



Dufferin County

Multi-Jurisdictional Fire Prevention and Protection Modernization Plan



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ACRONYMS

AHJ	Authority Having Jurisdiction
CFES	Caledon Fire and Emergency Services
DFD	Dundalk Fire Department
EFD	Erin Fire Department
FSB	Fire Service Board
FUS	Fire Underwriters Survey
GVDFD	Grand Valley and District Fire Department
MMFD	Mulmur-Melancthon Fire Department
NFPA	National Fire Protection Association
OFD	Orangeville Fire Department
POC	Paid-on-Call
RDFD	Rosemont District Fire Department
SDFD	Shelburne and District Fire Department



SECTION 1

Preface

SECTION 1: PREFACE

County Background

Nestled in Central Ontario, Dufferin County spans an area of 1,486.31 square kilometres and is home to 66,257 residents, according to the 2021 census. Established as the Provisional County of Dufferin in 1881, it was carved out from portions of Grey, Simcoe, and Wellington counties. Looking ahead, the 2017 Official Plan projects that Dufferin County's population will rise to approximately 81,000 by 2036, marking an anticipated 18% increase. Detailed population projections for each of the county's eight municipalities are provided in the table below, which incorporates both the initial estimates from the Dufferin County Official Plan and updated figures from Statistics Canada.

Industrial Revolution of Fire Service ¹

The fire service's history dates back to the relics of portable water pumps found in ancient Egypt. The first organized fire service recorded in history began in Rome under the rule of Augustus Caesar over 2,000 years ago; groups of enslaved people were dispatched through the night, in charge of watching for fires and crime – herein the fire brigade was born.

Throughout ancient times, firefighting equipment evolved along with the demand for better firefighting services. Insurance companies began supporting local fire brigades which in turn protected insured buildings. By the 1900s, the need for governance by municipal and district partnerships became evident. Mid-century expansion of urban areas, changes in government responsibilities, and government initiatives led to a massive wave of municipal mergers.²

Hereon, we can infer that independent agencies were developed, which governed the vast regions of populated land; this is where the concept of a Fire Service Board (FSB) was established.

As civilization has evolved, there has been a shift from rural to urban communities, for which the needs of either differ tremendously, highlighting challenges in a wide range of governance.

¹ Jim Spell. "A brief history of the fire service: from ancient equipment to modern technology." FireRescue1. Accessed March 22, 2024. <https://www.firerescue1.com/firefighting-history/articles/a-brief-history-of-the-fire-service-from-ancient-equipment-to-modern-technology-uTSiJ1nGr7xUm5fm/>

² "How Local Government Works." Association of Municipalities of Ontario. Accessed March 26, 2024. <https://www.amo.on.ca/about-us/municipal-101/how-local-government-works>

Evolution of Dufferin County and Fire Service Challenges

Dufferin County (the County) is an upper-tier municipality composed of 14 Council members representing eight municipalities, including the Town of Orangeville, Town of Shelburne, Town of Grand Valley, Township of Amaranth, Township of East Garafraxa, Township of Melancthon, Town of Mono, and Township of Mulmur.

For more than 30 years, the residents of the County have relied on fire services provided by various lower-tier municipalities and several Fire Service Boards (FSBs), including some that are based outside the County's borders.

Currently, the County does not oversee fire service delivery nor possesses the authority to alter the existing model. Some have criticized the Fire Service Board (FSB) governance model in use for its inadequacy in addressing the needs of a growing population. Operating fire services has become increasingly costly, and more technically demanding. Pumper trucks now exceeding a million dollars and aerial trucks costing upwards of three million dollars. While it was once considered acceptable for fire apparatus to remain in service for 30 years or more, this is no longer acceptable. Effective capital planning is essential to ensure that fire equipment adheres to National Fire Protection Association (NFPA) and Fire Underwriters Survey (FUS) standards.

Moreover, the costs of constructing and operating fire stations have soared in recent years. For instance, one of the County's fire services is planning to build a new station with a projected cost exceeding \$25 million.

Rising salary costs for department personnel must also be factored into the increasing expenses. In the summer of 2022, Ontario Regulation 343/22: Firefighter Certification under the Fire Protection and Prevention Act (FPPA), 1997, came into effect. This Regulation mandates that all firefighters must be certified according to the standards outlined to perform fire protection services. By July 1, 2026, all firefighting disciplines are required to meet these certification standards, and an amendment has further stipulated that Technical Rescue disciplines must achieve the necessary certification by July 1, 2028. These regulatory requirements contribute significantly to the overall cost and management of operating fire services.

In addition to rising operational costs, the firefighting sector is becoming increasingly litigious. Within the County, at least two significant lawsuits have been initiated by fire service staff and applicants against Fire Service Boards (FSBs). Compounding the issue, homeowners—particularly those relocating from urban to rural areas—often have elevated expectations for fire services and are more inclined to file claims if these expectations are unmet. This growing trend poses a substantial challenge for developing communities.

TABLE #1: MUNICIPALITIES AND CORRESPONDING FIRE SERVICES

Municipalities	Fire Departments			
Town of Orangeville	Orangeville Fire Department (OFD)			
Town of Shelburne	Shelburne & District Fire Department (SDFD)			
Town of Grand Valley	Grand Valley & District Fire Department (GVDFD)			
Township of Amaranth	Orangeville Fire Department	Grand Valley & District Fire Department	Shelburne & District Fire Department	
Township of East Garafraxa	Grand Valley & District Fire Department	Orangeville Fire Department	Erin Fire Department Erin (EFD)	
Township of Melancthon	Mulmur-Melancthon Fire Department (MMFD)	Shelburne & District Fire Department	Dundalk Fire Department (DFD)	
Town of Mono	Shelburne & District Fire Department	Rosemont Fire Department (RFD)	Orangeville Fire Department	Caledon Fire and Emergency Services (CFES)
Township of Mulmur	Shelburne & District Fire Department	Rosemont Fire Department	Mulmur-Melancthon Fire Department	

Although this chart may seem confusing, it mirrors the complexity of the multiple fire services that serve different communities, which can also be confusing for residents.

FIGURE #1: FIRE SERVICES ORGANIZATIONAL CHART

Fire Services Organizational Chart

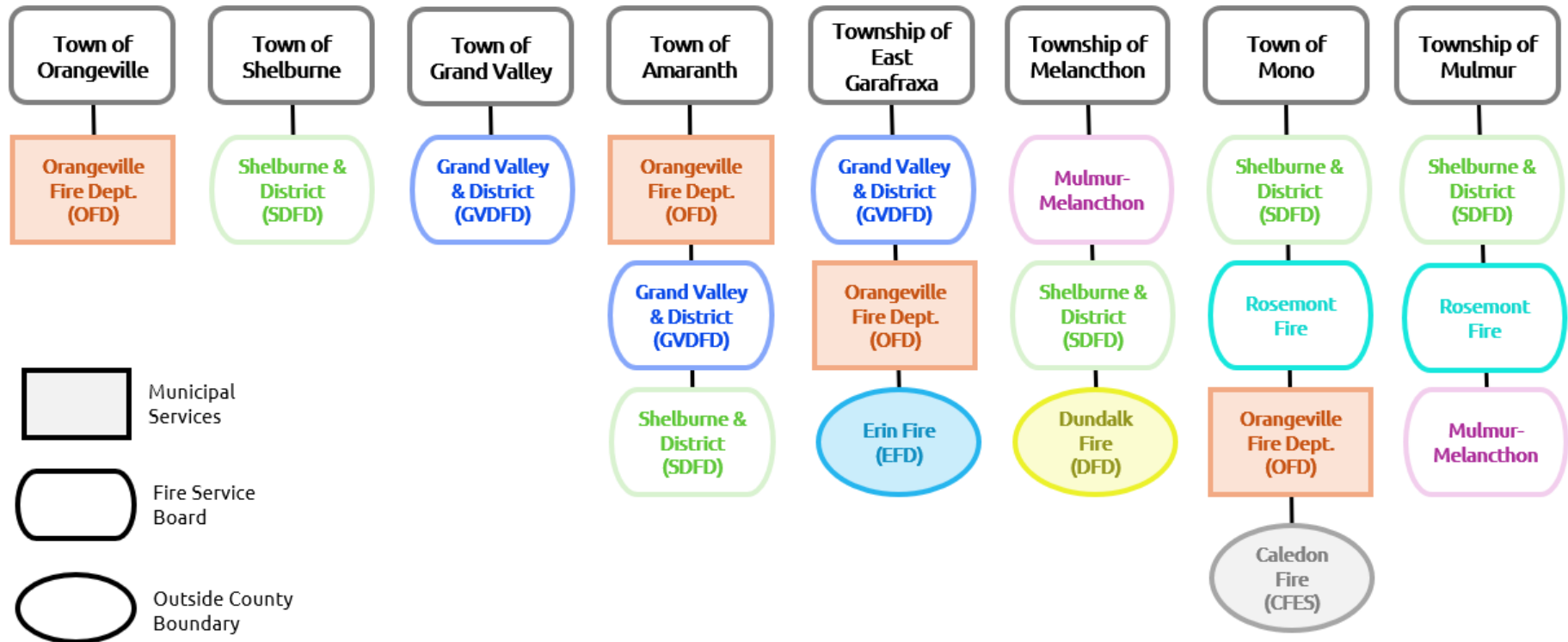


TABLE #2: MUNICIPAL POPULATION FORECASTS

	Population 2021 Statistics Canada	Population Forecast to 2031	Population Forecast to 2036	Percent Difference
Orangeville	30,167	36,490*	36,490*	+20.96%
Shelburne	8,994	10,000*	10,000*	+11.18%
Grand Valley	3,851	7,478*	7,503*	+94.83%
Grand Valley Urban	-	6,050*-	6,050*	-
Grand Valley Rural	-	1,428	1,453	-
Amaranth	4,327	4,680	4,710	+8.85%
East Garafraxa	2,794	3,150	3,180	+13.81%
Melancthon	3,132	3,410	3,430	+9.51%
Mono	9,421	9,770	9,890	+4.97%
Mulmur	3,571	4,290	4,340	+21.53%
Subtotal (excluding future reserved allocation)	-	79,268	79,543	-
Future Reserved Allocation	-	732	1,457	-
Total for the County of Dufferin	66,257	80,000	81,000	+22.25%

Note from the original chart:

Source: Statistics Canada National Household Survey 2011, MOI Letter, August 2010, MMM, C4SE

* Population forecasts beyond that identified is constrained due to the lack of approved municipal water services and municipal sewage services.

