



# **OFM**

## **Review of Fire Protection Services (Fire Prevention) in the City of Greater Sudbury**

**May 23, 2012**



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## 1.0 Purpose

The purpose of this review is to assist the City of Greater Sudbury in meeting its legislative responsibilities as per Part II of the Fire Protection and Prevention Act, 1997 S.O. 1997, Chapter 4 (FPPA). The Office of the Fire Marshal (OFM) was requested to conduct a review of the fire prevention components that would include public education, fire safety inspections (enforcement) and investigations for the City of Greater Sudbury. The OFM met with municipal officials on January 16<sup>th</sup>, 2012 and it was agreed upon by both parties that the City of Greater Sudbury would benefit from a review.

## 2.0 Legislative Authority

This review of fire protection services in the City of Greater Sudbury was conducted under the authority of the FPPA.

Part III Fire Marshal - Powers of the Fire Marshal

### 9.(1) The Fire Marshal has the power

- (a) to monitor, review and advise municipalities respecting the provision of fire protection services and to make recommendations to municipal councils for improving the efficiency and effectiveness of those services.

## Part I Definitions

“fire protection services” includes fire suppression, fire prevention, fire safety education, communication, training of persons involved in the provision of fire protection services, rescue and emergency services and the delivery of all those services.

## 3.0 Scope

The municipality was formally advised by the OFM of the scope of this review in a letter dated January 26, 2012<sup>1</sup>. This review evaluated the following:

- Establishing and Regulating By-law (determine the level of fire prevention services the City of Greater Sudbury provides).
- Risk Assessment (utilizing the OFM Fire Risk Sub-Model) to identify all high and extreme risks in the municipality.
- Fire Inspection practices and protocols (training, frequency, enforcement option, utilization of non-traditional staff).
- Public Education programs development and utilization.
- Fire Investigations to assist in improving fire service delivery gaps.
- Evaluate current pre-plans in place and identify any gaps. Developing pre-plans for all high and extreme risks (enhancing the health and safety for staff and residents/occupants).
- Interaction between various city services (improving response to various issues).

## 4.0 Review Methodology

This review evaluated the fire prevention components of fire protection services provided by the City of Greater Sudbury utilizing the OFM Public Fire Safety Guidelines (PFSG), other OFM publications and programs as the criteria for analysis. Based on the completed review a determination was made as to whether or not the municipality is meeting its FPPA responsibilities and recommendations as provided.

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<sup>1</sup> Appendix 1 – Notification of OFM Review of Fire Protection Services in the City of Greater Sudbury pursuant to Clause 9.(1)(a) of the Fire Protection and Prevention Act, 1997.



## 5.0 Executive Summary

This review will assist the City of Greater Sudbury in meeting its legislative responsibilities as per Part II of the Fire Protection and Prevention Act, 1997 S.O. 1997, Chapter 4 (FPPA). The review has identified a number of recommendations to assist the City of Greater Sudbury in meeting their responsibilities in accordance with fire prevention components of fire protection services provided as stated in Clauses 2.(1)(a) and 2.(1)(b) of the Fire Protection and Prevention Act, 1997.

The City of Greater Sudbury Fire Services is conducting many of the required activities, however in the absence of set objectives and outcomes. There are opportunities to improve the safety of the public, front-line fire service personnel and to reduce the liability to the municipality. By reducing or eliminating gaps in service the City of Greater Sudbury Fire Services can be more responsive to the public needs and enhance service delivery by improving communications both internally and with other municipal departments.

The recommendations in this report are intended to assist the municipality to improve the effectiveness and efficiency of fire prevention services it provides. This review also identifies a number of potential issues that are beyond the legislative authority of the Office of the Fire Marshal but do have an impact on fire department operations.

### Recommendation #1

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services completes a risk assessment utilizing the OFM Fire Risk Sub-Model to assist with the development and update of public education, fire safety inspection and investigation programs and services. Council then resubmits its Annual Compliance Declaration to the OFM.

FPPA 9.(1)(a)

### Recommendation #2

The Council of Greater Sudbury revises the Establishing and Regulating By-law that defines core services and the level of fire protection services specific to fire prevention based on the completed risk assessment.

FPPA 9.(1)(a)

### Recommendation #3

The Council of Greater Sudbury designates sufficient staff to ensure the enforcement of municipal By-laws on a 24 hour basis including municipal fire related By-laws.

FPPA 9.(1)(a)

### Recommendation #4

The Council of Greater Sudbury ensures a policy is developed and implemented to provide written delegation to the Chief Fire Prevention Officer as Chief Fire Official where referenced in the Ontario Fire Code for sections requiring "approved".

FPPA 9.(1)(a)



**Recommendation #5**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops, approves, implements and reviews on an annual schedule all fire prevention operating guidelines. Furthermore, all fire prevention staff is trained to the established operating guidelines.

FPPA 9.(1)(a)

**Recommendation #6**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services utilizes the OFM Fire Risk Sub-Model for prioritizing building stock to develop a routine fire safety inspection program to target extreme and high risk occupancies.

FPPA 9.(1)(a)

**Recommendation #7**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops and implements an operational guideline to ensure all fire prevention staff utilizes a method to ensure consistent municipal fire prevention files.

FPPA 9.(1)(a)

**Recommendation #8**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services conducts a review of all property files to ascertain all outstanding fire code violations or fire hazards including the provision of an approved fire safety plan to ensure the building is compliant with the Ontario Fire Code. An operational guideline is to be developed to assist in choosing the most appropriate enforcement options pursuant to FPPA<sup>2</sup> and Provincial Offences Act.

FPPA 9.(1)(a)

**Recommendation #9**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services considers integration and deployment options of fire prevention staff for all areas in the delivery of fire prevention services to improve efficiencies, reduce travel time and increase inspections.

