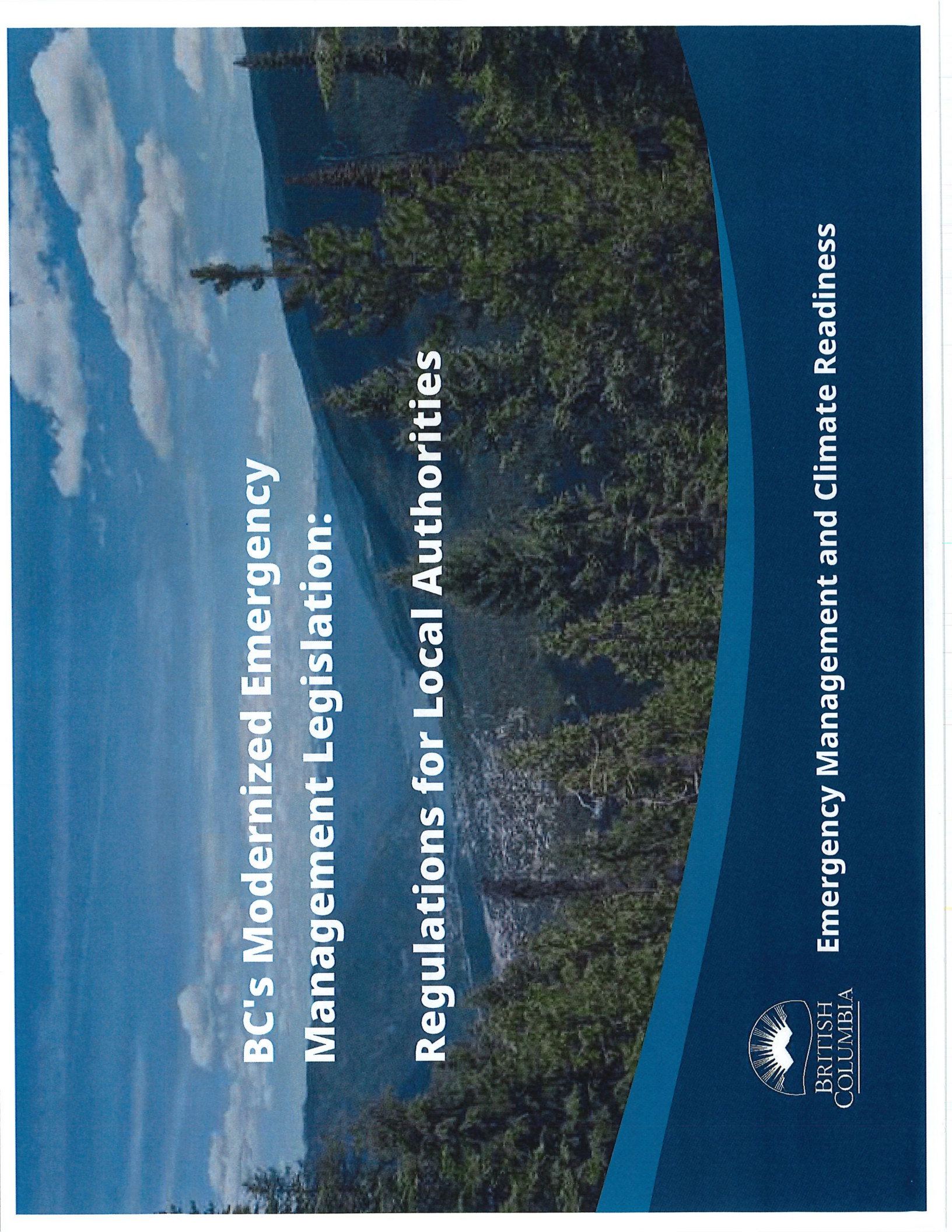
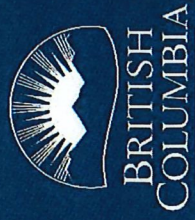


Appendix A – B.C.s Modernized Emergency Management Legislation Regulations for Local Authorities



BC's Modernized Emergency Management Legislation: Regulations for Local Authorities



Emergency Management and Climate Readiness

Introduction

The Province intends to introduce a modernized emergency management statute during the fall 2023 legislative session to replace the Emergency Program Act. The new statute will reflect several key policy shifts that have been informed by best practices in emergency management, partner engagement and co-development with First Nations. While the Emergency Program Act focuses primarily on emergency response, the new statute incorporates the principles of the UN Sendai Framework on Disaster Risk Reduction and includes the four phases of emergency management—preparation, mitigation, response, and recovery—and clarifies what is required from partners in each phase.

The Ministry of Emergency Management and Climate Readiness is preparing to draft regulations to accompany the new statute, including a new regulatory approach for local authority emergency management. The proposed statute allows the Province to provide additional details on certain requirements through regulation, while others will be addressed through policy and guidance.

While the new statute identifies several key partners, this paper focuses on regulations for local authorities. Feedback received in response to this paper will inform the design and drafting of these regulations, which are currently targeted for completion in 2024.

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Process

How to Provide Feedback

Feedback on the content of this paper can be submitted to modernizeEM@gov.bc.ca.

Submissions will be accepted until December 31, 2023.

This discussion paper has been publicly released and posted for feedback on the govTogetherBC website. We welcome your feedback on the two focused topics highlighted in this paper, on the key questions presented throughout, and on any other ideas you have related to emergency management regulations for local authorities.

In fall 2023, the Ministry of Emergency Management and Climate Readiness will engage local governments through virtual sessions. Information on engagement opportunities will be posted on our [website](#).

How the Regulations Will Be Made

Responses to this paper will help inform provincial government decision-making as the regulations for local authorities are being designed.