** Additional Future Reserved Allocation may be accommodated within Shelburne, subject to satisfying the Shelburne Urban Settlement Expansion policies of Section 3.5.1.2.

FIGURE #2: FIRE SERVICE COVERAGE

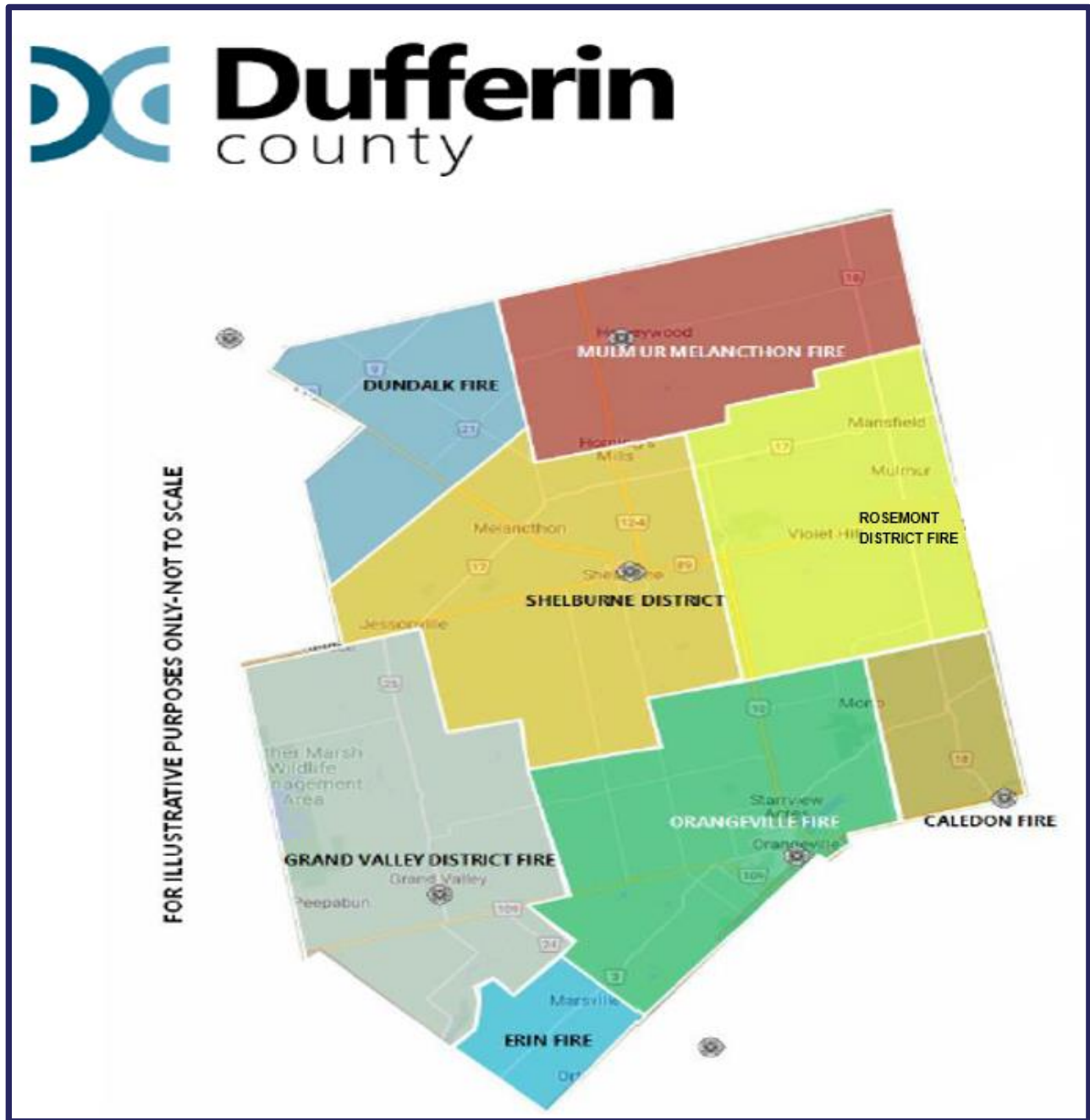
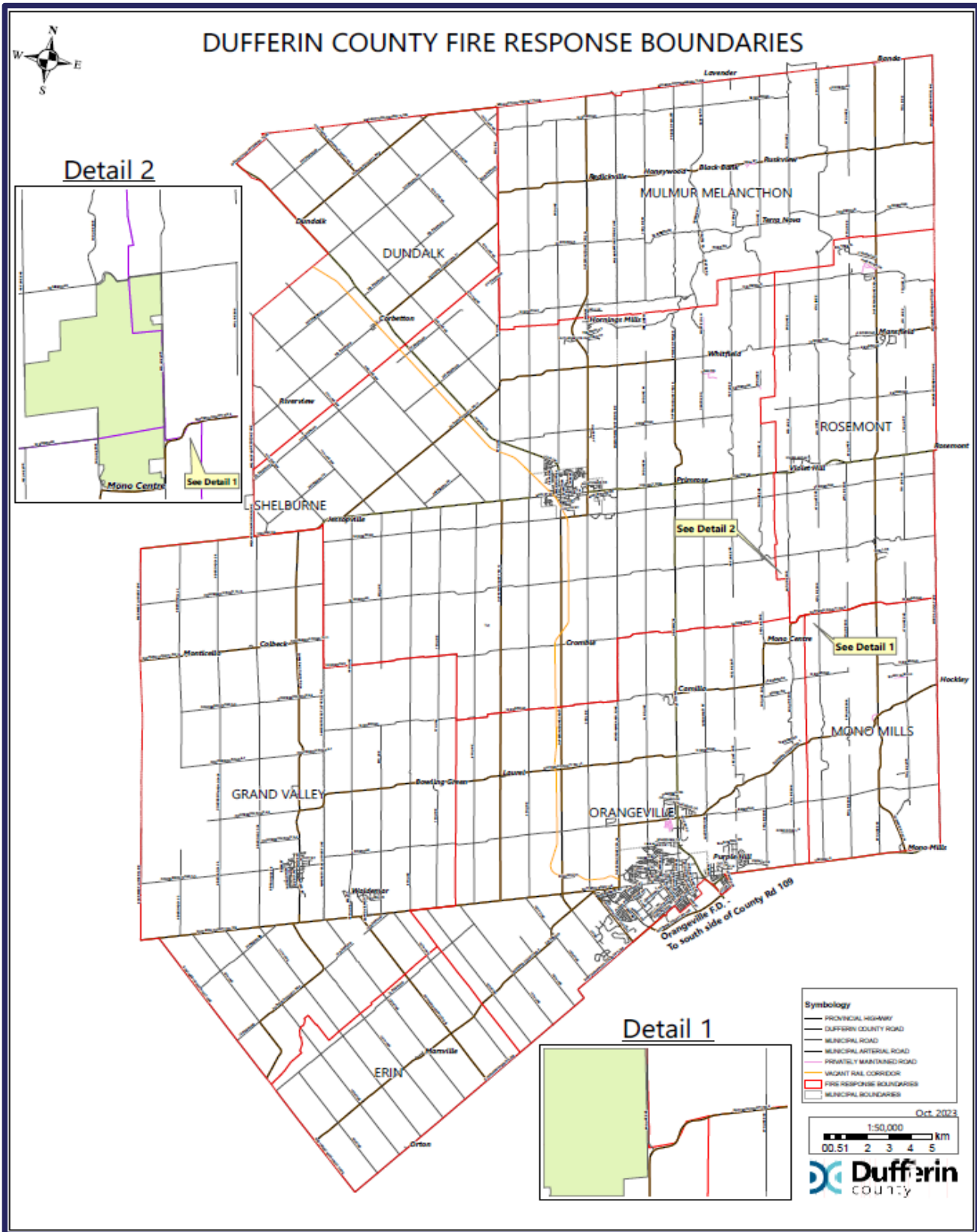


FIGURE #3: SERVICE BOUNDARIES WITHIN THE COUNTY



The lower-tier municipalities outside of County borders that provide fire protection services are contracted through service agreements with:

