aerial Operations
 - NFPA 1002 Apparatus Operator Chapter 10 – Mobile Water Supply (Tanker) Operations
 - NFPA 1006 Chapter 4 – Tower Rescue
 - NFPA 1006 Chapter 13 – Machinery Rescue
 - NFPA 1006 Chapter 23 – Floodwater Rescue
 - NFPA 1021 Fire Officer Level 2, Level 3, and Level 4
 - NFPA 1031 Fire Inspector Level 2 and Level 3
 - NFPA 1035 Public Fire & Life Safety Educator Level 2
 - NFPA 1035 Public Fire & Life Safety Educator Level 3
 - NFPA 1041 Fire Instructor Level 2
 - NFPA 1041 Fire Instructor Level 3
 - NFPA 1061 Telecommunicator Level 2
- The OFMEM should develop information packages and easy to use flow charts for Fire Chiefs to better understand certification and the certification process (i.e., full-service fire departments follow this path, exterior attack fire departments follow this path, if you are grandfathered in this standard follow this path, if you are not grandfathered follow this path etc.).
- The OFMEM should convene meeting(s) with all RTC Operators to maintain consistent oversight and to discuss and resolve RTC concerns that are being brought to the attention of the OFMEM, RTC Operators or both.
- The Ontario Fire College should make the NFPA 1006 Awareness level training content (for each of the disciplines) available to all Fire Departments to ensure that their staff are trained (and therefore safe) in each discipline at no charge.
- There needs to be improved student tracking processes so that student records are not lost when the students change fire departments or register for different courses using different names (i.e., Steven, Stephen, and Steve, Rob, Robert, Bob, etc.). Use of unique student ID numbers would assist with this.
- The Regulation should explicitly state that people Grandfathered under the previous provisions are considered to be certified under the intended meaning of Certified in this Regulation.
- The governance structure should be revised so that this Regulation applies to, at minimum, First Nations Fire Services. In many areas of the province, fire departments



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

have automatic or mutual aid agreements with fire services that are not encapsulated within this regulation (First Nations, Airport, Military, and Industrial).

- The OFMEM should consider partnering with the OAFC on the FireCon (Northwestern Ontario) and NorthEastern Conference (Notheastern Ontario) and partially fund those events for the purpose of providing training opportunities and supports for Northern Ontario firefighters. This approach would improve access to training for Northern firefighters and provide the OFMEM with improved access to these departments at events that already exist.
- The OFMEM needs to ensure that the correcting of previous inaccurate test bank questions is complete, and that training and testing are being done to the most current NFPA standards. Being two NFPA standard cycles behind and having inaccurate questions based on other countries information within the test bank is problematic.
- There needs to be specific direction provided to fire departments about whether one fire department can train/certify firefighters to two different levels of service, and how this would fit within this Regulation. As an example, can one fire department establish a level of service of interior fire attack, but only have some firefighters trained/certified to interior attack while others are trained/certified to exterior fire attack, so long as the departments operating guidelines explicitly reference how the exterior fire attack firefighters are utilized? Similar confusion exists for drivers/pump operators. Can a department have people who only train/certify to this role if that is all they do?
- There needs to be specific direction provided related to how automatic and mutual aid will work where departments with different service levels come together at an incident. How does it operationalize where interior attack trained/certified firefighters respond to an area with an exterior attack level of service? Are they to perform within their training/certification scope or the level of service of the area they are in?



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Conclusion

The OAFCh supports all measures designed to improve the fire and life safety of Ontario's firefighters and the public. As we believe the intent of this Regulation holds the fire and life safety of Ontarians and its firefighters at its forefront, the OAFCh supports the proposed Firefighter Certification Regulation. However, the OAFCh also believes that this Regulation will only succeed as intended if the concerns raised in this report, including [Appendices A](#) and [B](#) and resolved.

The OAFCh mission is to lead innovation and excellence in public and life safety. We work cooperatively with the provincial government, key stakeholders, and other organizations to promote excellence and innovation in the areas of education and training, legislation and public policy, fire and membership services.

We represent the Chief Fire Officers of the 441 municipal fire departments in the Province of Ontario. These Chief Officers are ultimately responsible, by statute, for the management and delivery of fire, rescue, and emergency response to the 15 million residents of Ontario.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Sources

1 - *Highway Traffic Act, R.S.O. 1990, c. H.8 – s. 22, (a.1)*

<https://www.ontario.ca/laws/statute/90h08>

2 – “It took 5 years and bake sales, but this rural Ontario area now has 911 service.”

CBC article - <https://www.cbc.ca/news/canada/thunder-bay/911-service-niobe-1.4038368>

March 24, 2017

3 - *Ontario’s Occupational Health and Safety Act, R.S.O. 1990, c. 01.*

<https://www.ontario.ca/laws/statute/90o01>

4 – “Ontario Expanding Firefighter Training Across the Province.”

Ontario Newsroom - <https://news.ontario.ca/en/release/59945/ontario-expanding-firefighter-training-across-the-province>

January 13, 2021

5- Auditor General Land Ambulance Service Review.

<https://www.auditor.on.ca/en/content/annualreports/arreports/en15/4.04en15.pdf>

<https://www.auditor.on.ca/en/content/annualreports/arreports/en13/304en13.pdf>

6 – “Ontario Combating Gun and Gang Violence.”

Ontario Newsroom - <https://news.ontario.ca/en/release/1001174/ontario-combating-gun-and-gang-violence>

November 16, 2021

7 – “Ontario Providing Support to Local Fire Services During COVID-19.”

Ontario Newsroom - <https://news.ontario.ca/en/release/60651/ontario-providing-support-to-local-fire-services-during-covid-19>

March 11, 2021

8 – “Ontario Asking Citizens to Embrace the Ontario Spirit and Volunteer”

Ontario Newsroom - <https://news.ontario.ca/en/release/1001633/ontario-asking-citizens-to-embrace-the-ontario-spirit-and-volunteer>

February 18, 2022



Appendix A – Proposed Changes to the Regulation

This Appendix includes comments specifically intended as feedback on the Regulation itself (as opposed to implementation challenges) and is being provided in hope that revisions of the Regulation will consider this feedback. Additionally, many of the member comments in Appendix B also reference feedback specific to the Regulation within their comments so that section should be fully reviewed with the goal of pulling out that feedback also.

Member Comment 1

Draft Currently Reads:

2. (1) Every municipality, and every fire department in a territory without municipal organization, must ensure that its firefighters perform a fire protection service set out in Column 1 of Table 1 only if, on or after the corresponding day specified in Column 3 of that Table,
- (a) the firefighter performing the fire protection service is certified, at a minimum, to the corresponding certification standard set out in Column 2 of that Table; or
 - (b) this Regulation provides that the certification standard referred to in clause (a) does not apply with respect to the firefighter.

Amend to Read:

2. (1) Every municipality, and every fire department in a territory without municipal organization, must ensure that its firefighters perform a fire protection service set out in Column 1 of Table 1 only if, on or after the corresponding day specified in Column 3 of that Table,
- (a) the fire protection service is approved by the Authority Having Jurisdiction in a territory without municipal organization or within a municipality's Establishing and Regulating by-law;
 - (b) the firefighter performing the fire protection service is certified, at a minimum, to the corresponding certification standard set out in Column 2 of that Table; or
 - (c) this Regulation provides that the certification standard referred to in clause (b) does not apply to the firefighter.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Draft Currently Reads:

2. (2) The certification must be,

- (a) provided by the Fire Marshal; or
- (b) an accreditation from the International Fire Safety Accreditation Congress (IFSAC), or a Pro Board seal, that is recognized by the Fire Marshal as equivalent to the certification provided by the Fire Marshal.

Amend to Read:

2. (2) The certification must be,

- (a) provided by the Fire Marshal; or
- (b) an accreditation from the International Fire Safety Accreditation Congress (IFSAC), or a Pro Board seal, recognized by the Fire Marshal as superior or equivalent to the certification provided by the Fire Marshal and be accredited by the International Fire Safety Accreditation Congress (IFSAC), or Pro Board.

Draft Currently Reads:

3. (1) A certification standard set out in item 1 or 2 of Table 1 does not apply with respect to a firefighter who,

- (a) is performing a service that is within the scope of that item;
- (b) has been a firefighter for no more than 24 months; and
- (c) is operating under the supervision of a firefighter certified to that standard.

(2) A certification standard set out in Column 2 of Table 1 does not apply with respect to a firefighter who is,

- (a) temporarily assigned to perform a different fire protection service for which a different minimum certification is required; and
- (b) operating under the supervision of a firefighter who has obtained the certification corresponding to the fire protection service or services being delivered.

(3) If a firefighter was previously certified under this Regulation for an item listed in Table 1, that certification continues to be valid even if the requirements for obtaining that certification are subsequently updated or changed.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Amend to Read:

3. (1) A certification standard set out in item 1 or 2 of Table 1 does not apply with respect to a firefighter who,

- (a) is performing a service that is within the scope of that item;
- (b) has been a firefighter for no more than 24 months; and
- (c) is operating under the supervision of a firefighter certified to that standard.

(2) A certification standard set out in Column 2 of Table 1 does not apply with respect to a firefighter who is,

- (a) temporarily assigned to perform a different fire protection service for which a different minimum certification is required; and
- (b) operating under the supervision of a firefighter who has obtained the certification corresponding to the fire protection service or services being delivered.

(3) If a firefighter was previously certified under this Regulation for an item listed in Table 1, that certification continues to be valid even if the requirements for obtaining that certification are subsequently updated or changed.

(4) If a firefighter previously received a certificate of equivalency from the Office of the Fire Marshal or was certified prior to this regulation, that certification continues to be valid even if the requirements for obtaining that certification are subsequently updated or changed.

Draft Currently Reads:

4. (2) (b) before September 30, 2023, the firefighter's municipality, or fire department in an area without municipal organization, provides the Fire Marshal with information, such as training records, to demonstrate to the satisfaction of the Fire Marshal that the firefighter, through past training and experience, has obtained the requisite knowledge and requisite skills associated with the corresponding standard; and



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Amend to Read:

4. (2) (b) before September 30, 2023, the firefighter's municipality, or fire department in an area without municipal organization, provides the Fire Marshal with **information, such as** training records, to demonstrate to the satisfaction of the Fire Marshal that the firefighter, through past training and experience, has obtained the requisite knowledge and requisite skills associated with the corresponding standard; and

Draft Table 1 Currently Reads:

9.	Team Lead Exterior Attack: Supervision of firefighters that provide fire suppression operations from the exterior of the building only.	All job performance requirements in Item 1 and the following job performance requirements of NFPA 1021, "Standard for Fire Officer Professional Qualifications", 2014 Edition, Chapter 4 (Fire Officer I):	July 1, 2026
----	---	--	--------------

Amend Table 1 to Read:

9.	Team Lead Exterior Attack: Supervision of firefighters that provide fire suppression operations from the exterior of the building only.	All job performance requirements in Item 1 and the following job performance requirements of NFPA 1021, "Standard for Fire Officer Professional Qualifications", 2020 Edition, Chapter 4 (Fire Officer I):	July 1, 2026
----	---	---	--------------

Draft Table 1 Currently Reads:

13.	Team Lead Interior Attack: Supervision of firefighters that provide fire suppression operations from the interior of the building and can perform rescue.	All job performance requirements in Item 5 and the following job performance requirements of NFPA 1021, "Standard for Fire Officer Professional Qualifications", 2014 Edition, Chapter 4 (Fire Officer I):	July 1, 2026
-----	---	--	--------------

Amend Table 1 to Read:

13.	Team Lead Interior Attack: Supervision of firefighters that provide fire suppression operations from the interior of the building and can perform rescue.	All job performance requirements in Item 5 and the following job performance requirements of NFPA 1021, "Standard for Fire Officer Professional Qualifications", 2020 Edition, Chapter 4 (Fire Officer I):	July 1, 2026
-----	---	---	--------------

Draft Table 1 Currently Reads:

20.	Fire Investigator: conducting fire cause and origin investigations.	All job performance requirements of NFPA 1033, "Professional Qualifications for Fire Investigator", 2014 Edition, Chapter 4 (Fire Investigator).	July 1, 2026
-----	---	--	--------------



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Amend Table 1 to Read:

20.	Fire Investigator: conducting fire cause and origin investigations.	All job performance requirements of NFPA 1033, "Professional Qualifications for Fire Investigator", 2022 Edition, Chapter 4 (Fire Investigator).	July 1, 2026
-----	---	---	--------------

Draft Table 1 Currently Reads:

21.	Fire and Life Safety Educator: providing fire and life safety education.	All job performance requirements of NFPA 1035, "Standard on Fire and Life Safety Educator, Public Information Officer, Youth Firesetter Intervention Specialist, and Youth Firesetter Program Manager Professional Qualifications", 2015 Edition, Chapter 4 (Fire and Life Safety Educator).	July 1, 2026
-----	--	--	--------------

Amend Table 1 to Read:

21.	Fire and Life Safety Educator: providing fire and life safety education.	All job performance requirements of NFPA 1035, "Standard on Fire and Life Safety Educator, Public Information Officer, Youth Firesetter Intervention Specialist, and Youth Firesetter Program Manager Professional Qualifications", 2015 Edition, Chapter 4 (Fire and Life Safety Educator I).	July 1, 2026
-----	--	--	--------------

Draft Table 1, Column 2, Items 3, 7, 25 and 26 Currently Reads:

NFPA **1072**, "Standard for Hazardous Materials/Weapons of Mass Destruction Emergency Response Personnel Professional Qualifications",

Amend Table 1, Column 2, Items 3, 7, 25 and 26 to Read:

NFPA **1072**, "Standard for Hazardous Materials/Weapons of Mass Destruction Emergency Response Personnel Professional Qualifications", **2017 Edition**



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 2

Please note that the Member Comments submitted by this individual were written directly into the Regulation itself to help explain where their concerns are. This members' concerns and comments are highlighted in red.

- OAFIC Response

ONTARIO REGULATION

to be made under the

FIRE PROTECTION AND PREVENTION ACT, 1997

FIREFIGHTER CERTIFICATION

CONTENTS

1.	Definition
2.	Mandatory certification
3.	Exceptions
4.	Transition
5.	Commencement
Table 1	Mandatory certification for fire protection services

Definition

1. In this Regulation,

“NFPA” means the National Fire Protection Association.

Mandatory certification

2. (1) Every municipality, and every fire department in a territory without municipal organization, must ensure that its firefighters perform a fire protection service set out in Column 1 of Table 1 only if, on or after the corresponding day specified in Column 3 of that Table,

- (a) the firefighter performing the fire protection service is certified, at a minimum, to the corresponding certification standard set out in Column 2 of that Table; or
- (b) this Regulation provides that the certification standard referred to in clause (a) does not apply with respect to the firefighter. **Could be clearer.**

(2) The certification must be,

- (a) provided by the Fire Marshal; or **what will it be called.**



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

- (b) an accreditation from the International Fire Safety Accreditation Congress (IFSAC), or a Pro Board seal, that is recognized by the Fire Marshal as equivalent to the certification provided by the Fire Marshal. **Needs to be rewritten.**

Exceptions

3. (1) A certification standard set out in item 1 or 2 of Table 1 does not apply with respect to a firefighter who,

- (a) is performing a service that is within the scope of that item;
- (b) has been a firefighter for no more than 24 months; and
- (c) is operating under the supervision of a firefighter certified to that standard. **How will this work with mutual aid?**

(2) A certification standard set out in Column 2 of Table 1 does not apply with respect to a firefighter who is,

- (a) temporarily assigned to perform a different fire protection service for which a different minimum certification is required; and **how will this work with mutual aid?**
- (b) operating under the supervision of a firefighter who has obtained the certification corresponding to the fire protection service or services being delivered.

(3) If a firefighter was previously certified under this Regulation for an item listed in Table 1, that certification continues to be valid even if the requirements for obtaining that certification are subsequently updated or changed. **For how long? Many standards have a currency requirement,**

Transition

4. (1) Subject to subsection (2), a certification standard set out in item 1, 2, 3, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 17 or 18 of Table 1 does not apply with respect to a firefighter if the Fire Marshal issues the firefighter a letter of compliance with the certification standard in accordance with this section.

This is not grandfathering

(2) The Fire Marshal shall issue a letter of compliance with a certification standard to a firefighter if,

- (a) the firefighter has been performing the fire protection service that the standard corresponds to since at least,



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

- (i) January 1, 2021, in the case of a certification standard set out in item 1, 2, 3, 5, 6 or 7,
 - (ii) January 1, 2020, in the case of a certification standard set out in item 9, 10, 11, 12, 13, 14 or 15, or
 - (iii) January 1, 2019, in the case of a certification standard set out in item 17 or 18;
- (b) before September 30, 2023, the firefighter’s municipality, or fire department in an area without municipal organization, provides the Fire Marshal with information, such as training records, to demonstrate to the satisfaction of the Fire Marshal that the firefighter, through past training and experience, has obtained the requisite knowledge and requisite skills associated with the corresponding standard; and
- (c) the Fire Marshal is satisfied with the information provided under clause (b).

Commencement

5. [Commencement]

TABLE 1
MANDATORY CERTIFICATION FOR FIRE PROTECTION SERVICES

Item	Column 1 Fire protection service	Column 2 Minimum Certification Standard	Column 3 Compliance Deadline
1.	<p>Firefighter Exterior Attack: Fire suppression operations from the exterior of the building only.</p> <p><i>4.1 and 5.1 should be removed</i></p> <p><i>IMS training</i></p> <p><i>4.3.10 although they are using the skills, the general statement is misleading.</i></p> <p><i>4.3.21 how many small rural departments have air monitoring equipment</i></p> <p><i>5.3.2 general statement is misleading</i></p>	<p>The following job performance requirements of NFPA 1001, “Standard for Fire Fighter Professional Qualifications”, 2019 Edition, Chapter 4 (Firefighter I) and Chapter 5 (Firefighter II):</p> <p>4.1, 4.2, 4.3.1, 4.3.2, 4.3.3, 4.3.6, 4.3.7, 4.3.8, 4.3.10 (A1-A9, B1-B3, B4 (exterior stairway), B5-B10), 4.3.15, 4.3.16, 4.3.17, 4.3.18, 4.3.19, 4.3.20, 4.3.21, 4.5</p> <p>5.1, 5.2, 5.3.1, 5.3.2 (A1-A4), 5.3.3, 5.3.4, 5.4.2, 5.5.3</p>	July 1, 2026
2.	<p>Firefighter Exterior Attack and auto extrication: Fire suppression operations from the exterior of the building only and auto extrication rescue.</p> <p><i>Where does item 33 come into play</i></p> <p><i>HazMat awareness chapter 4 1072 (470) should be included</i></p>	<p>All job performance requirements in Item 1 and the following job performance requirements of NFPA 1001, “Standard for Fire Fighter Professional Qualifications”, 2019 Edition, Chapter 5 (Firefighter II):</p> <p>5.4.1</p>	July 1, 2026
3.	<p>Firefighter Exterior Attack and hazardous materials response: Fire suppression operations</p>	<p>All job performance requirements in Item 1 and all job performance requirements of NFPA 1072, “Standard for Hazardous</p>	July 1, 2026



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

	from the exterior of the building only and Operations-level hazardous materials response. Why not the mission specific component Current standard is 470	Materials/Weapons of Mass Destruction Emergency Response Personnel Professional Qualifications”, 2017 Edition, Chapter 5 (Operations).	
4.	Firefighter Exterior Attack, auto extrication and hazardous materials response: Fire suppression operations from the exterior of the building only, automobile extrication rescue and Operations-level hazardous materials response.	All job performance requirements in Items 1, 2 and 3.	July 1, 2026
5.	Firefighter Interior Attack: Fire suppression operations that enter the interior of the building and can perform rescue. Why not 4.3.5 accountability is an OSHA requirement, this would make a total FF1	All job performance requirements in Item 1 and the following job performance requirements of NFPA 1001, “Standard for Fire Fighter Professional Qualifications”, 2019 Edition, Chapter 4 (Firefighter I) and Chapter 5 (Firefighter II): 4.3.4, 4.3.9, 4.3.10 (A10-A11, B4 (interior stairway), B11), 4.3.11, 4.3.12, 4.3.13, 4.3.14 5.3.2 (A5-A9, B1-B6)	July 1, 2026
6.	Firefighter Interior Attack and auto extrication: Fire suppression operations that enter the interior of the building and can perform rescue and automobile extrication rescue. Where does item 33 come into play HazMat awareness chapter 4 1072 (470) should be included	All job performance requirements in Item 5 and the following job performance requirements of NFPA 1001, “Standard for Fire Fighter Professional Qualifications”, 2019 Edition, Chapter 5 (Firefighter II): 5.4.1	July 1, 2026
7.	Firefighter Interior Attack and hazardous materials response: Fire suppression operations that enter the interior of the building and Operations-level hazardous materials response. Why not the mission specific component Current standard is 470 no reference to year	All job performance requirements in Item 5 and all job performance requirements of NFPA 1072, “Standard for Hazardous Materials/Weapons of Mass Destruction Emergency Response Personnel Professional Qualifications”, Chapter 5 (Operations).	July 1, 2026
8.	Firefighter Interior Attack, auto extrication and hazardous materials response: Fire suppression operations that enter the interior of the building and can perform rescue, automobile extrication rescue and Operations-level hazardous materials response (full service firefighter). Why are all firefighting skills now required? Mission specific now required NFPA certification	All job performance requirements of NFPA 1001, “Standard for Fire Fighter Professional Qualifications”, 2019 Edition, Chapter 5 (Firefighter II).	July 1, 2026
9.	Team Lead Exterior Attack: Supervision of firefighters that provide fire suppression operations from the exterior of the building only. Why not 2020 edition of 1021	All job performance requirements in Item 1 and the following job performance requirements of NFPA 1021, “Standard for Fire Officer Professional Qualifications”, 2014 Edition, Chapter 4 (Fire Officer I): 4.1.1, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.4.1, 4.4.2, 4.4.4, 4.4.5, 4.5.3, 4.6, 4.7.1, 4.7.3	July 1, 2026
10.	Team Lead Exterior Attack and auto extrication: Supervision of firefighters that provide fire suppression operations from the exterior of the	All job performance requirements in Item 2 and the following job performance requirements of NFPA 1021, “Standard for Fire Officer	July 1, 2026



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

	building only or that provide auto extrication rescue.	Professional Qualifications”, 2014 Edition, Chapter 4 (Fire Officer I): 4.1.1, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.4.1, 4.4.2, 4.4.4, 4.4.5, 4.5.3, 4.6, 4.7.1, 4.7.3	
11.	Team Lead Exterior Attack and hazardous materials response: Supervision of firefighters that provide fire suppression operations from the exterior of the building only or that provide Operations-level hazardous materials response.	All job performance requirements in Item 3 and the following job performance requirements of NFPA 1021, “Standard for Fire Officer Professional Qualifications”, 2014 Edition, Chapter 4 (Fire Officer I): 4.1.1, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.4.1, 4.4.2, 4.4.4, 4.4.5, 4.5.3, 4.6, 4.7.1, 4.7.3	July 1, 2026
12.	Team Lead Exterior Attack, auto extrication and hazardous materials: Supervision of firefighters that provide fire suppression operations from the exterior of the building only or that provide automobile extrication rescue or Operations-level hazardous materials response.	All job performance requirements in Item 4, and the following job performance requirements of NFPA 1021, “Standard for Fire Officer Professional Qualifications”, 2014 Edition, Chapter 4 (Fire Officer I): 4.1.1, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.4.1, 4.4.2, 4.4.4, 4.4.5, 4.5.3, 4.6, 4.7.1, 4.7.3	July 1, 2026
13.	Team Lead Interior Attack: Supervision of firefighters that provide fire suppression operations from the interior of the building and can perform rescue. Why not 2020 edition of 1021	All job performance requirements in Item 5 and the following job performance requirements of NFPA 1021, “Standard for Fire Officer Professional Qualifications”, 2014 Edition, Chapter 4 (Fire Officer I): 4.1.1, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.4.1, 4.4.2, 4.4.4, 4.4.5, 4.5.3, 4.6, 4.7.1, 4.7.3	July 1, 2026
14.	Team Lead Interior Attack and auto extrication: Supervision of firefighters that provide fire suppression operations from the interior of the building and can perform rescue or that provide automobile extrication rescue.	All job performance requirements in Item 6 and the following job performance requirements of NFPA 1021, “Standard for Fire Officer Professional Qualifications”, 2014 Edition, Chapter 4 (Fire Officer I): 4.1.1, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.4.1, 4.4.2, 4.4.4, 4.4.5, 4.5.3, 4.6, 4.7.1, 4.7.3	July 1, 2026
15.	Team Lead Interior Attack and hazardous materials response: Supervision of firefighters that provide fire suppression operations from the interior of the building and can perform rescue or that provide Operations-level hazardous materials response.	All job performance requirements in Item 7 and the following job performance requirements of NFPA 1021, “Standard for Fire Officer Professional Qualifications”, 2014 Edition, Chapter 4 (Fire Officer I): 4.1.1, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.4.1, 4.4.2, 4.4.4, 4.4.5, 4.5.3, 4.6, 4.7.1, 4.7.3	July 1, 2026
16.	Team Lead Interior Attack, auto extrication and hazardous materials response: Supervision of firefighters that provide fire suppression operations from the interior of the building and can perform rescue or that provide automobile extrication rescue or Operations-level hazardous materials response (full service fire officer). You also need 1041 Why all jprs now NFPA certification	All job performance requirements of NFPA 1021 “Standard for Fire Officer Professional Qualifications”, 2014 Edition, Chapter 4 (Fire Officer I).	July 1, 2026
17.	Pump Operations: Operation of a pumper apparatus without driving the apparatus, or where the apparatus does not require a class D licence.	All job performance requirements of NFPA 1002, “Standard for Fire Apparatus Driver/Operator Professional Qualifications”,	July 1, 2026



