From Co-operation to Coercion: The Design and Implementation of Intergovernmental Policy for Emergency Management in Ontario, 1990-2006

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Canadian provincial governments frequently adopt policies which rely on municipal governments for their implementation. A policy statement declaring a provincial government's commitment to limiting urban sprawl, for instance, is meaningless unless new practices are effectively implemented by municipal planners (Brunt and Winfield, 2005). In order to achieve their policy objectives, provincial governments often seek to change municipal behaviour, and they employ a wide range of instruments for this purpose (Andrew, 1995; Frisken, 1997).

Sometimes provincial officials present well-reasoned arguments to persuade municipal decision-makers that a given problem is severe and action is urgent. In other cases, broad consultation with municipalities and stakeholders gives provincial ministries legitimacy in establishing guidelines or "best practices" in a particular policy field, and awarding recognition to municipalities that adhere to them. The provinces' superior revenue-raising capabilities also allow for grants and subsidies to entice municipal acceptance of provincial policy priorities. All of these approaches are co-operative in nature, in that policy goals are articulated and compliance is encouraged, but municipal councils are empowered to decide whether and how to incorporate the objectives into local practice.

However, when the aim is to harmonize standards or practices across the entire municipal system, provincial governments typically select a more coercive policy instrument. Legal tools are the primary coercive means available to provincial policy-makers in directing municipal behaviour. Legislation gives authoritative sanction to the policy objectives of the political executive, imposing legal obligations on municipal governments and creating an accountability relationship to be policed by officers of the state. Legislation also authorizes cabinet ministers to make regulations—binding rules of behaviour that have the force of law—in order to further specify municipal responsibilities in an area of public policy. Since municipal governments are constitutionally subordinate to provincial authority, these instruments leave municipalities with no legal option but to carry out the policy prescriptions.

But because coercive intergovernmental policies can significantly alter the scope of municipal responsibilities and divert scarce resources from other important community priorities, they are often regarded as unwelcome intrusions into local affairs. Committed to their existing routines, local officials tend to resist the responsibilities imposed by intergovernmental mandates, particularly when they require a significant departure from current practices, or when they impose costs, but do not provide financial resources to pay for them (for example, Cimitile et al., 1997; Lovell and Tobin, 1981; Mueller, 1984). Thus despite their legal and hierarchical superiority, provincial governments cannot assume that intergovernmental mandates will be effectively implemented. Indeed, analysts have long observed that policy outputs at the local level can deviate significantly from the goals and objectives set out by policy-makers at higher levels of government (for example, de Alteriis, 1990; Pressman and Wildavsky, 1973; Van Horn and Van Meter, 1977). The voluminous scholarly literature on policy implementation includes dozens of case studies and comparative analyses, which document the many barriers to the effective translation of intergovernmental policies into positive local outputs.

This paper examines the origins and impacts of Ontario's *Emergency Management Act*, a coercive intergovernmental mandate promulgated in the early 2000s, which significantly altered municipal responsibilities concerning emergency planning. For decades, Ontario municipalities

were empowered, but not required, to prepare for emergencies, and provincial officials used various co-operative techniques to encourage and persuade local governments to undertake comprehensive emergency planning. Then in 2003, the Government of Ontario adopted a more coercive approach, mandating every municipality to implement an emergency management program complying with specific standards.

What factors motivated the shift from a co-operative to a coercive intergovernmental policy? Is a coercive intergovernmental mandate an effective tool for improving the quality of municipal emergency management? It is argued here that the *Emergency Management Act* was formulated as a response to mounting evidence that a co-operative approach had failed to achieve provincial policy objectives. Although the intergovernmental mandate has generally raised the profile of emergency management among municipal governments, the effectiveness of implementation has varied, influenced by differences in local commitment to the policy objectives and community capacity to carry out the provincial directives. The case offers insights into the dynamics of intergovernmental policy design and implementation, but also highlights practical considerations for other jurisdictions contemplating Ontario's approach as a potential model for emergency management.

The paper begins by drawing on scholarly literature to explore the opportunities and challenges associated with intergovernmental policy design and implementation. It then describes the political environment of emergency management, which is normally marked by public and political apathy, creating a significant barrier to positive local policy development. The third section examines the ideas and events which led to the changes in Ontario's emergency management policy and the design considerations behind the intergovernmental mandate. Municipal responses to the mandate are discussed in the fourth section, in order to illustrate the variable local impacts of this policy.