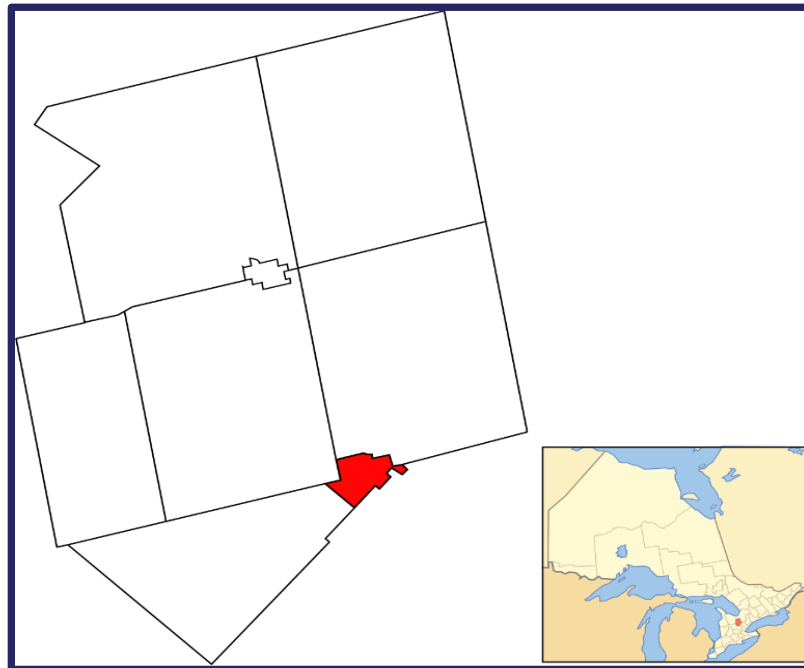
- Caledon Fire and Emergency Services (CFES) provides services to a portion of the Town of Mono.
- Erin Fire Department (EFD) services a portion of the Township of East Garafraxa (as well as the Town of Erin, outside County borders).
- Dundalk Fire Department (DFD) provides services to a large portion of the Township of Melancthon (as well as two other municipalities outside the County).

EMG has conducted a full review of each community and its related governance model. During this review the following points were assessed:

- How the community is protected (how many departments)
- The governance model - self governed, FSB or a combination
- An overview of feedback received in relation to the effectiveness of the governance
- Summary - future opportunities for efficiencies.

Town of Orangeville

FIGURE #4: TOWN OF ORANGEVILLE WITHIN DUFFERIN COUNTY



The Town of Orangeville was incorporated in 1874, named after Captain Orange Lawrence.³ Located in the south-central part of the county, this area is known as the 'seat.' It is bordered by East Garafraxa to the southwest, Mono to the northeast, and Amaranth to the northwest. The current population stands at 30,167, with a density of 1,900 people per square kilometer. By 2036, the population is projected to increase by 20.96%, reaching approximately 36,490 residents.

The Orangeville Fire Department (OFD), established in 1878, is the only directly operated municipal fire department within the County. It opened its current headquarters in 1972.⁴ It has a suppression team of 20 full-time firefighters and 28 volunteer firefighters responding from a single fire station. The Department serves the Town of Orangeville, Town of Mono, and the Townships of East Garafraxa and Amaranth.⁵

The Town is served by a single fire department, which follows a unified model for fire prevention education and enforcement. Although the Fire Department is directly managed by

³ "Orangeville, Ontario." Wikipedia. Accessed March 25, 2024. https://en.wikipedia.org/wiki/Orangeville,_Ontario

⁴ "2023 Year End Information." PDF provided by the Fire Department.

⁵ "Fire Services". Town of Orangeville. Accessed March 27, 2024. <https://www.orangeville.ca/en/living-here/fire-services.aspx>

the Town, it has established an advisory committee with representatives from the neighbouring municipalities it serves. This committee helps maintain open communication by sharing information and collecting feedback from these municipalities. While the committee lacks formal authority, its role in facilitating dialogue is valued by the municipalities. Additionally, the Fire Department provides annual presentations to each of the councils to ensure transparency and foster engagement.

Feedback suggests that the fire service is highly regarded and well-supported by the Council. However, rising operational costs, particularly for maintaining career firefighters, are a concern. In 2020, the town transitioned from a municipal police service to a contract with the Ontario Provincial Police, which reduced annual costs by 48%. This shift has led to discussions about exploring alternative approaches to managing fire service expenses.

There is the opinion that the fire services should be 'fairly, and safely equipped', while remaining financially sustainable. As the costs of the fire service rise in the town of Orangeville, the town must raise the charges for fire coverage provided to neighbouring municipalities.

Town of Shelburne

FIGURE #5: TOWN OF SHELBURNE WITHIN DUFFERIN COUNTY



Statistics

The Town of Shelburne, incorporated in 1877 with an initial population of 750 villagers⁶, has grown to 8,994 residents. By 2036, the population is projected to reach 10,000, reflecting an 11.18% increase. The current population density in Shelburne is 907.1 people per square kilometre.

The town is served by the Shelburne and District Fire Department (SDFD), which has been operating since 1982 with one fire station. The Department is led by a full-time fire chief and includes a paid-on-call deputy chief, along with 35 approved paid-on-call firefighters. The Fire Services Board (FSB), consisting of five municipalities with two members each, sees the Town of Shelburne contributing 56.43% of the budget, corresponding to its share of calls within the municipality.

⁶ "Shelburne, Ontario." Wikipedia. Accessed March 25, 2024. https://en.wikipedia.org/wiki/Shelburne,_Ontario

The Town of Shelburne has contemplated a resolution to dissolve the FSB, believing that greater 'care and control' is needed. Council supported, in principle, the recommendations specific to fire services from the County of Dufferin Service Delivery Review Part A and the dissolution of the board of management whereby the service would be directly delivered by the Town of Shelburne. Staff was directed to review and outline the processes to move forward with the dissolution of the board and outline the estimated timelines and estimated costs.

Shelburne and District Fire has exceeded the capacity of their current facility and a significant investment in the facility is required. Additionally, the 2024 capital budget highlights the need to replace two fire trucks, further straining financial resources.

The FSB contracts with the Shelburne Municipal Benefit Program and has begun adopting municipal policies and procedures for human resources and other operational areas. The Town Clerk has worked with the FSB so that it better meets transparency guidelines.

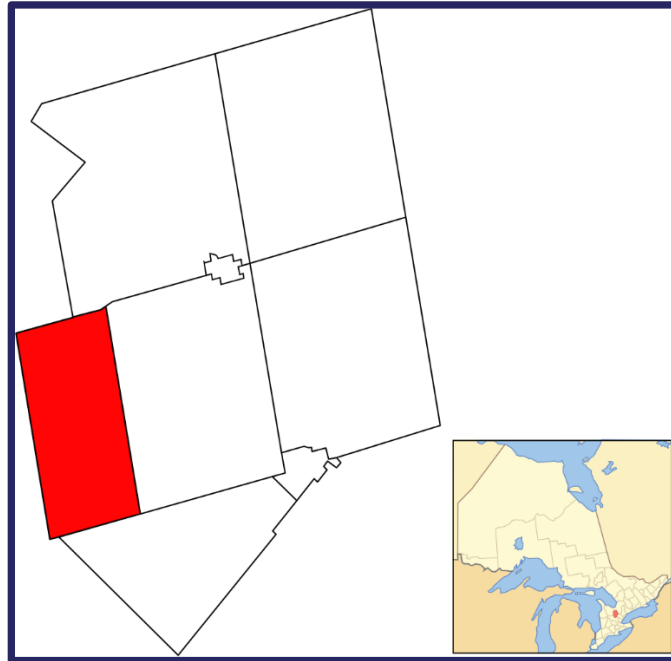
The County provides IT support through a service agreement, while the Town provides GIS, HR, finance, purchasing, benefits, through informal arrangements, and is not being compensated for the full range of services provided.

The original fire station, constructed before the formation of the FSB, is owned by the Town of Shelburne. However, an addition completed in 2012, during the FSB's governance of the fire department, means that each of the participating municipalities owns a share of the building. Under the terms of the agreement the land on which the station sits remains the property of the Town of Shelburne.

The Fire Services Board (FSB) is currently negotiating to acquire additional land next to the Fire Department. However, municipalities are concerned about having limited or no influence over the proposed property expansion.

Town of Grand Valley

FIGURE #6: TOWN OF GRAND VALLEY WITHIN DUFFERIN COUNTY



The Town of Grand Valley is in the southwest corner of Dufferin County. The formation of the town was a result of an amalgamation of the Township of East Luther, a rural farming area, and the Village of Grand Valley, thereafter, known as the Town of Grand Valley in 2012.⁸ It has a current population of 3,851 residents and a density of 18.7 people per square kilometre, with a significant growth of 94.83% expected by 2036, bringing the population to approximately 7,503 residents.

The Grand Valley and District Fire Department (GVDFD) has a single station operated by a Fire Service Board that serves the Town of Grand Valley and Townships of Amaranth and East Garafraxa.

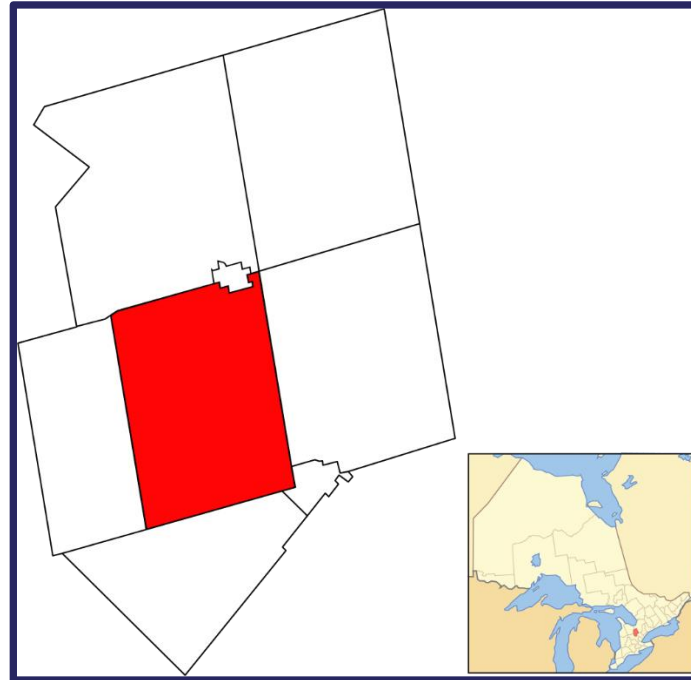
The operating levy is adjusted based on the call volume of the municipalities with the 2024 assessments allocating Amaranth with approximately 20.6% of the budget, East Garafraxa with 16% and the Town of Grand Valley with 63%.