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

		2017 Edition, Chapter 5 (Apparatus Equipped with Fire Pump), without pre-requisites in Chapter 4.	
18.	Pump Operations: driver: Driving and operating a pumper apparatus that requires a class D licence. Will a DZ fullfill chapter 4 requirements other than the 4.4 which can be met in item 1	All job performance requirements in NFPA 1002 “Standard for Fire Apparatus Driver/Operator Professional Qualifications”, 2017 Edition, Chapter 5 (Apparatus Equipped with Fire Pump).	July 1, 2026
19.	Fire Prevention/Inspection: conducting fire and life safety inspections. Should there be a certification requirement for plans examiners	All job performance requirements of NFPA 1031, “Standard for Professional Qualifications for Fire Inspector and Plan Examiner”, 2014 Edition, Chapter 4 (Fire Inspector I).	July 1, 2026
20.	Fire Investigator: conducting fire cause and origin investigations. There is a 2022 edition	All job performance requirements of NFPA 1033, “Professional Qualifications for Fire Investigator”, 2014 Edition, Chapter 4 (Fire Investigator).	July 1, 2026
21.	Fire and Life Safety Educator: providing fire and life safety education. Educator 1	All job performance requirements of NFPA 1035, “Standard on Fire and Life Safety Educator, Public Information Officer, Youth Firesetter Intervention Specialist, and Youth Firesetter Program Manager Professional Qualifications”, 2015 Edition, Chapter 4 (Fire and Life Safety Educator).	July 1, 2026
22.	Training Officer: providing training and education to other fire personnel.	All job performance requirements of NFPA 1041, “Standard for Fire and Emergency Services Instructor Professional Qualifications”, 2019 Edition, Chapter 4 (Fire and Emergency Services Instructor I).	July 1, 2026
23.	Emergency Communicators: taking emergency calls. Will this apply only to fire service dispatchers	All job performance requirements of NFPA 1061, “Standard for Public Safety Telecommunications Personnel Professional Qualifications”, 2018 Edition, Chapter 4 (Public Safety Telecommunicator I).	July 1, 2026
24.	Incident Safety Officers: undertaking the primary role of incident safety officer at emergency calls. Are FDs now required to have one Need 1021 thus Need1041	All job performance requirements of NFPA 1521, “Standard for Fire Department Safety Officer Professional Qualifications”, 2020 Edition, Chapter 5 (Incident Safety Officer).	July 1, 2026
25.	Hazardous Materials Response — Operations Mission Specific Level: responding to emergencies involving hazardous materials at the Operations Mission Specific Level. Mission specific is designed for service levels New standard is 470 (2022) no year referenced	All job performance requirements of NFPA 1072, “Standard for Hazardous Materials/Weapons of Mass Destruction Emergency Response Personnel Professional Qualifications”, Chapter 6 (Operations Mission Specific)	July 1, 2026
26.	Hazardous Materials Response — Technician Level: responding to emergencies involving hazardous materials at the Technician Level. New standard is 470 (2022) no year referenced	All job performance requirements of NFPA 1072, “Standard for Hazardous Materials/Weapons of Mass Destruction Emergency Response Personnel Professional Qualifications” Chapter 7 (Hazardous Materials Technician).	July 1, 2026
27.	Rope Rescue — Operations: rope rescue at the Operations Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue	July 1, 2028



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

	I thought that the OFC only has curriculum for 2013 edition for all 1006	Personnel Professional Qualifications”, 2021 Edition, Chapter 5 (Rope Rescue) (Operations): 5.2	
28.	Rope Rescue — Technician: rope rescue at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 5 (Rope Rescue) (Technician): 5.3	July 1, 2028
29.	Structural Collapse — Operations: structural collapse rescue at the Operations Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 6 (Structural Collapse Rescue) (Operations): 6.2	July 1, 2028
30.	Structural Collapse — Technician: structural collapse rescue at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 6 (Structural Collapse Rescue) (Technician): 6.3	July 1, 2028
31.	Confined Space — Operations: confined space rescue at the Operations Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 7 (Confined Space Rescue) (Operations): 7.2	July 1, 2028
32.	Confined Space — Technician: confined space rescue at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 7 (Confined Space Rescue) (Technician): 7.3	July 1, 2028
33.	Vehicle Rescue — Operations: rescue involving passenger vehicles at the Operations Level. When is this to be used? How will it be enforced or put into E&R by law How does this work with 1001 5.4.1	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 8 (Common Passenger Vehicle Rescue) (Operations): 8.2	July 1, 2028
34.	Vehicle Rescue — Technician: rescue involving passenger vehicles at the Technician Level. When is this to be used? How will it be enforced or put into E&R by law	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 8 (Common Passenger Vehicle Rescue) (Technician): All of 8.3	July 1, 2028
35.	Heavy Vehicle Rescue — Operations: rescue involving heavy vehicles at the Operations Level. When is this to be used? How will it be enforced or put into E&R by law	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 9 (Heavy Vehicle Rescue) (Operations):	July 1, 2028



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

		9.2	
36.	Heavy Vehicle Rescue — Technician: rescue involving heavy vehicles at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 9 (Heavy Vehicle Rescue) (Technician): 9.3	July 1, 2028
37.	Trench Rescue — Operations: trench rescue at the Operations Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 12 (Trench Rescue) (Operations): 12.2	July 1, 2028
38.	Trench Rescue — Technician: trench rescue at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 12 (Trench Rescue) (Technician): 12.3	July 1, 2028
39.	Surface Water Rescue — Operations: surface water rescue at the Operations Level. With the amount of water/ice and section 21 recommendation/ requirement shouldn't awareness be mandated for ice and water	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 17 (Surface Water Rescue) (Operations): 17.2	July 1, 2028
40.	Surface Water Rescue — Technician: surface water rescue at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 17 (Surface Water Rescue) (Technician): 17.3	July 1, 2028
41.	Swift Water Rescue — Operations: swift water rescue at the Operations Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 18 (Swiftwater Rescue) (Operations): 18.2	July 1, 2028
42.	Swift Water Rescue — Technician: swift water rescue at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 18 (Swiftwater Rescue) (Technician): 18.3	July 1, 2028
43.	Ice Water Rescue — Operations: ice water rescue at the Operations Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 20 (Ice Rescue) (Operations): 20.2	July 1, 2028



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

44.	Ice Water Rescue — Technician: ice water rescue at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 20 (Ice Rescue) (Technician): 20.3	July 1, 2028
-----	--	---	--------------

Member Comment 3

The mandatory certification exemptions under 3.0 does not take into consideration firefighters being re-assigned permanently to a technical rescue hall. For more details, please see [Member comment 25 in Appendix B – Members Comments](#).

Member Comment 4

Consideration should be given to opening up grandfathering provisions one final time as part of the implementation of this standard. Many Fire Chiefs have taken on the leadership of Fire Departments where the previous leadership did not complete grandfathering applications. Affording the current department leadership an opportunity to complete grandfathering will assist with implementation of this Regulation.

Member Comment 5

The Regulation should explicitly state that awareness level training (but not certification) is required for the NFPA 1006 disciplines.

Member Comment 6

Not within the Regulation itself, but within the accompanying commentary, it should be confirmed that anyone previously grandfathered to Firefighter Level 2 includes Hazmat Operations (as that is how it was interpreted by Chiefs at the time and any change to that will mean all grandfathered personnel would have to then achieve full NFPA 1001 certification in order to progress to Hazmat Technician). If the previously grandfathered firefighters are not considered grandfathered to Hazmat Operations, then this would represent a multi-million-dollar cost as previously grandfathered firefighters assigned to perform hazardous materials duties would have to complete the entire NFPA 1001 certification process, despite being grandfathered and told previously that included the Hazmat component within Firefighter certification.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 7

Not within the Regulation itself, but within the accompanying commentary, it should be confirmed that there are no pre-requisites to the NFPA 1006 disciplines except awareness level before operations level and operations level before technician level. The 2021 standard no longer includes Chapter 5 Core Skills, and the rope rescue skills for each discipline are embedded within the discipline meaning NFPA 1006 Rope Rescue is not a pre-requisite either. This was mistakenly listed in the most recent Ontario Fire College Course Calendar. It should also be confirmed that NFPA 1001 Firefighter certification is also not a pre-requisite to completing the NFPA 1006 certifications.

Member Comment 8

The regulation should include an initial 12-, 18-, or 24-month apprenticeship period for all firefighters (exterior attack and full service) similar to the previous regulation. This will allow departments to recruit and then commence the training. During the apprenticeship period the firefighter would be limited to working within the scope of their training and to work under supervision.

A similar apprenticeship period should be afforded for firefighters who have moved into a station or apparatus that performs a specialty (technical rescue or hazardous materials). This firefighter should be afforded 12-, 18-, or 24-months to complete the certifications for those specialty discipline(s). During this period, the firefighter would be limited to working within the scope of their training and to working under supervision.

A shorter (perhaps 8 - 12 months) apprenticeship period should be allowed for a firefighter promoted to Fire Officer to complete the required certifications (NFPA 1021 Fire Officer Level 1 and NFPA 1041 Fire Instructor Level 2).

Member Comment 9

The Regulation should be revised to confirm that NFPA 1041 Fire Instructor Level 1 is required for Officers as it is a co-requisite to NFPA 1021 Fire Officer Level 1.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 10

Many Chief Officers who were engaged on the consultation expressed confusion over what certification is required to perform auto extrication. There are auto extrication skills covered in NFPA 1001 Firefighter Level 2 certification, and then auto extrication skills in NFPA 1006 Common Passenger Vehicle Rescue and NFPA 1006 Heavy Vehicle Rescue. There needs to be specific direction within the Regulation or accompanying documents that confirm specifically what level of certification each department, based on their department size and type, needs be able to perform auto extrication and at what level.

Member Comment 11

While the timelines were not widely discussed as barriers to success, it should be noted that some Fire Departments indicated that longer timelines would be more beneficial to success. Some suggested an additional year for each (5 - 7 years as opposed to 4 - 6 years). They noted the need to first revise their Establishing and Regulating Bylaw to be able to know which fire protection services will be established by Council and noted that this process will align with the Community Risk Assessments (CRA) to be completed by 2025. They indicated that longer timelines would allow communities to utilize the CRA as the guide to complete the certification process.

Member Comment 12

There should be, either as part of the Regulation or in a supporting document, reference to how compliance to this Regulation will be audited and what the consequences of non-compliance are.

Member Comment 13

The term "temporary" within the Regulation needs to be specifically defined. At what timeline does "temporary" no longer mean "temporary"? Is it filling in at a station or a different level (i.e., a firefighter acting as an Officer) for one shift or one call? Is it being placed at a different station or new role for one month? Six months? Would it cover a firefighter transferred to a specialty role (i.e., hazmat) and then commencing the NFPA 1072 training and certification? If so, how long would they have to complete that certification?



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 14

- 1) If a Firefighter has NFPA 1001 I and II that it includes Operations-level hazmat response.
- 2) If a firefighter has been grandfathered to NFPA 1001 I and II that it includes Operations-level hazmat response

Note: Item 8, Column 2 of Table 1 only states NFPA 1001 Chapter 5. It does not reference any other JPRs or "Items". This does not make sense as the certification includes Ops level hazmat response - needs clarification

Member Comment 15

Please note that Member Comment 15 has been included as Member Comment [number 33 in Appendix B](#) due to the fact that it includes both specific recommendations on the Regulation itself as well as additional comments and feedback and would be appropriate in both Appendix.

Member Comment 16

Please note that Member Comment 16 has been included as Member Comment [number 47 in Appendix B](#) due to the fact that it includes both specific recommendations on the Regulation itself as well as additional comments and feedback and would be appropriate in both Appendix.



Appendix B – Members Comments and Feedback

During the O AFC's consultation period, the O AFC encouraged our members to put in writing their thoughts/opinions/concerns over the proposed Regulation and that we would submit comments on their behalf to ensure anonymity. Please find below the O AFC members comments on the proposed Regulation that were shared with us. Comments are written as received, with minor spelling and grammatical corrections made for flow. The only other changes made to members comments were the removal of any identifying aspect of their comments such as changing department names to "X". The O AFC maintains a listing of all comments received on this issue for internal record keeping.

These are comments received directly from members as part of the O AFC member engagement process and may not reflect the views of the O AFC. In some cases, they may reflect a misunderstanding of the Regulation or the implementation process. In other cases, they may have already received answers or the requested information from the OFMEM. However, every member's thought, voice, and opinion are important, so all are included. The comments below were all received in writing throughout the O AFC membership consultation process concluding on the date listed on the cover of this report.

It should be noted that the O AFC defines Full-Time departments as departments where every employee is a full-time employee, Composite Departments are those with at least one part or full-time employee and which can include a part-time Fire Chief, Volunteer Department as departments where the Fire Chief is defined as volunteer for contractual purposes, and NFPP Volunteer as defined by the Northern Fire Protection Program.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 1

The need for financial support to ensure compliance is absolutely necessary as well as the capacity of the OFM to support the requirements in terms of registration and program support with curriculum.

In respect for compliance certificates, I would anticipate there will a large intake in requests, will the OFM have adequate support? Additionally, if the review process is prolonged due to the workload which in turn contributes to noncompliance, will the FM have authority to grant an extension?

In respect to compliance, if departments are non-compliant by the dates, what is the consequence? Will this now be a health and safety issue? Who will be responsible for compliance? Will it be the OFM or MOL? The regulation is void of any enforcement/non-compliance measures.

- Composite Department. Approximately 105,000 residents.

Member Comment 2

My department agrees with firefighter certification and standardized training. We have been building towards certification for the past 3 years.

Local issues that have arisen are as follows:

- Access to AS&E staff. We have approximately 45 firefighters to certify, 14 pump operators, and 9 officers.
 - Funding to assist with the enhancement of local training programs, building training grounds, increased funds to RTC's to bring cost down, access and implementation of online training component.
 - Questions regarding certification of external fire depts and completing auto extrication certifications.
 - Firefighter retention - It is a given that I will lose firefighters while already low in numbers. During the meetings it was discussed that other areas have flourished with certification, our local commitment is lacking. This is our reality. We will do our best to retain firefighters however many are already on the edge of leaving. I believe that certification requirements will push them away.
- Volunteer Department. Approximately 3,000 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 3

Just a short note to express my thanks for the OFM Briefing related to training and certification as it relates to the new O/Reg. I believe that it is simple, clear, to the point and manageable over time. I was pleased to find that the draft included reference to Fire Service Telecommunicators as they have been most often mentioned in fire related inquests since 1989. I believe that this is the last, best opportunity to professionalize the fire service in my career. I will be pleased to see this done.

I understand that there will be a presentation for CAOs, perhaps on Feb. 16th. My CAO has not received an invite. I believe that he would benefit from the presentation since he and council may not realize that collectively, they may be overpromising on the delivery of fire protection services in their E+R Bylaw and under delivering fire protection, particularly during the business day.

I have worked for 7 rural/composite fire departments, on an interim/troubleshooting basis, since 2019. Without exception, each fire department is using a version of the OFM Model E&R bylaw that identifies the fire protection services that municipalities provide. Without exception, they all fail to indicate that during the business day, the fire department may show up with 3-5 volunteer firefighters in 15-20 minutes and find themselves unable to perform interior firefighting or perform rescue.

The current bylaws, with respect, would lead one to believe that the public is always receiving the maximum level of service. We both know that this is incorrect. In their current form, some/many E&R bylaws give cover to municipalities hoping to be willfully blind to the daytime staffing realities and sets fire chiefs up for failure post-fire.

I appreciate the work that you and your staff have done on this file. I believe that the regulation, if implemented correctly, has the opportunity to improve public and firefighter safety.

- Volunteer Department. Approximately 7,300 residents.

Member Comment 4

I support the certification program in its principle and believe it is time to ensure the firefighters safety.

In the two services I have been with since the program's inception, I found that both departments have worked hard to meet the requirements of certifications. In my current department, I see the biggest hurdle as the pump operator's requirement, but I am sure within four years and the legacy program possibility, we will work through that.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

I attended the OFM briefing last Tuesday evening, I am encouraged by Mr. Snider's comments regarding testing. I have one firefighter that is dyslexic and has difficulty testing. He has served in the Canadian Armed Forces, and they found ways to allow him to test. I have one firefighter, who is one of the most useful members I have, yet he has a phobia to testing and will completely freeze up. I am hoping through oral testing he can pass. He was able to complete his recruit program, several years ago, he was able to complete all practical components of the recruit training, however, could not pass the written component of the testing.

Regarding the subject of funding, I was extremely disappointed hearing the fact that last year's provincial grant was underspent. This could mean one of two things. Either there are department leaders that did not believe that they required the grant or did not want to take the time to fill out the appropriate paperwork, or possibly they did not need the funds that were offered to them. It may be possible that grants based on population is not the appropriate way. A review should be taken as to who did not use the grant and possibly find out why. It may be possible that many larger departments have a larger tax base and are fairly well equipped. My small department received its grant and bought one training prop which the municipality had to also subsidize as well. I am in bad need of new computers. Each station is supplied one desk computer to complete reports on Fire Pro. The other computers had been purchased through donations and are well past their shelf-life date. In order to allow them to be connected into the municipal system, they would have to be purchased through the county system who operates our IT and there is an annual maintenance fee. Further, regional schools should be funded to ensure they have a supply of computers in order that they could do on-line testing. On-line testing is truly the way to go in the future.

Lastly, I would like to see if there is some way, that courses could be set up for fire leaders in some of the technical responses. Many departments do not have the luxury at a call, to have a certified member be the IC [Incident Commander] at a technical call as when a certified member arrives, he needs to be hands on.

And in my opinion, hands on should not be the Incident Commander. However, to expect a 55+ year old to take a technical course and be expected to complete the practical portion of such a course is not fair. If they had the theory portion and was able to watch the practical portion, they would be able to be the Incident Command such a call.

- Composite Department. Approximately 7,300 residents



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 5

Firefighter certification is extremely important, and I fully support it. I do feel that we need to be cognizant of future cost towards unionized members seeking certification competency pay for technical rescue response. I am hopeful that the OAFCh can assist in championing a coordinated effort to address the issue much like a coordinated bargaining aspect that can assist likeminded departments. There will be certification implementation costs, maintenance costs and then there could also be accent costs such as competency pay expectations of OPFFA locals. Ensuring that departments have assistance with cost considerations, templates and sharing of cost aspects amongst all municipalities will be a key consideration. I recognize the OAFCh cannot be all to everyone however it can lead and champion town halls, education, workshops etc. that provide the basis for Chiefs to get the information needed and that the submitted quantitative costs can be substantiated amongst municipal governments and provincial governments for funding, grants, and budgets. Happy to assist wherever possible.

- Full Time Department. Approximately 211,000 residents.

Member Comment 6

Part of our training program for new fire officers is to complete 1041 and 1021. Registration for these courses has been limited with only two firefighters per department and wait times have been months to years for some members. The OFM needs to schedule more courses, so we are able to certify our officers in a timely manner. We are limited with staffing and do not want to be held up because courses are not available.

If the intent of the regulation is to improve performance and safety across the province, training for specialized rescue must be fully supported by the OFM. The OFM approves colleges and private companies to deliver 1001 and 1072. The OFM should be delivering their own programs and working to approve colleges and/or companies to provide specialized training. The TSSA approves third parties to provide elevator rescue training to firefighters. Can departments pick parts of a standard to train to? As an example, we may not choose to provide all the services described in the Rope Rescue Technician section and may choose only some. Is this an all or nothing scenario?

Who is training the OFM evaluators/field officers in all the specialized rescue disciplines?

- Full Time Department. Approximately 92,000 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 7

1. In X Department we believe firefighter certification is a huge step forward in ensuring our profession meets professional standards.
2. I share concerns in the capacity of the OFMEM to manage to support the mandatory training as we have already seen the lack of certain courses toward certification.
3. E-testing needs to be made available to all fire departments at no cost to the municipality to have quick access to testing and quick access to marks for the student.
4. I believe there should be a funding model to off-set the costs of training at RTC versus that of the now defunct Fire College. The move to RTC had an effect on the bottom line of municipal budgets with increased cost for courses, meals, mileage, and accommodations.
5. Clear direction needs to be given to departments on what is required for "letter of compliance" for NFPA 1002.
6. We are entrusted to train our people in order to get them to a level to write and complete practical certifications, however, we feel the need to allow us more flexibility to be able to assess our own members for certifications. OFMEM should allow for individual evaluators in their own department this flexibility.

- Composite Department. Approximately 20,000 residents.

Member Comment 8

Funding and resources are big issues for us here in X Municipality.

Grandfathering was never initiated here, and we will have to send all our Firefighters through the RTC in X Location (70 Firefighters in total @ \$1,000-\$1,200 per firefighter. This will have a huge impact on our budget for the next 3 years just for training.

I would also like to know what the OFMEM has planned for providing sufficient resources to accommodate small Municipalities in meeting the regulation(s) i.e. Regional Advisors, Training evaluators etc.

Since the OFC closed is there any plan for ALL the seminars to be hosted by the OFMEM? These seminars were beneficial in networking and have a better understanding the direction of the province. As well the province is not disconnected to the level of service in the Fire



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Service, big or small. I also understand there is a model in some Municipalities for "E-Testing" which I would be interested in seeing available across the province.

When I was on the Executive and President of the OMFPOA we had a great relationship with the OFMEM through the Deputy Fire Marshal and the OFMPOA could deliver the "right message" to its members across the province. I think the OFMEM is trying to improve this, however, there seems to be no plan (going forward through the OAFCA) to support the Municipalities with this mandatory regulation.

I commend the work the OAFCA is doing going forward on this bumpy windy path.

Communication is key!

- Composite Department. Approximately 4,400 residents.

Member Comment 9

Although I support certification for Firefighter Levels I and II, it is easy to justify this as a safety requirement for our staff. What is hard to justify is the mandate for the other requirements such as pump ops. Would like to see some sort of justification table for the value added of mandating all the other courses.

I.E. define the benefit between a one-time certified pump operator and a constant refresher trained non-certified pump operator.

- Volunteer Department. Approximately 4,100 residents.

Member Comment 10

- 1) Will the OFM be able to support this certification with the staff they currently have?
 - 2) Limited availability to RTC
 - 3) Funding resources.
- Composite Department. Approximately 13,100 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 11

It is imperative that legacy certification be given for all the tech rescue (1006) disciplines. The task of certifying members will be an extremely costly one and will result in a diminished level of service.

- Composite Department. Approximately 43,600 residents.

Member Comment 12

I wanted to comment that I am in favour of the certification process. I am Fire Chief X immediately east of Y. We have 3 stations and cover from Lake Ontario to Z Lake. I really like the certification process and have been a student of it myself. I find that it is a very easy system to follow and gives us all a benchmark for qualifications. I know that it is coming at an added cost, but that is my responsibility to make it work. Funding from the Government would definitely help but I don't think it should be a requirement. All but one of my Firefighters has 1001 Levels I and II. Moving forward for all our new recruits, 1001 Levels I and II are mandatory requirements.

The only thing I wish would happen through a process like this is that we identify a need for a complete revision of the FPPA (1997). One example is the need to provide appropriate definitions for Full-Time, Part-Time, and Volunteer firefighters. It is time in our industry that we recognize what a Part-Time Firefighter is as the definition under Volunteer is inadequate.

- Volunteer Department. 6,900 residents.

Member Comment 13

A couple of concerns.

Cost obviously, certification will cost more and as a small department, budget is always an issue.

The other concern goes hand in hand and that is the technical rescue. There are not many RTCs that offer all the courses and definitely not in the north, how do we get the courses and trainers brought to us? The cost to have someone come up and put on a course is large and there are limited resources available to do that. Will the OFM be providing trainers and the courses to be delivered?

- Volunteer Department. Approximately 1,900 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 14

I just recently received two firefighter certifications for two of my members who had just finished their Pumper Operations. In the envelope from the OFM's AS&E was their certificates and the forms to the Pro Board which the member can apply for their NFPA seal. If the government is proposing that firefighters must now have that seal, then why is the fire department or the firefighter paying for it? Should not the OFM be ensuring when they send the documentation of the fact the firefighter has been successful, that they also apply to the ProBoard to ensure the firefighter receives their seal?

- Composite Department. Approximately 7,400 residents.

It is our understanding that firefighters are not required to purchase the additional ProBoard seal. The letter is provided in the event that they wish to do so for their own professional development. Completing certification through either IFSAC (no cost) or ProBoard (registration cost) ensures compliance.

