



Services aux Autochtones
Canada

Indigenous Services
Canada

Sous-ministre

Deputy Minister

Ottawa, Canada
K1A 0H4

John Williamson
Chair
Standing Committee on Public Accounts
House of Commons
Ottawa, Ontario
K1A 0A6

January 15, 2024

Dear Mr. Williamson:

Indigenous Services Canada (ISC) is pleased to provide electronically, in both official languages, the progress reports requested before or by January 31, 2024, pursuant to Recommendations 1, 3 and 7 of the House of Commons Standing Committee on Public Account's Report 34 entitled, *Emergency Management in First Nations Communities*, tabled on November 27, 2023.

I would like to preface our response by noting that the *Steering Committee on ISC's Actions to Address Auditor General of Canada Performance Audit Recommendations on Emergency Management* informs our work to address the recommendations in the Auditor General of Canada's 2022 report entitled *Report 8, Emergency Management in First Nations Communities*.

Almost every recommendation in the aforementioned reports of this Committee and the Auditor General (AG) reference ISC working in collaboration with First Nations. As such, in partnership with the Assembly of First Nations (AFN), a steering committee was created with the intention of serving as an avenue for co-development between ISC and First Nations, specifically First Nations communities' members who have professional knowledge of emergency management in the First Nations context. This advisory body of 12 First Nation emergency management practitioners was stood up on October 12, 2023, and meets every two weeks. Members provide their feedback on the development and implementation of actions to address the AG's recommendations to improve outcomes for First Nations Communities.

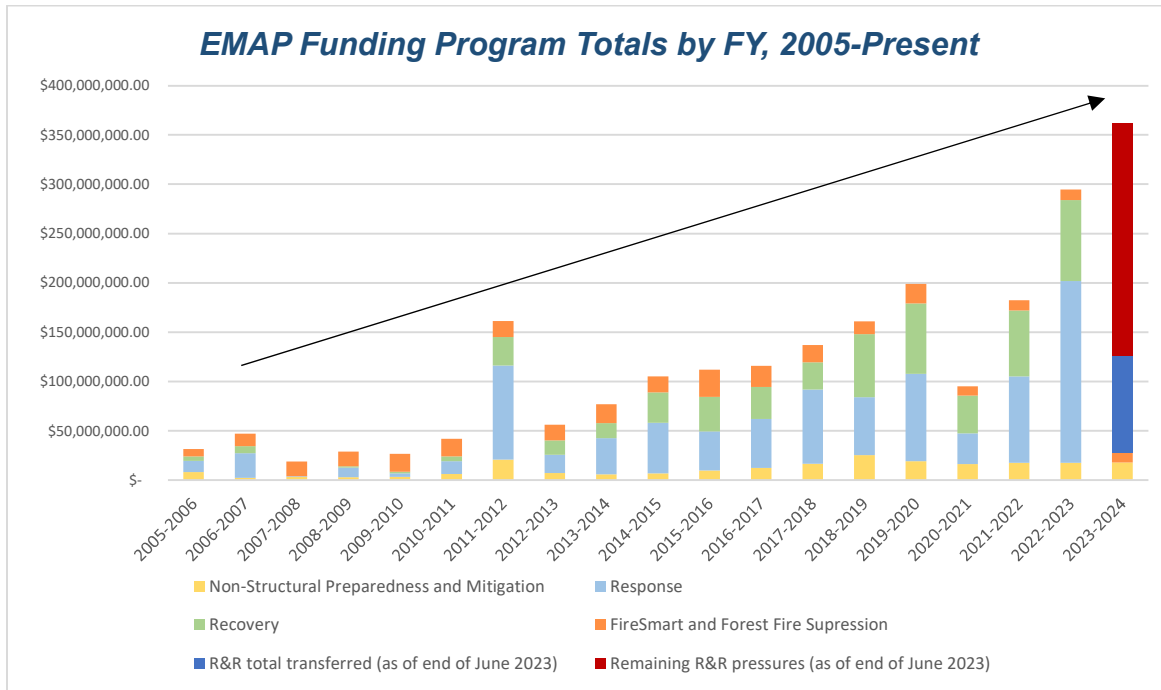
Recommendation 1: On the risk-based allocation of resources

That, by 15 January 2024, Indigenous Services Canada present the House of Commons Standing Committee on Public Accounts with a report outlining the progress made by the department, in collaboration with the First Nations, in identifying the risks related to emergencies and the costs of preventing and potentially responding to them. A final report should also be presented by 30 April 2024 explaining the new approach for allocating project funding based on this identification of needs and risks. The final report should also confirm that the new approach and funding measures have been implemented.