FPPA 9.(1)(a)

**Recommendation #10**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services reviews and revises Policy Fire-OP-206 G-PINP - Fire Company Inspection/Pre-Incident Plan into two separate operational guidelines for suppression staff. Develops a guideline for the purpose of pre-planning of high and extreme risk occupancies and another guideline for the inspection of low risk occupancies.

FPPA 9.(1)(a)

<sup>2</sup> OFM-TG-01-2012 - Fire Safety Inspections and Enforcement (May 2012)

<http://ofm.gov.on.ca/en/Legislation%20Directives%20and%20Technical%20Guidelines/Technical%20Guidelines%20and%20Reports/pdf/OFM-TG-01-2012.pdf>



**Recommendation #11**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services provides additional resources to conduct fire prevention inspections for all areas of Greater Sudbury in accordance with the risk assessment.

FPPA 9.(1)(a)

**Recommendation #12**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services considers the merits of a formal partnership with media campaign stakeholders to maintain the public education and media program.

FPPA 9.(1)(a)

**Recommendation #13**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops an evaluation process for public education activities and programs for specific occupancies and demographics in accordance with the risk assessment.

FPPA 9.(1)(a)

**Recommendation #14**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops operational guidelines for public education and addresses interaction between divisions for the transfer of information.

FPPA 9.(1)(a)

**Recommendation #15**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops and implements a smoke alarm operational guideline and program to all areas of the municipality.

FPPA 9.(1)(a)

**Recommendation #16**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops an operational guideline to provide the transfer of relevant fire scene assessment and investigation information to the Fire Prevention Division for the purposes of updating the risk assessment and relevant programs and activities.

FPPA 9.(1)(a)

**Recommendation #17**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services adheres to the Occupational Health and Safety Act (OHSA)<sup>3</sup> for all staff conducting fire scene assessments and investigations.

FPPA 9.(1)(a)

<sup>3</sup> Ministry of Labour, Fire Fighters Guidance Note #4-13 Fire Investigation, January 2007.

<http://www.oafc.on.ca/sites/default/files/uploads/documents/Section21/Section21-4/GN-4-13%20Fire%20Investigation.pdf>



**Recommendation #18**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services reports all fire incidents to the Office of the Fire Marshal that meets the criteria as stated in the Fire Marshal's Directive 2011-01: OFM Notification of Fires and Explosions.

FPPA 9.(1)(a)

**Recommendation #19**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops a formal indoctrination process and training program to ensure all fire prevention staff are trained as required to perform their municipal and legislative responsibilities and duties.

FPPA 9.(1)(a)

**Recommendation #20**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops and provides fire prevention staff with the required equipment for the performance of their duties.

FPPA 9.(1)(a)

**Recommendation #21**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops an operating guideline to identify the duties and training requirements<sup>4</sup> for fire suppression captains when conducting an inspection for compliance with the Ontario Fire Code.

FPPA 9.(1)(a)

**Recommendation #22**

The Council of Greater Sudbury considers a formal collaboration between the City of Greater Sudbury Fire Services and the Building Services Department to clarify roles and responsibilities of municipal staff for the purpose of plan reviews to ensure a timely and effective delivery of services.

FPPA 9.(1)(a)

**Recommendation #23**

The Council of Greater Sudbury in consultation with their legal services develops a policy pertaining to the retention and purging of fire department records.

FPPA 9.(1)(a)

**Recommendation #24**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services consolidates paper and electronic resources into a records management system accessible to all divisions of the fire department.

FPPA 9.(1)(a)

<sup>4</sup> The Ontario Fire College course curriculum  
<http://www.ofm.gov.on.ca/en/Fire%20College/default.asp>



**Recommendation #25**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services provides access to Citrix database to all fire prevention staff.

FPPA 9.(1)(a)





## 6.0 Municipal Legislative Responsibilities

### 6.1 Fire Protection and Prevention Act, 1997 - Fire Protection Services

The Fire Protection and Prevention Act, 1997 (FPPA) establishes responsibility for fire protection services. The FPPA states at:

#### Part II - Responsibility for Fire Protection Services

##### Municipal responsibilities

- 2.(1) Every municipality shall,
- (a) establish a program in the municipality which must include public education with respect to fire safety and certain components of fire prevention; and
  - (b) provide such other fire protection services as it determines may be necessary in accordance with its needs and circumstances.

##### Fire chief, municipalities

##### Responsibility to council

- 6.(3) A fire chief is the person who is ultimately responsible to the council of a municipality that appointed him or her for the delivery of fire protection services.

### 6.2 Municipal Responsibilities - Clause 2.(1)(a) FPPA

The OFM on December 10<sup>th</sup>, 2003 presented to City of Greater Sudbury a Municipal Fire Protection Information Survey (MFPIS) and determined municipal compliance with public education and fire prevention requirements of Clause 2.(1)(a) of the FPPA.

Compliance with Clause 2.(1)(a) requires that a municipality meet the OFM minimum acceptable model which is comprised of the following:

- Simplified Risk Assessment (SRA);
- Smoke alarm program, including home escape planning;
- Distribution of public education information and implementation of public education programs; and
- Fire prevention inspections upon complaint or request.

The OFM in 2009 initiated an annual continued compliance requirement for municipalities.<sup>5</sup> As part of the continued compliance program the public education and fire prevention program for the municipality must be current and meet the OFM minimum acceptable model. Requirements for continued compliance are:

- Review the SRA;
- Complete the Compliance Self Assessment Form;
- Endorse the Declaration of Compliance; and
- Submit the Report on or before the compliance date.

The municipality confirmed on August 30<sup>th</sup>, 2010 to the OFM that it was compliant with Clause 2.(1)(a) of the FPPA<sup>6</sup>. For the purpose of compliance with Clause 2.(1)(a) the OFM examined the SRA in the City of Greater Sudbury to determine its reliability and validity.

The current SRA has no additional updates since it was completed in 2003.