- OAFC Response

Member Comment 15

Certification is accepted by the majority of the Fire Chief's, but the Regulation has some major issues:

1. The OFM issued an Introduction Technical Briefing at their sponsored Webinar and promised to will share with the attendees the presentation. Fire Departments have not received briefing yet.

This has been shared by the OFMEM since this comment was received
– OAFC Response

2. The OFM is overly optimistic with its capabilities that are mandated in the regulation.
 - The OFM does not have the resources to review the certification needs of the 441 fire departments in Ontario.
 - The question is where are these personnel coming from? How qualified are they? And how long to educate them to contribute?
3. In the proposed regulation Table 1 sections 27 through section 41:
 - The technical rescue training requirements have not been created yet: and the OFC are stating they are almost complete.
 - Fire Chiefs cannot assess the training required for their respected departments. Our department should be exempt because we are awareness training only in



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

these requirements. If awareness is a requirement the department would have to schedule training and funding

The OAFCh understands this to mean awareness training only, not testing or certification, is the requirement.

- OAFCh Response

4. The OFM stated that the new certification should not cost your departments any more than municipality's traditional budget. They were the only participants in the webinar who had this opinion.
5. Legacy certification will be the deciding factor affecting the costs for municipalities. If legacy is denied a detrimental training cost will occur.
6. During the OFM presentation the option of certifying during regular training days was recommended by OFM.
 - The Township of X has 2 training days for 2 hours a session a month and 1 maintenance practice.
 - The required annual training already mandated by the OFM Live Fire, SCBA, Hose testing etc. plus the proposed certification requirements makes this proposal impossible.
7. The Legacy Ontario Seal process has not been finalized and distributed to fire departments by the OFM. The full implications of the certification process can only be fully evaluated after direction is given

Observations

1. The Certification Process timelines have been unfairly placed upon Municipality's. One month consultation period and full implementation by June is onerous upon all involved (Municipalities, Fire departments and the OFM)

The OAFCh understands this information to be factually incorrect as written in the Regulation implementation timelines.

- OAFCh Response

2. There are too many unanswered questions which affects the accuracy of any reports required by any Municipal council that only can only be answered in the future.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

3. Financial obligations can only be assessed when Legacy, training requirements, Timelines, expectations of OFM, and expectations from Municipalities are addressed by OFM.
 4. Retention of firefighters may become an issue with mature firefighters.
 5. The Government of Ontario is enforcing Certification so they should provide funding annually to offset future training needs for the municipality. Each requirement needs textbooks, tuition, and other expenses and the government is going to have to provide this funding.
 6. The promotion by the OFM that Certification would cost municipalities no extra expenses raises concerns over how out of touch the OFM is with Volunteer Fire Departments.
 7. THERE ARE TOO MANY UNANSWERED QUESTIONS for Municipality's to make accurate decisions and comments. The "Trust Me" with good intentions just does not fly
- Volunteer Department. Approximately 4,100 residents.

Member Comment 16

The biggest concerns for us would be:

1. We need to have quicker results for testing. Waiting 3 months is unacceptable and very frustrating. Either online testing or a proctor with the ability to bring the testing program on tablets or computers that can provide results quickly. We are in 2022 so this should be an option.
 2. With the possible increased hours in training there will be a need for more funding. Either an annual grant or some other means to apply for additional funding to support our budgeting process.
 3. Having NFPA skills assessment checklists available for all departments. Instead of relying on each department to provide this information. A template that all could use would make life easier.
- Composite Department. Approximately 6,000 residents.

The information for point three is listed on the OAFCh's website. The OAFCh has reached out to this member to share the information.

– OAFCh Response



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 17

X Fire Department would like to offer the following comments/concerns/requests in regards to mandatory certification.

1. There needs to be provincial funding to offset the costs associated with this process. This funding needs to be ongoing and cannot be a trivial one-time lump sum payment.
2. The OFMEM needs sufficient staffing at AS&E to ensure that they will be able to efficiently administer this process. Timely results for testing is only one of the few things that will be affected if they are not prepared.
3. All materials, such as curriculums, skills sheets, teaching materials etc. need to be shared with ALL departments even those departments that do not have Learning Contracts. Many departments have well trained staff that can deliver good, competent, training to our members. They will only need the approved materials.
4. Materials need to be created and released in a timely matter. While there are 6 years allowed to certify to many NFPA 1006 skills, OFMEM has not provided fire services with any information to start down that road. We cannot be demanded to certify and not be given the materials with which to do so.
5. There must be an increase in courses offered online by OFMEM. One or two offerings of a critical core course for a certification program is not sufficient. The four-year window will be eaten up in short order if we are only able to send an individual to one or at best two courses per year.
6. There MUST be improved communication between OFMEM and Ontario fire departments. Something cannot be simply released on a website, fire chiefs must be notified of every single part of this process by email, so that nothing goes unnoticed.

Thank you for the opportunity to provide comment on this matter.

- Composite Department. Approximately 12,000 residents.

Member Comment 18

I am writing today in regards to Fire Fighter Certification. I am against certification, however I do believe that a certain level of training should be met by fire fighters before attending fire scenes. This is the responsibility of the Fire Chief.

Career Fire Fighters are scheduled shifts in which they are responding to calls, completing duties around the firehall or training. This is their only job, once they go home, they are on their own time. Volunteer Fire Fighters are on call 24/7 work a regular job, have families, and then respond to calls when dispatched anytime day or night. They never know what or where they are being called to. Then after the call they are expected to return to their regular job or return back home. They train on their scheduled nights or days which takes more of their time.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Forcing them to write tests and perform to the highest level of a standard in front of a tester will cause people to quit or just not sign up.

It is difficult enough to recruit fire fighters and retain them. Most fire departments are looking for people to join. Asking them to jump through hoops while working a full-time job and family. What will happen is there will be communities without a fire service.

In Ontario, the Fire Services is the only emergency service that does not receive any sort of funding from the provincial or federal governments for equipment, training or wages. Yet they want to come in and regulate anyway.

Municipalities can only put so much on taxpayers backs before they can't afford their taxes. There are 441 fire departments in Ontario, and as said they are all different. Everyone has a list of core services they provide for the municipality. As I said, with limited funding, they do the best they can with what they have. Some areas have very few people that can join or are able to join.

I believe that fire fighters should meet a standard, this should be in a guideline for that specific department depending on their needs.

Qualified, checked off yes, Certified NO, most are never planning on being career fire fighters. Career, Composite, and volunteer departments should all be different as each has their own requirements. They are completely different and should be treated this way.

I have been in the Fire Service for 33 years. Over the years I seen a lot of positive changes from PPE, trucks, equipment, and access to training.

Certification is not going to be one of these positives.

- Volunteer Department. Approximately 2,500 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 19

An electronic testing system should allow much quicker, if not instantaneous, results and would be a great improvement. I do not believe that each department should be required to maintain a stock of tablets/laptops to conduct the testing on. A central supply, available to the proctor would be utilized at a much higher level and would be easier for AS&E to update and control.

Bulk purchasing of textbooks would be beneficial. If the province wants the fire service to train to a specific standard, they should provide to tools required.

We would like to see the cost of certification testing to be funded with a one-time grant based on the number of FF employed.

RTCs

There needs to be some standards set for the operation of RTCs. I have dealt with several in the course of my duties over the last year. Some have been easy to deal with and others were very frustrating.

If an organization is going to offer training as an RTC, they should be required to do the following:

- 1) Provide a list of courses offered to the OFC for publication on a central website (being done now).
- 2) Provide a website of their own (or send info to OFC and have them collate and publish it) with:
 - application cut off dates
 - vacancies
 - prices
- 3) COMMUNICATE! When the only place to obtain information regarding RTC programs is from the RTC itself, they need to answer their phones/emails. Some do an excellent job returning emails with responses within hours or even a day or two. When correspondence is not answered for weeks, and in some cases never, it is frustrating and does not indicate a well-run operation. A simple "course is full" response would be fine.

Learning Contracts

It would help if the OFC would publish some details regarding the Learning Contracts. I can find many references to them but almost no specifics.

- Volunteer department. Approximately 2,900 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 20

I think e-testing would be great for all departments in Ontario.

Yearly grants are a great way to off-set training cost for mandatory certification.

- Volunteer Department. Approximately 3,700 residents.

Member Comment 21

After reviewing the legislation and looking at our community needs, the following are the writers concerns with the legislation and challenges that it will have on the X fire service. The writer is fully supportive of certification of some form but believes the proposed legislation is not reflective of the needs of the volunteer fire service.

1. The extremely short review time (30 days) was not an appropriate length of time to provide adequate comments for the Legislation. The Legislation has a number of areas that financial considerations could not be calculated due to missing information and unknown factors. The length of comment time should have been at least 120 days when all information was provided.
2. Given the history of the Office of the Fire Marshal to complete tasks, the Legislation should have had a staggered implementation starting with Firefighter I and II certification to ensure that the OFMEM had the staffing and resources to provide the support required. If this is not in place, the municipality will find itself to be liable for the actions of the OFMEM. Once certification was running smoothly it should then be expanded to the next level, gradually, to ensure that it could be efficiently managed.
3. Remove the certification for pump operations, vehicle extrication, and heavy vehicle extrication and move to a local level qualification much like aerial operations. This will allow fire departments the ability to continue to provide service and it would reduce the certification requirements by allowing knowledge of local equipment and procedures.
4. Although the OFMEM has stated that there will be no cost for evaluations, they only provide lead evaluators. Other evaluators must be provided by the local municipality at their cost. Evaluations are not practical on regular training nights due to amount of time and logistics required which would add costs to the department for conducting evaluations.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

5. Although there is a phase in allowance for firefighters, there is no phase in time for other positions. There should be an allotted time to certify officers and other positions before requiring full certification.
6. The timeline for completion of certifications does not reflect the reality of the training schedule of most volunteer fire departments as well as not reflecting other legislated requirements that needs to be accomplished such as WHMIS, harassment in the workplace, health and safety training, superior tanker shuttle accreditation, first aid and CPR training, etc.
7. If the OFMEM is to be successful, they will require the following:
 - i. More and adequate staff to complete all evaluations.
 - ii. Increased E-testing to complete the testing process.
 - iii. Allowing delegated authority to conduct testing.
 - iv. A ban on waitlisting and course and evaluation cancellation, and
 - v. Provide one-time funding to fire departments for electronic devices for testing and annual funding to go directly to municipalities earmarked for training to make up shortages in their training budgets directly related to certification overages.
8. The OFMEM needs to expand resources for persons with learning difficulties including but not limited to the elimination of doctor's notes as proof of learning limitations. The proof should be related to the Chief who can inform the OFMEM of the requirements.

These comments only reflect the observations at the time of writing and may expand as more information becomes available.

- Composite Department. Approximately 6,700 residents.

Member Comment 22

X Fire Department is supportive, in principle, of moving toward mandatory certification in the Ontario Fire Service but would also like to address and identify some thoughts and concerns with this.

In no order:

- The regional training centers concept is a good one but in reality, is about five years from being fully functional and beneficial. The OFC should have remained open in conjunction with the development of regional training centers to provide drastically improved coverage and availability across the province
- The OFM/OFC needs to drastically increase its staffing and commitment to the Ontario Fire Service. A significant increase in course offerings at diverse locations and through



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

online format needs to be recognized. Right now, we have been told there is no program ready at the OFM to support this initiative, no curriculum ready at the OFM to support this initiative, and certainly insufficient staffing levels at the OFM to support this initiative. One would expect that long before the regulation for mandatory certification comes into play all these support mechanisms would be in place so that departments with initiative and drive could jump on things right away. The support is not there yet.

- Consideration should be given to reducing the restrictions on courses as well. Allowing a maximum of two per course per department in many cases is prohibitive.
- Consideration for improving the support for online course delivery needs to be investigated. I know that when I reached out to arrange for an online 1021 Level I course citing that I had eleven (11) personnel I wanted to go through it I was told categorically no way OFC could arrange this. Too busy. When I questioned things, I was told that their staff was too busy to do the marking of submissions which is the only component required.
- Consideration to expand regional training centers capability. I have been told that these locations are not allowed to host online course delivery and the courses they currently can deliver are very restrictive. Online delivery through regional training centers should be offered and made available as well as allowing for improved capacity and offerings.
- The process for establishing Learning Contracts needs to be vetted and improved as well as streamlined. It seems to take an exorbitant amount of time and effort to secure learning contracts through the OFM/OFC and yet this is touted as being one of the better methods for departments to reach compliance. The entire process needs to be overhauled and made more user friendly with a far greater turn around and commitment from the OFM/OFC to make this work.
- Funding needs to be put forth to support this initiative. There will be far more requirements for manuals to be purchased as certification is encompassing all levels of the Ontario Fire Service this time around instead of just firefighter levels. There will definitely be increased need to access regional training centers, especially for department such as ours, where we have no designated/dedicated training officer and the senior officers cannot be expected to operate the department and meet the mandates before us and deliver all the training as well. There will be increases to the amount of training required and to development of enhanced documentation that we have no bee in a situation to create.
- OFM needs to have more delivery personnel and less evaluators. Evaluation should be allowed within the department or organization by members of the department or organization without the requirement to locate and schedule third party evaluators. There needs to be an increased level of trust with municipal fire departments by the



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

OFM that they can deliver and have personnel who did not conduct the training complete the evaluations.

- Expand the legacy and make it easier. Allow Fire Chiefs to sign off personnel as being qualified based on skills, training, years of service etc. Asking us to send comprehensive documentation of our training so that they can be reviewed and **possibly** approved is in my opinion a waste of time. Again, the level of trust needs to be improved. I am sure that is almost every case a Fire Chief is not going to commit to something unless they feel comfortable with stating it.
- E-testing needs to become a reality in addition to more online availability. Other organizations have been doing this for years and it is a mystery as to why this cannot be put in place through the OFM/OFC. This would allow for personnel to conduct testing within their own department and find out immediately whether they have been successful or not
- Support support support. Don't feel it has been there for a while and certainly is not readily available in the near future.
- Time frames for compliance need to have built in flexibility if it is determined they are not attainable as we progress. We are not saying that there should not be an end date, but that date needs to be open for change as things progress.
- Surprised that there was even mention at this point in time for noncompliance and that the OFM would seek to involve MOL and pursue charges against fire departments. We have not even been able to start the process and/or received any support for the process and yet they are advising us of the consequences for failure to comply. This is something that should have come up well into the process and at an individual level in my opinion
- Interior firefighting must be supervised by 1021 Level III or higher? Unless we heard it incorrectly. Not many departments will be able to have this at every call.

The OAFCh believes this individual heard this incorrectly as it is not a requirement under the proposed Regulation.

- OAFCh Response

- The other thing I would suggest is having the ability with Online, through CERPS, to generate department or regional specific course to use the OFM/OFC curriculum at the \$65.00 fee, different then a Learning Contract. This would help with the added costs that will occur with RTC and accommodations for courses at remote locations. Keeping in mind this would need to have a minimum number of students preventing people for trying to do this with one or two students. They would need to remote into a RTC and complete the course.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

- NFPA 1002 legacy should be expanded. Not only should it be based on training and delivery but also based on experience. If departments have members who have driven apparatus and been pump operators for many years, they too should be considered for legacy based on the Fire Chief indicating so. Back to the trust and transparency. Having been involved for many years as an associate instructor for the OFC and pump ops program and having been involved in writing and re-writing for submission to IFSAC and Pro Board for review I can say that we here have opted to not send personnel to the OFC for this course. The quality of delivery and instruction for this program through the OFC has, in my opinion dropped drastically, to the point that the 1002 delivery through the OFC should be seriously reviewed. This is also part and parcel with delivery at private schools of operation whereby the course has been watered down to the point of not being of merit to students attending. We recently sent a member to a private operation approved to deliver the 1002 course and the member was afforded the grand total of 20 minutes on a pump panel over the duration of the course and clearly from the comments I received the quality of delivery and the quality of equipment used was very questionable.
- Composite Department. Approximately 22,000 residents.
-

Member Comment 23

I believe this mandatory certification may be the end of many volunteer fire departments. We currently have a team full of people who volunteer their off time to help out our community in times of crisis. These people do not have the extra time on top of work, volunteering and family to become certified firefighters. Also there are several sign offs that are required that many volunteer and rural departments will never practice; using a fire hydrant is an excellent example of this.

- NFPP Department. Unincorporated.

The OAFIC has included this comment as submitted, as we told all members that we would. However, the OAFIC does not believe the individual who submitted this feedback took the time to thoroughly understand the Regulation. The OAFIC will be reaching out to this member to assist and support them however we can through this process.

- OAFIC Response.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 24

First, I agree to minimum training standards for our Firefighters both suppression and prevention.

Training requirements for our firefighters is determined by level of service set by Council (E&R By-Law).

The E&R By-Law is set by the level of risk within the community, the risk is determined by a Community Risk Assessment.

Each Municipality is mandated to complete a Community Risk Assessment by July 1st, 2025, as set by Ontario Regulation 378/18.

I would think it would make more sense that the mandatory Firefighter Certification start date line up with the mandated Community Risk Assessment due date.

- Volunteer Department. Approximately 6,300 residents.

Member Comment 25

The mandatory certification exemptions under 3.0 does not take into consideration firefighters being re-assigned permanently to a technical rescue hall. Firefighters are moved permanently due to a variety of reasons, including bid processes, logistical requirements (filling gaps due to long term absences), and promotions. These moves could happen at any point throughout the year, absent of any alignment to planned training or certification processes.

There needs to be some provisions under the exemption, which allows the firefighters time to go through the certification process after being permanently re-assigned to a technical rescue fire hall. While it is reasonable to expect a fire service to provide the appropriate training after a firefighter is reassigned to a technical rescue hall, it isn't reasonable to think that the fire service can facilitate certification after each move happens; with any immediacy. This would result in the requirement to host written tests and skills evaluation at very frequent intervals, which is not feasible by the department or the Provincial oversight. Currently the OFM requires three-months' notice to host a certification exam, a department is required to have a minimum of twelve (12) firefighters to host an exam, and the results of the certification currently takes the OFM over three-months to process. Even if you wanted to certify a firefighter as soon as he/she/they has been moved permanently to a technical rescue hall, the process requirements result in a 6-month delay in determining a certification outcome. There is no language which permits the delay in certification of a firefighter being assigned permanently to a technical rescue hall and performing the skills in a rescue situation.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

The current exemption language 3. (2) (a) (b) fails to account for the regular occurrence of firefighter moves in and out of technical rescue fire stations.

3. (2) A certification standard set out in Column 2 of Table 1 does not apply with respect to a firefighter who is:

- i. temporarily assigned to perform a different fire protection service for which a different minimum certification is required; and
- ii. operating under the supervision of a firefighter who has obtained the certification corresponding to the fire protection service or services being delivered.

A permanent placement occurs in the fire service when a firefighter is placed on a roster or otherwise known as a shift list. Once a firefighter is placed on a roster at a technical rescue hall, there is no language in the proposed legislation that would allow him/her/them to perform a technical rescue task - even if trained to a standard, until the certification process (written exam and practical evaluation) takes place. Once a firefighter is permanently assigned to a fire hall the firefighter would not qualify under the exemption language as being temporarily assigned to a technical rescue team. With the proposed legislation including the word "and" in 3. (2) (a) it does not allow the provision of 3. (2) (b) to stand alone. To overcome this, the word "and" would need to be removed in 3(2)(a). However, under 3. (2) (b) supervision would need to be adequately identified. Supervision under the occupation health and safety act indicates someone with the knowledge, skills and expertise to take on that role. The implied CA language for most fire services collective bargaining agreements would indicate a supervisor is someone of a higher rank. Therefore, if a Captain or Acting Captain either working on overtime and/or floated into a fire hall would they be considered operating under the "supervision" of a firefighter at a lower rank? If a Captain or Acting Captain was permanently assigned to a technical rescue station and a firefighter was floated into a fire hall or was assigned through OT, would they be "supervised" by a colleague who may be of a lower rank? If this is the case, the association may have an argument for additional compensation. This has labour management implications.

Under transition 4. 2. (a) (i), (ii) and (iii) it is unclear why the letter of compliance with a certification standard (otherwise known as the legacy piece) differs for each component shown on table one. It is our opinion that the letter of compliance from the OFM should be in effect for dates up until the date prior to legislation coming into effect. On the date the legislation comes into effect, it would be fair to state that all parties have an obligation to ensure certification on a go forward. It is fair to believe each municipality has embraced certification differently dependent on access to differing supports from the province since 2013 to make certification a feasible option (learning contracts, proctors) and access to technical rescue curriculum (the large urban 12 fire departments). In fact, technical rescue certification for most of the province has remained in abeyance since 2015. The backdating of certification requirements in 4.2. (a) (1), 4.2. (a) (ii) and 4.2 (a) (iii) has a significant training consequence, which in turn has a corresponding resource and cost implication which we do not support.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

While we appreciate, the efforts to include the ability for the Fire Marshal to provide a letter of compliance, which will ensure many of our firefighters, can be compliant with the proposed legislation. In terms of industry standards, it will not be recognized for equivalency when trying to demonstrate have obtained pre-requisites for NFPA certification through IFSAC and/or ProBoard, therefore the value is for legislation compliance only.

- Full Time Department. Approximately 900,000 residents.

Member Comment 26

Let me start by saying X Fire Department is all in favour of the minimum certification for firefighters.

All though I am in favour of this, it will be a very large burden on the X Fire Service. Challenges will include:

Financial burden. X Fire Department has a very small operating budget for the amount of staff and stations we currently have (4 stations and 82 Firefighters). The cost to certify each firefighter that is not grandfathered or certified is unrealistic in the short 4-year window. Equipment replacement and repairs were priorities until mandatory certification was introduced. Council will now have to decide, replace aging fleet/equipment/PPE or invest in training first. X department would require some form of funding to help offset the costs. (i.e. provide instructors free of charge, or a large grant in the neighbourhood of \$2500/student).

Legacy - Legacy will not work in X. There are no historical training records to allow staff to apply for legacy. With lack of OFM audits and check ins, previous chiefs (in X) had no real obligation to maintain proper record management. With no record management, staff would be obligated to complete the entire course again, even if they have 10 years' experience.

AS&E exam - With certification not being mandated in the past, some firefighters did not challenge the AS&E exam after a course (i.e., Pump ops) due to language barriers. Some firefighters failed the exams and did not re-challenge the exam. Allowing firefighters to re-challenge the exam instead of retaking the course would be beneficial. The current one-year from course completion should be extended or unlimited to 3 attempts, regardless of time between completion of course.

DZ License - Currently, X does not mandate FFs to have a DZ license to drive the DZ vehicles. Using the loophole of the HTA, "drive a higher class of vehicle in an emergency". With this loophole, staff would not be eligible to take Pumper Operations1002 course as a DZ license is a prerequisite.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

The O AFC does not endorse or condone the use of the HTA in this capacity. The O AFC will be working with this member to resolve this concern and to ensure their drivers all achieve and maintain the appropriate license.

- O AFC Response.

Suggestion would be to allow firefighters to take (any) course under the approval of the Fire Chief if they do not meet the prerequisites.

The buy-in of current members will be difficult, which may result in a downgrade of service provided and a great possibility of closing stations.

The OFM may be needed to help the fire chief in limiting these great possibilities within X. Help may include meetings with the firefighters to help gain their support, or presentations to council.

- Composite department. Approximately 4,600 residents.

Member Comment 27

In yesterday's Q&A, I heard Mr. Snider state that a department cannot be a "full Service" fire department if members have received Ontario Accreditation through the Legacy program.

They gave the example of Pumper Operations. The Ontario Legacy Certificate is to be used for someone that does not drive a pumper to the scene but may be expected to operate the pumper once they arrive or was a pump operator who drives a smaller pumper that is not a D class truck. Otherwise, they are expected to take the NFPA 1002 Chapter 5 certification.

I have one or two members which English is their second language and/or have a complete phobia regarding formal testing. One has been with the department for 10 years and has his DZ license. Why could I not use the Ontario Certificate Pumper Ops program for those members? Ontario allows him to drive to the scene and the Ontario Certificate allows them to operate the pump. The only component missing would be the defensive driving of an emergency vehicle. However, using their logic, a person driving a smaller vehicle to the scene should require the same lessons of defensive driving.

I also have a few firefighters that have taken joint training program with other departments under the NFPA standard, however they have not passed the NFPA testing (under the former fire chief, there were no rules requiring the firefighter to pass). They were trained and have records of their skills under NFPA standard but have not successfully passed the formal theory testing. I understand from Mr. Snider that with this documentation, they could challenge the NFPA exam. Again, they do not do well in formal testing. They would have qualified under the



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

old grandfathering as having the knowledge, skills, and ability to do the job, but cannot pass a written test (note: they are good firefighters). Why do I want to place the stress of a written exam before them, when the Ontario Certificate Interior Firefighter would allow them to continue as a firefighter? If Ontario Accredited to Interior Firefighter, would they not be able to continue to do the same functions as the NFPA accredited firefighter? And if that is the case, how does it limit the fire department from being a “full Service” department?