Response:

Background

ISC acknowledges that there has been a trend of spending on response and recovery activities to emergency events that exceed spending dedicated to those of preparedness and mitigation. As noted in the AG’s report, the former outstripped the latter by 3.5 times during the period of 2018-19 to 2021-22 as illustrated in the table below.



ISC notes the benefits of increased spending on preparedness and mitigation efforts, as highlighted in Public Safety’s [2019 Emergency Management Strategy for Canada](#), where for every \$1 invested in preparedness and mitigation, \$6 can be saved in emergency response and recovery costs. In an era of ever-increasing frequency and intensity of emergency events, greater efforts must be focused on the preventative side of emergencies not only to reduce potential costs but to reduce the impact of emergencies and their negative mental and social effects on First Nations communities.

Overall, First Nations communities are at much higher risk than non-First Nations communities. First Nations are more likely to be evacuated as a result of an emergency event due to their comparative geographic proximity to areas with a higher risk of floods and wildfires as opposed to off-reserve communities. For example, 80% of First Nations communities are located in areas of wildfire risk. According to Canada’s National Adaptation Action Strategy, while on-reserve populations represent just over 2% of the Canadian population, they make up almost 40% of the total evacuees due to emergency events. First Nations communities also face challenges in recovery activities due to socio-economic factors potentially affecting their capacity, coupled with the psychosocial effects and accompanying lost economic opportunities. This social

dimension of risk highlights that, while the likelihood of an emergency event might be similar throughout a region, impacts strongly depend on the level of vulnerability.

Update

To gain a better understanding of its current risk-based approach at the regional level, ISC developed a survey and received feedback from its regional offices and its First Nations partners. The survey results revealed that 50% of ISC regions apply a risk-based approach to their funding decisions. All ISC regions identified the need for a more robust and targeted risk-based approach to assist in their funding decisions leveraging a wide variety of available tools and data. Finally, many underscored that a risk-based approach lies first and foremost at the First Nation community level given their unique context and circumstances.

ISC also consulted with other federal government departments such as Natural Resources Canada (NRCan), Public Safety Canada and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) to deepen its understanding of existing risk-based approaches. ISC also reached out to First Nations partners to gain a better understanding of their thoughts on a potential formula, and how a new formula would address community needs.

The results of these consultations are shaping the department's risk-based approach, which when updated, will make it easier to identify communities at the highest risk of emergency events. ISC is co-developing a more robust and comprehensive new risk-based approach that leverages existing data and tools such as flood and wildfire forecasts as well as socio-economic, demographic, geographic, and historical data. This approach seeks to maximize the effectiveness of mitigation and preparedness funding by focusing on First Nations communities at the highest risk of being impacted by emergency events.

For example, ISC has developed a list of the highest-risk First Nation communities. This list allows the approach to focus not only on the current context but also provides some insight, through a socio-economic lens, into a community's potential emergency response capability. Another example of ISC's new approach is an existing risk tool: the Climate Risk Index (CRI). This was developed by CIRNAC's First Nation Adapt Program using available forecasting data from sources such as Natural Resources Canada, as well as the ISC Emergency Management Assistance Program's (EMAP) database with over 15 years of information on First Nations communities' emergencies. This tool ultimately provides a risk scoring index for various emergencies such as floods and wildfires in each First Nation community.

First and foremost, the engagement of First Nations is required to implement this approach. The department is discussing the new risk-based approach with the Steering Committee and other partners to ensure the approach that will be implemented meets the challenges that First Nations have outlined during engagement, and the concerns included in the AG's report. The proposed approach was presented to the co-led First Nations Steering Committee on two occasions in December 2023. Feedback was integrated into the approach, including the need to consider the unique context and circumstances of every First Nation community in assessing risk.

Starting on April 1, 2024, this new co-developed risk-based approach will be implemented in all ISC regions to ensure more consistency where risk clearly informs all regions' funding decisions. Additionally, in select ISC regions, a pilot program will be launched where a percentage of each region's current preparedness and mitigation funding allocation will be dedicated to their highest-risk communities. Results of the pilot will inform programming across all regions in subsequent years.

