



Advocates for Safer Airports in Canada

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Transport Canada Civil Aviation

Aircraft Rescue and Firefighting (ARFF) Risk Assessment Team

Re: ARFF Risk Assessment – Municipal Response Assumptions and Contradictory Evidence from Newfoundland and Labrador Auditor General Report

Dear Sir/Madam,

I am writing further to correspondence recently provided to the Government of Newfoundland and Labrador regarding the findings of the Office of the Auditor General of Newfoundland and Labrador on emergency management and business continuity planning.

That correspondence raised concerns about the reliability of municipal emergency response capability within the province, particularly in light of the Auditor General's findings that a significant majority of municipalities lack current, tested emergency plans and that provincial oversight mechanisms do not validate operational readiness.

These findings have direct and material implications for Transport Canada's ongoing risk assessment of Aircraft Rescue and Firefighting (ARFF), specifically with respect to the treatment of **delayed municipal response as an "unlikely" scenario**.

1. Contradiction Between Risk Assumptions and Available Evidence

Transport Canada’s assessment framework appears to rely on the assumption that municipal fire services can provide timely and effective support to airport emergency response operations. This assumption underpins the classification of delayed municipal response as low likelihood.

However, the Auditor General’s report establishes that:

- Municipal emergency response capability is **not consistently planned, tested, or validated**;
- There is **no assurance of response time performance**;
- Inter-agency coordination has **not been systematically exercised**;
- Resource availability during concurrent emergencies is **not verified**.

In this context, the assumption of reliable and timely municipal augmentation is not supported by demonstrated evidence.

2. Methodological Implications for Risk Classification

Where a mitigation measure—such as municipal mutual aid—is:

- Unverified,
- Untested, and
- Not subject to performance measurement,

it cannot be methodologically relied upon to reduce either the likelihood or impact of a hazard scenario.

Accordingly, classifying delayed municipal response as “unlikely” appears to be based on **assumed capability rather than demonstrated performance**, which introduces a critical weakness into the risk model.

3. Appropriate Risk Characterization

Based on the evidence presented by the Auditor General, the following characterization is more consistent with established risk assessment principles:

- **Likelihood:** Unknown / Unproven (due to absence of validated performance data)

- **Impact:** High (given the dependence of survivability outcomes on timely rescue and firefighting intervention)

➔ Resulting in a **High and Unmitigated Risk Profile**

4. Implications for National Aviation Safety

The issue extends beyond Newfoundland and Labrador.

Many Canadian airports rely on municipal fire services through Memoranda of Understanding (MOUs) to supplement ARFF capability. If the underlying municipal systems are not validated, this introduces a broader systemic vulnerability into Canada's aviation safety framework.

An unvalidated external dependency cannot be relied upon as a primary mitigation measure in a safety-critical environment.

5. Request for Reassessment

In light of the above, I respectfully request that Transport Canada:

1. **Reassess the classification of delayed municipal response scenarios**, incorporating:
 - Evidence-based evaluation of municipal preparedness;
 - Verified response capability metrics, where available;
 2. **Reconsider the reliance on municipal mutual aid as a mitigating factor** in ARFF risk modelling where such capability has not been demonstrated;
 3. **Elevate the identified risk to a Ministerial level**, consistent with:
 - High-impact consequences; and
 - Uncertainty regarding mitigation effectiveness;
 4. **Clarify the evidentiary basis** used to support current likelihood classifications for municipal response assumptions.
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Conclusion

The findings of the Office of the Auditor General of Newfoundland and Labrador present a clear evidentiary challenge to key assumptions within the ARFF risk assessment framework.

Where response capability has not been demonstrated, it cannot be assumed. Where it cannot be assumed, it cannot be used to reduce risk.

Ensuring that risk classifications are grounded in verified operational capability is essential to maintaining the integrity of Canada's aviation safety system and public confidence in its oversight.

I would welcome the opportunity to provide further information or to engage in discussion on this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Chris Bussey', with a stylized flourish at the end.

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