Originally, when I listened to Mr. Snider, that is what I thought the legacy (Ontario Certification) program was going to be for, however during the Q&A, he seemed to define the Ontario Certificate Program with narrower guidelines. In my humble opinion, ‘Full Service’ and ‘Full time’ departments have two different meanings.

- Composite Department. Approximately 7,400 residents.

Member Comment 28

1. Will need support to develop internal instructors and programs.
2. Grants for training materials required to meet certification.
3. Subsidies for RTCs. Our department relied solely on OFC Gravenhurst campus for training. Costs were \$65/person plus mileage (roughly \$325). Now RTC courses run between \$400-\$500, mileage, lodging, meals (\$1500+). Without subsidies, budget will not be able to meet training costs.
4. No RTC in our County therefore, all courses require lodging and travel for all training courses. Will there be financial and logistical support to develop an RTC at my department to service 21 departments in our County?
5. Extension of windows by one year would greatly improve chance of success for small career, composite, and volunteer depts. This includes extension of 2-year window to 3-year for new hires, and 2027 and 2029 for compliance deadlines.

- Composite Department. Approximately 14,000 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 29

Le Service des incendies de X a fait une analyse exhaustive du projet de règlement portant sur la certification des pompiers. L'adoption d'un tel règlement, comportant les modifications recommandées dans ce mémoire, aura un impact considérable sur l'amélioration de la protection incendie des Ontariens.

Le Service des incendies de X reconnaît et cherche à promouvoir la certification des pompiers. En 2021, le Service a adopté la certification pour tous les nouveaux employés. En novembre 2021, une séance de certification pour plus de 60% des pompiers de Hawkesbury a été tenue en novembre dernier.

La formation sert à acquérir des connaissances et des habiletés dans le but de fournir aux pompiers tous les outils nécessaires pour accomplir les diverses tâches de façon sécuritaire et pour réduire les dommages causés par les incendies.

Article 2. (2)(a) – Mandatory Certification

Cet article indique qu'un pompier doit posséder soit une certification *IFSAC* ou *Pro Board*. Dans certains cas, le commissaire pourra émettre une certification *Ontario Seal*. Il y a plusieurs municipalités qui ont embauché des pompiers ayant complété avec succès le programme de formation du Ministère de l'Éducation du Québec pour obtenir un diplôme d'intervention en sécurité incendie. Il s'agit d'un programme de mille-cent-quatre-vingt-cinq (1185) heures.

- NFPA 1001 – Niveau 1
- NFPA 1001 – Niveau 2
- NFPA 1002 – Pompe
- NFPA 1002 – Échelle aérienne
- NFPA 1031 – Niveau 1
- NFPA 1006 – Niveau sensibilisation (chapitre 5)
- NFPA 1006 – Niveau opérations (chapitre 5)
- NFPA 1006 – Niveau technicien (chapitre 5)
- NFPA 1006 – Niveau sensibilisation (chapitre 7)
- NFPA 1006 – Niveau opérations (chapitre 7)
- NFPA 1006 – Niveau sensibilisation (chapitre 16)
- NFPA 1006 – Niveau opérations (chapitre 16)
- NFPA 1006 – Niveau sensibilisation (chapitre 8)
- NFPA 1006 – Niveau opérations (chapitre 8)
- NFPA 1072 – Niveau sensibilisation
- NFPA 1072 – Niveau opérations



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Il serait nécessaire que la langue ne soit pas un argument pour ignorer la reconnaissance de ce programme de formation, celui-ci étant beaucoup plus complet que *IFSAC* ou *Pro Board* combinés.

Article 3. (1) – Exceptions

Le délai devrait être de quarante-huit (48) mois. Une certaine période est allouée pour former les pompiers volontaires auxquels quelques services des incendies font appel.

Les pompiers volontaires ont un emploi et une vie personnelle/familiale. Une période de vingt-quatre (24) avait pour effet d'augmenter la charge de formation de façon importante pour les nouveaux pompiers volontaires.

En vertu de la norme NFPA 1500, article 5.3, un service des incendies doit avoir un programme de formation afin de s'assurer que les pompiers possèdent la formation initiale quant à la fonction du service. Le programme doit être basé sur les normes de qualifications professionnelles, NFPA série 1000.

De plus, en vertu de la norme NFPA 1500, article 5.3, un service des incendies doit avoir un programme d'entraînement afin de maintenir les connaissances et les habiletés déjà acquises pour un pompier. Ce programme requiert que les pompiers s'entraînent sur une base régulière.

Combiner ces deux programmes à des conséquences majeures sur la charge de travail des pompiers volontaires, le tout sans prendre en considération la charge de travail qu'impose la réponse aux interventions d'urgence.

Le Service des incendies de X a procédé à une analyse du projet de règlement et considère qu'il sera difficile de respecter la période de vingt-quatre (24) mois. Le Service recommande une période de quarante-huit (48) mois.

Certification nécessaire

Le Service des incendies de X recommande très fortement que les pompiers qui opèrent un appareil d'élévation doivent posséder la certification *IFSAC* ou *Pro Board* NFPA 1002, appareil d'élévation.

L'opération d'un appareil d'élévation est une tâche complexe nécessitant des connaissances et des habiletés particulières. Il y a plus de 300 appareils d'élévation en marche, en Ontario. Actuellement, il y a peu, voire aucun, cours portant sur l'opération d'appareils d'élévation. La majorité des pompiers qui opèrent un tel appareil n'ont aucune formation. Cette situation met donc à risque la santé de la population et des pompiers.

Test IFSAC en ligne et résultat dans un délai approprié



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Afin de faciliter le processus de certification, il serait approprié que les tests de connaissances à l'écrit soient disponibles en ligne. Actuellement, les délais avant de recevoir les résultats des tests sont d'environ quatorze (14) semaines.

Un délai de quatorze (14) semaines représente un stress anormal pour un pompier qui attend ses résultats. La technologie existe pour les tests en ligne, tel est le cas au Alabama Fire College.

Le délai adéquat afin de recevoir des résultats de tests devrait être de moins de deux semaines.

Les pompiers francophones

Il y a des services des incendies en Ontario qui ont le français comme langue de travail et comme langue opérationnelle. La langue pour le Service des incendies de X est également le français. Actuellement, il n'y a que très peu de formations sont offertes en français pour les pompiers francophones, en Ontario.

La formation NFPA 1021 niveaux 1 et 2 est indisponible en français, malgré que plusieurs demandes de la part du Service des incendies de X aient été faites à ce sujet.

Sans avoir les programmes de formation disponible en français, à partir du 1er juillet 2022, il sera impossible de respecter les exigences du délai. Si les programmes de formations qui sont prérequis aux examens de certifications ne sont pas offerts en français, il s'agira de discrimination systémique envers les pompiers francophones.

Des plaintes pourraient être déposées contre le Bureau du commissaire des incendies par rapport à cela.

Étant donné qu'il est possible que les différents programmes de formation ne soient pas disponibles en français d'ici le 1er juillet 2022, des exceptions devront être inscrites dans le règlement afin que tous puissent remplir les préalables pour les examens.

En définitive, le Service des incendies de X désire féliciter le leadership démontré par le Bureau du commissaire aux incendies de l'Ontario pour ce projet.

- Composite Department. Approximately 10,000 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 30

I support the process and appreciated the shared information. We do think that even though not applicable to First Nations – I do think language indicating that these are recommended across ALL Ontario communities would be helpful language as either it's a safety standard or it's not. If it is a provincial standard, then this aids being able to seek proper supports and funding for First Nations fire departments.

- Volunteer Department. Approximately 5,200 residents.

Member Comment 31

Volunteer Fire Services who utilize commercial vehicle operators (dump truck and bus drivers) for Apparatus/Pump operators should not have to certify to 1002, because the prerequisite is NFPA 1001 Level 1 & 2 and Hazmat Ops. This is too much to ask for someone who will not perform firefighting duties. The OFMEM has stated that these operators only need the provincial seal and do not need 1002 if they don't drive the truck or if the truck is a mini-pumper. How does the size of the vehicle or driving of the vehicle impact their ability to safely and effectively operate the pump?

- Volunteer Department. Approximately 6,300 residents.

Member Comment 32

- 1) Province must provide funding either in the form of grants or direct funding. MOH has mandatory legislation, standards and provides a 50/50 grant per year to each municipality in order to meet the requirements for paramedics. Fire should be no different. Not requesting a 50/50 model, but if expectations are set, then funding should be provided.
- 2) Fire departments should be able to test/evaluate their own if they have certified members who can evaluate. OFM states they can't do this at this point because the evaluator cannot participate in the training. This is not an issue as the evaluator would not be. Plus, other department(s) are doing it. Why the double standard?
- 3) More time is required to complete and prepare.
- 4) Legacy language is confusing and unfair. Grandfathering should have been brought back.
- 5) OFM states there will not be a lot of costs if a department has a good training program. There still will be costs associated, some being quite high, especially for some programs. OFM needs to admit and stop communicating otherwise.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

- 6) Support certification, but more time and thought is required.
- 7) Not enough RTC, OFM staff, or third-party evaluators for demand.
- 8) Only two live fire trainers, admitted pretty much booked for this season.
- 9) More resources need to be available

- Composite Department. Approximately 110,000 residents.

Member Comment 33

Exceptions: 3.

- o (1) (a) (b) and (c)
 - ☐ Assumptively this section would pertain to new recruits going forward.
 - Points for clarification:
 - o Does this mean that a new firefighter will have 24 months to become fully certified for all disciplines relative to a department's level of service?
 - o What discretion will said department have in regards to their recruit's certification period?
 - ☐ I.E. A new firefighter is hired, current rural departments level of service includes Ice and Water Rescue at the technician level, if new firefighter hasn't obtained 1006 certification within 24 months is that recruit still able to assist in said rescue operations as long as operating under the supervision of a certified firefighter beyond the 24-month window?
- o (2) (a) and (b)
 - ☐ Define temporarily (under item (a))
 - For a rural volunteer department, firefighters could theoretically be "temporarily" commencing duties on every call. Timeframes, frequency of occurrences, and assigned duties change each time they respond, as consistency in staffing is never known. Therefore, one could deem all tasks to fall under the basis of temporary in nature.
 - ☐ Clarify what "operating under the supervision of a firefighter who has obtained certification corresponding to the fire protection service or services being delivered"
 - Is this indefinite?
 - o I.E. FF #1 is trained and certified for Auto Ex Tech level, as long as FF #1 is present FF #2, #3, and #4 can conduct Auto Ex Tech Level skills without being certified in perpetuity?



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

- ☐ What training or certification is required for FF #2, #3, #4 to operate in this capacity if any?

- **Transition: 4.**

- o (1) and (2)

- ☐ Letter of compliance

- Why doesn't this include item 4, 8, 16, and 19-44?

- o If we are currently training to this level, and offering this level of service, then why can't any corresponding item covered in Table 1 be available for Letters of Compliance?

- ☐ This would make it more attainable for long tenured FF's and Officers currently in service.

- If we submit for a Letter of Compliance, will this count as meeting prerequisites for future courses?

- o I.E. Letter of compliance is approved for a FF to obtain Officer 1, in the future if said FF wants to obtain his Officer 2 certification (IFSAC) would the Letter of Compliance meet the prerequisite requirement of Officer 1?

- For clarification:

- o In regards to Legacy and Letters of Compliance we wanted to confirm that a "full service department" (As defined by Table 1, Item 8 in the proposed regulation), can still apply for Letters of Compliance under 4. (2) (a) (iii) of the proposed regulation for the requirements as outlined in Table 1 item 18. Or is our only option to obtain IFSAC certification under NFPA 1002? Simply put will Letter of Compliance adhere to Item 18 in table 1 for a full-service department? When would we have to complete IFSAC certification for NFPA 1002?

- o (2) (b)

- ☐ In regards to the documentation required to be submitted for Letters of Compliance:

- Will there be a standard template or checklist of what is required? (specifics)

- What timeframe can we expect to receive confirmation from OFMEM in regards to approving and providing our Letters of Compliance?

- If declined because of the documents submitted, will they provide grace so additional documents can be submitted to obtain approval after the Sep. 30, 2023, deadline?

- o (2) (c) ☐ What specific criteria will be utilized to assess the submission in order to attain "satisfaction by the Fire Marshal"?

- Will a specified framework allowing for satisfactory submission be provided?

- o Why not open grandfathering again?



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

- ☐ Petition the required governing bodies, succinctly with these proposed regulations timeframes, as it was a much simpler process and include all noted certifications being required?
- ☐ Therefore, we can adhere to the new process for all those moving forward vs penalizing long time, dedicated employees, when they are more than competent at the skill sets, based on departments current level of service and training.

Commencement: 5.

- o When will learning contracts be available for the courses that currently do not have any means of testing or standardized curriculums?
 - ☐ I.E., most 1006 disciplines to the Technician Level.
- o What will be the requirements to utilize learning contracts
 - ☐ Do all the instructors have to have already obtained certification in that specific discipline and course offering?
 - ☐ If one instructor is certified, can others operate under their supervision to assist in instructing?
 - ☐ Will Letters of Compliance being sufficient in order to instruct said courses?
 - ☐ Will all instructors be required to be certified to NFPA 1041 Level 2?
- o How will the OFMEM (OFC) provide enough proctors, examiners, and course material to obtain the lofty goals set forth, within the timeframes allocated considering the current staffing and turnaround times are beyond excessive?
 - ☐ What guarantees will they provide to confirm their commitment to support fire departments to achieve these goals?
- o How long will it take for RTC's to start offering adequate courses for certification in all noted disciplines?
 - ☐ Will the process to become an adjunct instructor under the OFC become more simplified and streamlined?
 - ☐ Will RTC instructors have to all be adjunct instructors? Or will instructors being able to operate under the supervision of an adjunct instructor, but themselves not be adjunct?
- o Who will provide funding for the exorbitant cost increases facing departments in perpetuity (rural departments have much smaller tax bases to attempt to fund both their current staff, and all future recruitments)?
- o When will this funding be available?
- o How will it be available?
- o What will be the process to obtain said funds?
- o What will be the criteria to obtain said funds?



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

o Why is this regulation much more convoluted compared to the previously submitted O. Reg 379/18?

☐ That table only had 11 items outlined under mandatory certification. This has 44, and the breakout of the JPR's doesn't align to current curriculums, meaning that departments either need to decipher this mess, and create their own curriculums, or take the additional time to actually determine that FF's will need to complete all of the noted courses in their entirety to actually obtain certification (simplify and streamline).

o What is the differentiation on Auto Ex under Item 8 vs 33-36 in Table 1?

☐ Under what specific requirement would the need for 1006 certification occur since the verbiage under the NFPA 1001 Level 2 standard clearly states that patient "extrication" is permitted utilizing tools and component removals from the vehicle to provide medical care and removal of the patient? (Full stop).

General questions and remarks:

- Who will be enforcing this regulation?
- What method of enforcement will be utilized?
- What penalties (punitive or other) will be levied?
- What process, if any, will there be to submit proof of certification, is this something that will be required annually by each department?

o Timeframes and requirements?

- Why is the regulation retroactive?

o I.E., why not make this effective for all firefighters hired after the implementation date. Therefore, certification of current firefighters would not be required.

☐ This could be based on factors such as incidents or injuries that have occurred on responses or training evolutions.

- If none, then that department's track record supports adequate training.

- It has been referred that mandatory certification above items listed in Table 1 are required. The example given was NFPA 1041 Level 2 is required as per NFPA 1403 for any live fire training evolutions. However, Table 1 states Training Officer requirements as NFPA 1041 Level 1.

o How can this be regulated, mandated, or enforced if not encompassed in this regulation?

☐ Unless the AHJ adopts all NFPA standards as requirements for our own Level of Service, there doesn't seem to be any lawful means where this can be enforced?

- This seems like a "should" not a "MUST"!



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

☐ Occupational Health and Safety have been mentioned to justify this; however it simply means firefighters must be “competently trained”. Nowhere does this mean NFPA and IFSAC is the only competent method.

- Does a municipality’s level of service (as stated in their E&R Bylaw) have to satisfy any recommendations from the CRA?
 - o I.E. CRA states we have many lakes; risk is there, and Ice and Water response is required. However, Council does not support that as the resources and personnel do not exist to provide that level of service. Therefore, E&R does not include Ice and Water.
- How will this requirement address the Volunteer and Rural departments?
 - o Not only existing firefighters, but all new recruits will now have a massive undertaking for a full service (with NFPA 1006 disciplines) department. Considering they typically sign up to help their community, not take on a second career.
- Currently the time frame of 2 years for all new recruits (after the implementation period of 4 or 6 years etc.) is not enough. Can this be extended to 4 years to better reflect a rural full-service department’s needs, time frames, time commitments for volunteers etc.?
- Right now, the 4 for non-technical and 6 years for technical is not enough time. Can this be pushed to 10 years for implementation?
 - o Example:
 - ☐ A rural department with 50 FF’s (volunteer). They are training to safely operate and serve their community.
 - ☐ Under this regulation all FF’s will need to be certified to NFPA 1001 Level 1, 2, NFPA 1072 to the Ops Level, NFPA 1002 Chapter 5, NFPA 1006 Chapters 5, 8, 9, 17, and 20 to the Operations and Technician Level.
 - Simple math = 15 written exams and 15 practical exams (assuming awareness isn’t mandatory or a prerequisite if so then add 5 more written and or practical exams). In addition, practice, training, exam prep, and attending courses or in house training. As well as certifying instructors, developing learning contracts or assessment checklists etc. Then encompass having to train for all the other items not covered by this regulation. (ATV, Boat rescue, Search and Rescue, Medical response, Wildland firefighting, etc.).
 - o 4 to 6 years is not remotely enough time.
 - o Training to maintain the physical ability to conduct physical response and rescue is what we do now. Preparing to write written exams and conduct practical evaluations in a very precise way requires preparation and practice to be successful. (In the exam). Not all of that translates into the



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

real world! This needs to be taken into consideration. One size does not fill all!

- Composite Department. Approximately 13,000 residents.

Member Comment 34

The X Department is a Volunteer Department with a part time Chief and Deputy. The Department represents the residents of the Municipality of X with a population of 2700 residents working from three stations. The Fire Department consists of one part-time Fire Chief, one part-time Deputy Fire Chief, three captains, four Lieutenants and forty-six volunteer Firefighters. The department trains every Tuesday evening for approximately two plus hours for a maximum of forty-eight training sessions a year. X Fire Department have been training to certification levels in NFPA for several years and continue to have great success in all training disciplines. Although some of the certification training is done on the regular Tuesday evening training some is also done on weekends and other evenings. Within the structure of the department, we have an active training team consisting of four officers and both the Deputy and the Chief. This team reviews the training needs of our department and recommends to the Chief an annual training plan. The team also coordinates all recruit training and additional NFPA certification training.

On the onset, NFPA certified training posed a few challenges. However, our team has been able to establish processes to ensure our Firefighters are compliant with NFPA certification standards as well as meeting the Level of Service found in our E&R by-law.

Along with our training team we also utilize our Certified Instructor level personnel along with all firefighters that have been certified to the respected levels for our continued training.

Our Team of Training Officers have been kept informed of the upcoming Regulations and have been so since the first attempt a few years ago. Our department fully endorse the proposed Regulation and look forward to being part of a very professional Fire Service within the Province of Ontario.

We would ask the Minister to expedite the online certification testing so fire departments can have a reasonable access to in-house fully online training and certification. This would allow us to have more Firefighters trained with much less costs.

We would ask the Ministers consideration in having an assigned adjunct instructor assigned to each PAC area to be able to provide curtain training on a regional bases to assist the fire service meet their obligations.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

We would also ask the Ministers consideration in removing some of the barriers for multiple fire departments to train together when using the learning contract format.

The X Fire Department does receive a training budget as part of their annual budget allocation although it has not been a substantial budget, we have been successful with our training program. It is difficult explaining on a yearly basis the importance and requirement of training employees as councils are always looking at budgetary reductions. I feel it would be beneficial for most fire departments if the Minister can somehow explain and press upon council their obligation in setting the levels of service and once that is done supporting the department with the proper training and equipment needed to safely carry out the tasks.

The purposed Regulations have set time frames to have certain disciplines completed and evaluated. We ask that the Minister fully staff the OFM and AS&E so that these time frames can be achieved, and departments see a smooth transition to the process.

It is important for the system to clarify the difference between 1006 and 1001 as it applies to auto extrication and heavy vehicle rescue to make it flexible for fire departments compliance. It very important not to remove that responsibility from the fire service where possible. The funds that some fire services receive from this service is critical in the on-going financial operations of the fire department.

Any ministry funding for training should go directly to the fire department to offset their training needs and not to RTC's because it does not benefit all fire departments equitably.

It would be beneficial if the ministry would utilize the North Eastern Fire Education Conference (NEFEC) and any other similar fire conferences as an opportunity to provide certificate training as part of that venue to participants. This would benefit both the conference organizers as well as the Firefighters.

Due to the vast differences in RTC's there is a significant difference in the cost to the participating fire department. There should be a provincial standard that a similar OFM certificate course should cost the same no matter what RTC you go to.

- Volunteer Department. Approximately 2,700 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 35

It is in my opinion the way the regulation is written it fits for full-time fire departments. For volunteer departments it really handcuffs us to having to have our members certified in many if not all of the subjects as we don't know who is responding to the emergency. I have great concerns that this is going to have a big financial impact on municipalities, handcuff Council into making difficult decisions on the level of service they provide, and it is really going affect our volunteer departments with recruitment and retention. I strongly believe we will have a shortage in volunteers in rural areas in the years to come due to this regulation. I understand Councils can change and set the level of service but really the CRA dictates the level of service that is required in the municipality.

- Extension on response as February 28th is too short of notice, we should have been given a minimum 3-month response period.
- Extension given for technical (Ice water rescue) as the new curriculum has not been released yet.
- Financial support should be available annually for certification including technical rescue courses.
- Recruitment and retention will be an issue due to the amount of time that is required to become certified. Certification is pushing out members that just want to help out their community and not be career FF's.
- We need clarification on wording in the regulation for example "Temporary" which is used throughout the regulation. Does this mean that a certified FF can act as an officer in the absence or delay of an officer?
- NFPA 1002 Pumper Operations needs to be grandfathered to existing members who were employed before January 2021.
- Heavy vehicle extrication needs to be grandfathered to existing members or taken out.
- We need a moving forward date set. Any new member hired after the set date is required to be certified. This will create a going forward movement and keep existing members qualified and keep level of services where they are already set and not a reduction and new members being hired will know up front the expectations.

We are not against certification as we are currently certifying members that can commit their time, but there needs to be a realistic regulation put in place with realistic timelines and grandfathering of existing members especially in 1002 pump operations. We need a Regulation that works for both career and Volunteer departments.

Thank you for your continuous efforts and proactive leadership.

- Composite Department. Approximately 2,500 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 36

Please find below some comments I would like to pass along regarding the Firefighter Certification Regulation:

- 1) I feel July 2026 should be extended. This regulation comes into effect July 2022 and that gives us four years to comply. Budgets are set for 2022 and therefore in reality it gives us 3 ½ years. If Fire Departments are going to use regular training nights to complete the training and then challenge the exam, I don't feel the three plus years is sufficient. If it was extended another year, that could be manageable.
- 2) That being said, I would like to suggest the two-years to train new firefighters once the regulation takes effect be extended at least one year as well. When a new Firefighter is hired their first year is more of a learning curve about the Fire Department in regards to all operations, not just training. It takes a new firefighter that first year to get comfortable with the position.
- 3) It would be nice if our Mutual Aid Association could have the learning contract with the OFM. Our Association could create a "Recruit Program" and conduct the required training for current firefighters that require the training and new firefighters when they join. This would allow more flexibility in when the course happens, and we could use our own instructors (mainly for Firefighter I & II).
- 4) Funding. As mentioned in our Zone Meeting, the five funding options that were mentioned would all be welcomed but I feel an annual grant based on number of firefighters each department has would be more beneficial.
- 5) Retention. Very concerned that it will be hard to keep our firefighters if we train them on our cost, they become certified and will apply to a career department and we lose them. This could also affect the College Fire Service Programs in the Province.

X Department has half its members certified either through the Grandfathering Process or the training course. We are looking at having to certify the other half (approx. 30 firefighters). Conducting this training during our regular training nights isn't possible as it would disrupt the training for the certified members. We are looking at sending them to a RTC or hopefully our County wide training done over several weekends (County Recruit Program). I estimated this cost to be approximately \$6,500 per firefighter for Firefighter Level I & II. (\$6500 x 30 = \$195,000). This figure is based on course fees, course materials, firefighter wages and firefighter mileage and other expenses. This doesn't include any of the other training that will be required (pump operators, incident safety officers, Officer Level training etc.).

Thank you for passing along my comments and I would like to thank you and the OAFC for the tremendous amount of work you are putting in on our behalf.

- Composite Department. Approximately 9,100 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 37

We are a municipality of only 1330 residents. We are already challenged in our brigade to get to our desired level of 20 volunteer firefighters. With these new certification requirements, it will be even harder to attract and retain volunteers. We already know that volunteers for any purposes/activities nowadays are harder to get than years ago. Our fire department only does exterior fire suppression (no interior suppression, no auto extrication, etc.).\

- Volunteer Department. Approximately 1,300 residents.