A final report, fully explaining the risk-based approach and confirming its implementation, will be presented to this Committee by April 30, 2024.

Recommendation 3—On departmental and regional emergency management plans

That, by 31 January 2024, Indigenous Services Canada present the House of Commons Standing Committee on Public Accounts with a report indicating whether the departmental and regional emergency management plans have all been updated.

Response:

Background

Section 6 of the *Emergency Management Act* (2007) (EMA) outlines the Emergency Management responsibilities of each Minister accountable to Parliament for a government institution to identify risks that are within or related to his or her area of responsibility—including those related to critical infrastructure—and to prepare Emergency Management plans to address those risks. Departmental plans help clarify roles and responsibilities, as well as outlining actions to support the efforts of First Nations to prepare for, respond to, and recover from emergency events.

As per the AG's audit, ISC's current Emergency Management Plan has not been updated since 2017 and does not reflect the department's current mandate and approach to working with First Nations. The audit noted that this includes ISC's regional emergency management plans which either had not been updated regularly or did not exist.

Update

Over the course of the Summer 2023, ISC undertook a review of existing regional emergency management plans and developed a draft template intended to be used by the regional offices to support the development and revision of their respective regional emergency management plans. As per the AG recommendation, the department sought to ensure the alignment of the template for the regional emergency management plans with the National On-Reserve Emergency Management Plan.

In the Summer and Fall of 2023, ISC reviewed and updated the National On-Reserve Emergency Management Plan to reflect the departmental structure and mandate as well as the shift to an all-hazards emergency management approach. To support this, ISC conducted internal and external engagements. The revised plan will reflect this all-hazards approach including two

aspects of health emergencies: (1) public health emergencies and (2) health aspects of natural disasters. In addition, the updated plan will also demonstrate the increased role and responsibility of the ISC Regional Communications directorate through a crisis communications response approach. Finally, ISC validated the updated draft of the National On-Reserve Plan with Public Safety Canada, given its responsibilities under Section 4.1 of the EMA. Going forward, ISC will use its previous engagement with First Nations partners to guide its work, and continue to engage with the First Nations Steering Committee to ensure that we are addressing First Nations issues, with the goal of finalizing the national plan before April 1, 2024, as per ISC's Management Response Action Plan.

Regional offices are updating their Regional Emergency Management Plans by January 2024. Regions will also engage with external partners on their plans in Winter 2024 with the aim of finalizing them by April 1, 2024. During this period, the plans will be considered interim, but functional. ISC is also committed to reviewing the plans on an ongoing basis, every two years.

Recommendation 7 —On the quality of emergency management services

That, by 15 January 2024, Indigenous Services Canada present the House of Commons Standing Committee on Public Accounts with a report explaining how the department: 1) defines what is meant by comparable services for First Nations; 2) monitors the services provided to First Nations to ensure that they are comparable to services provided to non-Indigenous communities, are culturally appropriate, and address the needs of marginalized groups; and 3) identifies and addresses shortcomings by monitoring emergency management service agreements and conducts lessons-learned exercises.

Response:

Background

One of ISC's key roles in emergency management is to provide funding directly to First Nations and service providers, such as provinces and territories (PTs) and third parties such as the Canadian Red Cross, who then provide "boots-on-the-ground" emergency services to First Nations. Currently, the reporting from these service providers does not provide ISC with the information required to assess whether emergency services are comparable to non-Indigenous communities, are culturally appropriate, address the needs of marginalized groups, or include lessons-learned exercises. Therefore, meeting this recommendation requires close collaboration with service providers and First Nations.

Historically, ISC's EMAP has committed to ensuring that First Nations have access to emergency services comparable to those available in municipalities of a similar size and circumstances in their respective province. This has generally been understood as EMAP's reimbursement of eligible expenses meeting or exceeding what PTs provide in off-reserve areas. This has been accomplished with EMAP reimbursing 100% of eligible expenses with wide-ranging eligibility as well as providing First Nation advance payments to ensure the funding support needed is readily available.

Update:

Through the Management Response Action Plan to the AG's report, ISC provided an action plan for addressing this recommendation. This report provides an update on ISC's progress, as of December 2023.

