



Canadian  
human rights  
commission

Commission  
canadienne des  
droits de la personne

**PROTECTED**  
(Once completed)

## COMPLAINT FORM

### YOUR CONTACT INFORMATION (You are the complainant)

Your first name		Your last name	
Independent First Nations Alliance (c/o Jonathan Gregg, CEO) Kitchenuhmaykoosib Inninuwug (c.o Chief Donny Morris)			
Mailing address			
34 Prince Street, Basement / PO Box 329 c/o Band Office			
Town or city		Province	Postal code
Sioux Lookout / Big Trout Lake		Ontario	P8T 1K6 / P0V 1G0
Home phone number (include area code)	Work phone number (include area code)	Cell phone number (include area code)	Fax number (include area code)
	(807) 737-1902	807 738 8321	
At which number(s) can we reach you during the day? <input type="checkbox"/> Home <input checked="" type="checkbox"/> Work <input checked="" type="checkbox"/> Cell			
What pronouns should we use to refer to you while processing your complaint? (he, she, they, etc.)			
He			
Your e-mail address, if any, by which you authorize us to send you personal information related to your complaint:			
jgregg@ifna.ca / donny.morris@ki-btl.ca			
<b>By filing your complaint, you are deemed to agree that the Commission may share your email address with the Respondent: <u>unless the complaint is about sexual harassment</u>. In all other cases, it is your responsibility to tell the Commission if you do not want us to share your email address with the Respondent.</b>			
<input type="checkbox"/> Please check here if your phone is a TTY (Text Telephone)			
The Commission recognizes its responsibility for ensuring that all people with individual needs receive the accommodation they require to participate fully and equally in the complaint process. Individual needs are specific needs related to one of the grounds of discrimination under the Act. Do you need accommodation to participate in the Complaint Process?*			
<b>Please select the box that applies to you (If none of these apply to you, contact the Commission):</b>			
<input checked="" type="checkbox"/> Canadian citizen			
<input type="checkbox"/> Permanent resident			
<input type="checkbox"/> In Canada on a Visa as a visitor, student or temporary foreign worker			

**If any of your contact information changes during the complaint process, it is your responsibility to inform us, otherwise your complaint could experience a delay or even be closed.**

## YOUR ALTERNATE CONTACT INFORMATION

Please provide the contact information of a person that you would like us to contact if the Commission cannot reach you. It could be a family member or friend.

Name of your alternate contact: Nicholas Rhone		
Home phone number <i>(include area code)</i>	Work phone number <i>(include area code)</i>	Cell phone number <i>(include area code)</i> 807 738 8321
E-mail address nrhone@ifna.ca		

## YOUR REPRESENTATIVE'S CONTACT INFORMATION

You do not need to hire a lawyer or other representative to file a complaint.

I do not have a representative

If you do choose to hire a lawyer, please provide the following contact information.

Name of your representative Julian Falconer	Firm Falconers LLP		
Mailing address 10 Alcorn Avenue #204			
Town or city Toronto	Province Ontario	Postal code M4V 3A9	
Work phone number <i>(include area code)</i> 416-964-0495	Cell phone number <i>(include area code)</i>	Fax number <i>(include area code)</i>	
E-mail address julianf@falconers.ca , christiannel@falconers.ca , erinm@falconers.ca , jeremyg@falconers.ca			

I prefer that information concerning my complaint be sent: *(Select one)*

only to me;

only to my representative; or

to my representative with a copy to me.

## TRADE UNION OR EQUIVALENT

Are you a member of a trade union or equivalent?  Yes  No

I give permission to the Commission to contact my trade union or equivalent regarding my complaint. If **yes**, please provide the following information:

Name of your trade union or equivalent	
Name of your union representative	
Work phone number <i>(include area code)</i>	Cell phone number <i>(include area code)</i>
E-mail address	



Canadian  
human rights  
commission

Commission  
canadienne des  
droits de la personne

## YOUR COMPLAINT

**Your Name:**

Independent First Nations Alliance ("IFNA") / Kitchenuhmaykoosib Inninuwug First Nation ("KI")

### ORGANIZATION YOUR COMPLAINT IS AGAINST

(This is the respondent)

If there is more than one respondent, you must file a separate complaint against each one.