Intergovernmental Policy Design and Implementation

Public policy scholars have long studied the complexities of policy implementation and have identified myriad issues policy-makers must consider in designing intergovernmental policies. In their classic study of local implementation of a federal economic development initiative in California, for instance, Pressman and Wildavsky (1973) advise policy-makers to carefully consider the local implementation environment including, for example, the compatibility of statutory objectives with the goals, values and routines of implementors, and the impact that potential changes in leadership of local agencies might have on implementation.

In another classic work, Van Horn and Van Meter (1977) emphasize that implementation is likely to be more effective if intergovernmental policies set out precise and consistent standards, which are clearly communicated to implementors. Other important design considerations they highlight include the general disposition of implementors toward the policy objectives and the resources implementing agencies can draw upon to put them into effect. Other studies, such as those of Mazmanian and Sabatier (1981; 1983), reinforce and expand on these findings, concluding that policy-makers must structure the implementation process by, for instance, communicating policy objectives clearly and consistently, and by ensuring implementing agencies are sufficiently resourced and committed to the policy objectives.

For these and other scholars, central considerations in the design of intergovernmental policies are the commitment of lower-level governments to the policy objectives and their capacity to carry out the mandated directives. Key factors affecting the commitment of local implementors are the perceived need for the service or activity within the community, as well as the level of support for the policy objectives among organizational superiors, such as elected officials and senior administrators. A local government's capacity to implement intergovernmental policy is a function of its willingness and ability to marshal human and financial resources to "produce" the policy outputs mandated by the higher-level authority.

Given the importance of local commitment and capacity, analysts prescribe a range of actions to facilitate effective intergovernmental policy implementation (for example, Goggin et al., 1990; May 1993; 2003). Chief among these recommendations are a call for clear and consistent policy objectives; the incorporation of capacity-building measures such as financial assistance, training and technical support; and efforts to build local commitment to policy goals by, for example, providing incentives for compliance and publicizing implementation successes. A strong policy design, which includes clear and unambiguous objectives and commitment- and capacity-building measures, is especially important in cases where implementing agents appear to lack motivation to take action on a problem (Ingram and Schneider 1990; May 1993).

Policy Designs

Co-operative and coercive intergovernmental policies are polar opposite approaches taken by higher-level governments to secure desired policy behaviour among lower-level governments (May 1995; May and Handmer 1992; May et al., 1996). The type of mandate that policy-makers choose depends on their perception of the commitment and capacity of lower-level governments. Co-operative intergovernmental policies assume subordinate governments have at least some normative commitment to the policy objectives set out by the higher-level authority and, if provided with financial or technical assistance to build capacity, will adopt appropriate courses of action to achieve the desired ends.

By treating subordinate governments as partners working toward an important public purpose, co-operative intergovernmental policies can generate local acceptance of the policy goals, which can translate into more effective outputs and outcomes over the long term. Moreover, by setting out desired ends, but leaving the means to achieve them to the discretion of subordinate governments, co-operative policies allow for innovation and experimentation. However, without the threat of sanctions, subordinate governments that do not perceive the problem addressed by the policy as urgent or salient may shirk the prescriptions, contributing to local disparities in implementation.

By contrast, coercive intergovernmental policies assume that subordinate governments will resist the policy objectives set out by the mandating authority. As such, they generally include detailed standards to limit discretion in policy development, mechanisms to monitor compliance, and often sanctions to compel lower-level governments to carry out the desired actions. By setting out universal rules of behaviour, coercive intergovernmental policies empower the agency tasked with overseeing implementation to clearly communicate the requirements to all subordinate governments. Prescribed standards offer a framework for

monitoring implementation performance and, backed by statutory authority, provide officials with the means to enforce policy prescriptions, normally by imposing penalties.

However, coercive intergovernmental policies can generate resentment among subordinate governments, which can weaken their commitment to the underlying intent of the policy. Acting to avoid sanctions, implementors may complete the minimum requirements to achieve legal compliance with the mandate, but fail to move beyond these basic standards. In addition, the requirements imposed by a coercive mandate may prompt subordinate governments to shift resources from other important, but discretionary, priorities. In comparing the efficacy of co-operative versus coercive intergovernmental policy designs in achieving similar policy goals, May and Burby (1996) conclude that co-operative policies can be effective when commitment to the policy objectives among subordinate governments is high, but that coercive policies are more effective in securing compliance when commitment is low.