Member Comment 38

I wanted to reach out after yesterday's meeting and give you a few of my concerns to add to your list to the Solicitor General.

1. As a small recently amalgamated fire service (3 stations, 80 firefighters) we will certainly need financial assistance. The strain to certify firefighters, instructors, officers and any Tech Rescue programs within the timeframe does not align with the current budget. We are a small mostly farming community with not a large tax base. This financial assistance should continue on an annual basis for the duration of the certification period.
2. More time is needed to complete all the certifications that the OFMEM and the Minister are proposing. I would suggest 5 years for the firefighter certifications and 7 years for Tech Rescue programs. This will also alleviate some of the financial burden by extending the time frame.
3. It is imperative that the Minister allows Officer and Instructor certifications to be run in-house by instructors who have the appropriate training and higher certifications in those disciplines. There will not be enough instructors in Ontario to complete these programs if they are not run in-house too.

I could go on about several others, but I am sure they have been covered off by other Chiefs.

- Volunteer department. 6,800 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 39

ISSUE: NFPA Transition and Ontario Fire College Closure

FUNDING: Operating

DEPARTMENT: X

PREPARER: X

BUDGET IMPACT: Increase of \$169,538

BACKGROUND:

Issue 1: In 2015, the Office of the Fire Marshal and Emergency Management (OFMEM) announced the transition from Ontario Fire Service Standards (OFSS) to the National Fire Protection Association Professional Qualifications Standard (NFPA). This transition included legislation that made certification mandatory in the province.

Due to the significant impact to the Ontario Fire Service, this legislation was temporarily rescinded to allow for each Fire Department to develop and implement a transition plan.

Impact: There is a significant training gap between the OFSS and the NPFA Professional Qualifications requiring all employees to be evaluated and receive updated job performance requirement skills training, testing and annual competency. This transition equates to approximately 1900 hours per employee, covering all applicable NFPA standards.

Issue 2: In January of 2021, the OFMEM announced the Ontario Fire College (OFC) closing while moving to a regional training centre (RTC) model, which various agencies and municipalities manage. The OFC facility has provided Fire Services throughout Ontario, including X, an educational faculty for Fire Personnel to attend approved Fire related courses and complete the associated NFPA certifications.

Impact: X has utilized the OFC to send employees for various NFPA courses and testing at \$65 per student, which includes room and board. With the introduction of the RTC model, costs for courses average \$300-\$500 per student, not including room and board, drastically outpacing our annual operating budget for courses and significantly increasing the incentive of hosting these courses internally.

Issue 3: 2021-2025 Fire Master Plan recommendation 4.7 identified the need to create and deliver Leadership and Officer training. Our current promotional system is designed as an evaluation tool only and is embedded in our collective agreement (CA). An educational



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

component will need to be collaboratively developed that aligns and supports the system in the CA.

RATIONALE / ANALYSIS:

- 1) With the transition to NFPA, there is a significant increase in required annual staff training hours. Course curriculum and evaluation must be developed and delivered. A five-year training plan matrix has been developed to ensure all staff receive and maintain NFPA certification status. A total of 1,045,000 staff hours are involved over the five-year period. This represents a change of approximately 66% increase over the OFSS model that did not require the same JPR delivery and evaluation model or the annual competency demonstration. Currently, the Training Division is staffed by 1 Training Coordinator and 7 Training Captains responsible for delivering approximately 5000 annual hours of training each. This creates a significant deficit between the available worked hours and the required training hours. The new Training Coordinator will organize and supervise the shift training leads (STL) (10) and shift training instructors (STI) (74) to assist with this deficit.

Mandatory certification legislation was temporarily rescinded, but this Ontario regulation is expected to be reinstated. The same individual or group must not conduct training and testing to comply with NFPA professional qualifications. This requires a segmentation of the training division into curriculum development/evaluation and delivery. To maintain the integrity of the evaluation process, the second Training Coordinator will oversee the provincial testing, reporting and internal records management system.

- 2) In lieu of the OFC closing, X has proceeded with the application process to become a Regional Training Centre (RTC) for the OFMEM. This will give X access to additional resources and curriculum needed to host NFPA courses and provide certification testing. This will reduce course costs for X and provide opportunities for revenue generation from Fire Departments in the province that do not have the approved training facilities or resources to deliver their programs.
- 3) The Training division will play a significant role in the research, development and implementation of a Leadership Development Program. The process will need to review best industry practices, human resources leadership strategies and business management models. Then convert them into a system that delivers training in conjunction with the evaluation system that is embedded in the CA. To assist with the development, implementation and maintenance of the Leadership Development Program, the new Training Coordinator will organize and support a Command working group.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

CONCLUSION:

One additional Fire Training Coordinator in 2022 will provide NFPA certification and testing and assist in the coordination of the RTC. This position will establish and maintain course offerings that will benefit X staff and provide revenue generation from external agencies. As course offerings are established, and the RTC model evolves, one additional Training Captain in 2023 will be required to meet the additional growth.

FINANCIAL IMPLICATIONS:

Fire Training Coordinator Salary: \$169,538

Fire Training Captain Salary: \$131,936

RECOMMENDATION:

One (1) Fire Training Coordinator (2022)
One (1) Fire Training Captain (2023)

- Full time department. Approximately 603,000 residents.

Member Comment 40

My comments on the O.F.M.'s proposed mandatory minimum training standards/certification regulation are as follows:

1. The in-force date for the regulation needs to move to January 1, 2023, to match up to our municipal budgeting year to allow us to start to plan for the cost associated with this reg.
2. The timelines to achieve FF 1&2 in four-years needs to go to five-years and the Tech Course needs to be extended from six to seven years accordingly IF the goal is to make this a successful role out for the Fire Service
3. The training of a new recruit needs to be extended from two to three years, the availability of courses to complete this and the recruits time commitment are huge factors for Volunteer Depts.
4. NFPA prerequisites are a limiting for timing of courses and overall access. This needs to be changed to be able to access them as offered or available – Will affect the timelines for completion.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

5. Tech Courses aren't approved – Still waiting on NFPA 1006 - Ice Water etc. and multiple others in the list from OFC – limits our chances to complete in timelines allotted. Leaves us in a bad position of liability to offer a service and not have approved training in place by OFM who is the authority having jurisdiction for course approvals.
6. E-Testing capacity is required to help challenge certification courses to help limit costs moving forward.
7. Funding on an annual basis is required to help achieve the process of Certification if it is to be a mandatory regulation by the province. This will help support FF Safety as whole to get to a high level of training and money not to be a limiting factor.
8. Ensure the Fire Marshal is held to the promise of support access, staffing, curriculum development, and removal of red tape barriers to make this happen
9. Clarify the Grandfathering compliance issue for FF 2 with Hazmat 472 OPS- major impact to training requirements for those previously grandfathered through OFM process.

I fully support training our FFs to operate to the level of service for which we supply. To do so in a safe and professional manner to the NFPA standards to be ready to serve our community. The regulation is a good step forward; however, it does need to be setup to be affordable and achievable by all levels of the Fire Service in the Province otherwise it will fail. By making the changes suggested above I believe this is possible for both sides to reach success.

- Composite department. Approximately 3,900 residents.

Member Comment 41

X Fire Department appreciates and shares the desire of the OFM to ensure the highest levels of safety for fire fighters across the province through the adoption of the NFPA standards in 2014 and now with the proposal to ensure consistency in training outcomes across the province through the introduction of Mandatory Fire Fighter Certification.

And X also appreciates the recognition in the current proposal of some of the operational realities between full-time and volunteer proposals and the inclusion of a variety of different levels of certification proposed to meet the varied needs on the ground. While this is a significant step in the right direction, there are differences in operational realities between BC and Ontario that need deeper assessment to ensure the model going forward will help attain the desired objective.

As it stands smaller volunteer teams such as ours, while supportive and willing to pursue the certification process will be unable to attain or sustain compliance with the regulation without



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

an ability to tweak the model and without the ongoing support and assistance of the OFM or some other authority within the province to coordinate and deliver suitable training at the local level. While BC has area level governance structures that can provide coordination, leadership, and support, in Northern Ontario for the large part it is the small community/FD as an independent entity and then the province.

While there are Mutual Aid Associations that on the surface may be able to provide a forum for some coordination or lobbying for the most part their power and jurisdiction is limited. Having access to regular opportunities for quality certified training at the local level is a must to attain and sustain small volunteer team compliance.

There has been suggestion in some of the presentation materials that any team will be able to get everyone trained in house within two-years, while that may be theoretically possible for some teams it will not be attainable or sustainable for many. The one-time effort is always potentially doable and I was one of eight (8) X department volunteers who over a period of three years, with great support from the OFM/OFC, completed the Company Officer program in spite of being 1300 kms from Gravenhurst. It was possible with great effort and sacrifice of participants and trainers who made it happen. Doable yes, necessary at the time unfortunately to attain class sizes that made it possible, recommended probably not.

In the meantime, it was necessary to continue with regular ongoing week to week training to ensure members remained current on knowledge and practiced on operations to remain competent and ready to respond safely to ongoing emergencies.

Many smaller volunteer teams such as X wear several hats and must keep current and competent in all. For X while equipment and training focus heavily on structure fires, seasonal threats of wildfires are of significant concern in any month without snow cover, and training, equipping for and responding competently to wildfires is an important first in requirement for the protection of people and property in the community, and with the closest ambulance base some 30 or more kilometers away from the closest entry point to the municipality, the provision of pre-ambulance care is not just a nicety but it is a critical front line reality that requires additional training and certification.

While we train for 2-3 hours every week, two weeks are for fire, one for 1st Response, and last for Hall and Equipment Maintenance and additional training on weekends for special training activities. This is the training that keeps us current, competent, and ready to respond safely.

The NW is a part of the province where many work 'out of town', sometimes in two-week rotations in remote locations or even seasonally if they are involved in construction or wildfire suppression.

It was decided a number of years ago that our weekly training would focus on maintaining knowledge skills and preparedness of the broad membership and that new recruits and



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

specialty training would be sought externally, and that when available OFC approved courses would be preferred.

That has mostly worked well for us with new members receiving consistent quality training that for the most part is OFC approved and should make compliance with the core requirements of the regulation at least relatively straight forward.

That said there are a few areas of concern especially in regard to certification of auto extrication and pumper ops. As a small rural volunteer team responding to such emergencies requiring these skills and all members are provided with regular knowledge and operating familiarity training as those skills may be required at any time. There has been some discussion about pumper operations and Auto Extrication technical training requirements and about the possibility that much of that may be picked up through the Legacy process. While we have a number of members who have taken pumper operations training there is no guarantee that any of those will be in the initial response crew on a fire call. While in auto extrication, while many members have taken auto ex courses in past in recent years. Auto ex training has been provided mainly by supplier trainers and as I understand it there is no certification from that training. Having to retrain 20 plus members in Pumper Ops or Auto Ex would definitely be a major concern on several levels, including volunteer availability, costs, and simply access to certified training opportunities.

Access to NFPA courses has been problematic in our area with the first opportunity to attend a NFPA Level 1 course in the area coming this spring, some seven (7) years after the adoption of NFPA standards in the province. We have four (4) students signed up for this course and are very thankful for the work the OFM/OFC has done to make this course more accessible through the Blended format and of course the opening of a new RTC in our area. And a special thank you to those in the OFM/OFC for their insight into the northern needs and developing and offering the Rural Fire Fighting course based on the NFPA standards. The RFF course allowed us to maintain an introductory training program that provided consistency with the NFPA standards.

It is worthy to note that of those members who took the RFF course several at their own cost went on to take a full FFI & II program outside of Ontario. There is also interest by some of our current RFF graduates to upgrade to at least the FFI level and some to FFII. A GAP course to assist those with RFF to attain FFI at least would be welcomed.

The OFM/small volunteer relationship has always been a close one and while these teams may wish to embrace the regulation there is lack the depth and horses to accomplish and sustain the initiative as proposed without a genuine partnership with the OFM. Initial suggestions would include:

- Creating an OFM/Volunteer FD liaison committee or working group to identify issues and look at what needs to be tweaked and possibly re-tweaked to successfully proceed



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

with and sustain the provision of NFPA based training and certification. There will be hurdles, punishment will not fix, working together towards the goal is preferable.

- Extending timelines for small volunteer teams – the reality in most cases is that the FC and one or two others carry the burden of the paper flow and timelines while necessary to stay on target are far easier to meet by some than others.
- Curriculum and Instructors – developing and providing curriculum and course outlines and even instructors to work with the small teams to identify specific small team needs and deliver consistent training in their communities. Ensuring even at Awareness level and even in house ongoing training is useful and consistent with NFPA requirements.
- Financial Support – for external training or time required to train or retrain members to changed requirements (auto ex, pump ops, etc.).

While there is work ahead and the results uncertain, we are quite willing to support the intent of the regulation and ask that the OFM recognize the unique issues that will be a reality in small northern fire teams attaining and sustain compliance.

- Volunteer Department. Approximately 2,000 residents.

Member Comment 42

I would like to say that I am in favour of certification of our service. I do have concerns on the implementation like many of my colleagues in particular with a volunteer service.

My concerns would be as follows:

1. With the closure of the Ontario Fire College, I believe that we will need some financial help to offset training. Sending our firefighters to a RTC increases our costs significantly due to travel and accommodation expenses plus the cost of the course.
2. Availability of courses is another concern. There has always been a challenge to get certain courses for our members and currently appears to be the same. Now they may have to travel further.
3. While there will most likely be online training it does not work for everyone. Ensuring access to training is a must.
4. The OFM says they will have the resources to support these changes. Will they?
5. Volunteer Firefighters will have to put in significant hours to get to where we need to be. Yes, they have given us four years to complete. I do believe it will still be a challenge and may make it difficult to attract new members when it is already hard to retain volunteers as families are working hard to pay mortgages in a crazy housing market. This doesn't make it any easier to attract new members.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

6. Support to have qualified instructors for in house training and flexibility with learning contracts to ensure other departments can share the training.
7. Certifying new Volunteer firefighters will require time from when they start, would like to see that flexibility.

I'm sure there are many good comments and look forward to seeing what other members have said.

- Composite Department. Approximately 21,000 residents.

Member Comment 43

One of my concerns regarding the certification of technical rescued revolves around departments that have only one hall. I already have members that have committed to training, responding to calls, working full-time, and taking care of their families. Now they're expected to take three or four certifications to support the township and risks pointed out by the CRA.

Unlike most fire departments with multiple halls and can spread that out, X only has one Firehall. In a nutshell, that means that the X fire department will be one of the most skilled departments in Ontario and will become a farm team for Toronto, London's, and Mississauga of Ontario. This drives the training costs down to the smaller municipalities to feed the big leagues.

For this to be successful, the OFM needs to provide the following:

- Online courses and materials that are available to help Departments train their personnel and pass the exams.
- Provide funding to offset the cost of hourly wages and training tools.
- Provide departments with training materials and Prepare courses for consistent training across-the-board.
- Partner with more local colleges to deliver in-class training for those challenged with online content.
- Provide qualified instructors for the RTC's that are focused on technical rescue disciplines to run the necessary courses.
- Designating an individual in each of the fire departments to sign off on certifications and testing.
- Volunteer Department. Approximately 11,000 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 44

Funding – regardless of the Fire Marshal's assertion that there won't be any additional costs associated with this certification regulation, I feel that there will be. Preparing firefighters for a certification exam is an onerous task. We want to set them up for success and that entails comprehensive amounts of training. Volunteer departments, including mine, will have to add additional training nights plus the time for certifications into our budgets. There will also be the retraining and retesting for any members that were not initially successful.

The funding could be a fire specific grant program or simply opening up the existing provincial grant programs (such as was done with the Gas Tax). This would permit fire departments to at least submit proposals to their municipal councils for inclusion into the grant request.

1006 Awareness – Why is the Awareness level not required to be certified through AS&E? All NFPA training should be subject to a test and certification regardless of the level.

Overall, I am in support of this proposed regulation. I feel that it is overdue and will go a long way to reinforce the fact that firefighters across the province need to be held to a minimum standard of training. I do think that funding should be addressed, especially to help smaller departments meet the required deadlines. Most departments in my zone will have minimal numbers of members that will be impacted however there will be a few.

I also hope that the OFM has the staffing to meet their obligations as they could be the weak link in the entire process...but I will remain positive.

- Composite Department. Approximately 6,000 residents.

Member Comment 45

I have a number of comments on the presentation. Looking at it from an NFPP point of view, it leaves me with more questions than answers. My department operates on donations with no guarantee of funding. So, anything that changes costs have a make or break effect. With Covid-19 and not being able to have any auction sales/flea markets/bake sales/pancake breakfasts keeping the lights on and heat paid let alone 911/dispatch/ radio license and all the other costs of running a fire department. This is the last time to be adding any other costs.

The training support without travel from the OFM is minimal and they do not even cover standard first-aid training. So, I have little hope that they will help much with certification (actions speak louder than words) the Covid-19 grant not being available to NFPP departments supports this theory.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

The NFPP is one fifth of the departments in Ontario or the largest if you look at it as a whole.

Some halls have no trucks, most have no internet, some have no halls. If the NFPP fails over lack of support the 40 some communities will be affected.

I started in the NFPP in 1988 so I have seen many faces of the OFM. I hope this gives you some food for thought.

- NFPP Department. Approximately 230 properties.

Member Comment 46

I realize the OAFCA supports the legislation 1,000%, however I cannot fully support the proposed firefighter legislation. Yes, I'm all for training, and provincial minimum standards for firefighters to be trained to sounds good. However, "forced/mandatory" requirements for a two-year volunteer before climbing on a truck to respond to an "incident" could potentially result in no "department response". What happens if NO certified pump operators or Team leads are available to respond?

I am concerned that some of the proposed legislation has potential to scare members (new and existing) away from the department & impact the department's ability to continue to provide services.

- X Department had nine calls last year (excludes six cancelled on route) and has low daytime manpower resources; **any loss of manpower due to "forced/mandatory certification" is worrisome.**

Firefighter with auto-X: I'm confidence certification is achievable (four years to obtain would be ideal if keeping to a 40, two-hour practices/year);

- No-one has said what happens to a volunteer firefighter who doesn't certify in the time allotted (family and work commitments are priority ahead of Fire Department).

CONCERNS:

1. Team Lead – have one member that has Officer 1 OFM course; only two may be able to meet transition (pending required documentation that hasn't been revealed).
 - The one good thing is if members fail the testing they can stay on as a "firefighter".
 - I'm apprehensive the new requirement may impact retention of current officers, and firefighters wanting to advance to officer position.
 - The downside of less "officers" is the potential for not having a "team lead" for a response (NO response?).



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

- Recommend an allowance that will enable a response when a “team lead” is unavailable – utilize “Incident Command” FF2 JPR.
2. Pump Operator – similar to team lead – have one member that took Pump course – members may be able to meet transition (pending required documentation that hasn’t been revealed); otherwise, it’s full course for all/those interested based on level of theory required.
 - Current requirements: 70-80% of knowledge testing are math – formulas and math skills have never used at any incidents in the 32 years I’ve been on the department.
 - What happens if don’t have “certified” pump operator at a fire scene – no response / wait for mutual aid (which is about an hour away?)
 - We teach firefighters to use pump charts, use radios or the thumbs up/down signaling to increase/decrease pressure – **complicated pressure & volume calculations have little value for our department.**
 - MTO requires commercial driver’s licence to drive most apparatus – NFPA 1002 Chapter 4 is 90% duplication **& a waste of time.**
 - Recommend the “pump Apparatus driver qualification require MTO “D-Z” licensing appropriate for the vehicle/weight class (eliminate confusion over driver licensing requirement) is needed and eliminate Chapter 4 pre-requisite.
 - NOTE: My department had to downgrade to a Ford 550, 1050igpm pumper as 80% of the daytime available members didn’t have/want to get “D-Z” licence; enabling us to provide a pumper response with a “G” license & in-house training
 3. Fire Inspection & Fire Educator – don’t have, will have to be contracted out to larger departments = higher municipal costs.
 4. NFPA 1006 (all): Are these required for Volunteer fire department to meet?
 - Fire department does not have staffing capacity to offer these services to the community – don’t anticipate being required to train to operations level for any of these disciplines.
 5. AS&E testing: I’ve listened to the need for quicker results/e-testing for all training/certification – website currently says with high volume testing results may take 14 weeks (should be under 30 days, not +3 months).
 - The Fire Marshal says they will come to our regular scheduled meeting to do testing (*I have little faith in OFMEM getting sufficient gov’t “continued support” to make-good on the promises heard in the technical briefings; in two years they’ll announce a new initiative that re-directs promised resources. OFM has broken so many promises over the years it’s hard to accept any).*
 - X has 11 members (including me) not all members can attend every meeting (working night-shift, family, health/flu/covid). We don’t/can’t meet current AS&E minimum requirements of 12!.
 - If only one or two members have to test, I’m pretty confident OFM won’t come (barrier to certification).



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Comment:

Last time, 85% of X Department members were not interested in completing documentation for grandfathering – indicating if needed a piece of paper to assist the community, they would leave the department (no regrets). At that time, a lot centered around FF1 & 2 skills and knowledge they would never need/perform.

- I see a similar situation this time with Pump Operator and Team lead skills / knowledge never use (calculating friction loss, determining water flow volumes – completing complicated math equations).
- It's nice to see the OFM saying they will audit every department's submission, but I fear they won't have resources to do a proper examination and it will be either your submission fit the template (or doesn't). The OFM "Northern Fire Chief's meeting" made it clear the OFC has issues with a department using any other service provider other than themselves.

Hopefully, the OFMEM will improve their messaging so that it actually encourages volunteers to get certified, rather than bureaucratic hurdles, the "our way or the highway" attitude of the OFC / little to no regard for the volunteer & the time they can give.

Volunteer Department. Approximately 1,000 residents.

Member Comment 47

Funding - To date the Solicitor General has not identified provincial funding to support implementation of this regulation. The impact to volunteer and Composite Fire Services can be substantial. In addition, the Impacts can be considered in two time periods:

- 1) Short Term - Transition/implementation period for current fire fighters to achieve compliance.
 - 2) Long-Term – The on-going impact for Fire Fighter Recruits hired after the proposed Regulation is officially posted (proposed July 1, 2022).
- We firmly believe that specialized and annualized funding must be provided to all fire services to support implementation of the regulations.
 - The Minister in her announcement of the closing of the Ontario Fire College on January 13, 2021, promised to support fire services. This has not come forward in any sustainable manner (with the small exception of a one-time grant for Training/Fire Prevention - Ontario Fire Safety Grant). Our community based on population received \$10,000.00 Thank You! But that figure only represents .05% of the funds budgeted for our departments Training and Fire Prevention programming (frankly it costs the



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

municipality more to notify council of the opportunity, apply for the funds, receive the funds, expend the funds, and be prepared for any audit that occurs, than the actual amount received).

- We believe sections of the Mandatory Certification regulation require amendments to improve understanding and compliance:
 - The Recruit Training Exception of 24-months to comply requires extension to at least 36-months and expanded to include all applicable areas and positions, such as fire inspectors and Fire Officer I & II, etc. replacing the limiting language found in section 3(b). As it is currently written, the regulation only applies to new hires providing exterior attack. The impact (costs) is yet to be fully determined as it relates to challenges for small operations.
 - Reciprocity is partially addressed in Sec. 2. but remains within the OFM mandate and AHJ. The result is no prior learning and certification by other AHJ with PRO Board or IFSAC validated programs are guaranteed to be recognized.

POSITION AND KEY MESSAGES

This submission of our position to the Public Consultation process identifies to legislators ensures they are aware of our position and the Impacts to our Fire Protection Delivery Programs in Our community.

- We agree that training and certifying our fire service personnel to the standards set out in the regulations improves the fire service and both firefighter and public safety.
- As per the FPPA and the O.H.&S. act, the onus is on the municipality to have properly trained fire service personnel that meet the level of service municipal council has determined to be appropriate for its community. This new regulation will require municipalities to demonstrate compliance.
- While the regulations do not detail how non-compliance will be handled, there is great liability risk to a municipality if it does not certify to the new mandatory standard for all categories of fire operations in the event something unfortunate occurs.
- We have assessed the potential impacts, with some uncertainty, as a lack of clarity still exists surrounding the proposed regulations. If our assumptions and interpretations of the regulations are correct, we have calculated the time requirements for training of our recruit fire fighters, our existing regular paid on call fire fighters and our officers (please see the table below the comment for more details).