As the town has a fire station within its boundaries, it has a fire prevention program provided by the single Department.

⁸ "Grand Valley, Ontario." Wikipedia. Accessed March 25, 2024. https://en.wikipedia.org/wiki/Grand_Valley,_Ontario

Township of Amaranth

FIGURE #7: TOWNSHIP OF AMARANTH WITHIN DUFFERIN COUNTY



The Township of Amaranth was incorporated in 1854.⁹ Its current population is 4,327 residents with a density of 16.3 people per square kilometre. Amaranth has an anticipated growth rate of 8.85%, bringing the population to 4,710 by 2036.

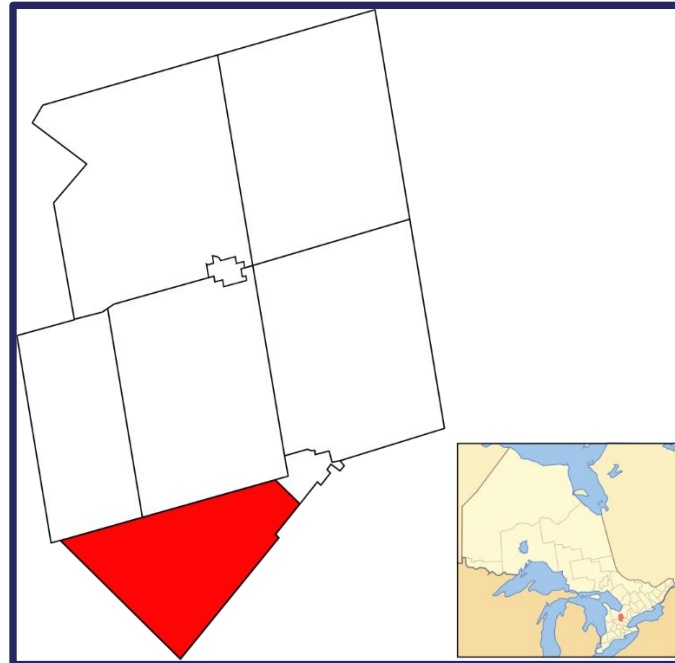
The Township is serviced by three fire departments – OFD, GVDFD, and SDFD. The result is that the Township has three different fire prevention education and enforcement models which can be difficult for property owners to understand.

The Township has two council members each on GVDFD and SDFD Fire Service Boards. Although they do not have formal representation on the OFD, the OFD does annual presentations

⁹ "Amaranth, Ontario." Wikipedia. Accessed March 25, 2024. https://en.wikipedia.org/wiki/Amaranth,_Ontario

Township of East Garafraxa

FIGURE #8: TOWNSHIP OF EAST GARAFRAXA WITHIN DUFFERIN COUNTY



Incorporated in 1869,¹⁰ the Township of East Garafraxa has a current population of 2,794 residents, with a density of 15.5 residents per square kilometre. Its population is expected to grow to 3,180 for a 13.81% increase by 2036.

The Township is served by three fire departments - GVDFD, OFD, and Erin (outside the County border). The result is that the town has three different fire prevention education and enforcement models, which can be difficult for property owners to understand.

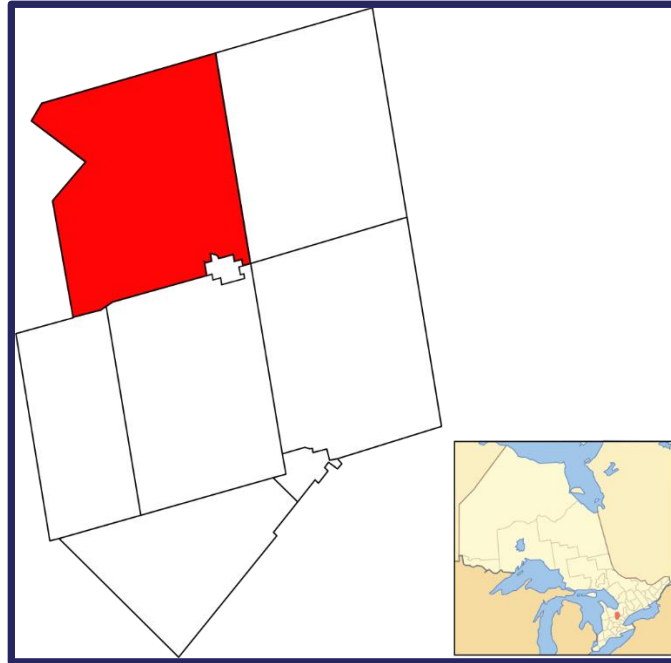
The Mayor and one Councillor sit as board members on the GVD Fire Board.

While the OFD and the GVFD provide annual budgets, the Erin Fire Department operates on an invoicing system based on the number of calls, the apparatus that responded, and the duration the apparatus is present on scene. In one case, a major fire incident consumed the entire annual budget that East Garafraxa had allocated for fire services. Although invoicing per call is a common practice in interjurisdictional agreements, it carries risks, particularly with large-scale emergencies that can quickly deplete allocated funds. As such, a more sustainable agreement should be in place between the two parties to cover large-scale emergencies.

¹⁰ "East Garafraxa." Wikipedia. Accessed March 25, 2024. https://en.wikipedia.org/wiki/East_Garafraxa

Township of Melancthon

FIGURE #9: TOWNSHIP OF MELANCTHON WITHIN DUFFERIN COUNTY



The Township of Melancthon is a rural township in the northwest corner of the County, bordered in the east by Mulmur, Amaranth and Grand Valley to the south, Southgate to the west, and Grey Highlands to the north. Founded in 1853, it was originally part of Grey County until it was transferred to Dufferin County in 1881.¹¹ The Township has a current population of 3,132 residents with a population density of 9.7 people per square kilometre; it is expected to grow to 3,430 at a rate of 9.51% by 2036.

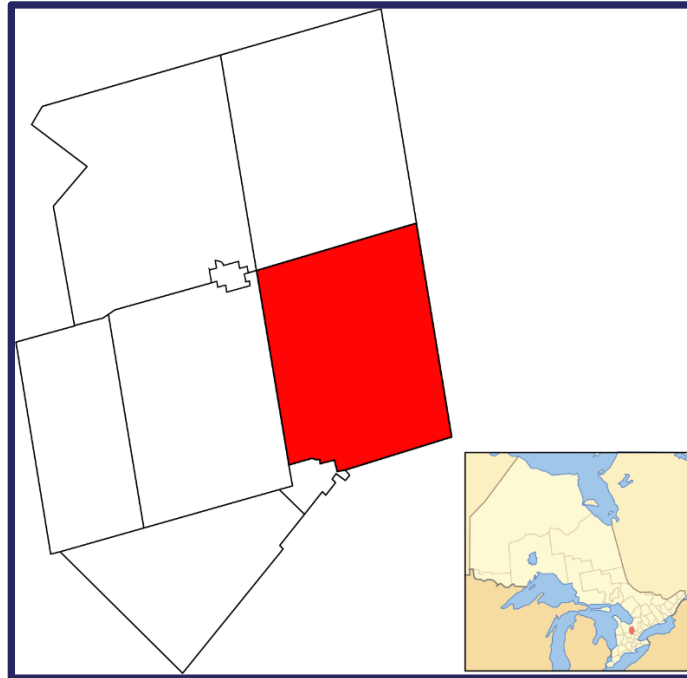
Melancthon is served by the Mulmur-Melancthon Fire Department (MMFD) as well as the SDFD and the Dundalk Fire Department (Township of Southgate, located outside Dufferin County). The result is that the town has three different fire prevention education and enforcement models which can be difficult for property owners to understand. Melancthon has appointed board members to serve on the MMFD and SDFD FSBs.

There is a service contract with SDFD which invoices the municipality at set flat rates. These rates are currently less than the MTO flat rates set by the province (that are updated annually).

¹¹ "Melancthon, Ontario." Wikipedia. Accessed March 25, 2024. https://en.wikipedia.org/wiki/Melancthon,_Ontario

Town of Mono

FIGURE #10: TOWN OF MONO WITHIN DUFFERIN COUNTY



The Town of Mono, originally the Township of Mono, incorporated in 1850, is a rural municipality in the southeast corner of the County, with Amaranth to the west and Adjala-Tosorontio to the east. As a township, it was part of “Simcoe District” (which later became “Simcoe County”) transferring to from Simcoe to Dufferin in 1881. It became the Town of Mono in 1999.¹²

The current population of 9,421 is expected to grow by 4.97% to 9,890 residents by 2036.

The Town is served by SDFD, RDFD, CFD, and OFD. The result is that the town has four different fire prevention education and enforcement models, which can be difficult for property owners to understand.