<sup>5</sup> Appendix 2 - OFM Communiqué 2009-08 Annual Compliance Report

<sup>6</sup> Appendix 3 - Greater Sudbury Declaration of Compliance



### 6.3 Municipal Responsibilities - Clause 2.(1)(b) FPPA

In addition to Clause 2.(1)(a) a municipality is responsible to provide such other fire protection services as it determines may be necessary in accordance with its needs and circumstances as per Clause 2.(1)(b). In order to determine what other fire protection services are necessary, a current risk assessment utilizing the OFM Fire Risk Sub-Model<sup>7</sup> in the municipality should be completed. The risk assessment provides the basis to establish the needs and circumstances in the municipality. Council is responsible to establish and determine the level of fire protection services and it is the role of the fire department to operationalize and deliver those services.

The OFM in determining whether the municipality is meeting its responsibilities with Clause 2.(1)(b) conducted an evaluation of:

1. The Establishing and Regulating By-law (E&R) and other fire related By-laws; and
2. Actual fire protection services specifically fire prevention provided for the City of Greater Sudbury identified in Section 3.0 Scope.

### 6.4 Municipal Fire Risk

Assessing fire risks within a community is the process of examining and analyzing the relevant factors that characterize the community and applying this information to identify potential fire risk scenarios that may be encountered. The assessment includes an analysis of the likelihood of these scenarios occurring and their subsequent consequences. This information serves as the basis for formulating and prioritizing fire risk management decisions to reduce the likelihood of these events from occurring and to mitigate the impact of these events when they occur.

The existing risk assessment is not current and does not identify extreme and high risk vulnerable occupancies such as residential high-rises, nursing homes, hospitals and senior residences.

A Standard Incident Report (SIR) is filed with the OFM for fire incidents and other fire department calls in accordance with Fire Marshal's Directive: 2008-001. A review of Greater Sudbury SIRs over the last five years (2006-2010) shows a majority of fires and dollar loss due to a fire occurred in residential fires. Four civilian fire fatalities, 63 civilian fire injuries and 28 firefighter fire injuries occurred in structure fires over 2006-2010 as reported. Specifically, five civilian fire injuries occurred within care and detention occupancies during the same period.

#### Recommendation #1

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services completes a risk assessment utilizing the OFM Fire Risk Sub-Model to assist with the development and update of public education, fire safety inspection and investigation programs and services. Council then resubmits its Annual Compliance Declaration to the OFM.

FPPA 9.(1)(a)

<sup>7</sup> OFM Fire Risk Sub-Model - June 2009  
<http://www.ofm.gov.on.ca/en/Fire%20Service%20Resources/Comprehensive%20Fire%20Safety%20Effectiveness%20Model/Fire%20Risk%20Sub-model.asp>



## 6.5 Establishing and Regulating By-Law

The Establishing and Regulating By-law (E&R) is a Council level document that articulates municipal policy for the fire protection services it provides to meet its needs and circumstances. The E&R By-law should further state the type and level of fire protection services that the municipality provides. The E&R By-law in stating the level of service creates a requirement for Council to provide the necessary fiscal and human resources to the fire department. Council is responsible and is accountable to ensure that the fire protection services that it provides meets its needs and circumstances and are delivered effectively, efficiently and safely.

The OFM evaluated the City of Greater Sudbury existing E&R By-law #2010-16 (Continuing Fire Service) and the proposed revisions to the By-law and determined that neither adequately define core services or the level of fire protection services. The current By-law does not provide an accurate description of legislative authorities, defined terms, reporting responsibilities, core services specific to public education, fire safety inspections and investigations. The municipality is presently revising the existing E&R By-law and have provided a copy of the draft By-law for the review.

For the purpose of enforcing fire related By-laws there is no delegated authority given to fire department members to enforce municipal fire related By-laws. Furthermore, enforcement of fire related By-laws are not conducted after normal business hours (Monday to Friday) by By-law Enforcement Officers.

In the definitions of the E&R By-law the defined term in the Ontario Fire Code for **Chief Fire Official**<sup>8</sup> is present however, it has not identified fire service personnel and delegation has not been assigned for the purposes of approving (**Approved**) as reference in the Ontario Fire Code.<sup>9</sup> Currently, the Fire Chief is the Chief Fire Official and at this time has not delegated their authority in writing for approvals under the Ontario Fire Code.

The current and proposed By-law indicates the Fire Chief will develop and implement policies and operational procedures. However, it has been determined that very few policies and operational procedures have been developed, approved and implemented in public education, fire safety inspections and investigations.

A more comprehensive E&R By-law is necessary to clearly state Council policy and direction. The core services defined in the E&R By-law do not align and reflect the fire prevention components and the level of those services the fire department currently delivers based on a completed risk assessment.

### Recommendation #2

The Council of Greater Sudbury revises the Establishing and Regulating By-law that defines core services and the level of fire protection services specific to fire prevention based on the completed risk assessment.

FPPA 9.(1)(a)

<sup>8</sup> Ontario Fire Code, SECTION 1.4 TERMS AND ABBREVIATIONS – “Chief Fire Official” [http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws\\_src\\_regs\\_r07213\\_e.htm](http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws_src_regs_r07213_e.htm)

<sup>9</sup> Ontario Fire Code, SECTION 1.4 TERMS AND ABBREVIATIONS – “Approved” [http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws\\_src\\_regs\\_r07213\\_e.htm](http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws_src_regs_r07213_e.htm)



#### Recommendation #3

The Council of Greater Sudbury designates sufficient staff to ensure the enforcement of municipal By-laws on a 24 hour basis including municipal fire related By-laws.

FPPA 9.(1)(a)

#### Recommendation #4

The Council of Greater Sudbury ensures a policy is developed and implemented to provide written delegation to the Chief Fire Prevention Officer as Chief Fire Official where referenced in the Ontario Fire Code for sections requiring “approved”.