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

- Training is conducted weekly in all stations (3) and is two hours in duration. The same training topic is conducted three different evenings at different stations to enable acceptable attendance, regardless of station assignment.
- Our present training Schedule is based on a three-year cycle for completion. Our 2022 budget for weekly training of 60 Paid on call fire fighters provides \$188,148.00. There are 47 possible training sessions each year available for attendance for a total of 94 hours for each fire fighter and officer.
- Currently a firefighter spends 2/3 (two thirds) of our current 94 hours of programming time on NFPA Standards. The remainder is non-NFPA training e.g., Medical Training, Municipal required training etc. In addition, our fire fighters spend up to 115 hours of their own time annually on training topics without remuneration.
- New recruit - Training to NFPA 1001 Level I & II (exterior & interior attack) would require approximately 225 hours of training to complete.
- Going forward, the regulation provides only 24 months for completion, this would equate to approximately three hours of training per week with 47 weeks per year or 50% more-time commitment and 50% more cost to the Municipality. Total costs for this additional time commitment is \$94,074.00 for each year required to implement certification for all current firefighters.
- These calculations are predicated on 100% attendance by all fire fighters which is not reasonably possible given family and work commitments of many of our fire fighters over the two-year period.
- This consideration also does not include any impacts to putting non-certification training still necessary to properly provide service on hold.
- Below is our current status regarding fire fighter certification by rank.

Current Firefighters by rank	Current # Fire fighters Certified	Remainder to become certified	Total Hours remaining to complete
37	5	32	5,250
Current Officers (including FT)	Current Officers Certified	Remainder to become certified	Total Hours remaining to complete
15	2	13	1,144
Current Recruits.			Total Hours remaining to complete
13	7	6	1,350
TOTAL 65	14	51	7744



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

- A one- time initiative requiring additional involvement by all existing fire fighters and necessary funding to achieve compliance is needed to expedite the new requirements.
- For all future new recruits, they would require 110 additional hours for their first two years. = \$2,420.00 per new Fire Fighter. In addition, Instructors will be required for the extra hours as well, totaling \$3,080.00.
- Total cost based on recruitment patterns of six fire fighters/yr. is \$33,000.00.
- If sufficient provincial funding is not provided to municipal governments, the province will knowingly create a new unfunded mandate on municipalities.
- Additional risk consideration: loss of partially trained members within the certification process as firefighters find current training requirements onerous at best and are becoming frustrated.
- Recruitment can involve the hiring of a completely certified firefighter partially certified firefighter or a firefighter has no certification whatsoever.
- The Fire service in general in North America experiences a higher rate of employee turnover for a number of reasons, consequently retention of employees while within the 3-year cycle, cannot be fully relied upon.
- The risk to financial costs and to maintaining an adequate number of certified members to deliver service as per the service delivery bylaw may therefore fluctuate, particularly if a nearly certified member leaves AFD for any number of reasons such as new employment outside the community or with a full time fire service for example.

The calculation provided by this departments training hours is listed on the next page

- OAFCh Response



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

<u>Fire Fighter Recruit Training</u>	<u>Total Hours to Complete</u>	<u>Own Time Hours</u>	<u>Annual Hours Spent</u>
NFPA Fire Fighter I & II	180 hours FF I-24 Modules FFII 9 Modules	48 hours	60
IMS –Blue Card	4 hours	0	4
Corporate Training 1. (AODA) – 30 minutes 2. Health & Safety at Work – 30 minutes 3. (WHMIS) – 45 minutes 4. Workplace Violence, Harassment and Discrimination – 15 minutes	2 hours		2
FF OH&S	2 hours		2
FF Specific WHMIS	2 hours		2
CPR/FA/defib	8 hours		4
Fire Prevention	6 hours	4 hours FPW	2
Driver Training	10 Hours		5
Water and Ice Rescue	6 hours	3 hours (Pleasure Craft Licence)	2
Auto Extrication	10 hours		4
Haz Mat Awareness	2 hours	8 hours Self Study	2
Haz Mat Operations	32 hours		10
Fire Ops Strategy & Tactics	10 hours		5
Rescue Ops	4 hours		2
Vent/ Salvage/Overhaul	4 hours		2
RIT/ FF Survival	6 hours		3
Mutual Aid	2 hours		1
Hose Testing	2 hours		2
Communications /Radio	2 hours		2
<u>TOTALS</u>	304 Hours	63 Hours	118 Hours

***In addition to ongoing FF training must complete on own time before completion of Probation ***

Obtain DZ License	95 hours	95	
AFD Driving Hours	20 hours	20 hours	
FA/CPR	8 hours		
FF Survival	6 hours		
TOTAL	129	115	

<u>Fire Fighter Training</u>	<u>Total Hours to Complete</u>	<u>Own Time Hours</u>	<u>Annual Hours Spent</u>
NFPA Fire Fighter I & II	180 hours FF I-24 Modules	48 hours	60



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

	FFII 9 Modules		
IMS –Blue Card	4 hours	0	4
Corporate Training	2 hours		2
1. (AODA) – 30 minutes			
2. Health & Safety at Work – 30 minutes			
3. (WHMIS) – 45 minutes			
4. Workplace Violence, Harassment and Discrimination – 15 minutes			
FF OH&S	2 hours		2
FF Specific WHMIS	2 hours		2
CPR/FA/defib	8 hours		4
Fire Prevention	6 hours	4 hours FPW	2
Driver Training	10 Hours		5
Water and Ice Rescue	6 hours	3 hours (Pleasure Craft Licence)	2
Auto Extrication	10 hours		4
Haz Mat Awareness	2 hours	8 hours Self Study	2
Haz Mat Operations	32 hours		10
Fire Ops Strategy & Tactics	10 hours		5
Rescue Ops	4 hours		2
Vent/ Salvage/Overhaul	4 hours		2
RIT/ FF Survival	6 hours		3
Mutual Aid	2 hours		1
Hose Testing	2 hours		2
Communications /Radio	2 hours		2
TOTALS	294 Hours	63 Hours	116 Hours

<u>Fire Officer Training</u>	<u>Total Hours to Complete</u>	<u>Own Time Hours</u>	<u>Annual Hours Spent</u>
NFPA Fire Officer I & II	60 hours	20 hours	30
IMS –Blue Card	28 hours	50	12 must do 36/3yrs to maintain Certification
Corporate Training	6 hours		2
1. (AODA) – 30 minutes			
2. Health & Safety at Work – 30 minutes			



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

3. (WHMIS) – 45 minutes			
4. Workplace Violence, Harassment and Discrimination – 15 minutes			
Supervisory Training - 4			
FF OH&S	2 hours		2
FF Specific WHMIS	2 hours		2
CPR/FA/defib	8 hours		4
Fire Prevention	6 hours	4 hours FPW	2
Driver Training	10 Hours		5
Water and Ice Rescue	6 hours	3 hours (Pleasure Craft Licence)	2
Auto Extrication	10 hours		4
Haz Mat Awareness	2 hours	8 hours Self Study	2
Haz Mat Operations	32 hours		10
Fire Ops Strategy & Tactics	10 hours		5
Rescue Ops	4 hours		2
Vent/ Salvage/Overhaul	4 hours		2
RIT/ FF Survival	6 hours		3
Mutual Aid	2 hours		1
Hose Testing	2 hours		2
Communications /Radio	2 hours		2
TOTALS	202 Hours	85 Hours	94 Hours
			Plus Delivery to FF
			Share of 47 sessions

- Composite Department. Approximately 22,000 residents.

Member Comment 48

The training team on my small department will do its very best to implement these new regulations and maintain fire suppression capacity. At the same time, we're estimating a reduction of up to 25% in membership during the next 5-10 years (from about 20 to about 15). We expect we might be forced to contract out of services including auto extrication, shore-based water rescue, and fire inspection, a shift towards exterior attack (largely because of limited staffing). We will also require financial incentives to encourage members to commit more time for training but have not yet quantified those costs.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

I should add the consultation time allotted for the regulation is prohibitively short, especially for chiefs who act in a volunteer capacity and have demanding jobs (in my case, farming.)

When I heard a new certification proposal was on the way, I wondered which one of my problems -- as the chief officer of a volunteer fire department -- it would solve. Would it ease the challenge of recruiting and keeping committed volunteers? Would it reverse the decline in civic engagement that makes it so difficult to find keen volunteers in a township with about 1,300 souls? Would it make maintaining a fire service less burdensome for ratepayers or ease the administrative load on a chief who is allotted four hours per week to carry out these duties?

Despite its merits, this proposal is unlikely to solve any of these pressing concerns, at least for our small, rural volunteer fire department. In its present form the regulation will reduce the department's ability to attract and retain new members (especially as we now rely heavily on people in the 40-60 age range), increase costs to the municipality, and reduce our scope of service.

Given northern Ontario's rural demographics and the general decline in volunteering, one option would be a provincial rural fire service. The province could set training standards, conduct training, and find and fund the people willing to take on the role.

However, I suspect that's not yet in the cards, so I'll deal with specific changes I'd like to see.

- 1) A longer compliance deadline. Consider five years for the compliance deadline for all but NFPA 1006-related standards. Seven years should be sufficient for 1006.
- 2) Extended training time for new members to reach compliance. Consider a three or four-year deadline for recruits to achieve certification.
- 3) Funding for curricula, or the release of a free standard OFC curriculum for departments to use. To stretch our \$2,000 training budget, we're sharing three IFSTA 7 texts among our members. Being able to give each firefighter a textbook would be beneficial.
- 4) Incentives for students. New volunteers seem less keen on using their holidays to attend additional training than previous generations. Perhaps the province can offer a stipend for students pursuing certification.
- 5) Subsidies for travel to RTC and reduced course costs. We have no operating RTC in our neighbourhood, and unlike the OFC, driving distances and accommodations at southern Ontario RTCs make attending courses prohibitively expensive. Since the closure of the Fire College, we have also been challenged to access specialized courses, including Pumper Ops, 1021, 1035, etc.
- 6) Provincial promotion of volunteering and citizenship. Can Ontario throw some advertising and marketing weight behind the concept of serving your local community?



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

This may be swimming against the tide, but the volunteer fire service requires people who are willing to break a sweat to help their own communities. Even just promoting the concept of altruism, service, and caring about your neighbours would help create the social conditions that generate more volunteerism.

Yours truly, with sincere thanks for this opportunity to comment.

This member also provided their comments to the 2018 Certification Regulation. As many of the concerns are still relevant with today's proposal, it has been included below too.

- OAFC Response

I attended the OAFC PAC meeting in North Bay, and I wanted to raise an issue that wasn't directly mentioned in our discussion: demographic change, and the rapid greying of the population in rural northern Ontario.

With relatively low rates of birth, limited immigration, and young people tending to move away for education and then not returning, northern Ontario's population is ageing at a faster rate than the province as a whole. Ontario's overall population has grown by 25 per cent since 1996, but the north is projected to lose 50,000 people by 2041 if the present trends continue. (You can find the source of my numbers in:

https://www.northernpolicy.ca/upload/documents/publications/commentaries-new/zefi-newcomers-1_press-release-final-en.pdf).

This will pose significant problems for a small, rural township like X. The obvious challenge is finding and retaining volunteers when there aren't many younger people around. The other issue is paying for the service, especially if you've got a slow-growth or declining economy, and a shrinking tax base. How would mandatory NFPA certification affect this? It's hard to argue against rigorous training and skills upgrades, but I can see a few unintended downsides from a one-size-fits-all certification policy:

Requiring every fire dept. member to achieve NFPA 1001 levels 1 and 2 could discourage otherwise useful people from joining.

In this township (population 1,200, a mix of commuters and farmers) we try to staff the volunteer department by taking advantage of the skills and abilities of our members. If we have a nurse who wants to do medical calls but doesn't want to fight fires, we'll slot her (or him) into non-fire roles. If we have a retired truck driver who's good behind the wheel but doesn't want to be on the end of a hose, we'll make him (or her) a driver or pump operator. We already have a couple of Amish members whose religion and culture require them to maintain full beards. They'll never be able to don SCBAs, but they're hard workers, helpful at wildfires, good with portable pumps, etc.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

In short, we need to make the best use of the available talent, and mandatory NFPA certification for all fire departments hampers this. I'm asking you to consider ways that small departments can continue to be flexible in using the skills of the volunteers available. The New Zealand solution may be one option, where volunteers can be "operational" firefighters, or work in support and administrative roles. (<https://fireandemergency.nz/volunteering/being-a-volunteer/>)

Finally, certification for all firefighters may make a full-service department unaffordable for small, rural communities.

We're still a traditional volunteer department, running mostly on community pride, and driven by an interest in community service. Out of our \$120,000 budget, just \$1,500 is earmarked for training, with another \$1,500 for per diems (members get \$120 a day when away on training) and \$1,500 for mileage and travel expenses. The members are paid in points. Last year, each point was just over \$11, so an all-night housefire earned you \$11. (That said, I'm trying to get the training budget built up).

Money is tight and committed volunteers are already scarce, but demographic changes could make things more difficult. Any effort to implement certification has to take this into account. Small departments will need more resources to maintain even the level of service we already provide, and right now, it's hard to see another level of government that's willing to help out.

What can I do about this on my own department? We're already using IFSTA 6 as our curriculum, but we'll be looking for ways to upgrade key skills through outside courses for fire officer, public educator, trainer, etc. The goal is to have a core of skilled firefighters for interior attacks and difficult suppression efforts, and complex medical calls. These firefighters will be backed by motivated colleagues who support their efforts by delivering water, managing traffic, etc.

At the same time, automatic aid with neighbouring municipalities could help us make the most of our manpower, even if our volunteer base is shrinking. I've also been targeting healthy retirees as a potential source of volunteers, although mandatory NFPA certification has discouraged some from considering the role.

How can the OAFC, the OFM, and others help? Consider more accessible training that fits into the work schedule of people with day jobs. Offer short upgrade courses for people already acting as supervisors, in fire prevention, etc. Offer short live-fire courses on a regional basis. We get so few fires now, it's hard for younger firefighters to rapidly build skills in a realistic setting. Most of all, I need the flexibility to match the skills and inclinations of volunteers with the roles in my department, and the resources to fund additional training.

- Volunteer Department. Approximately 1,300 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 49

Please accept this letter as my Department and Township's stance on the ***Proposed Mandatory Certification Regulation***.

As an Ontario Firefighter that grew up, and began my career in Quebec, I come from a culture that knows only mandatory certification. Therefore, it is of no surprise that I personally fully support this proposal. The Towns leadership group is also in full support of this proposal, as long as no members are left behind.

When I first became Fire Chief for the Township of X in 2019, four (4) members (17.4% of the department) held NFPA certifications. The idea of certification and recognized training was met with some opposition and resistance. Since then, the department has seen 19 members (82.6% of department) achieve at least one level of NFPA certification, as we have been successful in changing the culture and the way of thinking of our members.

We are in agreement that the time frames are respectable and achievable for current members (4 years), technician level members (6 years), as well as new members (2 years). I'd like to add, as long as the levels of certification are meant to not only represent the department's level of service, but also the individual's role within the department (i.e., not all members are on the technical rescue team, not all members are pump operators, etc.). I'd also like to reiterate that it is crucial that those who have been grandfathered are recognized at that level (which appears to be the plan) to help alleviate some of the training expectations on transitioning departments.

I can understand that departments starting from scratch are uneasy with this proposal, therefore it is crucial that the province continues to offer as many options for certification as possible. Ways in which this movement can be facilitated are:

- ***Ensuring that Learning Contracts, Assessment Checklists, and OFC Courses all remain options for certification;***
- ***Allow individual departments to provide their own qualified internal proctor(s);***
- ***Allow on site / internal electronic testing;***
- ***Provide timely / immediate exam results; and***
- ***Provide learning, teaching, and testing material in both official languages (potentially through partnership with l'École National des Pompiers du Québec).***

In conclusion, the Township of X and its Fire Department believes that the province's proposals paired with the above-mentioned suggestions will allow departments, such as ours, the confidence and capabilities to move forward with these training mandate proposals.

- Volunteer Department. Approximately 3,300 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 50

Dear Sir/Madame

Thank you very much for the proposed regulation and the ability to comment. X Services generally support the content of the proposed regulation. We believe, that regulating minimal requirements for firefighters in Ontario, is the right thing to do to improve both firefighter and public safety.

The proposed regulation does provide flexibility for the various “service models” for the provinces fire services, as determine by the municipal Council. Utilizing the NFPA standards to determine the certification requirements is logical, as for the past few years as this was the “de facto” standard used by many fire services in Ontario. Recognizing past “grandfathering” is essential to enable departments that have already invested time and money in recognizing the expertise already within each of the fire services.

The 4- and 6-year windows to comply with the proposed regulation is reasonable if an appropriate level of support is provided by the OFMEM. In past years the capacity of OFMEM has been eroded. I believe the fire service is skeptical about the ability of OFMEM to provide the necessary support for this regulation. The Ontario Fire College (administration) and the Regional Training Centers (RTC) will need additional leadership and resources to enable the training that is to be required to be completed. A centralized, province-wide training calendar and application process with deadlines will be needed to make the training effective and efficient. The current “hodge-podge” approach with each RTC advertising, and then seeking approval to conduct course, followed by individual application and costing models, makes in very difficult for a fire service to plan an approach for training.

The administrative “red tape” currently required by the RTC to organize training will need to be reduced to allow for a nimble ability to support training locally. As an example, the local RTC has 1 “NFPA Pump Ops Courses” schedule, not yet approved by OFMEM, for the next two years. In my area it is likely that there may be a need for a dozen or more courses. In discussion with the RTC, it has been indicated that they are hoping to get permission to conduct the 1 course, and uncertain as to their ability to get additional courses approved. This level of control, and lack of coordination with other RTCs does not provide for the required training.

Some course content is currently not available for all the certifications required. This will need to be rectified as it is essential that the fire service needs to “get going” once the regulation is finalized and approved.

Additionally, the Academic Standards and Evaluation (AS&E) section of OFMEM will need to offer on-line testing at locations readily available for volunteer firefighters. A web-based solution should be considered to make the testing available wherever sufficient conductivity



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

exists. The minimal number of firefighters required by AS&E for a proctored test should be dramatically reduced or eliminated. The use of in-house proctors, that are not associated with the training, should be considered as a best practice.

Furthermore, accommodating the current firefighter that cannot complete theory testing will require further clarification. Accommodation to this point has just been an extension of time to complete the exams. In the volunteer fire service, there are individuals who are competent firefighters who require different accommodation resources to meet a certification standard. Not developing appropriate accommodation processes to certify, will affect recruitment and retention in the volunteer fire service.

The final area I would like to discuss is costs associated with the introduction of this regulation. During the OFMEM “technical briefing” it was apparent that there was little appreciation as to the cost to implement, and what can be accomplished on a “training night”. The focus of the technical briefing was the actual cost to training; however, the larger cost is salary needed to support the training. Our current in-service training provided to our firefighters is already stretched to the limit because of required content. This training is supportive, but not conducive to preparing a member for a certification exam.

X Services has 110 firefighters. We have been certifying our firefighters for the past number of years, however, many exiting members will require to certify in:

- Pump Operations, (no past grandfathering available)
- HAZMAT Ops.
- A handful of members in other areas of certification including NFPA 1001, 1041 etc.
- Technical Rescue Disciplines where no past grandfather or certification was available.

If we were to send the members requiring certification to the local RTC or use a learning contract with the OFC, the cost of the training / assessment, and the associated salary cost would be approximately \$350,000 (excluding technical rescue).

By maximizing the use of our own training resources, completing an assessment checklist, and requesting AS&E to evaluate, the costs would be reduced to approximately \$100,000. Another \$20,000 would be required for the salary component of certifying the current technical rescuers. These costs are in addition to the regular in-service training programs already in place. This estimate maximizes the efficiency of our training and keeps the time commitment for our volunteers minimal.

The local “administration” of a training program such as this, also requires appropriate staff resourcing to coordinate the training. The logistics involved with coordinating this training I believe has been underestimated. As the sole full-time employee in the department with 110 firefighters, the training of volunteers with absences, shift work etc. makes the organizing of training challenging.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

The adoption of the current regulation will result in significant costs and logistical challenges to the municipality. An annual grant (possibly a match grant with the municipality) based upon a formula to off-set the cost would assist the fire service to comply with the regulation. The grant amount should be based upon the size and level of service provided by the fire department rather than just population. X population almost triples during the summer months which results in an increase to the number and complexity of the emergency response.

Thank you very much for the opportunity to share some thoughts about the proposed regulation. I wish you all the best at considering all the input that you will receive.

- Volunteer Department. Approximately 10,500 residents.

Member Comment 51

The Ontario government scrapped mandatory certification regulations for firefighters in 2018 as a result of challenges presented by the Association of Municipalities of Ontario (AMO). At that time the proposed mandatory certification regulations lacked gap analysis, had no funding and did not address issues that were brought forward by municipalities.

It should be noted that we are disappointed with the short, 30-day timeline for comment. 30 days is unreasonable for this type of regulation. In addition to the short timeline, we are being asked to comment on certification for some testing and standards that currently don't exist, and a "Legacy" provision has not been fully disclosed, making it difficult to analyze the proposed regulation and provide salient feedback.

At this time, municipalities are being told that there will be no cost for most fire departments to implement mandatory certification, except for an administration cost ranging from an estimated \$295-\$1400 (depending on the number of firefighters that are rostered). This "no cost" model assumes that a department is training to the standards; however, it needs to be noted that some of these proposed standards and testing haven't even been developed yet.

During the consultation meetings, the Ontario Fire Marshal (OFM) suggested that a typical rural Ontario fire department would require 3 exams to certify their personnel, and that OFM staff would come to the department's fire station to do testing on a training night, so no additional cost would occur. We can only speculate that the OFM was referring to testing for NFPA's 1001 and 1072 – Firefighter 1 (FF1), Firefighter 2 (FFII) and Hazardous Material Awareness and Operations (HazMat Ops).

When we look at the rural fire departments operating in our surrounding counties, most would require 17 written exams, as well as 11 practical skills exams, to certify a firefighter and maintain the department's level of service (the number of tests is reduced by 2 if a department only certifies to the operations level for ice/water rescue, rather than the technician level).



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

These tests do not include other required certifications and exams such as DZ licensing, medical certificates, watercraft licenses, H&S for workers, WHMIS, AODA, MNRF forest fires, etc. In addition, officers would require an additional 3 exams, and fire prevention personnel would also require 3 additional exams (many prevention members in rural Ontario are firefighters too, so this would be on top of the other requirements). Considering the amount of time that would be required for mandatory certification examinations, it would not be appropriate to exchange regularly scheduled training hours, for certification testing hours as offered by the OFM. With this regulation, and estimating the time needed for those certifications where no criteria currently exist, we could easily exceed 500 hours of training for a new firefighter, plus the time for certification exams.

Based on their track record over the last 10 years, we are skeptical that the Ontario Fire Marshall (OFM) will be able to deliver the support that will be needed to implement the new regulation. The OFM hasn't been unable to support the changes that they have already implemented, nor have they been able to provide new training resources to meet NFPA standards promised 5 years ago. Many rural Ontario fire departments have been left in the lurch repeatedly thanks to OFM staffing shortages and turnover, and by the closure of the Ontario Fire College (OFC) with no transition plan. With the OFC's closure, there has been frustration expressed that its processes are archaic, and it's still being managed like an independent college rather than a partner to the RTCs and municipalities.

If certification is going to be the provincial mandate, and it certainly seems that way based on the presentations, let's focus on how we may be able to shape the certification, rather than trying to stop the regulation as it's currently presented.

The following recommendations are how we believe we could make it work for us, and other typical rural Ontario departments:

- 1) Release the Legacy package immediately so that its impact on our training budgets can be recognized early and we can begin planning for 2023 budgets to be reflective of those changes.
- 2) Start mandatory certification requirements with FF I and FF II (which includes HazMat Ops certification), Instructor I, and Officer I (in the 2026 window as suggested).
- 3) To ease implementation and to spread out the workload, move all fire prevention, education, investigation mandatory certification deadlines to 2028 (Fire Inspector I alone is 156 hours of courses, plus certification exam).
- 4) Fire Officer I level needs a one-year implementation process to be included in the regulation.
- 5) Expand the 2-year onboarding of new hires to at least 3 years.
- 6) Pump Ops, Vehicle Rescue and Heavy Vehicle Rescue should be removed from mandatory certification. These skills should be kept as a municipal level responsibility, to meet a municipality's needs as required (similar to an aerial apparatus which has no certification requirement in this process).



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

- i. The pump ops course is a 40-hour course, plus testing – this comprehensive certification is not needed to run a pump for a primarily single-family dwelling type of community.
 - ii. The vehicle rescue and heavy rescue standards and testing are not available to review, and heavy vehicle training props are more difficult to get, so certification may be a significant challenge for rural Ontario departments. In addition, these heavy vehicles are traveling throughout the province and if we can't certify to heavy vehicle, then we are put in a difficult situation when we pull up to a motor vehicle incident involving heavy vehicles. Certification should be maintained and available for those municipalities that chose it but should not be mandatory for all municipalities.
 - iii. Have OFM provide hardware (computer or tablet) to RTCs: hardware can be owned by OFM in case an RTC closes so that the OFM can redistribute the hardware elsewhere as appropriate,
 - iv. Provide one time grant to municipalities for hardware purchase and provide an option to use OFM buying power to achieve best value.
- 7) Ice and Water Rescue is the most common fire department specialty rescue performed and is the primary reason the mandatory certification process was initiated (due to firefighter and student deaths). If we are provided proper training resources by January 1, 2023, then implementation for mandatory certification by 2026 is achievable (instead of the 2028 as suggested). However, we also recommend that the rope rescue prerequisite be removed, as it does not align with NFPA 1006 standards (note that the OFC calendar up to March 1, 2022, has no rope rescue prerequisites, but as of April 1, 2022 there is a rope rescue prerequisite).
- 8) Providing proper training resources are given by January 1, 2025, all remaining specialty rescue mandatory certifications are achievable by 2028 as suggested.
- 9) Expand online testing options.
- 10) Provide annual contribution fund specifically for training and certifications to municipal fire departments.
- 11) Ensure accommodations for learning difficulties (specifically written exams) are expanded with no requirement for a doctor's note. Additionally, due to some certifications not being included in the Legacy provisions, the loss of mature, experienced firefighters is a reality, as they could find the task of studying for written exams too onerous.