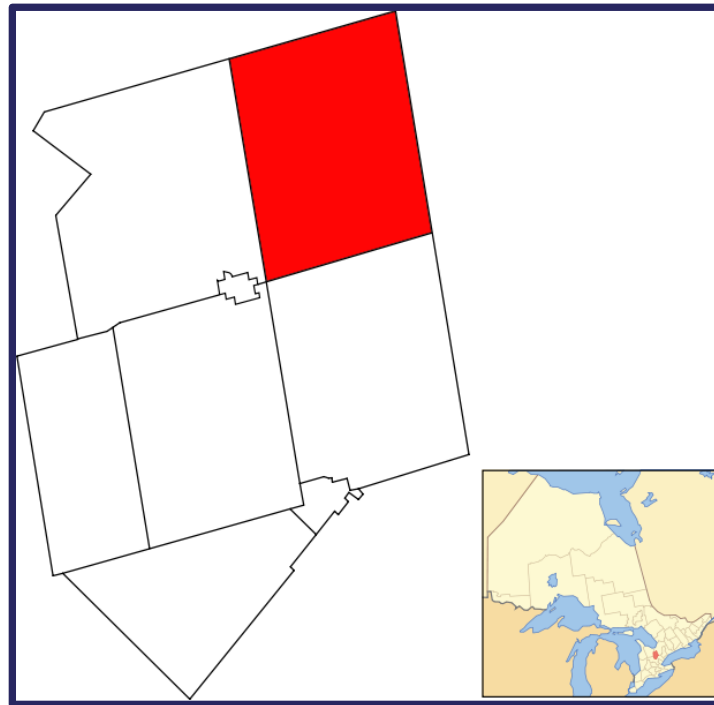
The CFD and OFD provide annual budgets based on the number of calls for the previous year.

The fire service agreement with SDFD was signed in 1991. There was a draft updated agreement in 2012 which has not been signed.

¹² “Mono, Ontario.” Wikipedia. Accessed March 25, 2024. https://en.wikipedia.org/wiki/Mono,_Ontario

Township of Mulmur

FIGURE #11: TOWNSHIP OF MULMUR WITHIN DUFFERIN COUNTY



Incorporated in 1851, the Township of Mulmur is in the northeast corner of the County, straddling the Niagara Escarpment.¹³ Its current population of 3,571 has a density of 12.1 people per square kilometre and is expected to grow by 21.53% to 4,340 residents by 2036.

The Township has two council representatives who sit on three different Fire Service Boards.

The Township is protected by the SDFD, RDFD, and the MMFD. The result is that the Township has three different fire prevention education and enforcement models which can be difficult for property owners to understand.

The Township has challenges developing the budget because each FSB budgets are set differently and do not use the same terminology, making line-by-line comparisons difficult. Further, the FSBs approve their own budgets without Council's approval, which causes concerns when there are large, unexpected increases, including legal fees, and sometimes training.

Each FSB does Capital asset planning differently, making it a challenge for the Town to forecast Capital costs.

¹³ "Mulmur." Wikipedia. Accessed March 25, 2024. <https://en.wikipedia.org/wiki/Mulmur>

Summary of Challenges with Current Operations

Municipalities are legally mandated to provide public education on fire safety and to enforce the Fire Code. This responsibility ensures that residents are informed about fire prevention and safety measures while maintaining compliance with fire safety regulations to protect public health and property.

Section 202 of the Municipal Act, 2001, S.O. 2001, c.25, as amended, allows two or more municipalities to enter into agreements to create a joint municipal service board. This provision enables municipalities to collaborate on establishing and operating such boards for services they deem necessary or beneficial. Municipal service boards cover a range of shared services, including fire services, libraries, arenas, health boards, water collection, utilities, police services, planning boards, and other bodies or local authorities established or exercising any power under any *Act*.

The legislative foundation for collaborative fire service arrangements was established in 1937, when municipalities were first authorized to enter into agreements with other municipalities or entities to deliver fire protection services. This provision laid the groundwork for cooperative fire service partnerships.

Municipal Act RSO 1937, c 226, s 425 Part 4

(4) For entering into a contract with the corporation of any fire brigade other municipality or municipalities for establishing, providing, and maintaining, jointly, a fire brigade, fire halls, fire engines, apparatus and equipment and for the maintenance and use thereof upon such basis as to the distribution of cost as the contract may stipulate.

(a) Each municipality shall issue its own debentures for its share of the capital cost of providing the said fire services, and the provisions of paragraphs 1 to 3 shall be applicable.

Fire Service Boards are long-standing entities that introduce a layer of municipal oversight to what were once independent fire brigades. They represent a model of shared governance, where multiple municipalities collaboratively oversee and manage a shared fire service. This structure enables joint decision-making and resource allocation, reflecting the evolving need for coordinated fire protection across multiple jurisdictions.

It should be noted that stakeholder consultations conducted by EMG revealed a range of perspectives. Some stakeholders support the use of Fire Service Boards, while others believe that Fire Service Boards are no longer an effective governance model in the evolving fire service environment.

Fire Service Board Benefits

Fire Service Boards provide advantages, including granting the municipalities receiving protection a formal role in decision-making regarding service delivery. In Dufferin County, these Boards consist of elected officials from the participating municipalities, who are tasked with keeping their Council and municipal staff informed about issues impacting the fire service. This structure ensures that local governments have a direct voice and vote in the management and oversight of fire services, promoting transparency and accountability in how these critical services are delivered.

In municipalities without an internal fire department, Fire Service Boards provide a mechanism for them to have a say in the fire services being delivered. For some long-standing Fire Service Board members, it is seen as a way to control expenses, while keeping their expectations in the forefront. They also believe that, with years of experience, they have a deep understanding of fire service leadership and management.

Fire Service Board Challenges

While members of FSBs generally support the FSB model, CAOs and Fire Chiefs often express concerns regarding its governance and effectiveness. Some of these challenges arise from the independent nature of the fire departments involved, which can lead to lower levels of coordination and integration among them.

Challenges

Under a Fire Service Board (FSB) model, the municipal Chief Administrative Officer (CAO) lacks authority and control over the Fire Chief, the fire department, or their activities, since the Fire Chief reports directly to the FSB. As a result, it is believed that FSBs do not offer the same level of oversight and accountability as a reporting structure that includes direct oversight by a CAO.

An establishing and regulating by-law (E&R) is a municipal council document that outlines policies for fire departments. It can be used to show how the municipality delivers fire protection services it has determined are necessary according to its needs and circumstances, as is required by the *Fire Protection and Prevention Act, 1997 (FPPA)*. The E&R By-law outlines the type and level of training required for fire department personnel. However, some municipalities serviced by the Fire Service Boards either lack an E&R By-law or have outdated versions, as they may not perceive themselves as directly responsible for fire services. This can result in inconsistencies in training and service standards across municipalities, creating gaps between the level of service that municipalities believe they are receiving and the actual level of service provided.

Several Chief Administrative Officers (CAOs) have noted that the fire service agreements between the Fire Service Board (FSB) and the municipalities have not been reviewed by legal services, and most have not been updated in many years.

Another concern is that FSB policies may not comply with provincial legislative requirements, such as those related to the *Accessibility for Ontarians with Disabilities Act (AODA)*, human resources, financial reporting, purchasing, and health and safety. Although municipalities do not have direct responsibility for the FSB, they still bear some level of responsibility, which could expose them to potential liabilities or financial obligations related to the FSB's operations.

Politicians who serve on FSBs often lack a background in firefighting, fire operations, or fire administration. Despite this, it was suggested that some boards try to involve themselves in operational matters, which can create challenges given their limited technical expertise.

Additionally, board members often lack experience in human resources management yet they are involved in managing HR issues. Each FSB has its own set of human resource policies, leading to a lack of consistency in how personnel matters are handled across different boards. FSBs are a strategic governance mechanism, not a director of tactical operations.

In one case, the Fire Service Board hired an administrative support person who reports directly to the FSB rather than the Fire Chief. While the Fire Chief requires administrative support, any work requests from this position need to be directed to the FSB. This reduces the Fire Chief's ability to provide direction and accountability to the role, without going through the FSB for authorization.

Independent FSBs often exhibit inconsistencies in planning among fire departments. Some departments have comprehensive strategic or master plans that outline a 10-year vision, while others lack any formal documentation or strategy.

Additionally, some FSBs operate without a cohesive financial plan or strategy, complicating municipal budget planning. This issue is exacerbated when a municipality is served by multiple fire departments, each with its own budgeting system.

FSBs within Dufferin County are relatively small organizations and typically lack internal administrative structures, including finance, human resources, and IT departments. To address

these needs, many FSBs contract these services from their local municipalities on a part-time or as-needed basis.

Some FSBs have not established capital reserves for apparatus or building expenditures. Fire apparatus that are used in suppression, including engines, pumpers, aerials, and tankers, typically have a lifespan of 20 years (or 25 years with recertification) and require financial planning. While buildings have much longer life spans, it is reasonable to anticipate the needs for capital repairs, expansion, and building replacement. This creates a concern for some municipalities when a large capital item is added to the annual budget.

This lack of capital reserves also poses a challenge when existing fire stations may not comply with current health and safety standards. For example, inadequate space may force bunker gear to be stored on the apparatus floor, and the absence of air filtration or exhaust extraction equipment can compromise the safety and well-being of fire service personnel.

Within the county, some fire departments invoice insurance companies for costs related to motor vehicle collisions or structure fires, while others do not utilize this practice. When different processes exist within a single municipality, it can create conflict. For instance, if one resident gets an invoice but others do not it highlights a lack of consistency in billing practices. Invoicing of insurance companies is becoming increasingly common as fire departments struggle with budget containment from the municipalities.