FPPA 9.(1)(a)

### 6.6 Operating Guidelines

Operating guidelines are used by the fire department to ensure that fire department personnel perform fire protection services in a specific and reproducible manner to promote continuity and consistency of operations. A guideline is a written statement to guide the performance or behaviour of departmental staff, whether functioning alone or in groups. Guidelines will enhance safety, increase individual and team effectiveness, form the basis of objective post incident evaluations, permit flexibility in decision making, and demonstrate due diligence.

The OFM requested fire department operating guidelines specifically for public education, fire safety inspections, fire investigations and suppression guidelines that interfaced with the fire prevention division. A review of the fire prevention division's 13 operating guidelines determined only one had formal approval by the Fire Chief or the Chief Fire Prevention Officer, which is Fire Watches (Fire-OP-201) however, it did not have an effective issue date. There were no operational guidelines for public education.

Through interviews conducted with fire prevention staff, not all staff adhered to existing operating guidelines and also not aware of all fire prevention operating guidelines. Furthermore, inconsistencies were identified through interviews in the delivery of fire prevention services, writing and filing reports, records retention and follow through to compliance with the OFC and the FPPA.

There are a number of operating guidelines that duplicate the same activity or program for full time and volunteer personnel such as Voluntary Home Inspection (G-VOLI and G-HOMI). Operational guidelines did not include up to date and current references such as OFM Technical Guidelines (G-PPOA) nor did the operating guidelines include all pertinent referenced documentation.

#### Recommendation #5

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops, approves, implements and reviews on an annual schedule all fire prevention operating guidelines. Furthermore, all fire prevention staff is trained to the established operating guidelines.

FPPA 9.(1)(a)



## 6.7 Fire Prevention – Fire Safety Inspection

The municipality has indicated that it is compliant with the requirement to provide inspections upon complaint or request Clause 2.(1)(a). To meet the intent of Clause 2.(1)(b), a municipality should develop and implement a routine fire safety inspection program for occupancies within their community based on risk. Buildings maintained in accordance with the provisions of the Ontario Fire Code (OFC) are deemed to be compliant and will perform as expected in the event of a fire. Compliant buildings will provide a greater degree of protection for occupants and responding firefighters. Building owners are responsible for carrying out the provisions of the OFC. Fire services have a public safety interest and that of their own personnel, in ensuring that buildings are maintained in accordance with the provisions of the OFC.

The OFM determined during the interviews with fire prevention staff that they were aware of the OFM Fire Risk Sub-Model however; it is not utilized to identify or target extreme and high risk occupancies for inspections.

### Recommendation #6

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services utilizes the OFM Fire Risk Sub-Model for prioritizing building stock to develop a routine fire safety inspection program to target extreme and high risk occupancies.

FPPA 9.(1)(a)

The OFM reviewed Municipal Property Assessment Corporation building occupancy data and fire prevention records selected from all geographical areas within the City of Greater Sudbury. The application of the Fire Risk Sub-Model was used to select 55 various properties to identify extreme, high and moderate risk occupancies.

The OFM further evaluated fire prevention records for the 55 selected properties based on approximately 20% of high and extreme occupancies in Greater Sudbury and identified a number of issues including inconsistent use of forms, non follow-up re-inspection of properties where violations occurred, no fire safety plans (where required) and lack of consistent enforcement options by all fire prevention staff.

The OFM examined the property files of the same 55 properties and the findings indicate 60 out of the 84 inspections reports with violations that required follow-up inspections were not conducted. No additional follow-up records or files indicate a compliance date.

The OFM conducted a review of fire safety plans in accordance with Section 2.8 of the OFC and a further request was made for an electronic file search for the same 55 properties. No approvals or fire safety plans (where required) could be located for any of the requested properties. Further research into property files could not provide fire safety plans for occupancies required to have a fire safety plan. Under the provisions of the OFC an approved fire safety plan is required for specific buildings or premises.<sup>10</sup> Without an approved fire safety plan, a building owner is not compliant with the OFC. A fire safety plan is an integral part of fire pre-planning to ensure an effective fire suppression response and occupant/firefighter safety.

<sup>10</sup> 2.8.1.1.(1) and 2.8.1.1.(2) of the Ontario Fire Code  
<http://www.ofm.gov.on.ca/en/Legislation%20Directives%20and%20Technical%20Guidelines/Fire%20Code/default.asp>



Assistants to the Fire Marshal designated under the FPPA have several options available to address violations of the Fire Code and other fire hazards that are not regulated by the Fire Code. Selecting the appropriate course(s) of action will ensure that the Fire Code contraventions or hazards are reduced or eliminated in a timely manner and/or enforcement measures are taken, as appropriate.

The decision to exercise any of the options for Fire Code compliance should be based on an analysis of the circumstances as determined by the attending Assistant to the Fire Marshal. Action taken by the Assistant to the Fire Marshal should be based on options found within the legislation (FPPA). Utilizing the legislation to address contraventions/hazards demonstrates the transfer of legal obligation upon the responsible owner or designate in the most expeditious manner available and, where applicable, includes enforcement measures by way of charge.

Interviews conducted with fire prevention staff and municipal prosecutors indicated that no operational guideline exist for the use of compliance options.

There are a number of systemic problems with the current fire safety inspection program that need to be rectified. The lack of inspections and current fire safety plans at higher risk occupancies is a significant public and firefighter safety issue.

**Recommendation #7**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops and implements an operational guideline to ensure all fire prevention staff utilizes a method to ensure consistent municipal fire prevention files.

FPPA 9.(1)(a)

**Recommendation #8**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services conducts a review of all property files to ascertain all outstanding fire code violations or fire hazards including the provision of an approved fire safety plan to ensure the building is compliant with the Ontario Fire Code. An operational guideline is to be developed to assist in choosing the most appropriate enforcement options pursuant to FPPA<sup>11</sup> and Provincial Offences Act.

FPPA 9.(1)(a)

Currently, all fire prevention inspectors are centrally located at the Fire Prevention Administration office (Station #1) and deployed to all areas of Greater Sudbury to conduct inspections. Due to the vast geography of the City of Greater Sudbury this results in a reduction of inspections due to long travel distances.