It was noted during the presentations that most fire departments in Ontario are doing a good job training their personnel, though there are some that are falling short. If this is a primary reason for the extensive list of mandatory certifications, then perhaps the OFM should work with those that need guidance and support and allow municipalities that are doing well to determine their own training needs and level of mandatory certification.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

In Part II of the Fire Protection and Prevention Act (FPPA) it notes: **Municipalities may establish fire departments**

5 (0.1) The council of a municipality may establish, maintain, and operate a fire department for all or any part of the municipality. 2001, c. 25, s. 475 (2).

When a municipality establishes a fire department, as authorized through Part II, section 2.1(b) of the FPPA, it allows council to provide fire protection services to meet the needs of the community. The training of firefighters is also their responsibility to ensure it meets the level of service provided. Non-compliance with these requirements is a Ministry of Labour responsibility (MOL), not the OFM.

Certification provides a municipality with a way to reduce their risk when it comes to training, however certification should be a tool which a municipality can choose, as it is needed, to fulfill a municipality's needs. We believe this type of tool is what most municipalities want but making certification mandatory to the level proposed is inappropriate as it forces a municipality to invest in a process it does not require to maintain its level of service and risks. Additionally, certification is only a snapshot in time and if an 18-year-old is hired today and becomes fully certified within the 2-year window allowed, it is still the municipality's responsibility to maintain their skills to the level of service set for the next 40+ years.

By reducing the number of mandatory certifications required, this will be more manageable and reasonable to ask of a volunteer firefighter. Retention is difficult enough with call volumes increasing, training demands and community events. The process of mandatory certification currently proposed has a high probability of negatively impacting the level of service across rural Ontario, including public safety, for reasons that are not appropriate, nor what the regulation started out to solve.

Focusing on the mandatory certifications, as described above, will ensure firefighters are safe when entering a hazardous area, supervisors are trained to manage those risks and the remaining small percentage of response levels are managed by the Municipality, and if certification is what they want, then they can add that to their internal processes, so its mandatory for them.

- Composite Department. Approximately 6,700 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 52

In regards to the special rescue, we currently train to the Operations level for rope rescue and have trainers that have trained to the Technician level.

Training has been provided by a third party.

With the evolution of our training program, we train our Firefighters to Operations level. Our Captains have completed this training when they were firefighters. Now that they are Captains, they assume the role of the Edge Person, Incident Commander, Safety Officer, or other supporting roles and would not perform any work on live rope.

Would all our Captains now have to go through a full certification for Operations level even though they would not be performing work on live rope?

Can we train Firefighters to Operations level and still have Captains supervise their work who are not certified to Operations level even though they completed this training in the past?

This is the same for our water and ice rescue training and response.

Can we train and provide service to parts of the Operations or Technician level of a standard? The example would be for Rope Technician and rigging and operating a high-line. This is something we would not perform, but there are other parts of the Technician level that we have determined we can train to and provide service for.

- Full Time Department. Approximately 92,000 residents.

Member Comment 53

We are a municipality of 3400 who supply interior attack with auto extrication and shore-based ice water rescue.

We hired five new recruits last year and will be lucky if two or three stick with it. We always hire 5-6 and are lucky if two stay. They either get bored or find it's not what they thought it would be.

I asked my new hires if we told you that you will need to be certified and take these exams would you have applied, both answered NO.

With a volunteer department it is hard to get everyone to attend on the same night, their actual jobs that pay the bills come first.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

My Budget was passed in January and my total training budget is \$1000.00 this won't even cover the materials needed to give to our firefighters. There will be extra costs for training that I have not budgeted for, and we do not have computers or iPad's to give to each firefighter. So, I have already lost the first year or I will need to take it from different areas of my budget.

I will need to purchase NFPA standard plus all the training material needed to comply. Where are small municipalities going to find the money to actually become compliant in the four years when we are losing the first year to budget restraints?

To ask a northern volunteer fire department to train to the same standard as a city fire department does not make sense.

Thank you all for working so hard for us.

- Composite Department. Approximately 3,400 residents.

Member Comment 54

I would like to start by saying thank you for all of your efforts providing us the information regarding Firefighter Certification. It was very well done and very much appreciated.

X Fire & emergency services fully supports the concept of Firefighter Certification. This is long overdue and needed to provide a minimum standard for Firefighters in the Province with regards to Training.

Here are some of the perspectives we would like to see addressed:

- Funding is always an issue when training to enhance any program within our Fire Service as budget constraints at the municipal level make it very difficult. But funding overall in the Fire Service has been addressed as a major concern already.
- Regional Training Centers require some attention. As a RTC for our region, we receive feedback and direction but there needs to be a very consistent and structured model that all RTCs across the Province need to adhere by. If it is going to be the RTCs that are to replace the Fire College, there needs to be a compulsory course list that all RTCs have to provide with the ability to provide elective courses if they have the need and ability. To enable this, the OFC and OFM need to have the instructor base and facilities available to complete the instruction.
- Pre-Fire Service program - I have to admit this was a good suggestion last night, I have apprehensions in putting the pressure on the Colleges to provide the Technical Rescue, Incident Safety Officer and Pumper Operations certifications as this will not only drive up the costs of these programs but there is no time frame on when the individual will shift from student to firefighter and start being able to apply these skills to gain



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

experience. I have found with some recruits that we have hired that over time, their skill level begins to perish just with basic firefighting skills.

Overall, most of our concerns and ideas related to the Firefighter Certification have already been brought forward. We look forward to the final version and beginning to start the process.

My apologies for the delay and thank you for the opportunity to provide our input.

- Full-Time Department. Approximately 136,000 residents.

Member Comment 55

Please see below our comments on the Mandatory Certification Regulation.

1. Having talked to our training staff and those that have recently gone to RTC to certify. Two years to get them through On-line Legislation 101, Hazmat 1072 awareness then Firefighter I & II IMS Training, then Hazmat 1072 Operations is going to be a challenge.
2. Recruitment & Retention - We have been struggling over the last five years to get quality people to join our team, this new Regulation will make it more difficult. From 2018 to 2020 we hired 15 new recruits, 6 of those have left, that's 40% over the last 3 years.
3. Accommodations for Learning issues – Will the OFC be able to accommodate those who have learning issues?
4. Funding - Will the Ontario government be funding this through one-time grants, annual grants, subsidize Reginal Training Centres (RTCs), or in-house training?
5. We are looking at cost over the next four years between \$200,000 to \$300,000.
6. This will affect our levels of service for the immediate future, (Hazmat, Water). Will have to get contracts with neighbors which will delay response times.
7. Can the OFM get local community colleges involved in certification? We have colleges that already have firefighter programs for full time students.
8. Electronic testing would mean there is no wait for a pass or fail. Waiting 12 – 16 weeks for results cannot happen anymore.
9. Council Training – Our council is already asking for more in-depth training. Need More.
10. Will the OFM/OFC have enough staff to do this? We feel that the OFC is not prepared for this and will not be able to recruit staff to get this done.

- Composite Department. Approximately 10,900 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 56

There has been very little communication about the Dispatch component of the Firefighter Certification. We in the X area, like almost 100 Northern Ontario Departments are dispatched by a MOH CACC. We have touched base with our CACC, and they have not heard anything about the dispatch component to the regulations.

We can't imagine that this has not been addressed however we have not found any information about the issue.

- Composite Department. Approximately 6,400 residents.

Member Comment 57

My thought to this is the Office/province has mandated the CRA [Community Risk Assessment] in order for Municipal Councils to be "educated" on the risk in their communities and how these risks should be mitigated or reduced through emergency response and planning. (As we already know).

So, I looked at this as a two-fold, if the Province mandates the CRA which benchmarks the level of service and then in addition is mandating Certification. This is obviously putting a large financial burden on the smaller municipalities. If there is provincial funding it should be measured by risk vs. mitigation and planning which is the level of service and resources, which = \$\$\$\$. Although population does play a factor in this, it shouldn't be the focus for financial assistance/grant funds.

In my view the CRA and the Certification has put the province "on the hook" so to speak to assist in this endeavor going forward.

- Composite Department. Approximately 4,400 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 58

Thank you for all the hard work you and the Executive have put into the submission for the certification commentary.

Myself, our Assistant Chief and Deputy Chief have attended as many of the Town Hall presentations as possible, including PACs outside our own and both summaries yesterday.

Our Mayor and CAO attended the briefing with the Fire Marshall last week. I appreciate President Grimwood's comments on the diversity of opinion amongst the OAFCh, but certainly I think our major concerns were well represented in the PACs, Town Halls, and yesterday's summary.

For context, we are a small composite department (1 full time Fire Prevention Officer) which relies entirely on volunteers for emergency response. We have a part-time Deputy Fire Chief as well as part-time Public Educator, Training Officer and Fire Prevention Officer (7 hours each per week). We embraced the NFPA standards several years ago and expect all our staff to certify for the position they hold. We train to the IFSTA curriculum. We have relied on the Fire College in the past for certification training for all positions except 1001 and 1072, for which we send our recruits to an RTC (EOETA). We pay for the courses, the OFC registration, an annual fee to be a member of the RTC, as well as the wages of the staff attending. It is not inexpensive, but we feel it is valuable. We have some well-developed internal programs for shore-based ice/water rescue, driver training/pump operation, low angle rescue for our extensive trail system. We have for years tried to develop agreements to recognize our programs – but they seem to go nowhere, often due to the seemingly constant change of staff in the academic sections of the OFM. We have dabbled in the on-line courses but have had some terrible feedback from our staff – outdated slide decks, instructor on vacation during the teaching period!, lack of responsiveness from the instructor to questions, delays in responding to course submissions. We currently have four members waiting for written exams to their on-line courses in January 2021. We initiated the process to have internal proctors approved in June 2021 and were just recently approved and advised to give three months notice for when we would like to host our own exams. We would like to have hosted the exams back in 2021.

With respect to electronic exams – our most recent recruits took their written exams electronically at EOETA on November 5; they were advised of their passing marks when they left the exam room. We still have not received confirmation from the OFC.

We embrace the concept of certification and are prepared to invest the time and effort to make it work. Our concern is with the ability of the Fire Marshal's Office/Fire College develop the required resources to administer the regulation in a fashion that will advance the professionalism of the fire service in the province. Maybe this time will be different...

Thanks again for your efforts on this initiative.

- Composite Department. Approximately 21,200 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 59

As one of the smallest fire departments in the province, I am mostly concerned with resources to complete the training and testing. Having to purchase the IFSTA manuals, workbooks, and exam prep materials for each firefighter, even on a small department will be a great impact on my budget. I would prefer the province provide the learning materials for each firefighter.

My other concern is that completing the Firefighter 1 (or 2) is a large commitment of time for both the classroom and practical components. It would be more feasible for my members - who are largely shift workers or busy family people - to study, practice and take the test for smaller chunks of the whole program. I propose breaking the course down into three manageable parts so that members who cannot attend two or three weekends in succession can complete the training / testing in manageable chunks. I know this would mean a change in the testing process but scheduling training / testing so that a member only has to prepare for a portion at a time will make it easier to prepare and succeed.

- Volunteer Department. Approximately 475 residents.

Member Comment 60

Re: Proposed Firefighter Certification Regulation.

The Ministry is proposing a firefighter certification model that outlines the mandatory minimum standard and corresponding job performance requirements of firefighters delivering specific fire protection services.

A regulation similar to the one currently being proposed was attempted by the Provincial government in 2018 and eventually withdrawn, due to the substantial financial impact on municipalities and concerns over reductions in staff compliments.

Although the new proposed regulation differs slightly from that proposed in 2018, the intent is clearly the same. As such the impact on municipalities also remains the same.

Like the majority of fire services in Ontario, X is a "full service" provider (exterior and interior attack). The regulation is being promoted as having flexibility and reduced training requirements based on the type of service provided, as some (very few) fire departments in Ontario provide external firefighting services only. It is only these limited number of fire services, primarily in remote areas of Northern Ontario, that will see reduced training requirements.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

X Department wants to be very clear; we support standards and training for our volunteer firefighters to a level that protects their safety, as well as providing a high level of service to our residents & business community. That said, we believe this is already being achieved through our current training standards.

The proposed regulation will have the following substantial impacts on our firefighting service:

- 1) **The cost** associated with having all firefighters certified to a NFPA standard or standards, will create significant cost increases in annual operating budgets for years to come. Recouping these costs will unfortunately have to be borne by the taxpayer. In review of the proposed regulation, the Ontario Fire College course calendar discloses that each “full-service” firefighter will require, within the next four years, a basic core competency skillset completed to certification of NFPA 1001-level II, 1072-Operations, and NFPA 1002. These Certifications alone, equate to 268 hours of salaried time. (Cost per firefighter +/- \$11,000). If NFPA qualified instructors are not available, the alternative option is sending firefighters to a Regional Training Center (RTC), thus burdening taxpayers with an additional expense of over \$3,000.00 per firefighter.
- 2) **“Retention and Recruitment”** are both crucial to the sustainability of any firefighting service. It can also be one of the most challenging issues volunteer Fire Departments face throughout rural Ontario.
 - a. Some of the long serving experienced members of our volunteer fire service may simply decide that at this point in their life, they are not willing to take the proposed compulsory NFPA training, and as such, be forced to retire from the fire service. I acknowledge that the proposed regulation discusses “Grandfathering clauses” or “Legacy opportunities”, but these are not guaranteed options and will delay meeting the compliance deadlines, if declined.
 - b. Convincing new recruits to join a Volunteer Fire Service is difficult considering the significant time commitment required that impacts their home/family life, as well as their job/career. Currently, new recruit training (weeknights and weekends), regular weekly training/maintenance nights and attendance at fire calls takes most if not all of a recruit’s free time. Adding the proposed onerous NFPA training requirements to existing training and attendance protocols, will have a profound negative impact on recruitment.

The intent of regulation to implement NFPA standards is sound, as it attempts to improve or enhance public safety. Unfortunately, if volunteer Fire Services throughout Ontario lose existing experienced firefighters and new recruits decide the time commitment required to certify to the NFPA standards is simply too much, the regulation could actually have the reverse effect and potentially decrease public safety.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

For the reasons mentioned above, The Town of X hereby requests that the provincial government revoke the proposed regulation.

- Composite Department. Approximately 8,400 residents.

Member Comment 61

Thank you for the opportunity to respond to the new Mandatory Firefighter Certification Program. With respect to X township, we have a few concerns regarding this program.

1. Being a small rural township, we can only get support from the firefighters for one (1) or two (2) training nights a month as most have employment outside of the township and the usual family responsibilities with which to contend. With this schedule it will be very difficult to get a novice certified within the two (2) year timeframe.
2. It is unclear what happens if a newbie does not get fully certified within that two (2) year timeframe. At that point in time, we have probably spent thousands of dollars with respect to training, so termination would be a waste of time, effort and money. There are numerous reasons why training cannot be completed within two (2) years such as - Covid - lack of Regional Training Centres or required courses - family issues - employment issues - health concerns just to name a few.
3. There is a lack of close Regional Training Centres (RTC) to support X firefighters. The closest is in Y which is two (2) plus hours from X. The next closest are Z or Q which are both three (3) hours or more away.
4. The cost to send firefighters to these locations increases costs significantly from the old Gravenhurst campus cost of \$ 65.00 although the OFMEM will still get its \$ 65.00 per course when firefighters take blended or other courses at the RTC's locations. Courses can cost \$300.00 - \$700.00 or more not including travel and accommodations costs with no monetary support from the OFM.
5. Blended courses create their own issues for rural firefighters. Many of my firefighters do not have access to reliable high-speed Internet. To that end, some do not even have a computer at home, and although I can loan them an iPad, they are obviously not savvy computer savants and require hands-on support when in use.
6. Grandfathering is no longer being considered except under the Ontario Seal Program. I had seven (7) firefighters certified under the grandfathering clause the last time around. I still have five (5) of those firefighters. I need clarification on what process is in place to issue a



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

letter of compliance for these firefighters. I shouldn't have to re-train a firefighter with twenty (20) or more years of service how to carry a ladder.

7. I am not clear on the difference between grand-fathering and legacy firefighters during the transition period.

8. Many of my firefighters just want to put out fires and assist people when they can. They are not generally interested in undertaking a written examination, although they would be proud to physically demonstrate what they know. The written exam may lead to some firefighters leaving the department. Is this step necessary under the Ontario Seal Program?

9. Where will certified trainers come from to provide training assistance to departments? Frequently I have firefighters who are not available to meet on a weekly training night as their construction job keeps them out of the township, sometimes for more than a week at a time. To further exacerbate their training, when they do get home their weekends are full of the things not done during the week. Separate training and testing times would likely have to be established for these workers due to their schedules.

- Volunteer Department. Approximately 2,400 residents.

Member Comment 62

Please find below some comments I would like to pass along regarding the Firefighter Certification Regulation:

1. I feel July 2026 does not give us sufficient time and should be extended. This regulation comes into effect July 2022 and that gives us 4 years to comply. Budgets are set for 2022 and therefore in reality it gives us 3 ½ years. If fire departments are going to use their regular training nights to complete the training and then challenge the exam, I don't feel the 3 plus years is sufficient. If it was extended another 1 year, it might be manageable.
2. That being said, I would like to suggest the two years to train new firefighters to any level takes time and should be extended at least an additional year. When a new firefighter is hired their first year is a learning curve about the fire department in regards to all operations, not just training.
3. We would like to propose that our Mutual Aid Association have a learning contract with the OFM. Our Association could create a "Recruit Program" and conduct the required training for current firefighters that require the training and for newly recruited firefighters. This would allow more flexibility in when the course happens, and we could use our own instructors. This method of training could be used for all courses.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

4. The statement made by Government Officials that it will not cost anymore is incorrect. To add extra training, to prepare individuals, will be costly. As mentioned in our PAC Meeting funding is crucial to this mandatory training program. As mentioned, any funding would be welcomed. I feel an annual grant based on number of Firefighters each Department has would be more beneficial than the grading system used by Government for the 2021 OFM grant. The bigger the city the more money you receive leaving smaller Municipalities smaller amounts granted.
5. I feel it is a major concern that it will be extremely hard to keep our existing firefighters and to recruit new individuals to fill vacant positions. Although all volunteer firefighters know of the dedication needed, to add this to new recruits will deter them from wanting to join unless there is another agenda. If we train them at our expense, they become certified and apply to a career fire department and we lose them. This could also affect the College Fire Service Programs in the province.

Y fire department has half its members certified through the Grandfathering Process. We are looking at having to certify the other half (approx. 13 firefighters). Conducting this training during our regular training nights isn't possible as it would disrupt the training for the grandfathered members. We are looking at sending them to a RTC or hopefully our County wide training done over several weekends (County Recruit Program). I estimated this cost to be approximately \$6,500 per firefighter for Firefighter Level I & II. ($\$6500 \times 13 = \$84,500$). This figure is based on course fees, course materials, firefighter wages and firefighter mileage and other expenses. This doesn't include any of the other training that will be required (pump operators, incident safety officers, Officer Level training etc.).

X fire department has approximately 54 members to be certified. Using the same figures for training to Firefighter I & II ($\$6500.00 \times 54 = \$351,000$) which is not achievable.

Thank you for passing along my comments and I would like to thank you and the OAFC for the tremendous amount of work you are putting in on our behalf.

- Volunteer Department. Approximately 7,600 residents.

OAFC note – The department that submitted this information also mentions a second department. This submitting department is listed as department “Y” while the second department mentioned is listed as department “X”.

Department “X” is also a Volunteer Department with approximately 7,100 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 63

The concerns and challenges that we are going to face are similar to those expressed during the previous townhall meetings by other Fire Chiefs.

1. Fire Fighter Retention – Senior officers and firefighters' may not want to commit to the new training requirements and decide to discontinue their service.
2. Recruitment – With our Municipality being a mix of Urban and Rural volunteer stations, the time commitment to become a volunteer firefighter may limit our ability to attract new firefighters.
3. Timelines – With our municipal budget set for the year an extra year on each timeline would be beneficial.
4. Access to online testing, quicker testing results, online access to booking an evaluator or proctor, and parameters on assisting firefighters conducting written testing that have problems with written testing need to be addressed.
5. Funding – With fire departments entirely municipal tax levy funded, some form of provincial funding would go a long way to cover the added cost of training, training equipment needs and additional resources.

- Composite Department. Approximately 25,000 residents.

Member Comment 64

The OAFIC is requesting input regarding the Ontario Regulation for Firefighter Certification, I would like to provide the following comments.

The X Fire Department fully supports the move to make firefighter Certification mandatory. The Regulation addresses the long-standing need for standardized firefighter training and is a positive move forward in the delivery of fire protection services in Ontario. The Regulation will address the perceived inequities that has existed between the paid-on-call firefighter and career firefighter model for the delivery of fire services in Ontario. All firefighters will be trained to a common standard based on the delivery model chosen by their municipality whether they are paid-on-call or career firefighters.

The move to having all municipalities declare their Level of (Fire) Service is a major step forward as it ensures that the municipal council understands its responsibility to deliver a defined Level of (Fire) Service for the municipality.

The X Fire Department adopted the NFPA Pro-Qual Standards in 2013 and has been certifying all new firefighters to NFPA 1001, FF I&II, and certifying the Officers to NFPA 1021 I&II. The X department also has a few members who were grandfathered to their respective positions.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

I would like to offer the following suggestions for the Board's consideration:

- Reopen grandfathering, the Authority having jurisdiction can do this. This would help to retain current firefighters, who for reasons unknown, did not get grandfathered previously.
- Opening the grandfathering process has the potential to reduce "legacy" firefighters.
- Reducing "legacy" firefighters, will allow municipalities to retain experienced firefighters who would be forced to leave at the end of the legacy period.
- Establish a fire department grant process, to assist all municipalities.
- As an example, the U.S Fire Administration, Assistance to Firefighters Grant requires a municipality to commit a percentage of the total dollars requested. This ensures municipal buy-in and ensures that grant funds are used for the intended purpose. The U.S. Fire Admin. uses a percentage ratio of the funds requested based on the municipality's population. They use 5% for under 20,000 population, 10% for over 20,000 population and 15% for a population over one million. New population ratios need to be established to suit Ontario's needs.
- The grants need to be for multiple years as this is not a one-year process, one grant process.
- Allow the municipal fire services who meet a predetermined criteria to administer the training programs and conduct self-administered testing and marking to reduce wait and processing times.
- The OFMEM should examine the Quebec model for firefighter training and testing. Quebec established mandatory firefighter certification several years ago and administers the training and testing through the Quebec Fire College. The Quebec Association of Fire Chiefs can be contacted for information.

In closing, I want to thank the Board of Directors and OAFC staff for ensuring that the Ontario Fire Service and Fire Chiefs had a chance to understand the proposed Regulation and its impacts on the fire service. The OAFC needs to be commended for hosting the information meetings, collecting the Fire Chiefs comments, and ensuring that the government receives the comments. It's encouraging to see that the OAFC Board of Directors is leading the way on this issue.

- Composite Department. Approximately 14,000 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 65

Subject: Proposal Number: 22-SOLGEN001 – Firefighter Certification

Dear Sir/Madame

We appreciate the opportunity to comment on the proposed regulation and that you are willing to listen to those of us who will be greatly affected by it. As a municipal fire service, we generally support the content of the proposed regulation. We believe, that regulating minimum standards for firefighters in Ontario will improve both firefighter and public safety.

We also acknowledge and appreciate the effort put forth by your office to engage chief officers around the province, in providing several opportunities to receive and understand the regulation. This allowed us to begin planning for the needs of our individual departments. You are to be congratulated.

We Perceive five main barriers to consider for successful implementation:

OFMEM Capacity

In past years the capacity of OFMEM has been eroded, leaving several positions unfilled and causing a disconnect between OFMEM and Fire Chiefs. Although we have noticed significant improvement in recent times, there still may be challenges for you to provide your current services. We were pleased to hear OFMEM's commitment of resources to the success of firefighter certification however, we do remain partially skeptical based on legacy practices of previous administrations.

Training and Testing Processes

There are several ways we feel training and access to training can be improved:

- Amalgamate RTC data bases for ease of finding and registering for courses.
- Open learning contract to multiple departments (piggyback).
- Remove course minimums. It may be difficult to have staff members re-engage after having a course cancelled at the eleventh hour.
- Several training packages still need to be developed.
- Reduce course and test minimums.
- Provide on-line testing. The pandemic has taught us electronic efficiencies.
- Accommodation for alternate testing methods needs to be considered.
- Faster or real time test results should be considered.
- Reduce three-month notice period.
- Bilingual training packages.
- Better tracking of student records. Perhaps I.D. codes rather than names which may be entered incorrectly, i.e.- Joe VanDam, Joseph Van Dam



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Access to Training

One obstacle the OAFC and our members believe must be overcome for this proposed Regulation to succeed is access to timely and affordable training including specialty and high-risk training such as those found in Technical Rescue. This in large can be addressed by ensuring effective and sustainable TRC models.

