

**Federal Submissions to GSAR Inquiry on the Draft Discussion Paper**

We respectfully submit the following suggestions on behalf of the Federal entities who are voluntarily participating in the GSAR Inquiry. Please contact us if the Inquiry desires further explanation or clarification.

Dated: August 2, 2021



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Counsel  
Justice Canada

**Current text<sup>1</sup>**

Search and Rescue can best be defined as “finding and aiding people in distress— relieving trauma and suffering”.

**Rationale**

This definition appears to be from Mr. Smith's company, SARI Canada. We suggest instead using the Search and Rescue Volunteer Association of Canada (SARVAC) definition of “search and rescue” and “ground search and rescue” for the purposes of the GSAR Inquiry.

**Suggested Text<sup>2</sup>**

Search and rescue (SAR) — the combined activities and tasks involved in both searching for and rescuing persons who are feared to be lost, missing, or in distress. Many searches do not involve rescue, and many rescues do not require searches.

Ground search and rescue (GSAR) — the conduct of a search and rescue operation to assist persons lost, missing, or in distress on land and inland waters.

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<sup>1</sup> Draft Discussion Paper, s. 1, p. 1.

<sup>2</sup> [https://sarvac.ca/wp-content/uploads/2015/08/Z1620-15\\_EN.pdf](https://sarvac.ca/wp-content/uploads/2015/08/Z1620-15_EN.pdf)

**Current text<sup>3</sup>**

The National Search and Rescue Secretariat (NSS) was established to provide direct, independent support to the Lead Minister, and be responsible and accountable for the conduct of the NSP. In 2016, the National Search and Rescue Secretariat came under the authority of Public Safety Canada.

**Rationale**

This paragraph accurately notes the appointment of the MND as Lead Minister for SAR. It should be clarified in this paragraph, which addresses the evolution of NSS and the SAR program from that start state, that MND no longer holds that role, nor does any other minister.

**Suggested Text**

The National Search and Rescue Secretariat (NSS) was established to provide direct, independent support to the Lead Minister, and be responsible and accountable for the conduct of the NSP. In 2016, the National Search and Rescue Secretariat came under the authority of Public Safety Canada. The role of Lead Minister for SAR has since been suspended.

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<sup>3</sup> Draft Discussion Paper, s. 4.1, p. 2.

**Current text<sup>4</sup>**

Department of National Defense–Canadian Forces

**Rationale**

Spelling corrections. We ask that the Inquiry correct this throughout the document.

**Suggested Text**

Department of National Defen~~ce~~–Canadian Forces

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<sup>4</sup> Draft Discussion Paper, s. 4.2, p. 3.

**Current text<sup>5</sup>**

Department of Fisheries and Oceans – Canada Coast Guard

**Rationale**

Spelling corrections. We ask that the Inquiry correct this throughout the document.

**Suggested Text**

Department of Fisheries and Oceans – **Canadian** Coast Guard

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<sup>5</sup> Draft Discussion Paper, s. 4.2, p. 3.

**Current text<sup>6</sup>**

- Public Safety– Royal Canadian Mounted Police

**Rationale**

The RCMP and the NSS within Public Safety Canada have distinct roles in Search and Rescue. We ask that the report list Public Safety Canada and the RCMP separately.

**Suggested Text**

- Public Safety Canada
- Royal Canadian Mounted Police

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<sup>6</sup> Draft Discussion Paper, s. 4.2, p. 3.

**Current text<sup>7</sup>**

Federal SAR operations are coordinated by the Joint Rescue Coordination Centers (JRCCs). SAR operations in the coastal waters, and on the Great Lakes, are the responsibility of the Canadian Coast Guard. Operations are often conducted with the assistance and cooperation of the Coast Guard Auxiliary. Searches for downed aircraft are the responsibility of the Canadian Forces, and are conducted with the assistance and cooperation of the Civil Air Search and Rescue Association (CASARA), a volunteer organization. Searches often involve volunteer ground SAR teams as well.

**Rationale**

While not the specific focus of the paper, including the definitions of specific Federal SAR responsibilities, including delineation of aeronautical and maritime SAR and the role the JRCC plays in both, should aid in future discussions of the overall national SAR framework. The integration of the Aeronautical and Maritime SAR operations in the JRCCs facilitates harmonized Canadian Armed Forces and Canadian Coast Guard response to incidents. The most appropriate response asset can respond to any incident managed by the JRCC, regardless of formally assigned mandate.

