



Advocates for Safer Airports in Canada

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The Honourable Tony Wakeham

Office of the Premier

Government of Newfoundland and Labrador

cc: Office of the Auditor General of Newfoundland and Labrador

Re: Auditor General's Report on Emergency Management and Business Continuity – Implications for Municipal Capacity, Airport MOUs, and Public Safety Risk

Dear Premier Wakeham,

I am writing to bring forward concerns arising from the recent report of the Office of the Auditor General of Newfoundland and Labrador regarding emergency management and business continuity planning across the province.

The Auditor General's findings identify systemic deficiencies in emergency preparedness, including the absence of plans in most municipalities, the lack of testing and validation of existing plans, and the absence of coordinated oversight to ensure operational readiness. These findings, taken together, point to a broader issue: emergency preparedness in many areas of the province is not demonstrably operational, but rather largely unverified.

While the report appropriately focuses on governance and planning, its implications extend further—specifically to the province's reliance on municipal emergency response capacity in support of critical infrastructure, including airports.

1. Municipal Capacity and Unverified Response Capability

The report establishes that a significant majority of municipalities do not maintain current, tested emergency plans, and that the Province does not have mechanisms in place to validate response capability. In practical terms, this means that:

- Response times are not consistently measured or assured;
- Resource availability during concurrent emergencies is not verified;
- Inter-agency coordination has not been meaningfully tested in many cases.

This raises a fundamental concern: where response capability has not been validated, it cannot be assumed.

2. Memoranda of Understanding (MOUs) with Airports – Risk Amplification

Airports within Newfoundland and Labrador rely, in part, on Memoranda of Understanding (MOUs) with municipal fire departments to supplement Aircraft Rescue and Firefighting (ARFF) capacity.

In light of the Auditor General's findings, these arrangements warrant closer examination.

MOUs typically assume that municipal resources will be:

- Available,
- Timely in response, and
- Operationally effective.

However, the audit suggests that municipal emergency systems may not consistently meet these assumptions. This creates a risk that MOUs, rather than mitigating gaps, may inadvertently:

- Transfer operational risk from federally regulated airport systems to municipal services;
- Place additional strain on already limited local resources;
- Create competing demand scenarios where both community and airport emergencies cannot be effectively managed simultaneously.

In this context, MOUs may function as **paper-based assurances of capacity**, rather than evidence-based guarantees of response capability.

3. Governance Considerations and Public Confidence

The findings also raise broader questions regarding how emergency preparedness risks have been assessed and tolerated over time.

In particular, there is a legitimate public interest in understanding whether prior policy approaches—especially those that supported reduced emergency response capacity in aviation contexts—may have influenced the development or acceptance of current preparedness levels.

Given that certain senior officials previously held roles involving legal advocacy related to airport emergency response frameworks, it is important, from a governance and public confidence perspective, that current and future decision-making be clearly grounded in independently validated public safety considerations.

This is not a question of individual conduct, but of ensuring that:

- Policy decisions are demonstrably evidence-based;
 - Emergency preparedness standards reflect operational realities; and
 - Public confidence in the integrity of safety oversight is maintained.
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4. Request for Provincial Review

In light of the above, I respectfully request that the Government of Newfoundland and Labrador consider:

1. **Undertaking a targeted review of MOUs** between airports and municipal fire departments, including:
 - Validation of actual response capability;
 - Assessment of response times under realistic conditions;
 - Evaluation of concurrent demand risks affecting municipalities;
2. **Assessing the adequacy of oversight mechanisms** to ensure that municipal emergency preparedness is:
 - Current,
 - Tested, and
 - Operationally effective;
3. **Clarifying the Province's role** in ensuring that municipal systems relied upon by critical infrastructure are capable of meeting those demands;

4. **Considering whether additional standards or safeguards** are required to ensure that emergency response arrangements—particularly those involving shared responsibility—are based on demonstrated capability rather than assumption.

Conclusion

The Auditor General's report presents a clear opportunity for the current government to assess inherited systemic risks and to strengthen emergency preparedness frameworks across the province.

At its core, this is an issue of public safety. Emergency response systems must be evaluated not on the existence of plans or agreements, but on their demonstrated ability to function effectively when called upon.

Ensuring that these systems are validated, coordinated, and reliable is essential—not only for community safety, but also for maintaining confidence in the broader safety infrastructure upon which residents and travelers depend.

Thank you for your attention to this matter. I would welcome the opportunity to provide any additional information or context that may assist in this review.

Respectfully submitted,



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