Costs and Funding

The OFMEM mentioned an administration cost in the initial presentation. We are not confident in the accuracy of that statement. After reviewing and revising E&R By Laws where applicable, each municipality must plan for the financial impacts to their own department. This may be difficult to immediately quantify. One thing for certain, the regulation comes into effect halfway through the fiscal year. An immediate one-time grant in 2022 needs to be made available to bridge our next budget cycle.

Recruitment and Retention of Volunteer Firefighters and Chiefs

X is a career department and is not affected by this heading however, all remaining departments in Y County are volunteer. In the last 30 days I have a new appreciation of the impacts FF Certification has on those departments. I am not in the position to comment but ask that you listen to and consider their position.

Other Considerations

In many of Ontario's Fire Departments the Chief Officers are the primary incident commanders and while the NFPA 1021 curriculum includes some incident command content, however it is minimal, and the regulation does not capture the necessary training related to strategy and tactics. It is recommended that additional Incident Command and Strategy and Tactics training be offered by the OFMEM.

The OFMEM should develop information packages and easy to use flow charts for Fire Chiefs to better understand certification and the certification process (i.e., full-service fire departments follow this path, exterior attack fire departments follow this path, if you are grandfathered in this standard follow this path, if you are not grandfathered follow this path etc.).

The OFMEM should convene meeting(s) with all RTC Operators to maintain consistent oversight and to discuss and resolve RTC concerns that are being brought to the attention of the OFMEM, RTC Operators or both.

The Ontario Fire College should make the NFPA 1006 Awareness level training content (for each of the disciplines) available to all Fire Departments to ensure that their staff are trained, and therefore safe, in each discipline at no charge.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

The OFMEM needs to ensure that the correcting of previous inaccurate test bank questions is complete, and that training, and testing is being done to the most current NFPA standards. Being two NFPA standard cycles behind and having inaccurate questions based on other countries information in the test bank is problematic.

- Full-Time Department. Approximately 71,600

Member Comment 66

Our area needs an RTC locally where our members can come home every night. With younger firefighter's the spouses will not tolerate their spouse being away for the length required for courses. This would also assist with the cost incurred by the municipality for lodging and mileage.

One of our other concerns is the certification required for extrication we will not be sending anyone away for a one-week course to get operations level, if we can't continue to train in house, we will discontinue extrication.

- Volunteer Department. Approximately 3,000 residents.

Member Comment 67

I would like to emphasize that to meet the expectations of the regulations there will have to be accommodations made for training from outside for many small departments. While training is available or is being planned for, the issue will be time and cost. For small, isolated departments, travelling to regional training centers is not an option. By the time courses are set and slots are available for these firefighters, circumstances have often changed where the firefighter can no longer attend. Also, the cost of travel and accommodations as well as the course cost itself puts the training well beyond the funding available from the community.

Internet based training works to some degree but for hands on training there must be boots on the ground. Not all areas have reliable internet and within areas that have internet there are pockets where internet is not available. The issue often is topography. Our fire hall would require a 60-foot tower to have a reliable connection. Even the cost of internet is a significant cost for a small department.

I would like to suggest that there be training officers available through the OFM who could move from department to department in an area and who would be responsible for the training of personnel and the preparation of records. An alternative would be that funding be provided through the OFM to a group of departments who could then hire trainers to do the same.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Assistance in training would free up officers to manage the fire department services, as the burden of providing services and training is simply not sustainable. Without training assistance many small departments will simply fade away, leaving their communities with no fire protection and negating all of the efforts made by the OFM in developing local fire protection during the past forty plus years.

- Volunteer Department. Approximately 60 families year-round with summer growth.

Member Comment 68

Funding for the fire service to achieve the new regulation. Access to e-testing at all fire departments. Clarification on auto extrication in FF 2 and 1006. Legacy for pump ops, or pump ops on go forward. Unachievable to certify whole province in it by deadline.

Tech rescue deadline is tight for programs not already written and approved to the new standard. Extend dates.

Ability for OFMEM to be able to support this regulation.

Provide the fire service with clear direction on programs preapproved (i.e., IFSTA no assessment checklist required by ASE) More flexible testing requirements from ASE, 3 months notification does not lead well to some tech rescue scenarios where water conditions may change through out the year.

- Full-Time Department. Approximately 84,000 residents.

Member Comment 69

Proposal Number: 22-SOLGEN001 – Firefighter Certification

Dear Sir/Madame

We appreciate the opportunity to comment on the proposed regulation and that you are willing to listen to those of us who will be greatly affected by this proposed regulation. As a municipal fire department, we respect the content of the proposed regulation. We believe, that regulating minimal requirements for firefighters in Ontario will improve both firefighter and public safety.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

In past years the capacity of OFMEM has been eroded. The fire service is skeptical about the ability of OFMEM to provide the necessary support for this regulation to be successful. Significant staffing shortages and reduced resource funding exist and will require a substantial investment to meet the requirements of this regulation. We find the current approach to provincial training and regional training centers (RTC), difficult to navigate and a more refined and easier to follow system needs to be available to fire department to ensure success.

Adequate access to training courses and resource materials poses a significant barrier for departments that have limited personnel and resources. To insure fair and equitable implementation of the regulation fire departments need the support of the OFMEM to access the required resources. If this not done the process will not be successful.

Additionally, the Academic Standards and Evaluation (AS&E) section of OFMEM will need to offer on-line testing at times and locations readily accessible to volunteer firefighters. A web-based solution should be considered to make the testing available wherever sufficient connectivity exists. The minimal number of firefighters required by AS&E for a proctored test should be dramatically reduced or eliminated. The use of **in-house** proctors, that are not associated with the training, should be considered as a best practice.

Furthermore, accommodating the current firefighter that cannot complete theory testing will require further clarification. Accommodation to this point has just been an extension of time to complete the exams. In the volunteer fire service, there are individuals who are competent firefighters who require different accommodation resources to meet a certification standard. Not developing appropriate accommodation processes to certify, will affect recruitment and retention in the volunteer fire service.

Some course content is currently not available for all the certifications required in the regulation. This will need to be rectified as it is essential that the fire service needs to “get going” once the regulation is finalized and approved.

The costs associated with the introduction of this regulation will be significantly more than what has been discussed. During the OFMEM “technical briefing” it was apparent that there was little appreciation as to the cost to implement. What can be accomplished on a “training night” is grossly overestimated by some. The current in-service training provided to our firefighters is already stretched to the limit because of required content. This training is supportive, but not conducive to preparing a member for a certification exam. The certification training and testing will not only have a substantial financial impact on fire departments, but it will also have significant impact on the time and availability of fire fighters many of whom are trying to balance personal lives, work and firefighting. Just because a member passes an exam and is signed off for performing the task one time does not mean that person is proficient at the skill, additional training hours are requirement to master these skills.

The adoption of the current regulation will result in significant costs and logistical challenges to the municipality. An annual grant (possibly a matching grant with the municipality) based upon



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

a formula to off-set the cost would assist the fire service to comply with the regulation. The grant amount should be based upon the size and level of service provided by the fire department rather than just population. It must also be recognized that the costs will be ongoing and that a one-time injection of funds will not support the long-term implications of this regulation and its success.

The proposed regulation does provide flexibility for the various “service models” for the provinces fire services. Utilizing the NFPA standards to determine the certification requirements is logical. The recognition of past “grandfathering” is essential to enable departments that have already invested time and money in training of their personnel. We must also insure many of the senior members of the fire departments can continue to serve their communities. Reopening “grandfathering” should be reconsidered in light of the new regulation.

Recruitment and retention of firefighters in a non-career department has been extremely difficult in recent years. The increased demands that this regulation and the negative affect it will have on attracting people to the service must be recognized. Additional recruitment and retention resources need to be developed to insure the successful implementation of this regulation and the long-term success of the fire service in general. We also feel that the current timelines proposed in the regulations for certification are not realistic and need to be extended to ensure it success.

We would also like you to keep in mind that we are heading out of a global pandemic and the financial burden that has affected our province and municipality is something we have never seen in our times, our community is just beginning its long road to financial recovery.

Thank you very much for the opportunity to share our concerns about the proposed regulation.

- Composite Department. Approximately 2,000 residents.

Member Comment 70

Re: New Training Requirements for all Firefighters

After several meetings and presentations from all of the stakeholders, the Town of X fire department would like to address the following matters regarding the certification; First of all, we are for a higher standard of training and commitment to same. These training protocols and standards allow us to serve our community effectively and efficiently.

Our concerns lie with the next five foundations which will be onerous for a small volunteer department.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Our training budget is limited and must be approved by two separate levels of municipal governance. The costs involved to bring our 60 firefighters to the certifications currently under review and consultation would be an extreme financial burden to our town. Accessible and significant funding should be made available to offset these costs.

Access to training both online and in class is currently a difficult obstacle for our department to scale. Course delivery must be made available to account for the demands placed on volunteer attendance within the limited number of open courses. In addition, these courses must be offered in geographical areas that meet the needs of the smaller departments and municipalities.

Our department does train to NFPA standards when we can and where we can find outside training opportunities. We welcome the occasion to define and enhance our skill sets. Outside training resources should be made available to departments to ensure they meet the compliance standards.

Once the training has been completed, we should have a testing process that is consistent and accessible to all firefighters. Accommodations need to be made to augment the process and that requires more than just 50% more time. Add to this the opportunity for electronic testing and instant results and we will be heading in a better direction.

As stated earlier, the OFMEM must be able to support and deliver courses in greater numbers and availability. In saying this, we realize the OFMEM must have the means to do so. They should be supported by the province to ensure that the lack of resources does not hinder the advancement and continued training of our firefighters.

Finally, yet hardly the least important, is the retention and recruitment of firefighters. As we have heard throughout this consultation process, many departments have experienced and long service firefighters that have given many years of service to their community and are quite well versed in wide range of firefighting disciplines and yet have never certified to the NFPA standards. We believe this will be a real challenge for our department, if we are required to enforce the proposed regulation. Veteran firefighters may rethink and possibly leave the service and their experience and leadership cannot be replaced. Perhaps another grandfathering opportunity would help to alleviate this problem. Add to this scenario that recruitment and the time it will take to have new firefighters certified will hinder the enrollment process in our area.

In closing, we want to work with all of the relevant parties to help this process move forward and we appreciate the opportunity to be involved in the consultation process.

- Volunteer Department. Approximately 7,600 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 71

1. Beginning in 2023, a predictable and meaningful annual grant for all fire departments to ensure sustained training for the duration of the implementation timelines of this Regulation. This funding should be based on the size of the department, number of firefighters, and the number and level of fire protection services provided. Funding could be conditional on submitted training plans, training documentation, completed community risk assessments and achieving letters of compliance and/or NFPA certifications.
2. Recruitment and retention - Assist local Municipalities with recruitment, possibly grant can be attached to recruitment for the 200 hours of training for certification. OFMEM update the Volunteer Firefighter Recruitment and Retention Guide to assist volunteer fire departments that are struggling with recruitment and retention.
3. Course waitlist needs to be addressed with more availability.
4. Regional Training Centers - in areas where there are not regional training centers provide assistance in setting up some annual training in the areas.
5. In House proctors, which would assist greatly in moving the certification forward and maintain the system
6. Remove the \$65.00 Ontario Fire College Fee for training conducted outside of the College.
7. The OFMEM restore the Chief Officer Executive Seminar, that was held at the Ontario Fire College, at an alternate location to provide Chief Officers on-going training supports on items such as establishing levels of service, updating Establishing and Regulating by-laws, implementing certification and more. A template of Establishing and Regulating By-Law with examples of different levels of service to standardize fire service requirements across the province. The OFMEM should immediately develop and deliver training for Chief Officers and Council's on establishing the levels of service and updating Establishing & Regulating By-laws
8. The need to first revise their Establishing and Regulating Bylaw to be able to know which fire protection services will be established by Council and noted that this process will align with the Community Risk Assessments (CRA) to be completed by 2025. Suggested an additional year for each (5-7 years as opposed to 4-6 years), the longer timelines would allow communities to utilize the CRA as the guide to complete the certification process.
9. Not within the Regulation itself, but within the accompanying commentary, it should be confirmed that anyone previously grandfathered to Firefighter Level 2 includes Hazmat Operations.

X Fire and Rescue fully supports certification.

- Composite Department. Approximately 20,500 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 72

Proposal Number: 22-SOLGEN001 – Firefighter Certification

Dear Sir/Madame

We appreciate the opportunity to comment on the proposed regulation and that you are willing to listen to those of us who will be greatly affected by it. As a municipal fire service, we generally support the content of the proposed regulation. We believe, that regulating minimal requirements for firefighters in Ontario will improve both firefighter and public safety.

In past years the capacity of OFMEM has been eroded. The fire service is skeptical about the ability of OFMEM to provide the necessary support for this regulation. Significant staffing shortages and reduced resource funding exist and will require a substantial investment to meet the requirements of this regulation. The current “hodge-podge” approach to provincial training and regional training centers (RTC) advertising, and then seeking approval to conduct course, followed by individual application, and costing models, makes it very difficult for a fire service to plan and succeed at current training levels. The proposed regulation will require a more unified approach to be successful.

Adequate access to training courses and resource materials poses a significant barrier for departments that have limited personnel and resources. To insure fair and equitable implementation of the regulation fire departments need the support of the OFMEM to access the required resources. If not supported, a patch work of training and a duplication of efforts will result in an unworkable situation and a lack of consistency in implementation of the regulation.

Additionally, the Academic Standards and Evaluation (AS&E) section of OFMEM will need to offer on-line testing at times and locations readily available for volunteer firefighters. A web-based solution should be considered to make the testing available wherever sufficient conductivity exists. The minimal number of firefighters required by AS&E for a proctored test should be dramatically reduced or eliminated. The use of in-house proctors, that are not associated with the training, should be considered as a best practice.

Furthermore, accommodating the current firefighter that cannot complete theory testing will require further clarification. Accommodation to this point has just been an extension of time to complete the exams. In the volunteer fire service, there are individuals who are competent firefighters who require different accommodation resources to meet a certification standard. Not developing appropriate accommodation processes to certify, will affect recruitment and retention in the volunteer fire service.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Some course content is currently not available for all the certifications required in the regulation. This will need to be rectified as it is essential that the fire service needs to “get going” once the regulation is finalized and approved.

The costs associated with the introduction of this regulation will be significantly more than what has been discussed. During the OFMEM “technical briefing” it was apparent that there was little appreciation as to the cost to implement. What can be accomplished on a “training night” is grossly overestimated by some. The current in-service training provided to our firefighters is already stretched to the limit because of required content. This training is supportive, but not conducive to preparing a member for a certification exam. The certification training and testing will not only have a substantial financial impact on fire departments, but it will also have significant impact on the time and availability of fire fighters (many of whom are trying to balance personal lives, work and firefighting).

The adoption of the current regulation will result in significant costs and logistical challenges to the municipality. An annual grant (possibly a match grant with the municipality) based upon a formula to off-set the cost would assist the fire service to comply with the regulation. The grant amount should be based upon the size and level of service provided by the fire department rather than just population. It must also be recognized that the costs will be ongoing and that a one-time injection of funds will not support the long-term implications of this regulation.

The proposed regulation does provide flexibility for the various “service models” for the provinces fire services. Utilizing the NFPA standards to determine the certification requirements is logical. The recognition of past “grandfathering” is essential to enable departments that have already invested time and money in training of their personnel. We must also insure many of the senior members of the fire departments can continue to serve their communities. Reopening “grandfathering” should be reconsidered in light of the new regulation.

Recruitment and retention of firefighters in a non-career department has been extremely difficult in recent years. The increased demands that this regulation and the negative affect it will have on attracting people to the service must be recognized. Additional recruitment and retention resources need to be developed to insure the successful implementation of this regulation and the long-term success of the fire service in general.

Thank you very much for the opportunity to share our concerns about the proposed regulation.

- Volunteer Department. Approximately 2,400 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 73

For feedback on the proposed regulation and concerns from the public, including the Municipalities. Some areas we have identified from the Town of X perspective are as follows:

- There is currently no ongoing governmental funding for Municipal Fire Services. The Fire College was closed in 2021 and where possible, the OFMEM is transitioning to online theoretical learning modules, or courses through Regional Training Centres. However, it is important to note that most of these certification levels also include practical components that need to be completed. As noted in the May 2021 Fire Master Plan in relation to the X Training Division, "the training division is currently struggling to meet its established service delivery and programming. Part of this issue is the availability of one CTO and one TO" (p. 87). To meet this increased workload, as part of the X three (3) year implementation plan for the Fire Master Plan, it is recommended that an additional Training Officer be hired in the 2023 calendar year.
- In order for the fire service to maintain our current training and continue to achieve and maintain the proposed certification levels, we need the OFMEM to allow our department to conduct more in-house e-testing and evaluations of our staff. Presently the ability to have in-house evaluators by the OFMEM is extremely limited. Additional costs are also charged by the OFMEM for sending Evaluators to Fire Departments to conduct the testing and or evaluations.
- There will be additional costs attributed due to sending X personnel to Regional Training Centres for courses that are not hosted internally such as higher-level officer courses and certain specialty courses. As detailed above, staff are putting together information to map out our progress toward compliance, additional costing due to certification and an increase to training.
- Presently, we need to purchase the resources for NFPA courses including test books, standards and job performance requirements to ensure that we meet the requirements to train and certify our firefighters. We suggest that the government could supply these items to the Fire Service through the OFMEM at no charge to municipalities. This would reduce some of the increase in cost over the next several years.
- On February 14, 2022, the OAFIC formally submitted a 2022 Ontario Government Submissions requesting that the Province of Ontario create an annual funding grant to offset the increased training costs due to the introduction of Certification and the mandatory minimum training standards.

X Services strongly supports the OAFIC in this position.

- Full-Time Department. Approximately 122,000 residents.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Member Comment 74

Subject: ONTARIO REGULATION to be made under the FIRE PROTECTION AND PREVENTION ACT, 1997: FIREFIGHTER CERTIFICATION

The X Fire Department (XFD) supports all initiatives that contribute to the health and safety of our staff and the residents we serve, including the implementation of mandatory certification for the Ontario Fire Service.

As a progressive organization we recognize the critical importance of evolving our policies and procedures in lockstep with evidence-based best practices and making good on our commitment to continuous improvement. This applies to all aspects of our service delivery, including resource deployment, public education and code enforcement programming, emergency response and mitigation, logistics, planning and administration, and of course the training component that undergirds and ensures the necessary competencies to perform efficiently and effectively in these areas.

The draft regulation introduced on January 28, 2022, purports to establish and regulate standards of certification for firefighters across several disciplines. In the content below the XFD would like to identify the areas of concern that we have along with suggested remedies for consideration.

Throughout the last 26 days of the 30-day public consultation process much time has been spent attending technical and townhall meetings to gain a fulsome understanding of the draft regulation and the pending impact on the XFD. To say this has been a challenge would be an understatement considering the significance and magnitude of effect the regulation will have on the Fire Service. We are still uncovering nuances of the regulation and trying to determine the overall impacts.

- *The XFD would respectfully request consideration be given to providing an additional month of consultation to allow Fire Departments to better understand the potential impacts (operationally and financially) that will be realized.*

During online information sessions conducted by the Office of the Fire Marshal, assurances were made regarding supports that would be provided by that office – specifically, the availability of Proctors and Lead Evaluators to conduct testing, access to online testing for agencies, the hiring of additional personnel within the Academic Standards & Evaluation section to cope with the increased administrative workload, alternate processes that would recognize existing legacy compliance and provide avenues for certification based on experience and/or proof of training (i.e. grandfathering, which is a critical requirement for implementation success for local Fire Departments), and timelines that would not create hardship or impose financial burden.



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

- *The XFD is very concerned that our ability to be successful in meeting the mandates / timeframes of the proposed legislation will be contingent on the OFM's ability to provide us the required resources/processes they have assured we would receive. If the OFM enacts all assurances they have made and makes resources/processes available on or before the implementation date of the regulation, it would provide us with a greater level of confidence in our ability to achieve success in meeting the requirements of the regulation. The XFD respectfully requests consideration be given to this.*
- *As an alternative to the above, the XFD respectfully requests consideration be given to providing the X Fire Department the applicable delegated / designated authority and access to the electronic testing system prior to the implementation date of the regulations, thus providing us the ability to test and evaluate our own staff in house as required.*
- *If enactment of all assurances will not be available as of the regulation implementation date, the XFD respectfully requests consideration be given to adjusting/moving the compliance deadlines to a date reflective of all resources / processes being in place.*

Most concerning is a reversion to multiple standards: full NFPA mandated certification for some agencies based on certain criteria, and a lesser "Ontario Seal" compliance for others. After decades of moving the province towards the globally recognized NFPA standard, we are taking a precarious step backwards. The establishment of multiple tiers of competency will impact individuals and organizations alike. Additionally concerning, is that agencies mandated to certify to NFPA standards are not being certified to the most current standards.

- *The XFD respectfully requests consideration be given to using the most current NFPA standards in force on the date of implementation of the regulation, and that the implementation date be deferred until appropriate training materials and resource commitments are made available by the OFM.*
- *The creation of an Ontario Seal qualification (modified version of NFPA) holds limited value as it will not be recognized outside of the province (limiting professional development opportunities) and ineligible to be used as prerequisites for future required NFPA courses. The XFD respectfully requests the concept of an Ontario Seal be modified and/or adjusted to address these concerns.*
- *The regulation is silent on how jurisdictions claiming different service levels/certification standards (NFPA vs. Ontario Seal) could be impacted during mutual and automatic aid interactions. The XFD is looking for clear direction on how situations are to be dealt with when Fire Departments having different services levels respond and work together at the same emergency scenes.*
- *The XFD is concerned that a municipality's determination of service levels and types of fire protection services their Fire Department will provide will be based on the certification level they can afford and / or accomplish, rather than the Community's Hazard Identification Risk Assessment and respective need.*



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

Under the proposed regulation, the X Fire Department is classified as a full-service agency due to the type and degree of our service response level. We deliver service across our geographic boundaries using career, composite, and volunteer models, however all regions of the municipality benefit from the same hazard response mitigation capability (fire suppression, hazmat, high-angle rope rescue, auto-extrication, etc.) This mandates that all personnel are trained equally, and with respect to the proposed regulation – will need to hold full NFPA certification.

- *The workload to collect, collate, verify, prepare and submit documentation to reconcile XFD personnel certifications and legacy compliance with AS&E records is substantial. Pending the results of that process, we must then formulate a plan to train (and possibly re-train) personnel to the requisite NFPA standards. The timelines provided in the proposed regulation to achieve compliance have been termed “plentiful”. Objectively, it is unlikely that XFD can fulfil its obligations under the current draft regulation language, especially given the training dynamics of a composite workforce. The XFD respectfully requests consideration be given to the adjustment of the compliance timeframes to reflect an additional one year (from time of regulation implementation) being added to all proposed compliance dates and that consideration be given to the implementation of net-zero cost financial assistance program for participating departments.*
- *It is unclear whether previous letters of compliance (grandfathering) with NFPA standards will continue to be recognized in the same capacity as was originally stated in 2016. The XFD respectfully requests consideration that the OFM re-affirm the validity of prior grandfathering in perpetuity by issuing certificates with IFSAC seals to letter of compliance holders.*
- *Rather than using a go-forward date that acknowledges and maintains qualifications obtained prior to an implementation date, some qualifications will be retroactively affected (i.e., the Hazmat portion of Firefighter 1002 certification.) The XFD respectfully requests consideration be given to setting an implementation date following the consultation period with no retroactivity. We are requesting that all certifications and letters of compliance issued prior to this date remain integrally and wholly valid as at their date of issue.*
- *The regulation includes Exceptions that are vague and don’t provide specifics about terms like “temporarily assigned”. The XFD respectfully requests consideration be given to drafting and including a glossary of definitions to be inserted at the beginning of the regulation.*
- *The regulation uses language that the XFD believes has the potential to create labour relations issues – specifically relative to the definition of “supervision of a firefighter”. The XFD respectfully requests consideration be given to additional consultation with legal counsel and/or a labour relations committee to ensure language is clear and not subject to misinterpretation by employers and their representatives, or to misappropriation by existing collective agreement language.*



ONTARIO ASSOCIATION OF FIRE CHIEFS

Leading innovation and excellence in public and life safety

In closing, the XFD acknowledges and endorses that there is tremendous value in creating a holistic framework for firefighter training and certification in Ontario. We strongly believe that the current draft regulation, modified and/or enhanced according to input and feedback such as provided above provides a solid framework for this to happen. We look forward to continuing to work with the Government and the OFM to ensure the success of this initiative.

Thank you in advance for your consideration of our concerns and potential remedies.

Composite Department. Approximately 580,000

CONFIDENTIAL