Provincial policy-makers who seek to achieve policy goals by changing the behaviour of municipal governments therefore face important decisions in designing intergovernmental policies. Broad choices include whether to adopt a co-operative or coercive policy design, the scope and priority of various policy objectives, and which commitment- and capacity-building measures to incorporate in order to facilitate implementation. These policy design choices must be sensitive to the political environment which surrounds a particular policy field.

The Political Context of Emergency Management

Emergency management policy refers to a framework of plans, procedures and practices adopted by public authorities to address unforeseen, urgent situations that pose a serious risk to people's life, health or property. In Canada, primary functional responsibility for emergency management is delegated to local governments. Although they can draw upon provincial or federal support if required, local governments are expected to have the capacity to respond effectively to emergencies within their borders (Kuban, 1996; Scanlon, 1995). All communities face potential emergencies—ice storms, floods, train derailments, industrial accidents, and so on—and the effectiveness of a local government's response to such events depends on the quality of its emergency management program.

On the one hand, their extensive knowledge of the community equips municipal governments with critical information necessary to design effective emergency management programs. Local first responders, such as police, firefighters and emergency medical services personnel, are a source of valuable knowledge and experience, which emergency planners can draw upon to diagnose emergency-related needs and develop policy proposals. Every community faces different risks, so local officials are arguably best positioned to determine the appropriate scope and content of preparedness measures (Newkirk, 2001).

On the other hand, local residents typically underestimate the likelihood of an emergency and therefore do not perceive a pressing need for extensive planning and management. The probability of these events is low enough that most citizens do not prepare themselves, let alone organize with others to demand public investment in this area (Larsson and Enander, 1997).

Moreover, the costs and benefits associated with emergency management are diffuse, so organized interests seldom lobby for or against policies in this area.

In the absence of public demands, there is little incentive for municipal politicians to prioritize emergency management, when it is weighed against competing agenda items. Donahue and Joyce argue that "local governments—lacking both the political wherewithal to worry about events that may never occur and a clear rationale to expend limited dollars on technical expertise that may never be needed—prefer to shirk these costly responsibilities and concentrate on more pressing local problems" (2001: 733). The general result, as articulated by Wolensky and Wolensky, is "a pattern of inconsistent and often weak performance by local governments across all disaster stages" (1990: 708).

Poor-quality local emergency planning is partly a function of perspective. From a national or provincial vantage point, localized emergencies appear frequent, and disasters probable, so planning for their impacts seems imperative. But at the local level, emergencies are rare and the odds of a disaster seem remote, so "the need for emergency management seems far less compelling, and public support for disaster preparedness is very difficult to sustain" (Kreps, 1992: 159-160). Beverly Cigler calls this the "intergovernmental paradox" of emergency management, whereby "the governments least likely to perceive emergency management as a key priority—local governments—are at centerstage in terms of responsibility for emergency management" (1988: 10).

Higher-level governments must mobilize in the event that an emergency exceeds the coping capacity of a community, so they have a strong incentive to pressure or persuade local governments to adopt comprehensive emergency management programs. Various instruments are available to impel local action: reports of emergencies in other communities can be used to exhort local officials to focus on emergency management, financial incentives can be offered to induce local compliance with higher-level performance goals, and legislation and regulations can be adopted to mandate emergency measures (Mushkatel and Weschler, 1985; Tierney, Lindell and Perry, 2001: 205-206).

Although these policy tools are technically substitutable, they vary in the degree to which they require public resources, and the extent to which they restrict the behaviour of lower-level governments. As noted above, the choice of instrument appears to be primarily determined by policy-makers' perceptions concerning the level of commitment to the policy goals among target governments and their capacity to implement them. This perception can change over time, as policy-makers respond to indicators of implementation performance and evaluate the efficacy of the existing policy design. The following section examines the sequence of events that led to the Government of Ontario's decision to switch from a co-operative to a coercive intergovernmental policy design, and describes the scope and content of the resulting policy.