The Ministry of Emergency Management and Climate Readiness will also be co-developing the regulations with First Nations in alignment with the Province's obligation to ensure that the laws of B.C. are consistent with the United Nations Declaration on the Rights of Indigenous Peoples. For background on why B.C.'s modernized emergency management legislation is being co-developed, see the [Declaration on the Rights of Indigenous Peoples Act](#) and the [Interim Approach to Implement the Requirements of Section 3 of the Declaration on the Rights of Indigenous Peoples Act](#).

*With your help, we will create
safer, more resilient communities
for all British Columbians.*

BC's Modernized Emergency Management Legislation:
Regulations for Local Authorities



Context

Modernizing B.C.'s Emergency Management Legislation

Climate-related emergencies are impacting communities around the globe at an unprecedented rate and B.C. has not been immune. In recent years, we have endured some of the most challenging emergency conditions of our lifetimes, including the COVID-19 pandemic, catastrophic wildfire seasons, devastating floods, and increasingly extreme weather events. Since 2019, B.C. has been working on developing new provincial emergency management legislation to reflect this changing world by incorporating best practices, learnings from recent events, and the Province's commitment to reconciliation.

In 2018, B.C. adopted the United Nations Sendai Framework for Disaster Risk Reduction, which outlines international best practices to address and reduce disaster risk, and we have been taking action to align with this global strategy to increase preparedness and resilience. The following year, the

Declaration on the Rights of Indigenous Peoples Act became law in B.C. and the principles of that Act are key to the foundation of the modernized emergency management legislation.

For more information on B.C.'s road to modernizing our emergency management legislation, visit www.gov.bc.ca/emergencymanagementact.

Technical Resource

The Province anticipates introducing the new emergency management legislation in fall 2023. When the legislation is introduced, the full text of the proposed legislation will be accessible through the [website of the Legislative Assembly of British Columbia](#). In the meantime, we have released a technical paper, [B.C.'s Modernized Emergency Management Legislation: A New Framework for Disaster Risk Reduction, Response, and Recovery](#), which provides an overview of the major policy concepts included in the proposed legislation.

What are Regulations?

The statute, also referred to as an Act, sets the overall framework for emergency management in B.C. It establishes the key requirements, powers, and responsibilities of regulated entities.

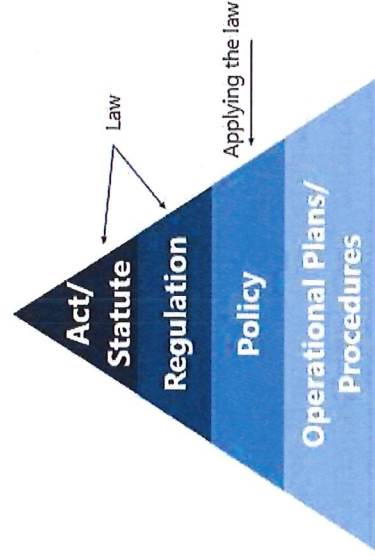


Figure 1 Hierarchy of Legislation

Regulations provide finer details on areas identified in the statute. For example, the emergency management statute will require regulated entities to prepare risk assessments, and the regulations can specify certain details, such as whether risk assessments need to be reviewed on a set schedule. The process for amending regulations to reflect learnings or needs from future events is also more streamlined than the process for amending the statute.

The statute will identify what may be outlined or required in regulation. In other words, it will provide authority for regulations. However, while certain topics will be authorized to

be addressed in regulations, the existence of this authorization does not necessarily mean that regulations will be made for those topics. Some matters may be better addressed through policy. Policy, along with operational plans and procedures, can provide guidance to ensure the legislation functions as intended.

This engagement process will help determine which details should be considered for inclusion in regulation rather than in policy, plans, or procedures.

Key Changes for Local Authorities

The new statute will reflect several key policy shifts that have been informed by best practices in emergency management, partner engagement, and co-development with First Nations. While the Emergency Program Act focuses primarily on emergency response, the new statute includes the four phases of emergency management—preparation, mitigation, response, and recovery—and clarifies what is required from identified actors in each phase.

Under the existing regulations, local authorities must:

- prepare local emergency plans that reflect potential emergencies and disasters that may affect any or all of an area within their jurisdiction;
- include an assessment of the relative risk that a given type of emergency will occur, along with its potential impact on people and property; and

BC's Modernized Emergency Management Legislation:
Regulations for Local Authorities



- establish priorities for restoring essential services provided by the local authority.

Some of the key changes for local authorities in the proposed legislation that may be further detailed through regulations include:

- clear requirements for risk assessments, emergency management plans, and business continuity plans;
- a framework for multijurisdictional emergency management organizations; and
- requirements to consult and cooperate with Indigenous governing bodies.

Emergency planning requirements

Municipalities and regional districts will be required to ensure that risk assessments are prepared for all reasonably foreseeable hazards within their jurisdictions. They will also need to ensure that there is at least one emergency management plan for each area within their jurisdiction. Generally, this means that municipalities will need to have a plan that covers municipal boundaries, and regional district plans can exclude areas for which municipal plans exist. Additionally, in recognition of the unique nature of regional districts, [Key Question A6](#) seeks input on how the regulations could focus regional district risk assessments and emergency management plans on geographic areas for which the making of plans is most critical.

Municipal authority under the legislation will apply within municipal boundaries. Regional district authority will apply within the boundaries of any electoral areas within a regional district. As local authorities, Modern Treaty Nations may exercise powers within the boundaries of their own treaty lands. If Crown land falls within municipal or regional district boundaries, a municipality or regional district will be authorized to use powers and will be required to perform their duties under the legislation within these Crown lands.

Emergency management organizations

Hazards and emergencies do not respect jurisdictional boundaries and collaboration can greatly enhance effective mitigation, preparedness, response, and recovery. The legislation will enable the creation of multijurisdictional emergency management organizations that include any combination of local authorities, Indigenous governing bodies, and the provincial government. The creation of a multijurisdictional emergency management organization will allow for requirements (such as preparing risk assessments and emergency management plans) to be fulfilled as a collective.