We suggest replacing the current text with the following.

**Suggested Text**

In Canada, the provision of aeronautical SAR and maritime SAR services is a federal government mandate. Aeronautical SAR is defined as an incident involving an aircraft, whereas a maritime SAR is an incident involving a vessel or a person from a vessel, including the medical evacuation of a person(s) from a vessel. The Canadian Coast Guard (CCG) is responsible for maritime SAR services in Canadian coastal waters and the Great Lakes (including the St. Lawrence Seaway). The CCG also provides funding to the Canadian Coast Guard Auxiliary (CCGA) through a contribution program to support their provision of strategically located, trained, and qualified volunteer members and vessels that are prepared and available to support CCG search and rescue activities.

The Canadian Armed Forces (CAF) has the primary responsibility for the provision of aeronautical SAR services and effective operation of the coordinated aeronautical and maritime SAR system. Though not formally assigned a GSAR mandate, the Canadian Rangers, a reserve component of the Canadian Forces, are often called upon to assist responsible authorities in GSAR operations. The DND/CAF provides funding to the Civil Air Search and Rescue Association (CASARA) through a contribution program; and is responsible for establishing standards for CASARA members and monitoring to ensure CASARA volunteers meet those standards.

Despite the formal division of responsibilities, the CAF and the CCG coordinate closely in the provision of aeronautical and maritime SAR services through the Joint Rescue Coordination Centres (JRCCs). These centres are staffed 24 hours a day by CAF and CCG personnel. In addition, the CCG operates a Maritime Rescue Sub-centre (MRSC) in St. John's, Newfoundland to coordinate local maritime SAR operations. Searches can involve volunteer ground SAR teams as well.

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<sup>7</sup> Draft Discussion Paper, s. 4.2, p. 3.

CAF and CCG resources, when and where available, can be called upon to assist in the prosecution of ground SAR and humanitarian SAR incidents (not considered aeronautical or maritime), in support of a province or territory, which occur within provincial or territorial areas of responsibility.

Parks Canada coordinates GSAR limited to Lost, Overdue, and Injured person incidents in Canada's National Parks and other land it manages (whereas the police coordinate missing person incidents).



**Current text<sup>8</sup>**

In the National Parks, Parks Canada retains the responsibility for lost and missing person searches.

**Rationale**

We suggest removing this text from the paper, given the clarification regarding Parks Canada we have suggested for section 4.2. However, if the author wishes to include the caveat about Parks here as well, then we suggest replacing the current text with this portion of our proposed text from section 4.2.

**Suggested Text**

Parks Canada coordinates GSAR limited to Lost, Overdue, and Injured person incidents in Canada's National Parks and other land it manages (whereas the police coordinate missing person incidents).

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<sup>8</sup> Draft Discussion Paper, s. 4.3, p. 3.

**Current text<sup>9</sup>**

Police services, especially in rural areas of Canada, do not have the resources of equipment and trained personnel to conduct urgent, cost effective searches.

**Rationale**

It is a broad statement with respect to Canada, not NL, without any source.

**Suggested Text**

Police services, especially in rural areas of Canada, do not **always** have the resources of equipment and trained personnel to conduct urgent, cost effective searches. **Based on the resource requirements of search and rescue operations, police services rely on trained Ground Search and Rescue Teams to conduct searches.**

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<sup>9</sup> Draft Discussion Paper, s. 4.3, p. 3.

**Current text<sup>10</sup>**

## 4.4 Federal Funding of SAR

**Rationale**

We are unsure of the intent of this section. The myriad ways Federal funds can make their way into various SAR programs is quite complex. A full understanding of this may not be within the scope of the Inquiry or may require extensive consultation with Federal entities.

Section 4.4 seems to suggest there is only one funding program. However, there are operational budgets for Federal SAR operations, contribution programs for the respective national SAR volunteer organizations, and the SAR NIF fund.

**Suggested Text**

We offer this as a general comment on this section as a whole and we do not have suggested text at this time. If the Inquiry feels that describing any federal funding status quo is within its scope, then further consultation with the federal entities may be advisable.

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<sup>10</sup> Draft Discussion Paper, s. 4.4, p. 4.

**Current text<sup>11</sup>**

The New SAR Initiatives Fund (NIF) was established by the Federal Government in 1988 to provide funding for new search and rescue initiatives that will improve the NSP in Canada.