Emergency Management in Ontario

Emergency management in Ontario is rooted in civil defence initiatives of the early 1950s, which involved planning for a possible nuclear attack. Throughout the 1960s and 1970s, emergency planners increasingly focused their attention on "peacetime" emergencies, prompted by major events such as Hurricane Hazel, a massive tropical storm which devastated communities in the Toronto region in 1954, and the "Great Northeastern Blackout" of 1965, in which a cascading system failure interrupted power to nearly 30 million people in Ontario, New York State, and New England. Technological hazards became a more salient concern for emergency planners in the 1980s, following a number of high-profile incidents, including a partial core meltdown at the Three Mile Island nuclear power plant in Pennsylvania in 1979, a serious train derailment in Mississauga, Ontario the same year, a deadly poison gas release in Bhopal, India in 1984, and a massive explosion and fire at the Chernobyl nuclear power plant in Ukraine in 1986.

By the end of the 1980s, there was a relatively long history of emergency planning in Ontario, and the function was well-established in the provincial bureaucracy. Emergency Planning Ontario, a branch of the Ministry of the Solicitor General, was tasked with overseeing provincial emergency planning, as well as co-ordinating and supporting municipal initiatives in this field. However, provincial legislation concerning emergency planning—the *Emergency Plans Act* of 1983—empowered, but did not require, municipalities to prepare for emergencies, stating only that "the council of a municipality may pass a by-law formulating or providing for the formulation of an emergency plan" (Ontario, 1983).

Paradigm Shift

In the early 1990s, a new paradigm of "integrated, all-hazards" emergency management had begun to take root in the United States and other countries, driven largely by an expanding body of research on the causes and consequences of disasters (Sylves, 1991). The model advocated efforts to reduce vulnerability to all types of hazards, and to make plans flexible enough to address any emergency, regardless of the triggering event. Furthermore, it expanded the policy goals of emergency management beyond a traditional focus on preparedness and response to include hazard mitigation—actions to prevent or reduce the impact of emergencies—and recovery, which involved planning to restore and rehabilitate a community after an emergency (McLoughlin, 1985). These objectives demanded a more systematic approach to emergency planning, which would involve identifying and evaluating risks, developing integrated plans to pull together response resources, providing regular training and exercises for emergency responders and developing public education programs to inform citizens about hazards and protective measures.

The ideas resonated with provincial emergency planning officials, who sought to emulate the approach in Ontario. A revised Provincial Emergency Response Plan, completed in 1992, integrated the emergency-related responsibilities of various provincial ministries and established a framework for co-ordinated response (Ontario, 1992). Reflecting the new, broadened objectives, in the mid-1990s Emergency Planning Ontario was renamed Emergency Measures Ontario (EMO) and its structure was adjusted to direct resources toward mitigation and recovery.

Most hazard mitigation measures, such as land-use zoning to limit property exposure in floodplains, were local in nature, so operationalizing the integrated, all-hazards model necessitated action by municipal governments. Lacking the legislative authority to compel municipalities to adopt the expanded range of priorities, provincial officials relied on a co-operative intergovernmental policy approach to generate local buy-in. In 1997, EMO launched an initiative called Partnerships Toward Safer Communities, which was the first concerted attempt to standardize municipal emergency planning in the province (Harrison, 2001). Under the program, municipalities were exhorted to partner with industry in order to map out a strategy to manage local emergencies. These efforts were to be guided by three progressive sets of standards—Essential, Enhanced and Excellent—summarized in Table 1.

Table 1. Partnerships Toward Safer Communities – Standards

Essential	• Appoint emergency measures officer • Conduct hazard identification and risk assessment • Formulate emergency response plan • Formulate hazardous materials response plan • Establish emergency operations centre • Document industry response resources • Perform "tabletop" emergency exercise (annual)
Enhanced	• Appoint public information officer • Include industry representative in emergency operations centre • Establish emergency telecommunications system • Provide training for elected officials and staff • Perform full-scale exercise (annual)
Excellent	• Establish mutual aid agreements with neighbouring communities • Conduct public education about hazards • Establish emergency media information center • Design risk-based prevention / mitigation program • Adopt risk-based land-use planning • Designate dangerous goods routes through community • Formulate recovery plan • Perform comprehensive program review (annual)

Source: Adapted from Major Industrial Accidents Council of Canada, 1999.

Provincial officials marketed the program as a way for municipal governments and industry to demonstrate due diligence in addressing known risks, to increase public confidence in industrial safety, and generally to ensure resources were in place to deal with emergencies (Newton, 2002). EMO provided reference materials, templates and advice to guide local implementation, and Four Area Advisory Councils were created, which brought together representatives of communities and industries to provide leadership for municipalities seeking to adopt the program objectives. Municipal participation in the program was voluntary, but it carried a measure of prestige for communities, as a Certificate of Achievement was awarded to those that proceeded through the various levels.