Consultation, coordination and cooperation

When a municipality or regional district prepares or revises a risk assessment or emergency management plan, they will be required to consult and coordinate with each municipality or regional district that has jurisdiction over an area adjacent to the municipality or regional district that is preparing or

revising their risk assessment or plan. Further consultation and coordination requirements could be included in regulations.

In alignment with the United Nations Declaration on the Rights of Indigenous Peoples, the new emergency management legislation will require consultation and cooperation in all phases of emergency management. Municipalities and regional districts will be required to consult and cooperate with Indigenous governing bodies when developing or reviewing risk assessments and emergency management plans. This includes Indigenous governing bodies authorized to act on behalf of First Nations Peoples whose traditional territory or treaty area includes an area within the jurisdiction of a municipality or regional district.

When the legislation receives royal assent, municipalities and regional districts will be required to contact Indigenous governing bodies and make reasonable efforts to reach agreement on the areas to be described in local authority emergency management plans for the purposes of consultation and cooperation. Entities authorized by First Nations Peoples to act on their behalf for the purposes of emergency management can be identified through this process.

For the response and recovery phases, consultation and cooperation will be required when either the Province or a local authority plans to use certain response or recovery powers. The Ministry of Emergency Management and Climate Readiness is developing additional supporting guidance on consultation and cooperation.



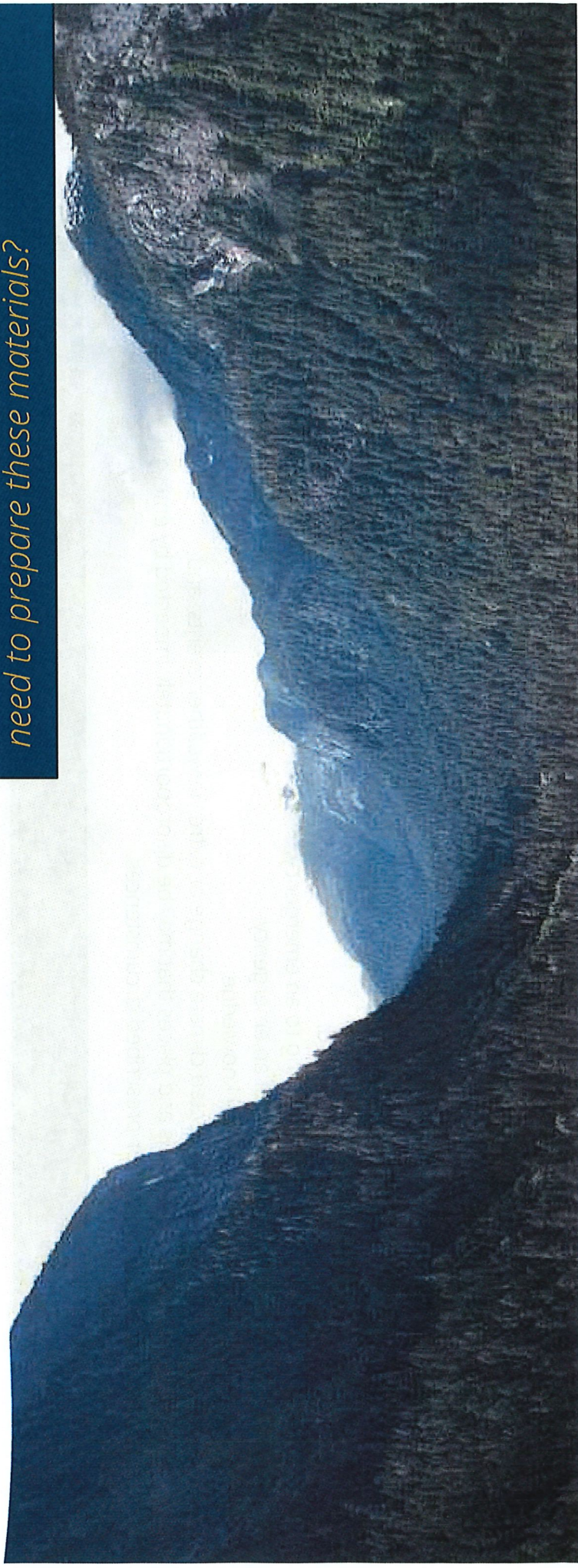
Focus "A" : Regulations for Local Authority Planning

The following sections outline key areas for which regulations concerning local authority planning could be made. Questions are included to prompt feedback. Please refer to the appendix for a summary of relevant regulation-making authorities.

When regulations for local authorities are made, requirements to prepare risk assessments, emergency management plans, and business continuity plans will take effect. Additional time will be provided to meet these new requirements.

Key Question A1: Phasing-In

How much time does your local authority need to prepare these materials?



Risk Assessments

Under the proposed legislation, risk assessments will need to consider:

- the degree of risk posed by a hazard;
- the likelihood of the hazard leading to an emergency;
- the potential scope and scale of an emergency;
- available Indigenous and local knowledge;
- potential impacts from expected climate change or extreme weather events; and
- impacts on people, animals and places that may be disproportionately impacted by emergencies and may be more vulnerable due to physical location or prescribed circumstances.

Modernized statute will require risk assessments to:	Regulations could:	Questions
be prepared in accordance with the statute	add to statutory rules for how risk assessments must be prepared	Key Question A2: Preparing risk assessments Should there be rules in the regulations for how risk assessments are prepared? If yes, what do you suggest?
identify all reasonably foreseeable hazards, and assess: • the extent of risk presented by a hazard • the potential consequences if an emergency occurs, with special consideration to (1) people who may experience intersectional disadvantage, and (2) vulnerable people, animals, places, or things	add to statutory rules for what risk assessments must contain	Key Question A3: Additional contents for risk assessments Should there be additional matters assessed in relation to hazards?

