

SENT VIA EMAIL (premier@ontario.ca)

June 1, 2022

The Honourable Doug Ford
Premier of Ontario
Legislative Building
Queen's Park
Toronto, ON M7A 1A1

Dear Premier Ford,

RE: Annual Emergency Exercise Exemption

On behalf of The District Municipality of Muskoka, I am writing to express key concerns regarding the requirement for Ontario municipalities to conduct an annual practice exercise for a simulated emergency incident as prescribed by Regulation 380/04. The simulations aim to validate response plans and procedures, train staff and identify areas of improvement to ensure emergency response is delivered at optimal levels. Exemptions are not currently permitted under this legislation. While the District of Muskoka acknowledges and supports the need for emergency exercises, Muskoka District Council strongly encourages the amendment of Regulation 380/04 to permit exemptions for municipalities who have responded to an actual emergency during the respective calendar year. A copy of the District's Health Services Committee resolution, as adopted by Muskoka District Council, is attached as Appendix I.

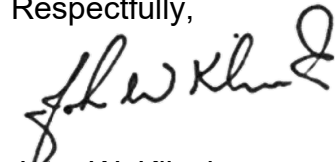
In 2021, The District's Emergency Control Group (ECG) convened twenty-four (24) times amounting to approximately 435 hours spent on emergency related activities. One of these incidents involved a watermain break in the Town of Bracebridge. Murray Advisory Services performed a critical analysis of the event and confirmed that the goals of an emergency exercise were achieved. The firm's final report included twelve (12) recommendations that helped improve the outcomes of a second water disruption event in the Town of Gravenhurst a few weeks later.

Despite the volume of actual emergencies managed by the ECG, the District of Muskoka must still conduct an annual exercise to remain compliant with the Regulation. This is not an efficient use of municipal resources and does not serve as a useful training mechanism for staff who have been over-extended by the emergency situations they have managed over the past year.

The Solicitor General granted a one-time exemption to municipalities in 2020 recognizing that municipalities were actively engaged in and managing various COVID-19 related initiatives. If pandemic management warrants an exemption to the annual simulation, surely there must be grounds to grant an exemption for the management of other emergency situations.

On behalf of Muskoka District Council, your consideration of this matter is appreciated.

Respectfully,

A handwritten signature in black ink, appearing to read "John W. Klinck". The signature is written in a cursive, flowing style.

John W. Klinck
District Chair

THE DISTRICT MUNICIPALITY OF MUSKOKA

Cc: Honourable Steve Clark, Minister of Municipal Affairs and Housing
Honourable Sylvia Jones, Solicitor General
Norm Miller, MPP Parry Sound-Muskoka
All Municipalities in Ontario

Appendix I

R10/2022-HS

The District Municipality of Muskoka

Health Services Committee
February 24, 2022

Moved By: J. Klinck

Seconded By: R. Nishikawa

WHEREAS Ontario Regulation 380/04: Standards under the Emergency Management and Civil Protection Act sets the municipal standards for emergency management programs in Ontario and requires municipalities to conduct an annual exercise with their Emergency Control Group in order to evaluate the municipality's emergency response plan and procedures, O. Reg. 380/04, s. 12 (6);

AND WHEREAS Emergency Management Ontario previously granted municipalities exemption for the annual exercise requirement when the municipality experienced an actual emergency with documented proof of the municipality actively engaging their emergency management procedures and plan in response to the emergency;

AND WHEREAS on August 5, 2021 the Chief, Emergency Management Ontario (EMO) issued a memo to Community Emergency Management Coordinators stating that effective immediately, the Chief, EMO would no longer be issuing exemptions to the O. Reg. 380/04 requirement to conduct an annual exercise;

AND WHEREAS municipalities experience significant costs and burden to staff resources when faced with the response to an actual emergency and activation of their Emergency Control Group and/or Emergency Operations Centre;

AND WHEREAS a municipality's response to an actual emergency is more effective than an exercise in evaluating its emergency response plan and procedures as mandated by O. Reg. 380/04;

Appendix I

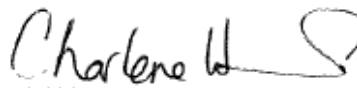
The District Municipality of Muskoka

AND WHEREAS planning, conducting and evaluating an emergency exercise requires significant time and effort for the Community Emergency Management Coordinator and Municipal Emergency Control Group that is duplicated when the municipality experiences a real emergency;

NOW THEREFORE, BE IT RESOLVED THAT Muskoka District Council hereby **requests** the Province of Ontario to amend Ontario Regulation 380/04 under the Emergency Management and Civil Protection Act to provide an exemption to the annual exercise requirement for municipalities that have activated their Emergency Control Group and/or Emergency Response Plan in response to an actual emergency that year in recognition of the significant resources used to respond to the emergency and the effectiveness of such response in evaluating the municipality's emergency response plan and procedures;

AND THAT a copy of this resolution **be forwarded** to the Honourable Doug Ford, Premier of Ontario; the Honourable Norm Miller, MPP for Parry Sound-Muskoka; the Honourable Steve Clark, Minister of Municipal Affairs and Housing; the Honourable Sylvia Jones, Solicitor General; and all other municipalities of Ontario.

Carried ✓
Defeated


Deputy Clerk