

Hello,

I am writing to make a submission to the added agenda for the Community and Protective Services Committee meeting coming up on March 18, 2024. My submission is regarding agenda item 2.6

Business Licensing By-law and Fireworks By-law – Amendments. Please note that I grant permission for this submission to appear on the public agenda. I am also copying all members of CPSC for their information.

I have reviewed the staff report and proposed by-law amendments. I am sharing the following two questions so that they may be addressed during the committee's discussion.

1. **Is there a mechanism available to the City to temporarily suspend or amend components of the Fireworks by-law or Business Licensing by-law (as it applies to fireworks) in response to acute elevated risk of wildfires, such as by declaring a temporary ban on selling or detonation of fireworks? (see background below)**
2. If there is such a mechanism, what process and criteria are used by officials to evaluate risk associated with fireworks, and how are any temporary changes communicated to businesses and the public?

Background:

- In June 2023, responding to an extended period of drought and extremely dry conditions, the Acting Fire Chief enacted [a larger outdoor burn ban](#) in London which lasted for 10 days. The [Open Air Burning by-law f-9](#) includes the following provision:
 - *"2.3. Notwithstanding the conditions in this By-law in which Open Air Burning is Approved, the Fire Chief, Chief Fire Official or designate shall have the authority to issue a burn ban under the conditions of a drought, pandemic, state of emergency, which would supersede all Approvals to conduct Open Air Burning in accordance with this By-law."*
- The draft Fireworks by-law does not make any reference to mitigating fire risks associated with fireworks, such as including a provision similar to the Open Air Burning by-law listed above.
- In 2024, it is forecasted that southern Ontario will experience abnormally dry conditions similar to last year ([source](#)). Under climate change conditions, elevated frequency and severity of droughts will continue in our region. Section 1 of the City of London Climate Emergency Action Plan states: *"London has luckily remained relatively unscathed from the severe physical impacts of climate change such as forest fires, major floods and intense heat waves that have struck other parts of the world. As time progresses however, London will very likely experience more severe effects."*

- In August 2023, the Environmental Stewardship and Action Community Advisory Committee (ESACAC) submitted [recommendations on the fireworks by-law update](#) that provide detailed research into London's wildfire risk. In summary, although London has historically been safe from wildfires, into the future there may be elevated risk to people, infrastructure and natural heritage. [The National Guide for Wildland-Urban Interface Fires](#) (NRCAN, 2021) provides recommendations for consideration by municipalities when enacting regulations, such as by-laws, to limit wildfire risks.

Thank you for your consideration.

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