Emergency Management Plans

Municipalities and regional districts will be required to have emergency management plans that are based on the results of risk assessments and that describe:

- measures necessary for each of the four phases of emergency management;
- the roles, powers, and duties of key persons;
- requirements for emergency resources;
- procedures for engaging emergency systems;
- plans for training and exercise programs; and
- how cultural safety will be promoted.

Modernized statute will require emergency management plans to:	Regulations could:	Questions:
be prepared in accordance with the statute	add to statutory rules for how emergency management plans must be prepared	Key Question A4: Preparing emergency management plans Should there be rules in the regulations for how emergency management plans are prepared? If yes, what do you suggest?
describe: • measures for each phase of emergency management • roles, powers, and duties of key persons • emergency resource requirements • procedures for engaging emergency systems (e.g., notification systems) • training and exercise programs • measures to mitigate the effects of emergencies on (1) people who may experience intersectional disadvantage, and (2) vulnerable people, animals, places, or things • measures to promote cultural safety	add to statutory rules for what emergency management plans must contain	Key Question A5: Additional contents for emergency management plans For example, regulations may specify that local authority emergency management plans must also describe measures to reduce the incidence of gender-based violence during emergencies. Should there be additional matters described for the purposes of emergency management plans?

Regional Districts: Risk Assessment and Emergency Management Plan Scope

Regional districts are responsible for unincorporated areas within their jurisdiction, many of which are rural, remote, and/or sparsely populated. The Province intends to make regulations that will limit the minimum required scope of regional district plans to geographic areas where plans can have the greatest impact.

Modernized statute will:	Regulations could:	Question:
require a municipality or regional district to prepare and maintain risk assessments for the hazards within their jurisdiction, and prepare and maintain an emergency management plan for their jurisdiction	create rules regarding the requirement for a municipality or regional district to prepare risk assessments and emergency management plans, including rules that could reduce the required geographic scope of these risks assessments and emergency management plans for regional districts	Key Question A6: Scope of regional district planning requirements How should the regulations establish a minimum required scope for regional district plans?



Consultation, Collaboration, and Cooperation for Risk Assessments and Emergency Management Plans

The modernized emergency management legislation will include a series of principles which, broadly speaking, aim to foster collaboration, coordination, and relationship-building. In alignment with the United Nations Declaration on the Rights of Indigenous Peoples and the Declaration on the Rights of Indigenous Peoples Act, consultation and cooperation will be required in all phases of emergency management.

Modernized statute will require local authorities, when preparing, reviewing, or revising a risk assessment or emergency management plan, to:	Regulations could:	Questions:
consult and coordinate with adjacent local authorities	add to statutory rules for how a local authority must consult and coordinate with other local authorities, and potentially prescribe other persons for the purpose of consultation and coordination	Key Question A7: Consultation and coordination with neighbouring local authorities Should there be rules in the regulations for how local authorities consult and coordinate with neighbouring local authorities in the course of preparing, reviewing, or revising a risk assessment or emergency management plan? If yes, what do you suggest?
consult and cooperate with Indigenous governing bodies and, if adjacent to the treaty lands of a Modern Treaty Nation, to consult and cooperate with that Nation	add to statutory rules for how a local authority must consult and cooperate with Indigenous governing bodies	Key Question A8: Consultation and cooperation with Indigenous governing bodies and Modern Treaty Nations Should there be rules in the regulations for how local authorities consult and cooperate with Indigenous governing bodies and (if applicable) Modern Treaty Nations in the course of preparing, reviewing, or revising a risk assessment or emergency management plan? If yes, what do you suggest?

Business Continuity Plans

Municipalities and regional districts will be required to have business continuity plans that describe how they will ensure the continued delivery of essential services during an emergency.

Modernized statute will require business continuity plans to:	Regulations could:	Question:
be prepared in accordance with the statute	add to statutory rules for how business continuity plans must be prepared	Key Question A9: Business continuity plans Should there be rules in the regulations for how business continuity plans are prepared? If yes, what do you suggest?

Reviewing and Revising Planning Materials

As the risk landscape continues to evolve, regular review of risk assessments, emergency management plans, and business continuity plans is necessary to ensure all information is current. One consideration in establishing review cycles is community capacity to meet the requirements. The goal is to strike a balance between ensuring risks are being regularly reviewed and reflected in plans and recognizing the differences in community capacities and contexts.

Modernized statute will:	Regulations could:	Question:
require a municipality or regional district to review and revise their risk assessments, emergency management plan, and business continuity plan	create rules regarding the requirement to review and revise risk assessments, emergency management plans, and business continuity plans, including rules that could establish a regular review cycle	Key Question A10: Review cycle Should there be rules in the regulations to establish a cycle for the regular review and revision of risk assessments, emergency management plans, and business continuity plans? If yes, what would be an appropriate cycle?

Focus “B”: Regulations for Emergency Management Organizations

Under the Emergency Program Act, local authorities are required to establish emergency management organizations. These organizations develop and implement emergency management plans as well as response and recovery measures. This requirement will continue under the modernized legislation, but multijurisdictional emergency management organizations will also be enabled.

