

April 1, 2016

Dr. Ray Gosine, Chair
Hydraulic Fracturing Review Panel
Bruneau Centre for Research and Innovation
Memorial University of Newfoundland
St. John's, NL A1C 5S7

Dear Dr. Gosine:

Fire and Emergency Services-Newfoundland and Labrador (FES-NL) would like to thank the Panel for the opportunity to discuss emergency preparedness as part of the Hydraulic Fracturing Review. Hydraulic fracturing, like many industrial activities, has inherent hazards and risks associated with the direct activities and/or the activities carried out to support the industrial activity. Emergency management principles look to prevent or mitigate against, prepare for, respond to and recover from adverse events.

Emergency management planning in Newfoundland and Labrador is under the mandate of FES-NL as part of the *Emergency Services Act*. Local governments (municipalities, local service districts and Inuit Community Governments) are required to develop an emergency management plan as per section 5(1) of the *Act*.

The local government undertakes the function of developing an emergency management plan and works with local and provincial emergency management partners. Emergency management plan development undertakes hazard identification and risk assessment for the local environment including geophysical attributes and commercial/industrial activities, and considers historical events. Additionally, the emergency management plan serves as an all hazards approach that would allow the local government and emergency management partners to undertake basic emergency response and recovery operations to an unexpected adverse event.

Fire and Emergency Services-Newfoundland and Labrador provides local governments with information and tools to develop their emergency management plans. The 12 Steps to Developing an Effective Emergency Management Plan (<http://www.gov.nl.ca/fes/emo/12Stepswithtemplate.pdf>) and Emergency Planning Template (<http://www.gov.nl.ca/fes/emo/municipalplanning.html>) outline the process that a local government should follow when developing an emergency management plan. These documents are complemented by information delivered through Basic Emergency Management (BEM) training courses. The BEM training material introduces the four-pillars of emergency management: *prevention/mitigation, preparedness, response and recovery*.

Fire and Emergency Services-Newfoundland and Labrador's Emergency Services Division regional staff are the main point of contact with local governments regarding the development of emergency management plans. Fire and Emergency Services-Newfoundland and Labrador regional staff are available to meet with local governments and assist them as they draft the emergency management plan. Once an emergency management plan is drafted, the review process may include FES-NL regional staff contacting the local government to seek further information or to provide advice to the local government on revisions. The review process may involve several edits by the local government based on the analysis and subsequent feedback from FES-NL regional staff.

Once the plan is in its final draft stage, the local government approves the emergency management plan in principle, with the Mayor or Chairperson signing the plan and the plan is then submitted to FES-NL, through the relevant regional staff. At the FES-NL headquarters, the Manager of Plans and Operations conducts a review and may consult with regional staff for clarification of or confirmation on information contained in the emergency management plan before forwarding to the Director for final review and approval. Once the emergency management plan has been approved by the Director, the signed document is sent back to the local government which in turn adopts the emergency management plan, with the Mayor or Chairperson signing the final version of the plan. The local government provides a copy of the final signed plan to FES-NL for its records.

The *Emergency Services Act* also allows for the development of regional emergency management plans. This regional approach has been undertaken in the Stephenville – Port au Port Peninsula region. Stephenville, being the hub of the region, is the main proponent of the regional emergency management plan. In this role, the Town of Stephenville is acknowledged as the lead for emergency management in the region. The original regional emergency management plan was first developed in 2008 and the most recent update was completed in the summer of 2015.

Given past commercial and industrial activities in the Stephenville and Port au Port area, the emergency management plan does identify responses to a variety of hazards including: dangerous commodities incident, road transportation incident, explosion incident, construction incident, and earthquake incident. This section may have to be revisited should hydraulic fracturing activity commence on the Port au Port Peninsula. Additionally, local governments are encouraged and supported in emergency exercise opportunities whereby potential adverse event scenarios are presented and response and recovery options are discussed and practiced.

The type of activities potentially associated with hydraulic fracturing operations may require emergency response should an adverse event occur. Depending on the magnitude and impacts of the adverse event, local first responders (e.g. fire, police, medical) may be able to provide the necessary response to an accident. In some adverse events, other response entities may be activated should there be any environmental impacts (e.g. Service NL, Environment and Conservation) and/or the private sector (e.g. company involved in the adverse event, private environmental response/recovery entities). Should the incident involve dangerous goods/hazardous materials, there are regional Hazardous Materials (HAZMAT) response teams in Corner Brook and Port aux Basques. These teams are housed within the respective municipal fire departments and through an arrangement with FES-NL, they provide regional response operations for HAZMAT incidents.

As the handling, storage and transport of hazardous materials are regulated, the hydraulic fracturing proponents have responsibilities to ensure that their respective entities have documented plans, procedures, and trained staff to work with such products.

Again, depending on the magnitude and impacts of the adverse event the regional emergency management plan may be activated in whole or in part. The emergency management plan outlines roles and responsibilities of the local governments and various emergency management partners. This emergency management plan activation may include the activation of the local government emergency operations centre to serve as a coordination point for the response and recovery operations.

In closing, should hydraulic fracturing operations proceed on the Port au Port Peninsula, then the regional emergency management plan would be reviewed to ensure that the existing document provides sufficient guidance should an adverse event occur related to hydraulic fracturing operations or if changes and enhancements are required to the emergency management plan to meet the new commercial/industrial activity within the region. This would include consultation with any hydraulic fracturing proponents to better understand the type of work involved, materials, goods and services required to conduct hydraulic fracturing, and the proponent's contingency plans for adverse events.

Sincerely,



DAVID MCCORMACK
Director of Emergency Services
Fire and Emergency Services-Newfoundland and Labrador