Taxpayer equality has emerged as a challenge in some communities served by multiple fire services. Disparities in service billing and funding can lead to uneven distribution of costs and benefits, creating inequities among taxpayers who may receive different levels of service or pay varying amounts for fire protection. For example, some residents may pay for full-time firefighters while others are served by volunteers, and the service levels provided by volunteer fire departments can vary significantly.

It was noted that municipalities and municipal purchasing groups might achieve cost savings (through a joint purchasing program) compared to FSBs that make purchases independently. By pooling resources and leveraging collective buying power, municipalities can often secure better prices and terms for equipment and services.

In communities served by multiple fire departments, inconsistencies in issuing burning permits and enforcing fire bans can create problems. For example, suppose one fire department imposes a burning ban while another does not. In that case, residents may express dissatisfaction if their area is subject to the ban while neighbouring areas are allowed to burn. One municipality tried to implement a unified burn permit form but faced significant challenges in getting the various fire departments to agree on its design and usage.

Some Fire Service Boards (FSBs) do not provide formal annual reports, resulting in a lack of detailed information about service performance and activities for the councils. This issue is more complicated for those fire departments from outside of the County serving these municipalities. For the FSB that are providing reports, there is not a common template, therefore, extracting information from multiple reports can be complex and not necessarily comparable. Some CAOs have expressed concern that the minutes of FSB meetings may lack transparency and may not capture all discussions. This can leave municipalities without a complete understanding of current or upcoming issues, impacting their ability to stay informed and engaged with the fire service's operations and challenges.

As each of the fire departments operates independently, there is a lack of consistency in the types and uses of equipment across the various departments. This variation can lead to inefficiencies and challenges in coordinating responses and standardizing practices. As fire departments may be responding to the same call using different types of equipment, which can result in situations where firefighting staff are not trained in or familiar with the equipment used by other departments. This issue also extends to radio systems, leading to communication breakdowns at fire scenes where multiple departments are present.

Current response boundaries were established according to historical municipal borders, including those that are no longer in place as municipal restructuring has taken place.

Suburban and rural areas require different firefighting tools due to their distinct characteristics. For example, a suburban municipality may benefit from an aerial device to fight fires in a multi-storey building, however the rural surrounding communities may not see the benefit to the same degree. If a fire department serves both a suburban and rural area, there can be conflict between fire service board members over who pays for the equipment. In some cases, rural municipalities may be required to pay a portion of the expense despite not needing that piece of equipment for their residents. In these cases, disagreements can cause delays in obtaining the required equipment.

There are ownership issues surrounding FSBs.

- If FSBs are dissolved, the municipality where each fire department is located would take on responsibility for its own operations, finance, human resources, and other aspects. This shift could be beneficial, but whether municipalities would welcome this change depends on their individual circumstances and preferences..
- Municipalities served by contracting fire prevention and protection services may no longer have a direct say in the department's strategic direction. Therefore, new agreements would need to be negotiated.

- In one instance, the ownership of various parts of the building varies depending on the municipalities providing funding at different levels. Some municipalities claimed a percentage of ownership of vehicles, while one FSB has indicated ownership of these vehicles rests with the FSB itself rather than the contributing municipalities.

County Operational Issues

Fire Prevention

Fire prevention encompasses both public education component and inspection components. It is the responsibility of the municipalities, rather than the FSBs, to fulfill these legislative requirements to provide fire prevention.

Fire Protection and Prevention Act, 1997, S.O. 1997, c. 4, Part II

Municipal Responsibilities

2(1) Every municipality shall,

(a) establish a program in the municipality which must include public education with respect to fire safety and certain components of fire prevention; and

(b) provide such other fire protection services as it determines may be necessary in accordance with its needs and circumstances.

Regulations include the “certain components of fire prevention” to include inspections of vulnerable occupancies. It also included inspections of other properties upon issue identification or request.

The primary challenge in complying with the *FPPA (S.O. 1997)* in this context is the responsibility for fire prevention services in municipalities that do not have their own fire departments. Many municipalities assume that fire departments are handling fire prevention but lack specific details. For example, some municipalities have minimal or no formal documentation regarding their fire department's fire prevention efforts. Additionally, some agreements between FSBs and municipalities lack clauses on fire prevention, leaving the FSBs not obligated to provide these services, as legislation assigns this responsibility to the municipalities.

When fire prevention programs are in place, they are often not coordinated among the multiple fire departments serving the municipality. As a result, different response areas within the same municipality may experience varying levels of fire prevention.

In some cases, the municipalities simply relied on the FSBs to ensure fire prevention was being provided without understanding what was provided, by whom, and to what extent.

Except for Orangeville, Fire Prevention Officers are typically volunteer firefighters who take on this additional role while maintaining their full-time jobs. As a result, their time may be limited, particularly when they are responsible for multiple municipalities. This dual commitment can impact their availability and effectiveness in performing fire prevention duties.

Further, some of the members of the fire departments who are doing inspections do not have the formal training and certification to do so.

The Office of the Fire Marshal (OFM) has prioritized fire prevention, recognizing that the actions of residents before the fire department arrives are crucial in determining whether injuries or fatalities occur. Therefore, fire prevention must be a key focus in the recommendations and actions resulting from this fire service review.

Training

All firefighters in Ontario, whether career or paid-on-call (often referred to as volunteers), must meet minimum training requirements to ensure their health and safety. This training requires hundreds of hours of training as well as ongoing training to improve and maintain skill sets during their career as a firefighter. These long training hours impact the availability of some to volunteer and some of those who get certified look to become career firefighters in other jurisdictions.

The new standards also require more time, planning, and skill of those who provide the training. Training officers must now train to standards and ensure that the documentation is highly specific and detailed. Being a training officer in today's environment requires experience mixed with an academic understanding of fires, risks, and the learning patterns of the audience. In smaller fire departments, Fire Training Officers were often volunteers who, despite lacking extensive formal firefighting education, gained their expertise through years of on-the-job experience.

This situation has created challenges in ensuring that all firefighters meet certification requirements set to take effect on July 1, 2026, and the new technical rescue training standards scheduled for July 1, 2028. To address these challenges, some Fire Service Boards (FSBs) have engaged private firefighting academies to provide the necessary training and certification.

A larger, county-wide fire service could potentially have the resources to employ full-time training officers, ensuring that firefighters receive the highest quality training available.

Radio System Upgrade

A common concern raised during stakeholder consultations was the lack of a unified radio system, currently there is a mix of analogue VHF radios and digital communications across various fire services. This inconsistency hampers the ability of fire departments to communicate effectively with one another, which is especially problematic given the frequent mutual aid calls.

Developing a common, modern radio system is a costly undertaking that FSBs have failed to agree upon. Additionally, the situation is further complicated by the fact that each FSB maintains independent contracts for fire service dispatching, adding another layer of disjointedness to the communication process. Some FSB members suggested that an upgraded radio system be the county's responsibility, as the cost of such an upgrade is beyond their individual budgets and the County could ensure consistency across the municipal boundaries. Due to the federal requirement to implement the Next Generation 9-1-1 upgrades, the dispatch centres may mandate that their downstream clients (fire departments) move to digital radio systems. This will place a significant cost on the FSBs that some have been trying to avoid or delay.

Support for Fire Victims

A concern with the current governance model is that fire departments do not make use of available support for fire victims. Many individuals affected by fires are not referred to County Social Services or provided with preliminary resources to aid their recovery. Improving the coordination of services for these individuals is crucial to ensuring they receive the necessary support and assistance in the aftermath of a fire.

Costs

A common concern is that municipalities are reluctant to subsidize other municipalities. Small municipalities are wary of covering the higher costs associated with larger communities, while the larger communities resist bearing the costs of the smaller communities. The county has the authority to adjust tax rates based on the level of service provided.

Additionally, there is concern that new residents moving to the county from the Greater Toronto Area expect a standard of fire service similar to what they were accustomed to, adding pressure to meet these expectations.

Unionization

There is concern about the potential for volunteer firefighters to unionize and how this might impact fire service costs. One question raised is whether a county-operated fire service could increase the likelihood of unionization. Additionally, there is apprehension that, even without

unionization, volunteer firefighter pay rates might rise to the highest level in the country.

Tiered Response

In various communities, a common issue raised is the role of volunteer firefighters in responding to medical calls, particularly when paramedics often arrive more quickly. This raises questions about the efficiency and necessity of having volunteer firefighters attend these calls, given that paramedics are better resourced to provide pre-hospital medical care. Additionally, there are concerns about the financial costs incurred by fire departments for handling these medical emergencies. Fire departments, whether volunteer and composite, encounter higher costs associated to tiered response protocols. While it is challenging for smaller individual fire departments to negotiate tiered response protocols with the Ontario Ministry of Health a unified county-wide plan might provide greater leverage in these negotiations.

Financial Accountability

There is concern by both CAOs and FSB members that there should be caution about moving fire services to the County level, as many have a concern that the County is not as accountable to the taxpayers in the same way lower tiers are, and therefore, expenses are less controllable. It should be noted, however, that some of the FSBs have delayed expenditures or avoided expenditures that will need to be made, regardless of the delivery option selected and that there will be significant costs attached.

Recruitment and Retention

Volunteer firefighting faces a growing challenge with recruitment and retention, as many experienced firefighters approach retirement and recruits often seek to improve their resume as they seek full-time career positions in other jurisdictions. New training standards demand that volunteers commit to longer training hours both initially to achieve certification and ongoing to meet the demands of the job.