1. ISC committed to working with its regional offices to do a review of current practices and determine the extent to which existing reporting requirements are effectively monitoring services provided, including comparability to non-Indigenous communities, culturally appropriate services, meeting the needs of marginalized populations, and lessons-learned exercises.

ISC has completed this review and, building on the findings of the AG's Report, found that:

- ISC regional offices do not currently have a definition of "comparable EM services for First Nations in relation to those available to municipalities of similar size and circumstance in each jurisdiction," and they do not receive reporting from service providers on whether aspects of on-the-ground emergency management services are comparable to non-Indigenous communities.
 - Most ISC regional offices do not currently assess whether emergency management services provided to First Nations are culturally appropriate or address the needs of marginalized groups, although some did so in an ad hoc, anecdotal, or case-by-case basis.
 - Most ISC regional offices do conduct lessons learned activities after emergencies, but there is room for improvement in formalizing lessons learned, such as using consistent methods, recording them, building them into the reporting cycle, and conducting analysis to assess shortcomings and ways to improve.
2. ISC committed to supporting First Nations to develop their own Emergency Management service standards.

Based on recommendations from regional offices and the First Nations Steering Committee, ISC will address comparability to non-Indigenous communities by supporting First Nations regionally to develop their own emergency management service standards, which will be integrated into multilateral service agreements. This addresses concerns that due to socio-economic inequities and differences in governance and responsibilities between First Nations and municipalities, providing comparable services (outputs) may not conclude in comparable results (outcomes). For example, in a community with inadequate infrastructure and emergency management coordinator positions, the same funding as provided to a municipality is unlikely to result in the same outcomes. This is also aligned with ISC's work in other key priority areas, where comparable services are being considered as substantive equality, whereby: First Nations have access to emergency services comparable to those in non-Indigenous communities; First Nations are to have control over

their emergency services; and First Nations may exercise their right to deliver emergency services through service delivery models designed by them to suit their needs.

Multilateral service agreements provide an opportunity for First Nations, with the support of ISC and PTs, to develop First Nation-led emergency management service standards that are region-specific, reflect realities of their socio-economic circumstances, are culturally appropriate, and meet the needs of marginalized community members. That said, in recognition that multilateral agreements will take several years to negotiate and finalize, ISC is working with the First Nations Steering Committee to co-develop national interim service standards in order to ensure that emergency services are more culturally appropriate and better address the needs of marginalized groups. ISC will invite service providers to meet interim service standards until First Nation-led service standards are finalized through the development of multilateral agreements.

ISC is in the process of soliciting feedback on such service standards. It is expected that interim service standards will be ready to share for implementation in April 2024.

3. ISC committed to engaging First Nation partners to seek their input on how to best conduct lessons-learned activities and measure whether emergency services are comparable to Indigenous communities, culturally appropriate, and address the needs of marginalized groups. ISC also committed to developing a report template whereby service providers can conduct lessons learned on how services can be improved, including to be more culturally appropriate and better address the needs of marginalized people.

Throughout Fall 2023, ISC has been working with the First Nations Steering Committee in order to co-develop solutions. Based on advice from the Steering Committee, as well as ISC regional offices, ISC is developing after action reports guidance and templates. This will expand and formalize existing lessons-learned activities. Service providers will be invited to develop after action reports after emergency events to facilitate routine assessments of what went well, what could be improved, and next steps/recommendations. This will include an assessment of whether and how services provided were culturally appropriate and addressed the needs of marginalized groups. Service providers will be encouraged to seek input from First Nations staff, such as Emergency Management Coordinators, when filling out after action reports in order to limit bias in self-reporting, and to follow privacy and ownership, control access and possession guidelines. ISC is recommending that it will review all reports to analyze overall trends and ways to improve and will report back to First Nations and service providers on an annual basis.

It is expected that the after action report guidance and template will be ready for implementation in April 2024.

We trust that the Committee finds this information useful for their work. The above responses illustrate the Government of Canada's commitment to ensuring First Nations communities can thrive and be resilient. The Department is committed to providing the remaining reports requested in the Committee's report under the prescribed timelines.

Should the Committee have any further inquiries, please contact John Beaudoin, Acting Senior Director, Legislative, Parliamentary and Regulatory Affairs Directorate, Indigenous Services Canada, john.beaudoin@sac-isc.gc.ca; 343-998-2373.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gina Wilson', with a long horizontal flourish extending to the right.

Gina Wilson