Although a number of municipalities, particularly larger cities, adopted the framework and were acknowledged for their efforts, the Partnerships Toward Safer Communities initiative had limited success. Provincial officials continued to face disinterest from municipal decision-

makers in most communities and struggled to persuade local governments and industry to devote time and resources to comprehensive emergency planning.

Prelude to a Policy Shift

In January 1998, eastern Ontario and southern Quebec were crippled by a massive ice storm, which interrupted electricity in many areas and left millions of Canadians without power (Kerry et al., 1999). A total of 66 municipalities declared a state of emergency, the highest number of simultaneous community emergencies for a single event in Ontario's history. Although most of the affected communities had emergency plans, these had not been well-maintained and many municipal officials were unfamiliar with their contents (Purcell and Fyfe, 1998: 13). The ice storm experience was a striking indicator that municipal governments were not adequately prepared for large-scale emergencies. Provincial officials contemplated ways to improve local response capacity, which seemed particularly important in 1999, as concerns were raised that the "Y2K bug"—a programming glitch that prevented computers from processing the date change at the turn of the millennium—could potentially disrupt critical infrastructure systems (Ginsberg, 1999; Sallot and Saunders, 1999).

Although New Year's Eve 2000 came and went without any major service interruptions, the potential ramifications of Y2K, as well as the lasting devastation caused by the ice storm, had attracted the attention of the provincial political executive. In June 2000, the premier's office directed EMO to evaluate the state of emergency planning in the province, review international best practices, and recommend ways to improve Ontario's policy framework (Harrison, 2006). The review included a survey of municipal governments, which painted a dismal picture: though 91 percent of communities had formulated an emergency plan, only 38 percent provided training for staff who would be expected to perform emergency duties; 29 percent had designated and equipped an emergency operations centre; and 21 percent had engaged in emergency-related public education efforts (Morton and Pirie, 2003).

Based on the survey responses, and judging by consultations with municipal personnel, it became clear to provincial officials that the co-operative approach had largely failed, as emergency planning was not being taken seriously in many communities (Richer, 2006). The review team developed a policy proposal, which included mandatory standards for municipal emergency management programs, and it was to be submitted to Cabinet in October 2001. But because the proposal was a significant departure from the permissive guidelines set out in existing legislation, the review team was skeptical that it would be adopted by decision-makers.

Policy Adoption

The terrorist attacks of September 11, 2001 (9/11) were ultimately the catalyst for a major shift in provincial policy. The event focused media and public attention on the state of community readiness for disasters, and the quality of municipal emergency planning was hotly debated by politicians in the Legislative Assembly (Ontario, 2001). Recognizing that a policy window had opened, EMO moved swiftly to capitalize on the unusual level of political interest, proposing new legislation to mandate the standards outlined in the provincial policy review. The Progressive Conservative government led by Premier Mike Harris was persuaded, and in

December 2001 introduced Bill 148, which would replace the *Emergency Plans Act* with the *Emergency Management Act*, requiring every municipality to implement a comprehensive emergency management program.

After second reading, the bill was sent to the Standing Committee on General Government for a detailed review. The Committee heard from various stakeholders, including the Ontario Professional Fire Fighters Association, the Ontario Association of Police Services Boards, the Canadian Centre for Emergency Preparedness and emergency officials from a number of municipalities, all of whom were supportive of the legislation (Ontario, 2002c). However, most of these witnesses also urged the government to provide financial resources to support municipalities in implementing the mandate, noting existing pressures on municipal budgets and the tendency to privilege other spending priorities over emergency planning.

The Committee also considered whether the legislation should include penalties for non-compliance, in case EMO required punitive tools to compel municipal implementation. This idea was ultimately ruled out, on the logic that a fine would only penalize the taxpayers in a municipality and because the mandate as written would permit a stakeholder party to seek a court injunction compelling a municipality to comply with the law, if necessary. The general consensus of the Committee was that diplomacy and exhortation would be sufficient to ensure municipal compliance once the mandate had the force of law (Ontario, 2002c).