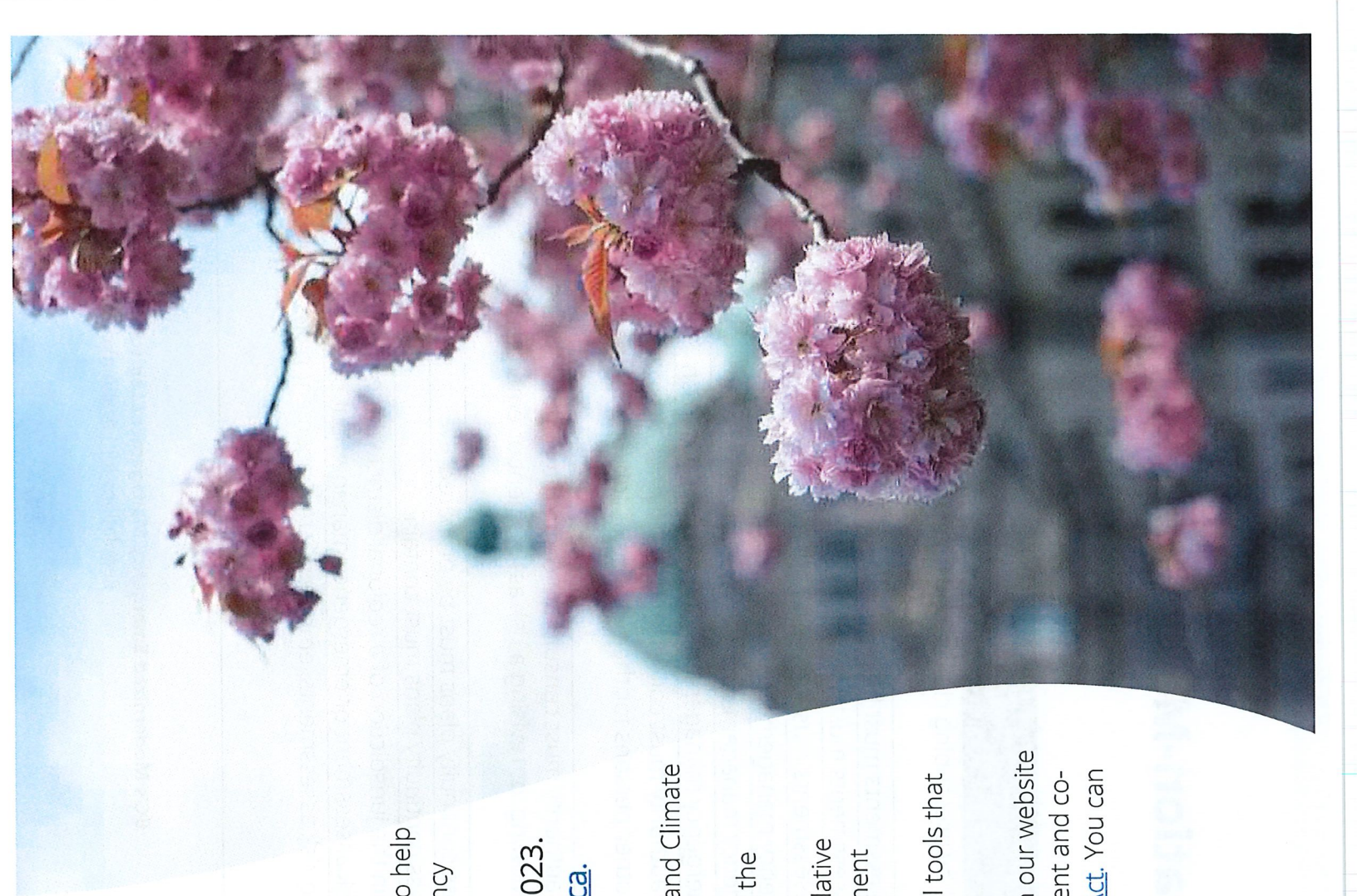
Emergency Management Organizations Other Than Multijurisdictional Emergency Management Organizations

Modernized statute will:	Regulations could:	Question:
require a local authority, if it does not join a multijurisdictional emergency management organization, to establish, appoint members to, and maintain its own emergency management organization	create rules for establishing, appointing members to, and maintaining emergency management organizations (other than multijurisdictional emergency management organizations)	Key Question B1: Local authority emergency management organizations Should there be rules in the regulations for establishing, appointing members to, and maintaining emergency management organizations? If yes, what do you suggest?

Multijurisdictional Emergency Management Organizations

The new multijurisdictional emergency management organization framework will allow members to undertake response actions as a single body. The framework will allow cross-jurisdictional collaborative relationships to be formalized and permit legislative and operational requirements to be met collaboratively. Multijurisdictional emergency management organizations can consist of any combination of local authorities, Indigenous governing bodies, and the provincial government.

Modernized statute will:	Regulations could:	Questions:
authorize a multijurisdictional emergency management organization to be established by any combination (two or more) of local authorities, Indigenous governing bodies, and the Province	create rules for the establishment, governance, and responsibilities of multijurisdictional emergency management organizations	Key Question B2: Establishing multijurisdictional emergency management organizations What rules should the regulations provide to govern the formation of multijurisdictional emergency management organizations? Key Question B3: Governance and responsibilities of multijurisdictional emergency management organizations Should there be rules in the regulations about the governance and responsibilities of multijurisdictional emergency management organizations? If yes, what do you suggest?
provide that a local authority in a multijurisdictional emergency management organization must provide information required by the provincial administrator, and comply with directions given by the provincial administrator	create rules as to which records relevant to a local authority's participation in a multijurisdictional emergency management organization must be given to the provincial administrator	Key Question B4: Multijurisdictional emergency management organization records Should there be rules in the regulations to specify the types of records relevant to a local authority's participation in a multijurisdictional emergency management organization that must be given to the provincial administrator? If yes, what do you suggest?



Conclusion

Thank you for taking the time to participate in this engagement to help shape the future regulatory approach for local authority emergency management.

The deadline for written submissions is December 31, 2023. Please send your submission to modernizeEM@gov.bc.ca.

Your feedback will help the Ministry of Emergency Management and Climate Readiness:

- understand the needs of local authorities in implementing the modernized legislation;
- identify policy options and pathways that provide the legislative foundation for strong local authority emergency management programs; and
- develop regulations and supporting policy and operational tools that reflect the needs and experiences of local governments.

