

File:

0400-20/2023/EMCR

The Honourable George Heyman
Ministry of Emergency Management and Climate Readiness
PO Box 9010 Stn Prov Govt
Victoria, BC V8W 9E2

Dear Minister Heyman:

Re: Emergency and Disaster Management Act

I write to you on behalf of the Cariboo Regional District Board of Directors to express our concerns, feedback, and hopes for the regulatory framework of the *Emergency and Disaster Management Act*. As you know, the Cariboo-Chilcotin region has faced at least one major emergency event in each of the last five years, with the sole exception of 2022, to respond to wildfires, floods, landslides, and the COVID-19 pandemic. Each of these disasters has disrupted regular business across our region, impacting 63,000 citizens living throughout 80,000 square kilometres of the Dakelh, Secwépemc, and Tsilhqot'in's unceded traditional territories.

We do not object to our public safety responsibilities under the new Act. Our emergency program already practices many of the principles enshrined under the new Act because of our geographic and cultural context. However, we are concerned by the pace of change, the increased expectations on rural regions and small communities, the capacity other agencies to work with us, and the availability of resources to meet our new responsibilities under the new Act.

The new *Emergency and Disaster Management Act* reflects very little of local governments' feedback. Much of the new Act does not reflect the realities of emergency preparedness, mitigation, response, or recovery needs for rural and remote communities. Various requirements, including those related to hazard identification and risk mitigation, are framed within the context of defined and contained urban centres, as opposed to disparate communities across rural areas. For example, the Act prescribes responsibility for Crown lands to local governments, without a funding or management mechanism in support of this responsibility. Areas for which we have no legal or regulatory authority over, and for which no funding or management model exists, will now become our responsibility when disaster strikes, despite a clear lack of authority or capacity to do so.

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We also question our response partners the level of readiness, including Provincial ministries, agencies, and corporations. The Act prescribes new responsibilities onto local governments for lands and programs that are within the jurisdiction and authority of other public sector bodies, including the Ministry of Social Development and Poverty Reduction, the Ministry of Transportation and Infrastructure, BC Parks, the various health authorities, and various others. We have observed that they are often lacking in their level of preparedness, willingness to participate in a unified command structure, and ability to engage in a high level of interoperability. This often begins with a breakdown in early communications as many of these organizations do not designate a duty-officer or provide information about how to contact them outside of regular operating hours. A high level of coordination, cooperation, and interoperability will be required to manage our new responsibilities, and it will begin with a strong foundation based in effective communications and preparedness.

We are also concerned about the capacity and readiness of all local parties to reciprocally engage with emergency planning. The Act requires local authorities to make a “reasonable effort” to reach agreements with each Indigenous Governing Body on how we cooperatively manage emergencies in our region. However, each local government and First Nation have small numbers of staff and have several other pressing and challenging issues to divide their attention towards. There are also several overlapping claims between each First Nation, which we will require clarity and direction for from the Province, as representatives of the Crown. Overall, we're concerned that the Act and future regulations won't fully consider the time needed to strengthen and grow our regional partnerships. This is essential for working together to create improved emergency management plans that address the needs and interests of each affected local government and First Nation.

We ourselves lack the resources to support our transition under the new Act. Our Emergency Program Services have five full-time staff who are fully engaged in meeting our current obligations, and do not have capacity for increased workload. We need time to forward ideas for a policy framework and staffing to engage with fifteen First Nations councils and three national governing bodies. To be effective in meeting the new Act's requirements, we need ongoing, sustainable funding from the Province to increase staffing resources, fund further training activities, and effectively co-develop emergency plans informed by effective hazard identification and assessment. Without this funding, we fear our ability to meet the requirements of the Act, and the provisions for enforcement and financial penalties for local authorities which fail to meet requirements under the Act. This only serves to diminish the work we have already been doing to foster collaborative relationships.

Our current level of staffing cannot keep pace with these changes. We expect we will need to at least double the number of staff dedicated to emergency management to meet the requirements of the new act. Without new, ongoing, and sustainable funding, increased costs to hire and house new staff to meet our new obligations will represent a substantial increase in taxation for residents. Already, we struggle to meet increasing demands on our citizens to fund provincial critical infrastructure rehabilitations, new services for growing populations, meet inflationary costs to maintain our services, and respond to climate change impacts.

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This will only add to a myriad of financial pressures on our residents during a time of significant economic adversity. Our forestry industry, the prime economic driver in our region, is facing continued challenges with access to fibre and sustainable supply; high interest rates increasing debt servicing costs for our residents; and unsustainable levels of inflation making every day living more costly. Our region also experiences secondary economic impacts in the wake of ongoing disasters in the form of lost fibre supply, devastation of natural landscapes that would draw tourists, and a loss of tourism activity because of wildfire activity.

We trust that these concerns, and the concerns of other regional districts, make clear that the Act's ambitions do not reflect governance or emergency management in an appropriate context for us. Our emergencies encompass large areas, impact multiple communities, involve multiple external parties and competing interests, and already spread our resources and staff thin. The absence of any process to consider the unique needs and concerns of regional district impairs the Act's ability to successfully modernize emergency operations at the local level. A regional district working group would provide a better platform to bring attention to these needs and inform improvements to the existing legislation.

The pace of change reflected under this Act and the subsequent regulations will impair local governments' abilities to be flexible and responsive on numerous fronts. Significant resources must be reallocated to address emerging priorities created by this and other legislation. We ask that the Province reconsider its present approach and implementation timeline to allow for engagement with a working group consisting of Regional Districts and establish a framework for consistent and ongoing funding for local governments. Doing otherwise erodes the ability of all parties to meet obligations and commitments under the new Act.

Respectfully,


Margo Wagner
Chair of the Board of Directors

- cc. Honourable David Eby, Premier
Lorne Doerksen, Member of the Legislative Assembly of B.C. (Cariboo-Chilcotin)
Coralee Oakes, Member of the Legislative Assembly of B.C. (Cariboo North)
Todd Doherty, Member of Parliament (Cariboo-Prince George)
Mayor Surinderpal Rathor, City of Williams Lake
Mayor Ron Paull, City of Quesnel
Mayor Maureen Pinkney, District of 100 Mile House
Mayor Ed Coleman, District of Wells
Union of B.C. Municipalities
North Central Local Government Association
All Regional District Boards

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