**Recommendation #9**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services considers integration and deployment options of fire prevention staff for all areas in the delivery of fire prevention services to improve efficiencies, reduce travel time and increase inspections.

FPPA 9.(1)(a)

<sup>11</sup> OFM-TG-01-2012 - Fire Safety Inspections and Enforcement (May 2012)

<http://ofm.gov.on.ca/en/Legislation%20Directives%20and%20Technical%20Guidelines/Technical%20Guidelines%20and%20Reports/pdf/OFM-TG-01-2012.pdf>





The Greater Sudbury Fire Company Pre-Incident Tactical Pre-Plan Form and Instruction Booklet and the Policy Fire-OP-206 G-PINP – Fire Company Inspection/Pre-Incident Plan are utilized by suppression staff and it is not clear in its direction regarding pre-tactical information gathered, compiling, storing and distribution of the information. The fire prevention division is not involved in any pre-planning activities and therefore, are not aware of any additional information gathered from suppression staff in the pre-planning process.

Policy Fire-OP-206 G-PINP – Fire Company Inspection/Pre-Incident Plan permits suppression staff to conduct inspections of high and extreme occupancies. Captains who conduct inspections are Assistants to the Fire Marshal, however they are not all trained to the same level to conduct specialized inspections for high and extreme risk occupancies.

**Recommendation #10**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services reviews and revises Policy Fire-OP-206 G-PINP - Fire Company Inspection/Pre-Incident Plan into two separate operational guidelines for suppression staff. Develops a guideline for the purpose of pre-planning of high and extreme risk occupancies and another guideline for the inspection of low risk occupancies.

FPPA 9.(1)(a)

All areas outside of the urban centre of the City of Greater Sudbury are serviced by two volunteer Fire Prevention Officers who provide inspection services only to Garson and Lively. The volunteer Fire Prevention Officers are limited to 20 hours per month to conduct inspections. During staff interviews this was identified as a barrier in conducting inspections in outlying areas.

**Recommendation #11**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services provides additional resources to conduct fire prevention inspections for all areas of Greater Sudbury in accordance with the risk assessment.

FPPA 9.(1)(a)

## 6.8 Fire Prevention – Public Education

The public education program should be based on the needs and circumstances as determined by the risk assessment process. Public education is designed to increase knowledge and to develop or change the attitudes and behaviours of all residents towards fire safety. It encompasses a wide spectrum of programs and activities presented to audiences as diverse as school children, older adults, homeowners, preschoolers, apartment dwellers, vulnerable persons, and employees – for example hospitals and nursing home staff. Public education programs have goals and objectives, are targeted at real and identified problems, and are evaluated on an ongoing basis through fire investigations, surveys and inspections.

The Greater Sudbury Fire service currently has two Certified Public Fire & Life Safety Educators (Fire Safety Officers) that presently coordinate and conduct public education activities for the entire municipality.



An active media campaign has been developed by the Greater Sudbury Fire Safety Officers in conjunction with other communities, however it is not formalized at this time. The fire safety messages are broadcasted throughout Northern Ontario and benefits those fire services and residents.

**Recommendation #12**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services considers the merits of a formal partnership with media campaign stakeholders to maintain the public education and media program.

FPPA 9.(1)(a)

During the interview process it was stated that the public education programs reflected local and provincial trends in fire safety. Several factors have hindered the development of specific and targeted public education programs/activities to be delivered to residents in the City of Greater Sudbury. Those factors include a current risk assessment, lack of post fire information (origin, cause and circumstances) from the fire investigation or fire scene assessment, purging of municipal files, lack of communication between divisions and no operational guidelines or tracking of activities (records management). The current system of tracking public education activities is out of date and does not include an analysis of fire investigations findings to shape the development and delivery of public education programs/activities. Furthermore, there is no evaluation process to validate and revise public education programs/activities according to needs and circumstances of the community or occupants to mitigate risk.

**Recommendation #13**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops an evaluation process for public education activities and programs for specific occupancies and demographics in accordance with the risk assessment.

FPPA 9.(1)(a)

**Recommendation #14**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops operational guidelines for public education and addresses interaction between divisions for the transfer of information.

FPPA 9.(1)(a)

Fire statistics show that having a working smoke alarms in the home will increase the chances of surviving a fire. Most fatal fires occur in the home while occupants are asleep. Fire deaths and injuries can be reduced significantly if every home had working smoke alarms and a home fire escape plan. An effective smoke alarm program will assist fire department staff protect residents from fire.

The smoke alarm program delivered in outlining areas is restricted by a fire department's decision of capping volunteer firefighter hours per station. The amount of volunteer firefighter hours per station to deliver the smoke alarm program may vary year to year due to budgetary constraints. There is no policy or operational guideline to address the smoke alarm program for the City of Greater Sudbury.





#### Recommendation #15

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops and implements a smoke alarm operational guideline and program to all areas of the municipality.

FPPA 9.(1)(a)

### 6.9 Fire Prevention – Fire Investigations

Fire investigations are an important component of fire prevention. Investigations are to be conducted at all fires and explosions. Investigations are used to determine origin, cause and circumstances of fires/explosions, assess code compliance, assess fire suppression effectiveness and to determine the effectiveness of built in suppression features. Conducting fire investigation is considered to be a reactive activity within the scope of fire prevention, since it can neither be predicted nor scheduled. However, fire investigations can be proactive in assisting with determining, developing and validating current fire protection services, as they relate to community needs and circumstances. Information collected by fire prevention staff when conducting investigations is a valuable tool in developing an effective fire prevention program for the municipality.

The OFM evaluated the current processes and activities surrounding fire investigations. The review identified no operational guidelines. During interviews with fire prevention staff and platoon chiefs it was confirmed that suppression crews conduct fire scene assessments and fire prevention staff does not conduct fire investigations. Information and knowledge from the fire scene is not transferred between fire suppression and fire prevention staff. The findings and information from fire investigations is necessary and beneficial when updating and revising programs.

