



Advocates for Safer Airports in Canada

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The Right Honourable Mark Carney

Office of the Prime Minister

80 Wellington Street

Ottawa, ON K1A 0A2

Re: National Aviation Safety Risk – Implications of Newfoundland and Labrador Auditor General Findings for Airport Emergency Preparedness

Dear Prime Minister,

I am writing to bring to your attention a matter of national significance arising from the recent report of the Office of the Auditor General of Newfoundland and Labrador concerning emergency management and business continuity planning.

This correspondence follows letters provided to both the Government of Newfoundland and Labrador and Transport Canada Civil Aviation regarding the implications of those findings. Given the broader consequences for Canada's aviation safety framework, I am now raising this issue at the federal level.

1. Auditor General Findings – Systemic Emergency Preparedness Deficiencies

The Auditor General's report identifies widespread deficiencies in municipal and provincial emergency preparedness, including:

- The absence of emergency plans in most municipalities;
- A lack of testing and validation of existing plans;

- No consistent assurance of response capability or coordination;
- Limited oversight to ensure operational readiness.

These findings point to a fundamental issue: emergency response capability in many jurisdictions is **not demonstrably operational**.

2. Direct Implications for Airport Emergency Response

Airports across Canada, particularly regional airports, rely in part on municipal fire services through mutual aid arrangements and Memoranda of Understanding (MOUs) to support Aircraft Rescue and Firefighting (ARFF) operations.

This creates a critical dependency:

Airport emergency response systems are only as reliable as the external municipal resources they depend upon.

Where those municipal systems are not validated—as identified in the Auditor General’s report—the reliability of airport emergency response is inherently uncertain.

3. Conflict with Current Federal Risk Assumptions

Transport Canada’s ongoing ARFF risk assessment has, to date, treated delayed municipal response as an “unlikely” scenario.

However, the Auditor General’s findings provide evidence that:

- Municipal response capability is not consistently planned or tested;
- Response times are not assured;
- Resource availability under real-world conditions is not verified.

This creates a direct conflict between **federal risk assumptions** and **provincial evidence of system capability**.

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

4. National Scope of the Issue

While the findings originate in Newfoundland and Labrador, the underlying issue is not isolated.

Across Canada:

- Many airports rely on municipal augmentation of emergency response;
- There is no consistent national framework requiring validation of that capability;
- Risk assessments may rely on assumptions that are not evidence-based.

This raises a broader concern:

Canada's aviation safety framework may be relying, in part, on emergency response systems that have not been demonstrated to function as required.

5. Public Safety and Confidence Considerations

Aviation safety in Canada is internationally recognized for its strength and rigor. However, that confidence depends on the integrity of the underlying systems—particularly those related to emergency response and survivability.

If there is a gap between:

- Assumed capability, and
- Actual operational readiness,

then there is a corresponding risk to:

- Passenger safety; and
 - Public confidence in the aviation system.
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6. Request for Federal Action

In light of these concerns, I respectfully request that the Government of Canada:

1. **Direct Transport Canada to reassess ARFF risk assumptions nationally**, with particular attention to:
 - Reliance on municipal fire services;
 - Validation of response capability;
2. **Examine whether current regulatory frameworks adequately account for external dependencies**, including:

- Minimum standards for demonstrated response performance;
 - Limitations on reliance on unverified municipal augmentation;
3. **Consider whether additional national standards or oversight mechanisms are required** to ensure that airport emergency response capability is:
- Measurable,
 - Tested, and
 - Operationally reliable;
4. **Ensure that high-impact, low-frequency emergency scenarios are assessed based on survivability outcomes**, rather than assumptions of response availability.
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Conclusion

The findings of the Office of the Auditor General of Newfoundland and Labrador present a clear and timely opportunity to examine a potential vulnerability within Canada's aviation safety framework.

This is not solely a provincial issue. It is a national public safety matter that warrants careful attention.

Ensuring that emergency response systems—particularly those supporting aviation—are based on demonstrated capability rather than assumption is essential to maintaining both safety outcomes and public confidence.

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

Respectfully submitted,



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