Regulations are currently targeted for completion in 2024. Watch our website for up-to-date information on supports and upcoming engagement and co-development activities: www.gov.bc.ca/EmergencyManagementAct. You can subscribe to the page to receive updates.

Appendix: Summary of Regulation-Making Authorities

Theme	Regulations Authorized To
Focus "A": Local Authority Planning	1. Add meaning to the term "vulnerable" by prescribing characteristics that make a person, animal, place, or thing vulnerable
	2. Add to statutory rules for how risk assessments must be prepared
	3. Add to statutory rules for what risk assessments must contain
	4. Add to statutory rules for what risk assessments must be based on
	5. Add to statutory rules for how emergency management plans must be prepared
	6. Add to statutory rules for what emergency management plans must contain
	7. Add to statutory rules for what an emergency management plan must be based on
	8. Add to statutory rules for how a local authority must consult and coordinate with other local authorities, and potentially prescribe other persons for the purpose of consultation and coordination
	9. Add to statutory rules for how a local authority must consult and cooperate with Indigenous governing bodies when preparing, reviewing, or revising a risk assessment or emergency management plan
	10. Add to statutory rules for how business continuity plans must be prepared
	11. Add to statutory rules for what business continuity plans must contain
	12. Create rules regarding the areas within the jurisdiction of a regional district where the regional district is not required to prepare a risk assessment or emergency management plan or both
	13. Create rules for reviewing and revising risk assessments, emergency management plans, and business continuity plans

Theme	Regulations Authorized To
Focus "B": Emergency Management Organizations	1. Create rules for establishing, appointing members to, and maintaining emergency management organizations (other than multijurisdictional emergency management organizations) 2. Create rules for establishing multijurisdictional emergency management organizations, including governance and responsibilities, as well as terms and conditions of agreements to join multi-jurisdictional emergency organizations 3. Create rules as to which records relevant to a local authority's participation in a multijurisdictional emergency management organization must be given to the provincial administrator
Miscellaneous	1. Add types of information, in addition to those that will be described in the statute, that the minister may, by order, require a municipality or regional district to provide to the government 2. Add types of actions, in addition to those that will be described in the statute, that the minister may, by order, require a municipality or regional district to take 3. Specify prohibitions, requirements, limits, or conditions that would apply to the exercise of response or recovery powers of a municipality or regional district 4. Add matters, in addition to those that will be described in the statute, that municipalities and regional districts must summarize in a report following a state of local emergency, and create rules that would require the publication of these final reports

Appendix B – CVEM Responses to EMCR Regulations for Local Authorities Discussion Paper

BC's Modernized Emergency Management Legislation: Regulations for Local Authorities-Discussion Paper

This draft response to the Regulations on Local Authorities Discussion Paper Summary was prepared by Comox Valley Emergency Management in collaboration with staff from the City of Courtenay, Town of Comox, Village of Cumberland, K'ómoks First Nation, Comox Valley RD, Comox Valley Emergency Management staff and mutual aid partners from City of Campbell River and Island Health/Health Emergency Management BC.

Questions as they appear on the Discussion Paper:

"FOCUS A": Regulations for Local Authorities Planning

Definition:

What are Regulations? – The statute, also referred to as an Act, sets the overall framework for emergency management in B.C. It establishes the key requirements, powers and responsibilities of regulated entities.

Key Question	Proposed Response	Discussion Notes
A1: Phasing-In How much time does your local authority need to prepare these materials (risk assessments, emergency management plans, and business continuity plans).	This is currently unknown. As further details have not been disclosed regarding the preparation of risk assessment, emergency management plans and business continuity plans, CVEM First Nations and local authority partners cannot offer an accurate timeline for preparing these materials, either individually or regionally.	<i>The discussion notes for A1 were repeated throughout the discussion paper review process and emphasize the importance of:</i> 1. standardized templates and strong tools for consultants, emphasizing alignment and consistency across the province. 2. sustainable funding is deemed essential for risk assessments, especially with potential rule revisions. 3. consideration is given to impacts on vulnerable populations, consistent notification tools, and clarity of roles, including BC housing and warm/cooling centers. Measures to promote cultural safety and inclusion are highlighted. Support is expressed for regional emergency plans with adequate funding and collaboration with key corporate service providers. 4. training and exercising together, avoiding political cycle influence, and defining scope consistently are noted priorities. 5. clear regional planning involving various stakeholders, including corporate service providers and internal government departments,

		is emphasized. The question of consultants and the type of plan, particularly an all-hazards approach, remains open.
A2: Preparing risk assessments Should there be rules in the regulations for how risk assessments are prepared? If yes, what do you suggest?	No. We would not be in a position to provide direction on this until the Province has provided local authorities with engagement or consultation opportunities, nor details, on the forthcoming Provincial comprehensive risk assessments that we have informed will integrate the existing Provincial Hazard Risk and Vulnerability Assessments (HRVA) and Climate Risk Assessment (CRA) processes. Also missing from risk assessments is how other Provincial assessments such as the Community Wildfire Resilience Plans (CWRP) and Wildfire Risk Assessments will also be integrated into this comprehensive risk assessment process.	The discussion notes for A2 and A3 emphasize the: • importance of respecting partners' capacity for feedback on technical papers and advocate for a comprehensive approach to Hazard, Risk, and Vulnerability Assessments (HRVA). • considerations for commercial forms, dependencies on infrastructure, and the need for collaboration with crown corporations in multi-jurisdictional risk assessments. • questions about rules, risk assessment frequency, and repurposing public infrastructure. • need for developing standards of operational practices rather than rigid rules, with a focus on tools and guidelines for consultants with a First Nations and regional perspective. • issues of fair monitoring, enforcement, and support for communities with limited capacity are raised. • importance of sharing resources for building trust is noted, along with the need for education on hazard vs vulnerability. • data management, protection, indigenous knowledge, and environmental science are highlighted, emphasizing the role of operating communication procedures, community plans, and long-range planning. • need for regional emergency planning that considers all communities and involves key corporate service providers at the planning table.
A3: Additional contents for risk assessments Should there be additional matters assessed in relation to hazards?	Yes. In order to complete these comprehensive risk assessment processes, local authorities will require core funding to both support the creation of new regional relationships and to engage with existing trusted partnerships in an ongoing capacity. As an example, the Comox Valley is surrounded by primarily private timber lands and the Province has not yet provided a clear understanding of how forthcoming Provincial comprehensive risk assessments will support Nations and local authorities to engage with private industry in a shared watershed landscape. To truly understand regional risk would require Provincial guidance on how to develop a common understanding of practices that reduce and increase risk of exposure to hazards and vulnerabilities of communities that are dependent on	