#### Recommendation #16

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops an operational guideline to provide the transfer of relevant fire scene assessment and investigation information to the Fire Prevention Division for the purposes of updating the risk assessment and relevant programs and activities.

FPPA 9.(1)(a)

It was determined that not all fire prevention staff is equipped with Personal Protective Equipment (PPE) for conducting post-fire code building compliance inspections. Furthermore, as indicated in the draft E&R By-law transfer of conducting fire investigations from suppression division to fire prevention division will occur.

#### Recommendation #17

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services adheres to the Occupational Health and Safety Act (OHSA)<sup>12</sup> for all staff conducting fire scene assessments and investigations.

FPPA 9.(1)(a)

During interviews and a review of OFM investigation statistics it was noted not all fire incidents were reported to the Office of the Fire Marshal in accordance with the Fire

<sup>12</sup> Ministry of Labour, Fire Fighters Guidance Note #4-13 Fire Investigation, January 2007.  
<http://www.oafcc.on.ca/sites/default/files/uploads/documents/Section21/Section21-4/GN-4-13%20Fire%20Investigation.pdf>



Marshal's Directive 2011-01: OFM Notification of Fires and Explosions<sup>13</sup>, requires all Assistants to the Fire Marshal to notify the Office of the Fire Marshal (OFM) of all incidents that meet the following criteria:

- All fatal fires or serious injuries requiring person(s) to be admitted as in-patient(s) to a hospital (24-hour response)
- Explosions (24-hour response)
- Fires in buildings with vulnerable occupants, including, but not limited to, nursing homes, retirement homes, homes for special care, senior residences and hospitals; (8:30 a.m. to 5:00 p.m.)
- Fires suspected of being incendiary and requiring expert technical assistance (8:30 a.m. to 5:00 p.m.)
- Large loss fires: \$500,000 and over (8:30 a.m. to 5:00 p.m.)
- Fires of unusual origin or circumstances (8:30 a.m. to 5:00 p.m.) Unusual fire/smoke spread, or involves circumstances that may result in widespread public concern, e.g., environmental hazard
- Fires in multi-unit residential occupancies when fire spread is beyond unit of origin (8:30 a.m. to 5:00 p.m.)
- Fires involving marijuana grow operations or clandestine drug laboratories (8:30 a.m. to 5:00 p.m.)

**Recommendation #18**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services reports all fire incidents to the Office of the Fire Marshal that meets the criteria as stated in the Fire Marshal's Directive 2011-01: OFM Notification of Fires and Explosions.

FPPA 9.(1)(a)

## 6.10 Training & Equipment

A review of the fire department training was conducted to identify if training has been provided for each of the fire prevention components that are established for the fire department. Additional training is required under the Occupational Health and Safety Act (OHSA), as prescribed by the Ministry of Labour. The Ministry of Labour in collaboration with fire service stakeholders develops Ontario Fire Service Section 21 Committee Guidance Notes.

Guidance Notes outline recommended equipment and procedures to be used by workers in the fire service to prevent injury or illness and comply with the intent and provisions as outlined in the OHSA. Ministry of Labour inspectors refer to guidelines, guidance notes, alerts, etc. when they carry out their enforcement duties under the OHSA. They are considered in determining if reasonable precautions for the protection of a worker are being taken under Clause 25.2(h) of the OHSA.

Council as the employer, and any fire department personnel who perform supervisory work have a legal responsibility to ensure that staff are trained to conduct the tasks that they are assigned.

<sup>13</sup> FIRE MARSHAL'S DIRECTIVE: 2011-01: TOPIC: OFM NOTIFICATION OF FIRES AND EXPLOSIONS  
<http://www.ofm.gov.on.ca/en/Legislation%20Directives%20and%20Technical%20Guidelines/Fire%20Marshal%20Directives/11-001.asp>



There is no initial training for new staff upon commencement of duties within the fire prevention division. Currently three senior fire prevention officers have obtained their Fire Prevention Officer certification from the Ontario Fire College. Three senior fire prevention officers have received their Building Code Inspection Number (BCIN), from the Ministry of Municipal Affairs and Housing for the purpose of plans review and final occupancy inspection. Two Public Safety Officers have received the Public Fire and Life Safety Educator's Certificate from the Ontario Fire College. Two volunteer fire prevention officers have taken the OFM Basic Fire Prevention and Inspection and Fire Cause and Determination courses.

It was identified there was no formal training, performance appraisals or developmental opportunities for full-time and volunteer staff in the fire prevention division. Furthermore, it was noted during interviews that not all staff were provided with the required equipment for the performance of their duties.

**Recommendation #19**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops a formal indoctrination process and training program to ensure all fire prevention staff are trained as required to perform their municipal and legislative responsibilities and duties.

FPPA 9.(1)(a)

**Recommendation #20**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops and provides fire prevention staff with the required equipment for the performance of their duties.

FPPA 9.(1)(a)

Fire suppression captains are currently conducting inspections in conjunction with pre-planning of buildings. Training has not been provided to all fire suppression captains to conduct comprehensive building inspections for extreme and high risk occupancies (hazardous materials processes and operations, flammable and combustible liquids, and fire safety plan reviews).

**Recommendation #21**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services develops an operating guideline to identify the duties and training requirements<sup>14</sup> for fire suppression captains when conducting an inspection for compliance with the Ontario Fire Code.

FPPA 9.(1)(a)

**6.11 Interaction between other department and/or agencies.**

Interviews were conducted with various municipal departments and staff to determine interactions with the Greater Sudbury Fire Prevention Division. The relationships between the Fire Prevention Division and other municipal departments were described as being conducive to a good working environment and no major concerns were noted.