Bill 148 received royal assent in November 2002 (Ontario, 2002a). It mandated municipal governments to formulate a comprehensive emergency management program and authorized the Solicitor General to make regulations setting out other specific standards. In early 2003, municipalities received a set of "Essential Program Standards"—summarized in Table 2—which included many of the elements of the Partnerships Toward Safer Communities program. Municipalities were expected to adopt an emergency management program complying with the new standards by the end of 2006.

Table 2. Municipal Emergency Management Program Standards

• Appoint emergency management co-ordinator	• Review emergency response plan annually
• Form emergency management committee	• Conduct comprehensive program review (annual)
• Establish emergency by-law	• Conduct public education about hazards
• Perform hazard identification and risk assessment	• Appoint public information officer
• Conduct critical infrastructure assessment	• Formulate response plan
• Establish emergency operations centre	• Provide training for elected officials and staff
• Conduct emergency exercise (annual)	

Policy Implementation

Shortly after the *Act* was passed, Emergency Measures Ontario was renamed Emergency Management Ontario and its budget was doubled. The intergovernmental policy was to be administered by regional field officers, each of whom was responsible for monitoring the efforts of the municipalities within a specific sector of the province. Whereas EMO regional field officers would previously visit municipal councils, seeking to persuade the elected officials to prioritize emergency planning, they changed their approach after the new provincial policy was

enacted, informing municipal politicians of their legal obligations and reminding them that compliance would be closely monitored (Beatty, 2006; Richer, 2006).

Several tools were developed to facilitate municipal implementation. First, EMO sought to establish in every municipality a single point of contact—a Community Emergency Management Co-ordinator—who would represent provincial interests to the local council, and who would report to the province regarding municipal efforts. The strategic objective, according to provincial officials, was to create a permanent position in the municipal bureaucracy, and thereby embed emergency management in municipal affairs (Beatty, 2006). The municipal officials designated as co-ordinators were required to take training courses, where they were introduced to a common doctrine and terminology.

Second, in order to assist communities in conducting a risk assessment, a website was created and a document was distributed, which identified natural, technological and human-caused hazards that could affect Ontario communities (Ontario, 2003b). Third, following the model of the Partnerships Toward Safer Communities program, a Provincial Emergency Management Advisory Council and five regional advisory councils were created to bring together municipal, provincial and federal emergency management personnel for the purposes of information-sharing and policy development. Although no general funding was made available for municipal emergency management, in September 2002 the province announced a $1 million annual fund to support the development of local Community Emergency Response Volunteer (CERV) teams (Ontario, 2002b). However, this fund was eliminated when a new Liberal government took office one year later, as part of a plan to tame an inherited budget deficit.

The *Emergency Management Act* marked a significant shift in Ontario's intergovernmental policy concerning emergency planning. Whereas the previous approach was co-operative, emphasizing voluntary standards, permissive guidelines, persuasion and partnership, the new mandate was coercive, in that it set out specific performance standards, created a formal reporting structure to monitor compliance, and left municipal governments with no legal option but to carry out the policy prescriptions. On the one hand, the policy objectives were straightforward and unambiguous and were communicated clearly and consistently to municipal implementors. Moreover, training, technical assistance, guidelines, policy manuals and expert information networks were made available to facilitate implementation. On the other hand, no tangible rewards were offered to entice municipal acceptance of the policy priorities, and no penalties were incorporated to compel recalcitrant local governments to comply.

Municipal Implementation

By selecting a coercive legal instrument, the provincial government sought to harmonize municipal behaviour concerning emergency management. The mandate spurred local policy development, particularly in municipalities that had historically neglected emergency planning. However, some local governments faced greater challenges than others in implementing the policy standards. This section draws on contrasting case analyses conducted by the author in order to illustrate the differential impacts of the intergovernmental mandate on communities with varying levels of commitment and capacity.

London

With a population of about 352,000, London is the largest municipality in southwestern Ontario and the sixth-largest city in the province. London is exposed to a wide range of hazards, most of which are weather-related, such as floods, ice storms, windstorms and hail. In addition, the municipality is located in Canada's "tornado alley"—a stretch of land in southwestern Ontario that is one of the most active tornado regions in the country. Technological hazards, such as industrial fires, extended power blackouts, and transportation accidents involving hazardous materials, are also a significant concern.

Despite the risks facing the community, residents historically exhibited little interest in the city's emergency planning. Long-serving elected officials and administrators reported no significant pressure from individuals, organized interest groups or the business community (Colvin, 2006; MacDonald, 2006). Although media coverage of hazard events occasionally piqued the interest of citizens, this generally had not translated into active demands for action on emergency preparedness. Nevertheless, some officials in London had long recognized risks to public safety and had sought to prepare for emergencies.

