



INTERNATIONAL ASSOCIATION  
OF FIRE FIGHTERS

# 30<sup>th</sup> Canadian LEGISLATIVE CONFERENCE

March 27-28, 2023  
Ottawa, Ontario

## LEGISLATIVE ISSUES SUMMARY

for MPs and Senators





# FACTS

# From Canada's Professional Fire Fighters

March 2023

Dear MP or Senator,

On behalf of the 27,000 Canadian members of the International Association of Fire Fighters (IAFF) I present you with a copy of our 2023 Legislative Issues Briefing Book. This book will provide you with a better understanding of issues in the federal arena that impact Canada's professional fire fighters.

The men and women of the IAFF are the first line of defense in more than 190 cities and towns across Canada. Our members risk their health and their safety every day on behalf of their fellow citizens. The decisions you make on Parliament Hill directly impact their ability to do their jobs safely and effectively.

This year, more than 150 IAFF fire fighters and member EMS personnel will gather in Ottawa March 27-28 for our historic 30<sup>th</sup> Canadian Legislative Conference and will meet with their elected representatives regarding these issues. I hope you will find the time to meet with members from your area to hear their concerns and learn how you can help move these issues forward.

Our IAFF Canadian staff are ready to assist you on issues affecting Canada's professional fire fighters and EMS personnel. In the meantime, we look forward seeing you during our conference and to working with you to advance public and fire fighter/EMS safety in Canada.



Sincerely,

Edward A. Kelly  
General President

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# Eliminating the ‘forever chemical’ PFAS from fire fighters’ protective gear

It is well known that fire fighters contract cancer and other diseases at higher rates than the general public due to the toxic exposures they experience in the course of their duties. As a result, firefighting practices emphasize proper PPE usage, decontamination protocols and other measures designed to minimize exposure to carcinogens and other dangers present in combusted materials.

But it has now been determined that for many decades, fire fighters have been regularly exposed to deadly chemicals from the very gear that’s supposed to protect them. The coats and pants that make up their own firefighting protective gear contain high concentrations of chemicals called PFAS for the primary purpose of repelling water and oil, a function safer substitutions can provide.

## What are PFAS and what risks do they pose?

PFAS (Per- and polyfluoroalkyl substances) are a large group of more than 12,000 synthetic chemicals not found in nature. Due to the strong, long-lasting carbon-fluorine bonds, many do not degrade in the environment and are difficult for the body to excrete. As such, PFAS are often referred to as “forever chemicals” whose presence in the environment and in drinking water is already being studied by the Government of Canada. Toxicological studies have raised concerns regarding the bio-accumulative nature and health risks of PFAS, and studies show PFAS exposure cause cancers and other health effects which are suffered by fire fighters at rates in excess of that of the general public. PFAS have also been shown to impact, behavioural development, metabolism and the circulatory, digestive, endocrine, immune, neurological, and reproductive systems.

## What can be done to protect fire fighters from PFAS in their gear?

Thankfully, we do not need more research and studies to show that exposure to PFAS causes adverse health effects. The science is well-established. What Canada’s fire fighters need is action in the form of swift regulatory changes from the Government of Canada that will require manufacturers to offer fire fighter gear without PFAS or similar toxins for use in Canada. The federal government should also specify and support regulatory requirements for the safe reclamation and disposal of firefighting gear that contains PFAS. Additionally, “Take-back” grants must be made available and funded through Health Canada and/or Environment and Climate Change Canada to assist fire departments, and municipalities who are ill-equipped to manage the financial burden of transitioning to safe, carcinogen-free fire fighting gear given the cost of these products.



## Current status

Through the Ministry of Health and the Ministry of Environment and Climate Change, the Government of Canada has already identified PFAS as chemicals of interest under its Chemicals Management Plan and is conducting research and monitoring their use, with a report expected sometime in 2023. They have identified several uses of PFAS including firefighting foam, but not firefighting gear. Virtually every fire fighter in Canada is currently using protective gear that is coated with dangerous PFAS.