**Rationale**

Correction of the SAR NIF contribution program title.

**Suggested Text**

The Federal Government established the Search and Rescue New Initiatives Fund (SAR NIF) in 1988 to provide funding for new search and rescue initiatives that will improve the NSP in Canada.

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<sup>11</sup> Draft Discussion Paper, s. 4.4, p. 4.

**Current text<sup>12</sup>**

The NIF, which is a contribution program, has an annual budget allocation of \$8.1 million, and as of 2017 has funded over 880 projects totaling over \$200 million.

**Rationale**

The amount of \$8.1 million is not accurate. It is currently \$7.6 million.

**Suggested Text**

The SAR NIF, which is a contribution program, has an annual budget allocation of \$7.6 million.

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<sup>12</sup> Draft Discussion Paper, s. 4.4, p. 4.

**Current text<sup>13</sup>**

## 4.5 Components of a Search and Rescue Program

In 2016 Public Safety Canada proposed a new and resilient approach which included three main themes. Each theme would enhance search and rescue capacity and capability in their respective provinces.

## 4.6 Strong Relationships

## 4.7 Empowered Individuals &amp; Communities

## 4.8 Knowledge &amp; Innovation

**Rationale**

The “proposed new approach” was contained in a discussion paper and not formally adopted by participants or governing bodies in search and rescue.

**Suggested Text**

We suggest removing sections 4.5-4.8 from the discussion paper for this reason.

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<sup>13</sup> Draft Discussion Paper, s. 4.5-4.8, p. 4-5.

**Current Text<sup>14</sup>**

Volunteer Ground Search and Rescue organizations and agencies having jurisdiction can eliminate ambiguity of authority under stress during critical incidents, if preplans are written with all stakeholders participating in their development.

**Rationale**

This appears to be a recommendation, which is beyond a description of how ground search and rescue presently operates in Newfoundland and Labrador. We suggest removing the statement from the draft discussion paper and reserving recommendations for a later part of the Inquiry in keeping with s 12 of the Rules of Procedure.

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<sup>14</sup> Draft Discussion Paper, s. 4.9, p. 5.

**Current text<sup>15</sup>**

NLSARA receives guidance and support from Public Safety Canada, the Federal governing body for search and rescue nationally.

**Rationale**

Public Safety Canada is not the federal governing body for SAR but rather acts to help coordinate national policy and program issues. Public Safety Canada does not provide direct guidance or support to NLSARA.

**Suggested Text**

We suggest removing this text from the paper.

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<sup>15</sup> Draft Discussion Paper, s. 5.3.2, p.8.



**Current text<sup>16</sup>**

Working around all aircraft especially helicopters requires constant vigilance, otherwise serious incidents or injury can result. All search and rescue members, including police, fire and EMS should attend helicopter ground school crew training and practice often in preparing landing zones, loading and unloading equipment (litters) and personnel.

**Rationale**

This appears to be a broad recommendation, which is beyond a description of how ground search and rescue presently operates in Newfoundland and Labrador. We suggest removing the statement from the draft discussion paper and reserving recommendations for a later part of the Inquiry in keeping with s 12 of the Rules of Procedure.

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<sup>16</sup> Draft Discussion Paper, s. 5.3.6, p. 11,

**Current text<sup>17</sup>**

On April 1, 1995, RCMP national policy established recommended best practices and training material for use in ground search and rescue operations. Prior to publication of that national policy, it was assumed that volunteer search and rescue groups would be trained according to a local standard of care.

**Rationale**

This information does not describe how GSAR presently operates in NL in accordance with the intent of the draft discussion paper. It also may not be accurate. We are currently working to locate the policy referenced here. We wish to reserve our right to comment on the effect, if any, of this policy.

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<sup>17</sup> Draft Discussion Paper, s. 5.5, p. 13.

**Current text<sup>18</sup>**

Fixed wing aircraft are also utilized on a number of search and rescue missions throughout the province. Fixed wing assets are generally obtained through the Civil Air Search and Rescue Association (CASARA) with a number of NLSARA members being trained spotters through CASARA. The Canadian Military and the Royal Canadian Mounted Police have a number of fixed wing aircraft that can be engaged in SAR operations based on weather, terrain and topography considerations.

**Rationale**

We make this suggestion to highlight that CAF aircraft are a last resort for GSAR, not a primary asset and correct the statement with respect to the RCMP's fixed wing aircraft assets.