	watersheds for clean drinking water, hydro-power supply, salmon stocks, agriculture, recreation, tourism, and more.	
A4: Preparing emergency management plans. Should there be rules in the regulations for how emergency management plans are prepared? If yes, what do you suggest?	No. However, the Province does need to provide standardized guidelines, templates and strong tools, paired with core funding for local authorities to ensure alignment and consistency of emergency plans across the province.	Discussion notes for A4, A5 and A6 emphasize: - the importance of respecting partners' capacity for feedback on technical papers and advocate for a comprehensive approach to Hazard, Risk, and Vulnerability Assessments (HRVA). - highlight considerations for commercial farms, dependencies on infrastructure, and the need for collaboration with crown corporations in multi-jurisdictional risk assessments. - developing standards of operational practices rather than rigid rules, with a focus on tools and guidelines for consultants with a First Nations and regional perspective. - issues of fair monitoring, enforcement, and support for communities with limited capacity are raised. - importance of sharing resources for building trust is noted, along with the need for education on hazard vs vulnerability. - data management, protection, indigenous knowledge, and environmental science are highlighted, emphasizing the role of operating communication procedures, community plans, and long-range planning. - need for regional emergency planning that considers all communities and involves key corporate service providers at the planning table. - consideration is given to impacts on vulnerable populations, consistent notification tools, and clarity of roles, including BC housing and warm/cooling centers. - measures to promote cultural safety and inclusion are highlighted. - support is expressed for regional emergency plans with adequate funding and collaboration with key corporate service providers. - Training and exercising together, avoiding political cycle influence, and defining scope consistently are noted priorities. - clear regional planning involving various stakeholders, including corporate service providers and internal government departments, is emphasized.
A5: Additional contents for emergency management plans. Should there be additional matters described for the purpose of emergency management plans?	No. However, the Province does need to provide standardized guidelines, templates and strong tools, paired with core funding, for local authorities to ensure alignment and consistency of emergency plans across the province.	
A6: Scope of regional district planning requirements. How should the regulations establish a minimum required scope for regional district plans?	Yes. Section 166 (d) of Bill 31 does clarify that the Minister may identify (under regulation) areas within a regional district where risk assessments will not be required. This requirement must consider the: - standards established by the Community Wildfire Resiliency Plan and Wildfire Risk Assessments, which is within a community or 1 kilometre around its perimeter, and; - risks and vulnerability assessments related to watersheds that provide drinking water and other critical resources to the community;	

	Additionally, the regulations need to provide autonomy to Regional Districts and MJEMOs that include Regional Districts to identify and allow for additional scoping requirements around regional planning in cases where Provincial entities may lack knowledge or experience. For example, the ability for a regional district to identify unique requirements under EDMA regulations for a private business that is also operating as a private water utility on private lands within RD boundaries to ensure that their business continuity plan includes the ability to provide water supply to residents and businesses, and for fire suppression purposes, during times of water scarcity or drought.	
A7: Consultation and coordination with neighbouring local authorities. Should there be rules in the regulations for how local authorities consult and coordinate with neighbouring local authorities in the course of preparing, reviewing, or revising a risk assessment or emergency management plan? If yes, what do you suggest?	No. This responsibility will sit with EMOs or MJEMOs, and it will be their responsibility to consult and coordinate with neighbouring local authorities and IGBs. The Province needs to provide guidelines, templates and core funding to support this ongoing work to develop and maintain comprehensive risk assessments and emergency plans that complement one another across jurisdictional boundaries.	The discussion notes for A7 and A8 highlight: • challenges of applying rigid rules in communities, emphasizing the need for operational guidance and trust-building. • sustainable funding, enforcement of timelines, standardizing language, and aligning with existing policies. • incorporating Improvement Districts, defining critical infrastructure, and integrating support into job descriptions are key considerations. • importance of differentiated plans for the public, internal collaboration, and operational guidelines is noted. • training for first responders on gender-based violence and ensuring support continuity during disasters are priorities. • defining terms, including animals and essential services, is emphasized. The need for collaboration and conversation, rather than strict rules, is underscored. • regular plan reviews and the potential for disagreement among municipalities in regional plans are also discussed, with a focus on collaboration with First Nations and IGBs.

A8: Consultation and cooperation with Indigenous Governing Bodies (IGBs) and Modern Treaty Nations. Should there be rules in the regulations for how local authorities consult and cooperate with Indigenous governing bodies and (if applicable) Modern Treaty Nations in the course of preparing, reviewing, or revising a risk assessment or emergency management plan? If yes, what do you suggest?	No. Rather than rules, local authorities need core funding, training and materials from Provincial bodies to support the overall understanding, integration and localization of DRIPA; as well as to develop a deeper working knowledge and understanding of 'free, prior and informed consent' and "the right to self-determination" as they apply to First Nations, Modern Treaty Nations, and/or IGBs.	
A9: Business Continuity plans. Should there be rules in the regulations for how business continuity plans (BCP) are prepared? If yes, what do you suggest?	No, to rules around BCPs specific to Emergency Management. We acknowledge that Provincial BCP rules or requirements may apply to EMOs, MJEMOs and EOCs, but ultimately BCPs remain an overall Provincial responsibility to standardize, monitor, enforce and support. AND	<i>The discussion notes for A9 and A10 highlight the:</i> • importance of legislative coherence and EOC support, advocating for business continuity plans (BCP) to assist EOCs and various services. • concerns are expressed about unclear statutory language, suggesting that standards of operational guidelines or best practices would be more helpful. • need for sustainable funding for communities to create, review, and exercise plans is emphasized, independent of election cycles. • differentiating between plans and operational guidelines is proposed, with the board providing input on the plan and operational updates coinciding with election cycles.