<sup>14</sup> The Ontario Fire College course curriculum  
<http://www.ofm.gov.on.ca/en/Fire%20College/default.asp>



Building Services did raise a concern regarding fire prevention staff completing plan reviews. There is a duplication of services respecting plan reviews for the purpose of identifying fire protection issues under the Ontario Building Code. The plan reviews by fire prevention staff has resulted in a delay in issuing permits by Building Services and in some instances were unable to meet the benchmark set for the permit issuance process.

**Recommendation #22**

The Council of Greater Sudbury considers a formal collaboration between the City of Greater Sudbury Fire Services and the Building Services Department to clarify roles and responsibilities of municipal staff for the purpose of plan reviews to ensure a timely and effective delivery of services.

FPPA 9.(1)(a)

**6.12 Records Management**

Fire department records are municipal records and therefore subject to the Municipal Act and the Municipal Freedom of Information and Protection of Privacy Act. Under the Municipal Act, municipalities have a legislated responsibility to have a records retention schedule which would include fire department records.

A comprehensive review of fire prevention files revealed inconsistencies and missing key documents (including both paper and electronic) pertaining to municipal addresses that inhibit and make it difficult for fire prevention staff to have a proper examination of the property file. No fire department policy or operational guidelines exist for fire prevention records.

The OFM was advised that a purging of fire prevention municipal files had occurred in the Fall of 2011. A letter dated October 15, 2011 from City of Greater Sudbury Risk Management/Insurance Officer directed staff to cease purging. Upon receipt of the letter the Chief Fire Prevention Officer directed fire prevention staff to cease purging of municipal files.

Suppression data is crucial to the development and revisions to fire safety inspection programs, investigation and public education activities. Currently, fire suppression staff utilizes an electronic database (Citrix) to complete reports and only a few fire prevention staff have access to Citrix. The access of information and the transfer of knowledge is not available to all fire prevention staff.

**Recommendation #23**

The Council of Greater Sudbury in consultation with their legal services develops a policy pertaining to the retention and purging of fire department records.

FPPA 9.(1)(a)

**Recommendation #24**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services consolidates paper and electronic resources into a records management system accessible to all divisions of the fire department.

FPPA 9.(1)(a)



**Recommendation #25**

The Council of Greater Sudbury ensures the City of Greater Sudbury Fire Services provides access to Citrix database to all fire prevention staff.

FPPA 9.(1)(a)

**7.0 OFM Conclusion – Municipal FPPA Responsibilities**

The purpose of this review is to assist the City of Greater Sudbury in meeting its legislative responsibilities as per Part II of the Fire Protection and Prevention Act, 1997 S.O. 1997, Chapter 4 (FPPA). The review has identified a number of recommendations to assist the City of Greater Sudbury in meeting their responsibilities in accordance with the provisions of fire protection services, as stated in Clauses 2.(1)(a) and 2.(1)(b) of the Fire Protection and Prevention Act, 1997.

The OFM will continue to monitor fire protection services, specifically fire prevention services in the City of Greater Sudbury, and will provide further advice and assistance in cooperation with the City of Greater Sudbury and its fire department.

Signed in Sudbury on May 23, 2012.

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Art Booth  
Operations Manager  
Northeast Region  
Office of the Fire Marshal



## 8.0 Appendices

### Appendix 1

Notification of OFM Review of Fire Protection Services in the City of Greater Sudbury pursuant to Clause 9.(1)(a) of the Fire Protection and Prevention Act, 1997.

January 26, 2012

Mayor Marianne Matichuk and Members of Council  
City of Greater Sudbury  
P.O. Box 5000, Station A  
200 Brady Street  
Sudbury, ON P3A 5P3

**Re: Notification of OFM Review of Fire Protection Services in the City of Greater Sudbury pursuant to Clause 9.(1)(a) of the Fire Protection and Prevention Act, 1997**

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Dear Mayor Matichuk and Members of the City of Greater Sudbury Council:

Officials from the Office of the Fire Marshal (OFM) met with City of Greater Sudbury municipal officials on January 16, 2012. During this meeting it was agreed by both parties that the City of Greater Sudbury would benefit from a review. At that time OFM staff advised that it would be our intent to initiate a review of fire protection services pursuant to our authority as per the Fire Protection and Prevention Act, 1997 (FPPA), Part III, Clause 9.(1)(a), specifically to fire prevention that would include public education, inspections (enforcement) and investigations for the entire City of Greater Sudbury – see Scope for consistency purposes.

The review will, upon completion, provide the City of Greater Sudbury with recommendations to assist in improving the effectiveness and efficiency of the delivery of fire prevention services to its residents and in meeting its responsibilities under the FPPA and other supporting legislation.

The scope of the review will address:

1. Establishing and Regulating By-law (determine the level of fire prevention services the City of Greater Sudbury provides.)
2. Risk Assessment (utilizing the OFM Fire Risk sub-model) to identify all high and extreme risks in the municipality.



3. Fire Inspection practices and protocols (training, frequency, enforcement option, utilization of non-traditional staff.)
4. Public Education programs development and utilization.
5. Fire Investigations to assist in improving fire service delivery gaps.
6. Evaluate current pre-plans in place and identify any gaps. Developing pre-plans for all high and extreme risks (enhancing the health and safety for staff and residents/occupants.)
7. Interaction between various city services (improving response to various issues.)

During the course of the review, should the OFM become aware of other issues which may impact on another ministry or regulatory authority, the OFM will notify, if necessary, both the municipality and that ministry or authority. Further, the OFM, as part of its responsibilities, will address any critical fire protection delivery issues that are identified and provide any assistance necessary to resolve those issues.

The OFM will provide a report to council with recommendations by May 15, 2012. Your ongoing cooperation is anticipated so that the report can be completed in a timely manner.

The OFM is available throughout the review to respond to any questions or address any concerns. I will be the lead on this review and may be reached by e-mail at [Art.Booth@ontario.ca](mailto:Art.Booth@ontario.ca) or by telephone at 705-564-4472.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Art Booth'.