**Suggested Text**

Fixed wing aircraft are also utilized on a number of search and rescue missions throughout the province. Fixed wing assets are generally obtained through the Civil Air Search and Rescue Association (CASARA) with a number of NLSARA members being trained spotters through CASARA. The Royal Canadian Mounted Police have one ~~a number of~~ fixed wing aircraft **in the Province of Newfoundland and Labrador. Its primary function is logistical support to the North Coast of Labrador. that can be engaged** ~~in SAR operations based on weather, terrain and topography considerations.~~ **As a last resort when other options have been exhausted, Canadian Forces fixed wing aircraft can be engaged to support a ground SAR operation, if available.**

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<sup>18</sup> Draft Discussion Paper, s. 5.3.6, p. 11.

**Current text<sup>19</sup>**

In Newfoundland and Labrador, helicopters are available through Justice and Public Safety, Emergency Services Division (ESD). Duty officers are on call 24/7 to assist Police, Fire, EMS, Emergency Management and Search and Rescue. From a resource management perspective, aircraft are available through contractual agreements with the province - RCMP B Division, Canadian Coast Guard, the Joint Rescue Coordination Center, (Department of National Defense) Civil Air Search and Rescue Association (CASARA).

**Rationale**

There is no contractual agreement between the CCG and/or JRCC and the Province.

There is no direct contractual agreement between the RCMP B-Division and the Province relating to helicopters/aircraft. The Provincial Government has a contracted service which they use. It is referred to as Government Air Services.

Please note all references to the Joint Rescue Coordination Centre should use the correct spelling.

**Suggested Text**

In Newfoundland and Labrador, helicopters are available through Justice and Public Safety, Emergency Services Division (ESD). Duty officers are on call 24/7 to assist Police, Fire, EMS, Emergency Management and Search and Rescue. From a resource management perspective, aircraft are available through contractual agreements with the province, ~~RCMP B Division, Canadian Coast Guard, and~~ Civil Air Search and Rescue Association (CASARA), **or through a request for assistance to the Joint Rescue Coordination Centre (Department of National Defence).**

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<sup>19</sup> Draft Discussion Paper, s. 5.3.6, p. 11.

**Current text<sup>20</sup>**

Differences in ground search and rescue procedures, equipment, training, or application of skills may predominate within the provinces and territories as a result of geographic or cultural emphasis, based on different methods and final desired standard of care.

**Rationale**

This is inaccurate.

**Suggested Text**

Differences in ground search and rescue procedures, equipment, training, or application of skills may occur predominate within the provinces and territories as a result of geography and/or other local realities. ~~ic or cultural emphasis, based on different methods and final desired standard of care.~~

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<sup>20</sup> Draft Discussion Paper, s. 5.5, p. 14.

**Current text<sup>21</sup>**

Police officers, Parks and Military personnel have noted that GSAR volunteers in this category are more highly trained in ground search and rescue techniques than their own members.

**Rationale**

While individuals may have expressed this opinion to the author, we would not suggest or agree that GSAR volunteers are more highly trained than federal SAR professionals are.

**Suggested Text**

Police officers, Parks and Military personnel have noted that GSAR volunteers in this category are ~~more highly trained in ground search and rescue techniques than their own members.~~ **highly skilled and play critical roles in GSAR operations.**

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<sup>21</sup> Draft Discussion Paper, s. 5.5, p. 17.

**Current text<sup>22</sup>**

The Civil Air Search and Rescue Association (CASARA) and the Coast Guard Auxiliary (CCGA) are two organizations comprised of volunteers in the province who have strong connections to their respective Federal bodies (Royal Canadian Air Force, Canadian Coast Guard). Volunteer members of these organizations possess skills and equipment to support their Federal mandated tasking agencies. They also receive sustainable funding and a number of dedicated Federal staff to support their respective volunteer organizations.

**Rationale**

CASARA and CCGA are Aeronautical and Maritime SAR volunteers, and not GSAR volunteers. The two organizations have been described separately under the Federal SAR section (4.2). If the intention of having this section is to draw comparison between the federally funded volunteer SAR resources and provincial GSAR volunteers, the comparison should be further clarified.

**Suggested Text**

We suggest removing this paragraph from the paper.

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<sup>22</sup> Draft Discussion Paper, s. 5.5, p. 17.