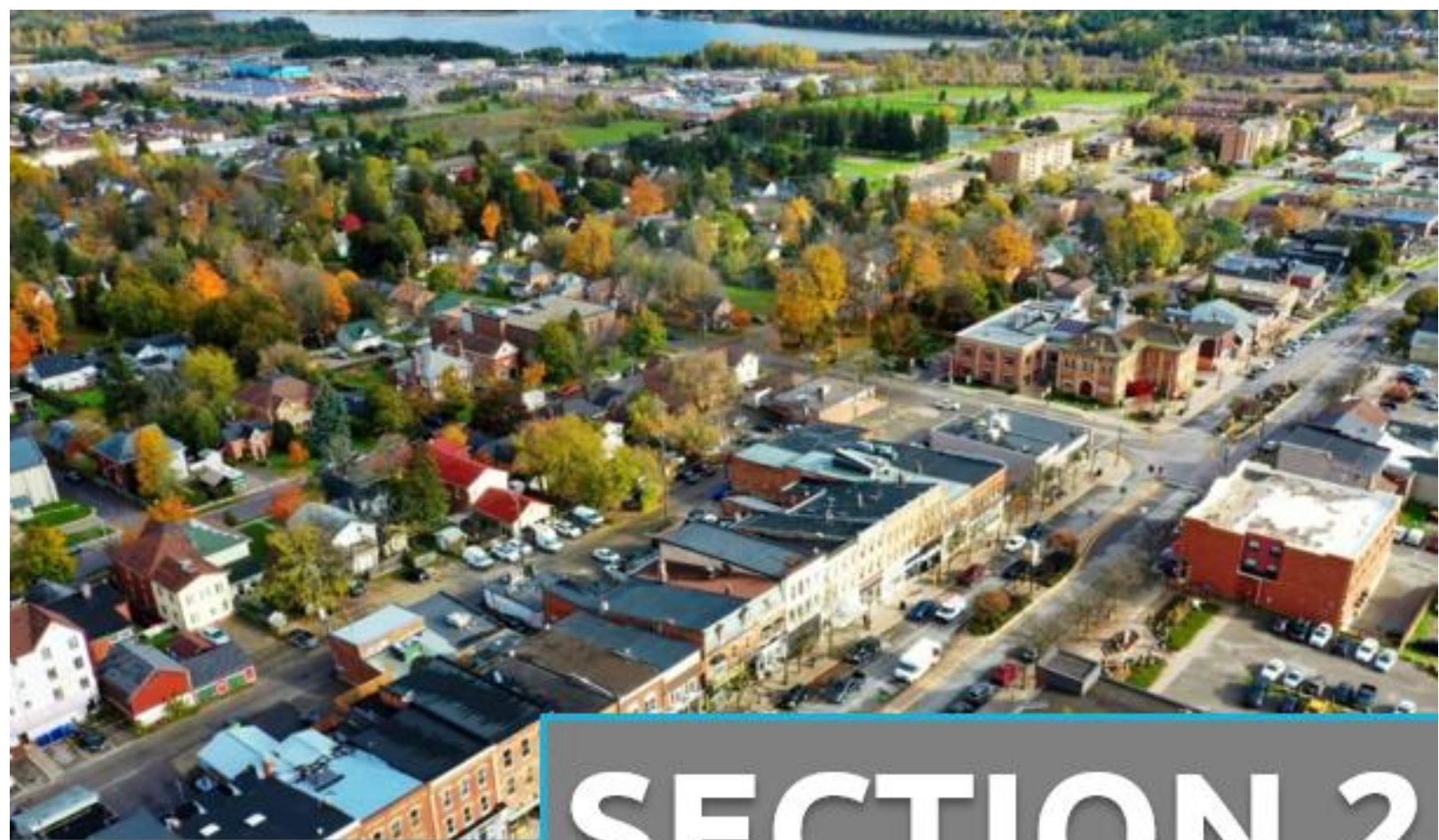
Additionally, residents who are busy with careers and family commitments, or who commute outside their community for work are finding it increasingly difficult to dedicate the time and effort required to be effective volunteer firefighters.

Other Concerns

Other points identified by EMG during the interview/review process include:

- Annual fire reports lack consistency due to the absence of a standard template.
- HR issues at non-municipal fire services often depend on the skillset of the Fire Chief, unless the FSB has an agreement with a municipality to provide HR support.
- Health and Safety protocols vary among fire services and lack consistency.

- Some believe that FSBs do not hold the fire chiefs accountable in the same manner as municipalities do. For example, certain FSBs have not conducted regular performance appraisals of the fire chiefs. Many CAOs feel that having fire chiefs report within the municipal structure increases accountability.
- As indicated by one FSB member, equipment needs can vary significantly between communities; for example, an aerial truck may be essential for one community but unnecessary for another. Consequently, more rural communities are reluctant to fund equipment they do not require. This concern has already been contentious within one FSB and is likely to persist regardless of the fire service model employed.



SECTION 2

Governance

SECTION 2: GOVERNANCE

Governance Model Overview for each Fire Department

Of the municipalities serving the County, there are four Joint Fire Service Boards and one municipal fire service.

Shelburne and District Fire Department – Fire Service Board

The Town of Shelburne has two representatives from five municipalities – Shelburne, Amaranth, Mono, Melancthon, and Mulmur – that sit on the Fire Service Board. The Town of Shelburne pays for 56.43% of the fire service budget, while the other four municipalities are responsible for the remaining 43.57%.



The SDFD has a full-time Fire Chief, a paid on-call deputy chief, and 28 paid-on-call firefighters (approved complement of 35 paid-on-call firefighters). The SDFD provides fire prevention for all five municipalities within the Board. Of the annual calls for service, most of the calls for service come from Shelburne at over 50% of the total call volume¹⁴.

“2024 Cost sharing breakdown” indicates that of the five-member municipalities, Amaranth pays 16.5%, Melancthon pays 15.1%, Mono pays 11.2%, Mulmur pays 9.4% and Shelburne pays 47.8%.

Grand Valley District Fire Department – Fire Service Board

The GVDFD FSB has six members, two each from the Township of Amaranth, the Township of East Garafraxa, and the Town of Grand Valley.

This Fire Service Board has been progressive in having a Fire Master Plan completed to review the current operations and look towards to the future.



Based on annual call volume averaged over three years, the Town of Grand Valley provides approximately 63% of the budget, Amaranth 21%, and East Garafraxa 16%.

¹⁴ Fire Chief Ralph Snyder. “Shelburne & District Fire Department 2022 Annual Report.”

Rosemont Fire Department – Fire Service Board

Rosemont & District Fire Department (RDFD) serves portions of the Town of Mono, the Town of Mulmur, and the Township of Adjala-Tosorontio (located in Simcoe County).



The 2024 operating budget indicated that costs are distributed as follows: 22% to Adjala-Tosorontio; 26% to the Town of Mono, and; 52% for the Township of Mulmur. The Fire Service Board (FSB) consists of six board members, with two members from each municipality. However, the Mulmur board members receive two votes each, resulting in Mulmur having four (50%) of the eight votes.

It should be noted that the Town of Adjala-Tosorontio, which also has its own municipal fire department, is examining the costs of participation in the Rosemount FSB, versus the coverage received.

The fire department responds to approximately 120-140 calls annually, with about 35% of these being medical emergencies.

The fire department is 100% compliant with the new training standards for firefighters, however, the specialized rescue standards that take place in 2028 will be challenging to meet.

The FSB has a capital budget reserve for apparatus but not for the station. As a cost containment strategy, Rosemont purchases standard commercial fire truck models to do the job rather than custom built trucks which have higher purchase costs.

Mulmur-Melancthon Fire Department – Fire Service Board

Mulmur-Melancthon Fire Department (MMFD) services the north portion of Mulmur and a portion of the north area of Melancthon. This board was created in 1982. The FSB is made up of two Councillors from each municipality.



The fire service has 27 approved firefighter positions, including the fire chief. The Fire Chief is a part-time (volunteer) chief, where the focus is operations, making fire prevention and inspections a challenging add on to the role.

The Town of Mulmur provides the financial and HR services for the FSB through a contract. The town does not have an individual for HR, so the town treasurer provides a dual role.

The Fire Department did 89 calls in 2023, of which 23 were in Melancthon, 66 in Mulmur. Approximately 50% of the calls are medical tiered response calls.

Operational costs are shared based on past call volume, with Mulmur covering 76% and Melancthon covering 24%. Capital costs are split evenly between the two municipalities at 50/50%. As there are separate operational and capital funding agreements, any surplus in operational funds at the end of the year cannot be transferred to capital reserves.

In 2010 the Fire Service Board passed a by-law that has stipulations to be followed if the Board is to be dissolved.

- Two years written notice is required
- Any debt incurred by the municipality to the department remains the property of the fire department
- Any assets, including reserves contributed by the municipality to the department shall remain the property of the department.
- If the department is completely dissolved, the realized value of assets is to be split on a 50/50 basis between the two participating municipalities.

Orangeville Fire Department – Member Municipality

The Orangeville Fire Department is directly operated by the Town of Orangeville and provides fire services to Amaranth, Mono, and East Garafraxa under contract, with annual pricing set by the Town of Orangeville. The OFD has established an Advisory Board for these municipalities to participate in; however, the board's role is limited to sharing information and there is no authority or responsibility beyond that.



