



## PEACE RIVER REGIONAL DISTRICT

September 21, 2020

Ministry of Health  
Emergency Medical Licensing Branch  
PO Box 9625 Stn Prov Govt  
Victoria, BC V8W 9P1

via email: [emalbfedback@gov.bc.ca](mailto:emalbfedback@gov.bc.ca)

To Whom It May Concern,

In response to the notice issued by the Union of BC Municipalities on September 16, 2020 regarding changes to licensing of first responders, the Protective Services Department of the Peace River Regional District respectfully provides the following feedback.

The Peace River Regional District directly operates the Charlie Lake Fire Department and has contracts for service with two non-profit fire departments and five municipalities. The fire departments vary in size and scope of response which include volunteer fire departments, composite fire departments and full time staffed fire departments. While the Protective Services Department can only speak on behalf of the Charlie Lake Fire Department, we are concerned that the changes proposed could increase costs for some of our service providers and in turn increase our costs to contract the service for our residents.

In reviewing the proposed changes to licensing of Emergency Medical Association First Responders (EMA FR) we have some concerns. While we understand the need to ensure that there is consistent testing for certification for members, we are very disheartened to see the format you are proposing to provide for this.

If we were to choose an option from the ones that have been proposed it would be Option 3: **“EMA Licensing Branch travels to all training institutions to conduct exams that are greater than 3 hours travel to an exam center.”** However, the travel time should be calculated as greater than 3 hrs total roundtrip. As the majority of our EMA FR's are volunteers and we feel that it is unreasonable to require them to travel long distances to serve in our communities, possibly increasing the risk of traffic accidents due to being tired or the extra costs of food and lodging. The office hours of the Branch also dictate that many of these members will have to take time off work to attend an exam resulting in financial hardship as well as inconvenience. This is an unacceptable and unreasonable burden for the ability to provide basic lifesaving first aid on behalf of the British Columbia Emergency Health Service (BCEHS).

The Charlie Lake Fire Department has gone to great lengths to obtain and maintain the ability to instruct the FR program within the department as well as certify their staff through accredited agencies including but not limited to the Justice Institute of BC (JIBC), Canadian Red Cross and Vancouver Island Emergency Response Academy (VIERA). The cost of bringing in outside evaluators has proven to be very expensive in the past and we feel that the new system will prove to be the same. This again will directly penalize the fire departments (volunteer, POC & Career) that have carried financial responsibility at a great cost to gain in house instructors/evaluators to combat against the same costs you are proposing.

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**PLEASE REPLY TO:**

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We do not feel that the province will have the capacity to ensure that all the fire departments will be provided equal treatment when providing enough classroom spaces to ensure compliance through certification or recertification. All of the FMR skills that are rigorously taught and examined in the fire departments can be carried out by any Good Samaritan including AED, CPR and administering Naloxone. We do not believe that mandating certification through the Province will enhance the service we already provide and it will increase costs significantly.

With the PRRD located in the north of the province with majority of the residents being rural it is extremely concerning that the increased burden to the fire departments will result in the loss of FMR services as they will be too cost prohibitive to maintain, resulting in increased response times as noted by the Chief Medical Officer in BC. Dr. Bonnie Henry's direction to Darlene MacKinnon, Chief Operating Officer, BC Emergency Health Services dated Sept.10 2020 noting;

*"I appreciate the work the committee has done in reviewing and modifying the response as we have progressed through the last six months. We are now at a point where it is safe to move ahead with a staged approach to increase the type of calls that first responders will be notified of. Initially, first responder agencies will again respond to all "red" calls. Recognizing that in rural communities, ambulances can take longer to reach patients, we are also enabling rural and remote first responders to again attend the less urgent but still serious "orange" coded calls they had previously attended."*

There is no reason why this service cannot be administered by a third party or the Fire Service itself as long as protocols are in place which the current program already has. If changes move forward we would suggest that the FR EMA licensing follow more in line with the Emergency Medical Responder (EMR), Primary Care Paramedic (PCP) and other EMA licensed programs where:

- A) The agency/responder proves that the licensee has maintained a minimum number of training or practical hours within the program (twenty hours is currently used for other rescue disciplines) and can meet the associated Job Performance Reviews (JPRs) as determined within the program. This twenty hour mandatory time could also replace the on-line recertification, ensuring that the practical applications of field use are gained. These practical applications are the backbone of the license. Additional classroom/theory can be added to ensure updates and changes to the program are implemented.

OR

- B) If an independent verification is required that the EMA licensing branch allow an independent adjudicator/examiner for the exam itself. This would fall in line with current PRO Board certified accreditation programs including those used by the current training providers.

We would like to thank you for your time and consideration of our feedback and we hope that the EMA Licensing Board will be able to determine a solution that is equitable and fair for all responders operating within British Columbia.

Should you require any further information regarding our feedback please feel free to contact me at [david.sturgeon@prrd.bc.ca](mailto:david.sturgeon@prrd.bc.ca).

Regards,

David Sturgeon  
Protective Services Manager