**Current text<sup>23</sup>**

Title: 5.6 Agency Having Jurisdiction

**Rationale**

Section 5.6 and its associated subsections outline NLSARA's support to GSAR and should specifically state such in the headers. The paper uses agency and authority interchangeably in the acronym AHJ, we suggest choosing one for consistency.

**Suggested Text**

Title: 5.6 Agency Having Jurisdiction **for Ground Search and Rescue**

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<sup>23</sup> Draft Discussion Paper, s. 5.6, p. 17.



**Current text<sup>24</sup>**

Newfoundland and Labrador Search and Rescue Association work in conjunction with the authority having jurisdiction (AHJ). Pending location of a search, the AHJ may be the Royal Canadian Mounted Police, Royal Newfoundland Constabulary, Canadian Coast Guard, Parks Canada or the Department of National Defense (Royal Canadian Air Force, Search and Rescue program). They assist the agency having jurisdiction with ground search and rescue operations, search and rescue missions on inland waters, including coastlines and downed and missing aircraft. The local educational, training, and knowledge of Newfoundland and Labrador Search and Rescue teams greatly enhance the ability of tasking, mandated agencies, (AHJ) to be able to perform their respective functions under national and provincial agreements.

**Rationale**

Neither CCG nor DND/CAF would normally act as AHJ for GSAR. The references regarding support for maritime and aeronautical SAR confuse the ground SAR focus of this section. For these reasons, we suggest the following text.

**Suggested Text**

~~Newfoundland and Labrador Search and Rescue Association work in conjunction with the authority having jurisdiction (AHJ). Pending location of a search, the~~ **agency having jurisdiction (AHJ) for ground search and rescue** may be the Royal Canadian Mounted Police, Royal Newfoundland Constabulary or Parks Canada. **Newfoundland and Labrador Search and Rescue Association work in conjunction with the AHJ.** They assist the AHJ with ground search and rescue operations, ~~search and rescue missions on inland waters, including coastlines and downed and missing aircraft.~~ The local educational, training, and knowledge of Newfoundland and Labrador Search and Rescue teams greatly enhance the ability of **teams during taskings, mandated agencies, (AHJ) assisting the AHJ** to be able to perform their respective functions. ~~under national and provincial agreements.~~

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<sup>24</sup> Draft Discussion Paper, s. 5.6, p. 17.

**Current Text<sup>25</sup>**

The RCMP, through contracted agreement with the province, cannot relinquish command and control to ground search and rescue organizations.

**Rationale**

The NL PPSA does not speak to ground search and rescue. We suggest replacing the text with the following.

**Suggested Text**

The RCMP has the final authority to make decisions in SAR operations, and maintains overall authority and responsibility for the search.

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<sup>25</sup> Draft Discussion Paper, s 5.6.1, p. 18.

**Current Text<sup>26</sup>**

The RNC responsibility primarily involves urban areas, but this does not distract from the fact that there ...Due to a substantial area of responsibility with large diverse geographic base, the RNC policy is similar to that of the RCMP.

**Rationale**

This is a broad statement that we cannot respond to appropriately without specific references. A fair comparison between RNC and RCMP policy would require a thorough examination of both policies.

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<sup>26</sup> Draft Discussion Paper, s 5.6.2, p. 19.

**Current text<sup>27</sup>**

The search and rescue program under Parks Canada in Newfoundland and Labrador falls under the “Use and Enjoyment by Canadians” business line and includes all work related to the provision of public safety services, including risk assessments and risk control measures for implementation, plans and polices. The provision also includes information and advice to assist visitors to national parks, national marine conservation areas and reserves, and national historic sites. The goals and objectives of the public safety program are to minimize the number and severity of visitor safety incidents through a visitor risk management program that involves risk assessment, public safety planning, and provision of appropriate levels of SAR services in field units. This is achieved through targeted prevention, education and information programs. As an agency having jurisdiction, Parks Canada will not only notify the local police service, but will involve the nearest ground search and rescue group to assist with their public safety mandate. Due to some of the remote, isolated wilderness areas that Parks Canada has to provide search and rescue services they will utilize a strong command and control function during critical incidents. Remote wilderness areas provide for challenging resource management in response to SAR missions. Interoperability between federal, provincial and local SAR resources is a requirement to bring a search and rescue mission to a successful conclusion. Parks Canada developed an Oracle based system a number of years ago in support of the national initiative fund. The system known as Occurrence Tracking Information System (OTIS) was not well received by staff due to implementation issues, but it had the ability to gather data from search and rescue public safety incidents and enhance delivery services. A number of Parks Canada staff are members of their local search and rescue teams which builds a strong foundation for SAR response. This is an important concept, as a number of SAR incidents are unified command, involving multi-agencies and can result in being multi-jurisdictional.