Art Booth  
Operations Manager  
Fire Protection Services

/ab

- c. D. Nadorozny, Chief Administrative Officer  
F. Bortolussi, Deputy City Clerk  
T. Beadman, Chief Emergency Services  
D. Stack, Fire Chief  
T. Bain, A/Assistant Deputy Fire Marshal  
Executive Committee – Office of the Fire Marshal



## Appendix 2

### OFM Communiqué 2009-08 Annual Compliance Report.

June 11, 2009

#### Annual Compliance Report

Every municipal / Northern Fire Protection Program (NFPP) fire department in Ontario has received a certificate from the Office of the Fire Marshal (OFM) confirming that it was in compliance with clause 2.(1)(a) of the Fire Protection and Prevention Act, 1997 (FPPA) at the time the certificate was given. Using the Municipal Fire Protection Information Survey (MFPIS), OFM advisory staff members worked closely with every municipality/jurisdiction to determine whether the municipality/jurisdiction had met its statutory obligations under the FPPA, and, if needed, to plan the next steps to be able to fulfill these obligations. The original purpose of the survey was to assist municipalities in complying with the minimum requirements for fire protection services, as directed by the FPPA, and to enable the OFM to meet its responsibility for monitoring municipal fire protection services in Ontario, as required by the Act.

For a fire department to be deemed in compliance, it has to satisfy four key requirements: simplified risk assessment; smoke alarm program, including home escape planning; distribution of public education information and implementation of public education programs; and, fire prevention inspections upon complaint or request.

The MFPIS data was used to:

- identify best practices in the fire service and share them with municipalities that could benefit by adopting them;
- create a database of useful information to be used by the OFM and shared, where possible, with the fire service;
- enable determinations regarding FPPA compliance that are made in an objective manner and that can be substantiated;
- provide advice and assistance to municipalities that are not in compliance currently;
- promote the use of up-to-date by-laws, service agreements, and council policies to establish appropriate service levels and provide adequate direction to fire department management; and
- recognize the achievement of municipalities that are in compliance and award a certificate of compliance, where appropriate.

The milestone of initial compliance has been reached, but the need for diligence remains. Meeting one's statutory obligations is an ongoing task. For that reason, a self-assessment tool has been developed that will allow municipalities to confirm continued compliance with clause 2.(1)(a) of the FPPA. This tool, the Annual Compliance Report, will help the OFM to fulfill its monitoring duties. The Annual Compliance Report will be sent to





municipalities and NFPP fire departments annually, three months prior to their compliance date, that is the date that appears at the bottom of the Certificate of Compliance. The Report will be sent in an electronic format, on a CD, to make it easier to complete. A copy of the Report is enclosed.

Completing the Annual Compliance Report entails:

- reviewing the simplified risk assessment;
- filling out a form entitled Compliance Self Assessment Form;
- signing the Declaration of Compliance; and
- returning the Report on or before the compliance date.

The Annual Compliance Report is not intended to be another municipal fire protection information survey, but rather a reaffirmation that the original information is current and correct. The self assessment form covers the four key requirements for compliance with clause 2.(1)(a): the simplified risk assessment; the smoke alarm program, including home escape planning; distribution of public education information and implementation of public education programs; and, fire prevention inspections upon complaint or request.

A quick review of the simplified risk assessment will allow the fire department to note if there have been any major changes within the community (e.g., new high-rise seniors' complex). The sections on smoke alarm programs, distribution of fire safety education materials and inspections upon request or complaint are simple and straightforward. Filling out these sections will confirm that these programs or processes are still active and in place, and provide a few basic statistics (e.g., number of inspections, number of charges laid). The final two sections offer an opportunity to explain factors that have had an impact on the ability to fulfill the minimum mandatory requirements and to recount any successes the municipality may wish to share.

Once completed, the Annual Compliance Report is to be signed by the fire chief and the head of council, and sent to the OFM. It will be reviewed by the local OFM fire protection adviser. Once it has been established that compliance is ongoing, fire protection advisers, in keeping with their monitoring duties, may conduct random audits of MFPIs and continued compliance documentation. Furthermore, the local fire protection adviser will be available to provide advice and assistance to any municipality that has had significant changes in its level of service and that has found itself to be in non-compliance.

Enquiries regarding the Annual Compliance Report should be directed to the local OFM fire protection adviser.

Enclosure

Annual Compliance Report ([HTML](#) , [PDF 90KB](#))

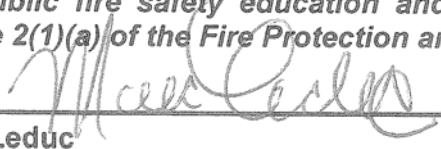


### Appendix 3

#### Greater Sudbury Declaration of Compliance

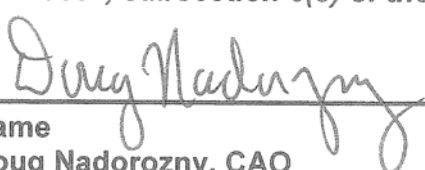
#### DECLARATON OF COMPLIANCE

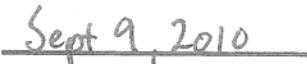
*We, the undersigned declare that the information provided is true and accurate. Further, we declare that the municipality of City of Greater Sudbury has completed all the necessary requirements for continued compliance with the public fire safety education and fire prevention requirements stated in clause 2(1)(a) of the Fire Protection and Prevention Act, 1997.*

  
\_\_\_\_\_  
Marc Leduc  
Fire Chief  
Greater Sudbury Fire Services

  
\_\_\_\_\_  
Date

*"A fire chief is the person who is ultimately responsible to the council of a municipality that appointed him or her for the delivery of fire protection services", subsection 6(3) of the Fire Protection and Prevention Act, 1997.*

  
\_\_\_\_\_  
Name  
Doug Nadorozny, CAO  
Greater City of Sudbury

  
\_\_\_\_\_  
Date