From the early 1970s to the mid-1990s, emergency planning involved relatively informal co-ordination among emergency services personnel, but political oversight was provided through the London-Middlesex Disaster and Emergency Co-ordinating Committee, which included two city councillors and met quarterly to discuss plans and co-ordinate activities with provincial officials. The foundation for emergency planning was the Peacetime Emergency Plan, which was adopted in 1975, setting out a general framework for emergency response (London, 1975).

In the wake of the Bhopal and Chernobyl disasters in the 1980s, concerns were raised that emergency planning in London was inadequate to manage a large-scale industrial accident. In 1989, a group of local businesses initiated a partnership with the city called the London and Regional Emergency Management Mutual Aid Council (EMMAC). This group met regularly to cultivate working relationships among industrial managers and emergency responders and to educate other community groups about emergency planning (EMMAC, 2006). The work of EMMAC provided a solid foundation for London's later participation in the Partnerships Toward Safer Communities program, and the city earned an award recognizing its achievement under the Essential level in 2001 (Fries, 2003). In 1994, London and Middlesex County jointly hired an Emergency Planning Officer, who was responsible for formulating and maintaining emergency plans for both the city and the eight municipalities in the county. The emergency planner, the EMMAC initiative, and the political oversight provided by the London-Middlesex Disaster and Emergency Co-ordinating Committee demonstrated that London had both a commitment to emergency management and the capacity to design and implement a program for this purpose before the revised intergovernmental policy was adopted.

When the *Emergency Management Act* was passed in 2002, a full-time Emergency Management Specialist was hired to fulfill the day-to-day planning responsibilities, and in late 2003, an Emergency Management Program Committee was established, which included representatives from the fire and police departments, ambulance services, environmental services, community services and the local health unit. For the next few years, the specialist and

committee worked to implement the statutory requirements. Specifically, they assessed and prioritized hazards threatening the city, identified vulnerabilities in critical infrastructure systems, adopted several supplementary response plans to address specific emergencies such as floods and hazardous materials, arranged training events for municipal officials, organized disaster simulation exercises to test plans and procedures, and established public education programs for city residents. London's emergency management efforts received strong support from politicians and senior administrators. For instance, the chief administrative officer described 9/11 as a "wake-up call," which illustrated that municipal emergency planning must improve significantly to ensure cities are ready for large-scale threats (Fielding, 2006). At a press conference in May 2006, the city government declared its intention to be among the best-prepared communities in Ontario (London, 2006).

Officials in London had historically recognized the value of emergency planning, and this commitment to emergency management was a strong foundation for effective implementation of the mandate adopted in 2002. Moreover, since the administrative infrastructure to support emergency management was already in place, London had a strong capacity to carry out the prescriptions of the *Emergency Management Act*, and this facilitated effective implementation in the city. London's emergency management program, which evolved significantly in the years following the mandate, complied with the specific procedures set out by Ontario's intergovernmental mandate, but also extended beyond these requirements to incorporate more advanced measures. This behaviour, coupled with the pronouncements of elected officials and senior administrators, demonstrated not only procedural compliance with the mandate, but also substantive acceptance of the underlying policy goals.

St. Thomas

The City of St. Thomas, located just south of London, is a relatively small municipality, with a population of about 36,000. St. Thomas is exposed to many of the same hazards as London, including natural events such as severe thunderstorms, ice storms, blizzards, floods and hail. Technological hazards are also a significant risk, such as a transportation accident or train derailment involving hazardous materials. But despite the significant risks facing the community, citizens and the business community generally showed little interest in emergency management. Neither elected officials nor city staff could recall a single inquiry from a local business or resident regarding emergency management, and there was no evidence of demands for increased levels of service in this area. Moreover, St. Thomas had very little experience with emergencies. The local government had never declared a state of emergency, or requested outside emergency response assistance. None of the interviewees could recall a major incident in the city's history that might have caused officials to evaluate the quality of local emergency planning.