## What We’re Asking

We are calling on Health Canada and Environment and Climate Change Canada to recognize the human health and environmental risks of PFAS and prohibit their manufacture, import, and use in firefighting protective gear. We also ask that the Government of Canada give consideration to budgetary allocations in the form of a grant program, for example, to support the local acquisition of PFAS-free protective gear and the safe reclamation and disposal of existing PFAS-laden gear. The cost of transitioning away from fire fighter gear that contain harmful PFAS cannot be sustained without the federal government’s support. This is an opportunity for the Government of Canada to lead in the fight against cancer in the fire service, the number one killer of those brave women and men who serve all of Canada’s communities, as well as prevent further contamination in our communities and our sources of drinking water from the unregulated disposal and secondary use of PFAS chemicals.



# Strengthening Canada's Airport Firefighting Regulations

In the event of an aircraft accident, there is always the potential for mass casualties as the threat of trauma, toxic smoke, and fire can make conditions inside a downed aircraft lethal in just three minutes. These dangers exist particularly on or near airport runways, where most aviation accidents occur.

Canadians deserve no less than the highest level of protection when using commercial air travel, including airport rescue and firefighting services that meet the highest international standards. This requires services to be in position for rapid response and staffed with enough personnel to initiate the rescue of trapped passengers while working simultaneously to extinguish fires.

It is shocking to learn that the Canadian Aviation Regulations (CARs), which govern Canada's airports, fall well short of airport rescue and firefighting standards such as those published by the International Civil Aviation Organization (ICAO) – a world leader in aviation and air passenger safety.

While some Canadian airports may voluntarily exceed the CARs requirements, fire fighters at several major airports in Canada are not positioned or resourced to respond quickly to a downed aircraft or to rescue trapped passengers.

## ICAO Standards

ICAO standards clearly identify rescue as a required function of airport fire fighters, meaning airports should staff and equip themselves accordingly. It also specifies that airport fire fighters should be able to reach *all points on all operational runways* within three minutes. Both the Canadian and U.S. military have adopted this model, which is also included in the National Fire Protection Association (NFPA) 403 Standard for Aircraft Rescue and Fire-Fighting Services at Airports.

## CARs shortfalls

It is only CAR 303, which regulates airport firefighting at Canada's major airports, that fails to specify rescue as a required function of airport fire fighters and only requires fire fighters to reach *the midpoint of the furthest runway* in three

minutes. Additionally, the CARs guidelines simply specify that airport fire fighters should have a certain number of vehicles and should be able to discharge a certain amount of extinguishing agent based on the anticipated number of airplanes taking off and landing. They do not specify a required number of personnel.

For example, Macdonald-Cartier International Airport in Ottawa — which fielded close to 3 million passengers in 2022 — does not have enough personnel on duty to perform rescue in the event of an aircraft accident. The airport's emergency response plan relies heavily on backup from City of Ottawa fire fighters, who will not be on the scene for up to 10 minutes or more, which is far too long to be of any practical assistance when passengers are trapped inside a burning fuselage.

When people are trapped inside a burning home, fire fighters are expected to do much more than spray water or hose down the sidewalk. They enter the structure and initiate aggressive interior fire suppression combined with actively rescuing people who are trapped inside. When that fire is aboard a commercial aircraft at a large Canadian airport, however, the current regulations only require airport fire fighters to hose down a path through the burning jet fuel and hope the passengers can escape the burning wreckage on their own or with the assistance of flight crews who have just endured the same crash.

## What We're Asking

To address significant regulatory shortfalls that needlessly put the safety of the flying public at risk, the IAFF asks the Minister of Transport to immediately review the CARs to bring them up to ICAO standards as soon as possible, including specifying the rescue of trapped passengers as a required and resourced function of airport fire fighters at Canada's major airports.

## Cost implications

Cost cannot be the overriding factor when it comes to important public safety issues. At the same time, we recognize that the commercial model of Canada's airport industry invites the discussion. While air travel decreased significantly in 2021 and 2022 due to the COVID-19 pandemic, projections show that passenger traffic at Macdonald-Cartier International Airport, for example, is expected to rebound to 4 million in 2025. At these levels, a modest ticket surcharge of 50 cents per passenger, for example, could easily permit the airport to meet ICAO standards, including reaching a downed aircraft quickly with enough personnel to conduct firefighting operations and interior rescue simultaneously. ■