In 2023, statistics indicated that 1,444 calls were responded to within Orangeville, 226 in Mono, 76 in Amaranth, and 59 in East Garafraxa

The Department has a Fire Chief, Deputy Chief, 20 full-time firefighters, 32 paid-on-call positions, and two training officers.

The OFD fire prevention division has a targeted plan for each of the response areas they have, with a focus on things like vulnerable occupancies, education, etc.

Having two training officers has allowed them to meet provincial training standards in advance for 100% of its staff.



SECTION 3

Options

SECTION 3: OPTIONS

Option 1: County-Run Fire Department (Single Department)

This option offers the greatest potential for consistency, accountability, and improvement in the fire service. Each municipality has representation and voting rights on the county council.

Some concern was expressed that areas being served by volunteers should be taxed at a rate less than those being served by career firefighters. The County has the capability to area-rate taxes, allowing fire service taxes to be based on the level of service received. This means that while the lower-tier municipalities would collect the taxes, they would not be responsible for setting the county tax rate. This arrangement would reduce the burden on municipalities to directly tax for fire services.

The County, being the larger jurisdiction, would have fewer challenges integrating the staff of the fire departments across the county.

The County has a Chief Building Official who serves many of the smaller municipalities and needs to work closely with the Fire Inspectors. Currently, fire inspections are conducted differently by various departments, which presents a challenge. However, with a unified fire service, there would be a consistent fire inspection program across all departments.

The larger fire department would benefit from economies of scale and its experience to operate more effectively. A single fire department would also allow for joint procurement of equipment and apparatus. Currently, there is no standardization for equipment, such as self-contained breathing apparatus. Joint procurement would save money and reduce the time spent on training.

Challenges

The primary issue heard from the FSB members is that there is a lack of trust in the county, which is unusual as the county council is made up of representatives from each municipality.

A fear was expressed that the county, being a large organization, would increase the fire service costs with bureaucracy. One CAO stated that they assumed costs would increase with a county-run service, but that the quality of the fire service would also increase.

Other FSB members were concerned about losing responsibility for the fire department operations, which is not an FSB responsibility. FSBs should be governance-focused, not operationally focused.

It would be critical to the process that a high level of consultation with the lower tier municipalities be part of the transition plan to provide reassurances of maintaining the fire service and how cost containment will be reflected.

It must be noted that some factors, such as upgrading the radio communications system and ensuring firefighters meet the new certification standards, will have a cost attached, regardless of the governance model.

Sub-Option

A sub-option to the county's assumption of fire services is for the county to assume governance and operations for the fire departments that are currently under a fire service board while leaving the Town of Orangeville to operate municipally as they currently do. This option recognizes the financial differences between operating paid on-call fire departments versus a fire department with many career firefighters.

Option 2: Single Fire Department (Orangeville) for the Entire County

Benefits

Note: The benefits of Option 1 and Option 2 will be the same, as both consist of the operation of a single fire department.

Since the OFD is the largest and most adequately staffed department, one option would be for the OFD to take over the operations of GVDFD, SDFD, MMFD, and RDFD, and then invoice the individual municipalities for the services provided.

While this option creates consistency across the county, the municipalities lose the ability to have any control as the OFD would set the pricing and operations. Municipalities would simply pay the invoice. Having said that, OFD has been an effective and efficient fire department, so there shouldn't be too much concern about expenditures being inappropriate.

The staffing hours and budget currently allocated to multiple fire chiefs could be reassigned to other roles, such as Fire Prevention and Training. This would enable the Fire Prevention program to deliver a consistent message, standardize processes (e.g., inspections, development plan approvals), and ensure uniform enforcement across all jurisdictions. For supervision, a single full-time district chief could be assigned to oversee the four smaller stations.

The County has a Chief Building Official who serves many of the smaller municipalities and needs to work closely with the Fire Inspectors. Currently, fire inspections are conducted

differently by various departments, which presents a challenge. However, with a unified fire service, there would be a consistent fire inspection program across all departments.

The OFD, with its existing staff of over 20 full-time employees, would be well-positioned to effectively manage a small number of additional full-time staff required to manage the outlying areas of the county. As a composite fire department, OFD already has strong part-time on-call experience that could be expanded across the county.

The larger fire department would benefit from economies of scale and its experience to operate more effectively. A single fire department would also allow for joint procurement of equipment and apparatus. Currently, there is no standardization for equipment, such as self-contained breathing apparatus. Joint procurement would not only save money but also reduce the time spent on training.

Additionally, while the fire department's digital radio system would need to be expanded, the associated costs could be distributed among the lower-tier municipal members.

Challenges

The Town, although the largest municipality in the county, would be required to add a sizeable (in excess of 120) part time employees to the town's complement of staff. This would require, an investment of time and resources within the HR and payroll functions.

With a Town of Orangeville model, other municipalities would lose their perceived control over budgeting and operations. The municipalities currently being provided contract services through the OFD are all pleased with the level of communications and the budgeting methods in place.

Option 3: Municipal Operations

In this option, OFD remains the same while the other three fire service boards (Grand Valley, Shelburne, Mulmur/Melancthon, and Rosemont) would become municipal departments (i.e., managed by their municipality).

In this model, the fire chief, along with the firefighters, become employees of the municipality responsible for the fire service. The Fire Chief would report to the CAO, but also have direct access to the municipal services such as HR, finance, and IT.

The municipality would be responsible for creating fire service agreements with the neighbouring municipalities for which fire service is provided. This agreement would include a financial model that defined how invoicing for the services would take place. Using OFD, as an

example, a line of communication is developed through annual presentations and education for the neighbouring municipalities.

Benefits

- Clear reporting hierarchy within the municipality.
- Transparency within the governance.
- Reduction of inter-municipal conflicts over budgeting that can delay the purchase of needed equipment.
- Provision of services through E&R By-laws is more accessible with a single fire chief, as opposed to a Fire Service Board composed of multiple council members with potentially little fire service background and differing opinions.

Challenges

The largest challenge with this model is that it does not address the inconsistencies currently seen with the FSB model. Most municipalities would still be served by multiple fire departments with differing levels of service, including fire prevention and fire suppression.

Some smaller municipalities that depend on others for fire services worry about lacking direct control over the fire department's finances, which they believe they have control over through the FSB.

One challenge identified was determining the division of ownership and compensation for the current fire stations, apparatus, and equipment among the member municipalities. An example given was in Shelburne, where the original portion of the fire station was built by the home municipality, but each of the member municipalities contributed to the expansion and renovation of the station. The question is how much the home municipality would pay to the FSB member municipalities for their contribution to the expansion.

Further, some FSB members may not wish to dissolve the FSB, so the issue of the process would have to be designed. Having one or two FSBs transfer to a municipal model will see benefits in those communities, but if some FSBs remain, some of the outstanding issues remain in those locations.

A sub-option suggested was for the County to assume the Fire Prevention roles throughout the region while maintaining the current fire services structure. This approach would address key issues but leave lower-tiers municipalities responsible for fire response.

Option 4: Status Quo with Recommendations

Status Quo implies that the Orangeville Fire Department remains under the municipal model, while the remaining fire departments remain operated by fire service boards.

Suppose FSBs are to be maintained in one or more jurisdictions. In that case, it is recommended that formal contracts should be made between the FSBs and the municipalities they serve, including a clear description of the level of services they will provide, including fire prevention education, fire code inspections and enforcement, fire department response to what type of calls, levels of service provided (e.g. technical rescue services), and reporting responsibilities.

There should be a standardized training program for Board members and CAOs to ensure the fire departments are appropriately administered.

A formal GIS study must be completed to rectify inconsistencies with municipal boundaries and provide more accurate fire protection. Current response boundaries are established according to historical municipal boundaries, including some that are no longer in place.

A sub-option suggested was for the County to assume the Fire Prevention roles throughout the region while maintaining the current fire services structure. This approach would address key issues but would leave the lower-tier municipalities responsible for fire response.

Challenges

Maintaining the current model would preserve all existing challenges, including inconsistencies in fire suppression, multiple fire prevention programs within a municipality, lack of coordination between fire services, and increasing difficulties as new standards for firefighting and technical rescue are introduced. While remaining with the current method of governance would involve less immediate change and delay expenditures, the ongoing challenges of FSBs will persist, and cost increases are unavoidable in the long term.



Conclusion & Final Comments

CONCLUSION AND FINAL COMMENTS

All the options presented have their respective benefits and challenges. Although EMG has identified a fourth option for maintaining the status quo, we are not recommending it. The ongoing inconsistencies with the FSBs appear to be the primary concern during EMGs review and interviews with municipal and fire staff.

Similarly, option three retains many of the current challenges and places a significant burden on small municipalities with limited administrative infrastructure.

During EMGs review of the Community Risk Assessments, inconsistencies were observed in which some of the risks are being addressed. These appear to arise from the varied governance of way fire services by the FSBs and individual towns. To resolve these challenges, there needs to be a unified system in place, allowing CAOs, Fire Chiefs, and Councils to exercise direct control over the services provided to their communities.

Currently, the situation is fragmented; some communities operate under FSBs, others have fire service agreements, and some have a combination of both. Only Orangeville has a municipally operated fire service.

The FSBs have played a crucial role in the fire service over the years and have served their communities effectively. However, as regulations and legislation requirements increase, reducing the number of governance organizations could lead to a more efficient and effective fire service for each community. This approach would not diminish the importance of town councils or their involvement in providing fire services to their communities.

EMG's opinion is that a single operational model should be adopted, based on the recommendations previously proposed. This would establish a more defined reporting and operational system for all parties involved, consistency of fire operations and fire prevention, and improved accountability.