	Yes, to the Provincial responsibility to create regulations and/or guidelines around BCPs, for all entities that are required to have BCPs, not just local authorities. To ensure consistency and efficiencies, these regulations and/or guidelines must align, clarify and strengthen existing BCP standards (for example ISO 22301). These Provincial regulations must also be accompanied by Provincial core funding, materials and tools to support the businesses and authorities that are required to develop, update and maintain them.	Yes, to the Provincial responsibility to create regulations and/or guidelines around BCPs, for all entities that are required to have BCPs, not just local authorities. To ensure consistency and efficiencies, these regulations and/or guidelines must align, clarify and strengthen existing BCP standards (for example ISO 22301). These Provincial regulations must also be accompanied by Provincial core funding, materials and tools to support the businesses and authorities that are required to develop, update and maintain them.	• suggested review timelines include a 5-year interval for risk assessments and yearly exercises for components of the emergency management (EM) plan and BCP. • clear standards and sustainable funding are deemed essential for these processes, which can aid communities in identifying risks and gaps early. suggested that BCP should not be part of the emergency management planning department/services.
A10: Review cycle. Should there be rules in the regulations to establish a cycle for the regular review and revision of risk assessments, emergency management plans, and business continuity plans? If yes, what would be an appropriate cycle?	Yes. 5 years would be an appropriate cycle for emergency plans, which aligns with the proposed review cycle of the EDMA legislation. As a best practice, the Province must consider that any changes to the EDMA legislation or regulations will trigger the requirement for local authorities and MJEMOs/EMOS to review and update risk assessments, which will prompt changes to the emergency plans. Consider also that if the Province plans to regulate a regular review and revision cycle to the EDMA legislation then the Province also needs to offer sustainable core funding to support EMOS/MJEMOs to ensure regular review and updates to local emergency plans and risk assessments; to maintain alignment with legislation changes, and/or to reflect any changes prompted by lessons learned from training and exercises and/or from emergency and disaster events.		

	AND	
	No. BCPs are the responsibility of the Province to regulate and must remain a distinct responsibility that includes EM but not for EM to enforce.	

Focus "B": Regulations for Emergency Management Organizations (EMO)

"Focus B" Regulations for EM Organizations:

- EMOs (local authority only)
- Multi-jurisdictional EMOs (includes multiple Local Auth, Indigenous Governing bodies, Prov government)

Key Question	Proposed Response	Discussion Notes
B1: Local Authority Management Organizations. Should there be rules in the regulations for establishing, appointing members to, and maintaining emergency management organizations? If yes, what do you suggest?	Yes, however, limited to the Provincial requirement to establish an EMO or MJEMO and the requirement to appoint a minimum of 2 members to ensure shared responsibility (more than an EPC) to support emergency planning for daily operations.	The discussion notes for B1, B2, B3 and B4 emphasize the: • need for guidelines rather than strict rules, considering the diverse capacities of different communities and the differences between municipalities and RDs, that support a diversity of rural, remote and urban landscapes and communities. • caution is urged in regulating the formation of multi-jurisdictional emergency management organizations (MJEMO) to ensure support, respect, and time for relationship-building. • importance of clearly distinguishing Incident Command Systems and Emergency Operations Center (EOC) responsibilities as operational roles, versus defining staffing and governance parameters for MJEMOs. • need for more guidance and information for respecting and addressing the authority of Indigenous governing bodies, band administrations, Hereditary Chiefs, and conflicts of interest is highlighted. • further definition of jurisdictional authority is recommended. • the need for a formal registration process of MJEMOs, including periodic reviews, and contractual agreements for organizations in MJEMOs.

			• <i>clear rules for joining/leaving, defined expectations, and collaboration through the lens of UNDRIP and Indigenous knowledge are advocated.</i> • <i>need for guidelines for record-keeping are preferred, support in the form of funding and sharing emergency plans and risk assessments is deemed essential for communities developing MJEMOs.</i>
B2: Establishing multijurisdictional emergency management organizations What rules should the regulations provide to govern the formation of multijurisdictional emergency management organizations?	No. Suggestion is that the Province work with Local Authorities as partners to co-develop guidelines and tools to support the establishment of an MJEMO and the appointment of members for emergency planning, defining criteria and portfolios.		
B3: Governance and responsibilities of multijurisdictional emergency management organizations Should there be rules in the regulations about the governance and responsibilities of emergency management organizations? If yes, what do you suggest? Multijurisdictional?	No. Suggesting the Province work with Local Authorities as partners to both understand and then co-develop guidelines and tools to support the establishment of an MJEMO governance and responsibilities structures for multijurisdictional emergency management organizations. under existing systems such as bylaws.		
B4: Multijurisdictional emergency management organization records. Should there be rules in the regulations	Yes, however, limited to the Provincial requirement to establish an EMO or MJEMO and can include a basic list of records that EMO and MJEMO are required to maintain and review to support function of the		

to specify the types of records relevant to a local authority's participation in a multijurisdictional emergency management organization that must be given to the provincial administrator? If yes, what do you suggest?	emergency planning for daily operations function of the MJEMO. This needs to be distinct from ICS and EOC documentation as those procedures and systems are already clear and established.	
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