**Rationale**

This information is inaccurate as it cites a defunct planning process and database. We suggest replacing the text with the following.

**Suggested Text<sup>28</sup>**

Parks Canada has primary authority and responsibility for lost, overdue or injured person incidents within its jurisdiction and will ensure a response to lost or injured person incidents utilizing Parks Canada, external search and rescue resources or a combination of both. For the purposes of (Parks Canada’s) Directive on Visitor Safety, responsibility includes all inland waters and lands within Parks Canada’s jurisdiction. This authority is derived from the *Canada National Parks Act*, Section 8(1). A primary objective of Parks Canada’s Visitor Safety program is to minimize the frequency and severity of visitor safety incidents through a visitor safety planning process that involves risk assessment, the elaboration and maintenance of response protocols, and provision of appropriate levels of SAR services in field units. Some of the key principals driving the process include prevention of incidents through information and appropriate control measures, safety, the utilization of the Incident Command System for the management of incident response, and working closely with SAR partners at the local, regional, and national levels.

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<sup>27</sup> Draft Discussion Paper, s. 5.6.3, p. 19.

<sup>28</sup> Parks Canada Directive on visitor safety – 2012.

A number of Parks Canada staff are members of their local search and rescue teams, which builds a strong foundation for SAR response. This is an important concept, as a number of SAR incidents are unified command, involving multi-agencies and can result in being multi-jurisdictional.

**Current text<sup>29</sup>**

It is important to note that if the lost, missing, or overdue person is not located within 24 hours with highly dedicated, trained resources, then this may be an indication that something is wrong within the response to the search and rescue incident. A thorough and detailed investigation must be completed by the agency having jurisdiction (Police, Parks).

**Rationale**

This appears to be an opinion and/or a recommendation, which is beyond a description of how ground search and rescue presently operates in Newfoundland and Labrador. We suggest removing the statement from the draft discussion paper and reserving recommendations for a later part of the Inquiry in keeping with s 12 of the Rules of Procedure.

**Suggested Text**

~~It is important to note that if the lost, missing, or overdue person is not located within 24 hours with highly dedicated, trained resources, then this may be an indication that something is wrong within the response to the search and rescue incident. An thorough and detailed investigation must be is typically completed by the agency having jurisdiction (Police, Parks).~~

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<sup>29</sup> Draft Discussion paper, s. 6.1, p. 21.

**Current text**<sup>30</sup>

SAR is the backbone of emergency management ...<sup>31</sup>

Search and Rescue is an evident function of emergency management ...<sup>32</sup>

Prior to publication of that national policy, it was assumed that volunteer search and rescue groups would be trained according to a local standard of care.<sup>33</sup>

**Rationale**

We feel these broad characterizations of the relationship between SAR and “emergency management” are not necessary in the context of the GSAR inquiry. These statements may cause confusion given the myriad categories of activities that can comprise “emergency management” at various levels of government.

We note that standard of care is referred to several times in the text. Standard of care is a legal term. Standard may be the more appropriate word.

**Suggested Text**

We would suggest removing these statements from the paper.

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<sup>30</sup> Draft Discussion Paper, s. 1, p. 1.

<sup>31</sup> Draft Discussion Paper, s. 7, p.25.

<sup>33</sup> Draft Discussion Paper, s. 5.5, p. 13.

**Current text<sup>34</sup>**

The six-step process is utilized in Newfoundland and Labrador by NLSARA members and agencies having jurisdiction.

**Rationale**

The RCMP uses its operational policies to conduct ground search and rescue. The six-step process set out at pages 22 to 25 of the draft discussion paper is not identical to the RCMP's policy.

**Suggested Text**

The six-step process is utilized in Newfoundland and Labrador by NLSARA members and agencies having jurisdiction.

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<sup>34</sup> Draft Discussion paper, s. 6.2, p. 22.



**Current text<sup>35</sup>**

The draft paper cites Royal Canadian Mounted Police. (2019). *Search and Rescue Policy*. Royal Canadian Mounted Police.

**Suggested Text**

We suggest citing the specific policies being referenced wherever possible.

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<sup>35</sup> Draft Discussion Paper, s. 5.6.1, p. 18, p 28.