As a result, emergency planning was historically a relatively low priority for the municipal government. Before 2003, St. Thomas' emergency management policies were developed by an employee at the county level, and there was no municipal official responsible for this portfolio in the city. Policies that did exist were formulated in an ad hoc fashion, borne out of "common sense community planning" (Graves, 2006). Although there was a written emergency plan, little consideration had been given to training, exercises, or other measures designed to facilitate a swift and effective response to emergencies. The relatively poor quality

of St. Thomas' emergency planning illustrated weakness in both commitment and capacity to develop and implement policies in this field.

In early 2003, the regional EMO officer briefed city council regarding its responsibilities under the intergovernmental mandate. In response, the chief administrative officer assigned the role of Community Emergency Management Co-ordinator to the fire department, where it was delegated to the training officer (St. Thomas, 2003). The timing of this appointment was poor. In 2001, a major fire had killed a resident and a 20-year veteran firefighter, prompting a coroner's inquest which recommended that the city hire eight additional firefighters by July 2004 (Fleury, 2002). Council endorsed the recommendations and moved up the implementation date for the new hires to January.

As such, shortly after the training officer was assigned the co-ordinator portfolio, he was struggling to implement the inquest's recommendations, which required hiring and training several new firefighters and reacquainting existing staff with the department's operational guidelines (McCallum, 2003). Given the high priority that both city council and his direct superiors placed on implementing the inquest's recommendations, the training officer perceived that his emergency management duties should be a secondary consideration (Ormerod, 2005). He received no specific instructions, except for a general mandate to "make the city compliant with the Act". No human or financial resources were allocated to facilitate policy development. Moreover, the city's political leaders only grudgingly conceded that they were obligated to implement the standards outlined in the Act (Kohler, 2006; Turvey, 2006). A lack of resources and weak political support clearly limited the city's emergency management policy capacity.

As a result, the co-ordinator struggled to implement the requirements of the mandate by, for example, forming an Emergency Management Program Committee, drafting a by-law adopting a revised emergency response plan, conducting a hazard identification and risk assessment and identifying critical infrastructure systems. However, the emergency response plan was broad and did not include specific provisions for evacuation, search and rescue, co-ordination of volunteer resources, and other important response-related functions. Little effort was made to educate citizens about hazards and few measures had been taken to ensure effective recovery after an emergency.

Thus although the *Emergency Management Act* was effective in securing in St. Thomas procedural compliance with the minimum specified standards, it did not cultivate stronger normative support for the underlying policy goal of comprehensive emergency management. In light of the historical record of emergencies, it was generally perceived by city officials that an emergency requiring a large-scale response was highly unlikely. As such, the Act was regarded as an unwelcome, unfunded mandate that appeared to hold little value for the municipality.

Conclusion

The two cases described above were presented here to illustrate the contrasting municipal responses to Ontario's intergovernmental policy. Generally, in communities where officials were already committed to emergency planning and had the capacity to develop and implement policies in this area, the Emergency Management Act further buttressed their efforts and

provided the impetus for positive program development. By contrast, municipalities with a weak commitment to emergency planning and weak administrative capacity faced challenges in implementing the fairly onerous program requirements imposed by the mandate.

The quality of municipal emergency planning determines the effectiveness of local response efforts when disaster strikes, but the perceived improbability of emergencies is a significant barrier to positive local policy development. For this reason, higher-level governments often must intervene in order to pressure or persuade municipal governments to devote attention and resources to this function. In Ontario, the perceived failure of a co-operative intergovernmental policy precipitated a shift to a coercive mandate which employed legislation and regulations to effect provincial policy objectives in this field. The mandate has been effective in generally raising the profile of emergency management among municipal administrators, though varying commitment and capacity among communities has contributed to disparities in implementation.

The nature of the provincial-municipal relationship is one of superior to subordinate, and the provinces use a wide range of instruments to ensure municipal behaviour is consistent with provincial interests. One important rationale for this system of control is that provincial governments rely heavily on municipalities to implement their policy initiatives. Coercive intergovernmental mandates offer one means by which provincial policy-makers attempt to alter municipal behaviour, but such policies involve special implementation challenges. They generally impose financial responsibilities on municipal governments and leave little flexibility for local policy innovation, and are therefore often met with resistance from municipal governments. Moreover, even if municipalities are legally obligated to comply with policy prescriptions, their implementation performance can be expected to vary depending on their commitment to the policy objectives and capacity to put them into effect. As such, intergovernmental policy design must be sensitive to the political environment surrounding a particular policy field and incorporate adequate commitment- and capacity-building measures to facilitate effective local implementation.

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