Name of business, organization or association

His Majesty the King in Right of Canada as represented by the Minister of Indigenous Services Canada

**In what city and province (or territory) did the alleged discrimination happen?** (If the events took place outside Canada, please contact the Commission)

City or town:  
IFNA Member Nations

Province or territory:  
Ontario

**When did the alleged discrimination take place?** ( The alleged discrimination has to be less than one year old, but exceptions may apply):

Start date (dd/mm/yyyy):

Last date (dd/mm/yyyy):  
Ongoing

**I have a reasonable basis to believe that the respondent discriminated against me based on one or more of the following ground(s) of discrimination** (Please check only the ones that apply to your situation):

- Race
- National or ethnic origin
- Colour
- Religion
- Age
- Sex
- Sexual orientation
- Gender identity or expression
- Marital status
- Family status
- Genetic characteristics
- Disability
- A conviction for which a pardon has been granted or a record suspended

Please tell us about what happened to you. ***It is important to explain how you identify with a ground(s) of discrimination, the treatment you experienced, why you believe that the treatment you experienced is because of the ground(s) AND when the treatment happened.***

Please answer the following questions in your complaint story. If you do not answer these questions in your complaint story, there could be delays in processing your complaint or your complaint may not meet the criteria to be accepted.

**Questions you need to answer in your complaint story:**

1. How do you identify with the grounds of discrimination you checked off on this form? (For example, if you chose National or Ethnic Origin, identify where you are from geographically, culturally, and/or historically e.g. I am Cree, I am East Indian)
2. How were you treated by the business, organization or association and how were you disadvantaged by that treatment?
3. Why do you believe the treatment you experienced is because of the ground(s) you identify with?
4. When did these events happen?
5. How did these events have a negative effect on you?
6. How have you tried to resolve the situation?

You may also choose to answer these questions using a separate document (no more than (3) pages in total). Keep any supporting documents with you. You may be asked for them later in the process.

*“[F]ire is not just a technical problem, it’s a social one. When communities lack the basics of safe housing, local fire departments, and equitable emergency response systems, deaths will follow. This is especially true for Indigenous communities, which have long been underserved by federal, provincial, and municipal governments due to complex jurisdictional disputes and underfunding.”<sup>1</sup>*

## **I. Overview**

1. This complaint is filed in accordance with s. 40 of the *Canadian Human Rights Act* (the “CHRA” or the “Act”) by the Independent First Nations Alliance (“IFNA”) and Kitchenuhmaykoosib Inninuwug (“KI”) (the “Complainants”). IFNA is a tribal council of five independent First Nations. KI is a fly-in community and member of IFNA, with a population of 1,500 Anisiniwew peoples. Fire services are presently delivered to IFNA communities pursuant to the Respondent’s *First Nations Fire Protection Strategy*. As this Complaint will show, these services are badly under-resourced, the result being a pattern of deadly fires across IFNA, most notably the deaths of a 9-member family in 2016 in Pikangikum and the deaths of a 5-member family in KI in 2019.
2. In compliance with the Commission’s *Rule 7.5*, this narrative is limited to a three-page summary. The Complainants additionally enclose a “Schedule A”, on the understanding that the Commission has authority to read and consider the “Schedule” during its assessment of the complaint, and that relevant portions of the Schedule may be brought forward into the report that will be written by the Commission, even if the Schedule itself is not before the Commission at the time of rendering its decision.
3. The Complainants allege discrimination, contrary to s. 5 of the *CHRA*, in the provision of a service, namely on-reserve fire safety services. The Complainants allege discrimination on the basis of race, national or ethnic origin, colour, and family status due to their status as First Nations persons. This discrimination is exacerbated by the Complainants’ remoteness.
4. The Respondent, Indigenous Services Canada (“ISC”), is the federal Ministry primarily responsible for providing services to Indigenous peoples.<sup>2</sup> ISC has undertaken to provide the benefits that come from fire safety services, committing to ensure “First Nations have access to emergency assistance services comparable” to elsewhere in Canada, adapted to their particular needs, and in line with acceptable quantitative and qualitative standards.<sup>3</sup>
5. If this matter is referred to the Canadian Human Rights Tribunal, the Complainants will call evidence demonstrating the severe, on-the-ground, discriminatory impacts stemming from the lack of fire safety services and resultant harm to the Complainants. This includes but is not limited to: the lack of fire preventative services, the lack of funding for training/recruitment/retention of fire safety personnel, inadequate fire response services, and the Respondent’s persistent failure to address urgent, chronic resourcing needs in the Complainant’s communities.

## **II. The Respondent’s Ongoing Failure to Address a Fire Safety Crisis**

6. The risk of fires faced by Indigenous peoples in Canada is not an accident of geography or personal behaviour; it is the predictable result of systemic neglect.<sup>4</sup> Evidence – much of it

---

<sup>1</sup> *A Deadly Disparity: The Urgent Need to Address Fire Risk in Indigenous Communities*, by Len Garis and Mandy Desautels, [National Indigenous Fire Safety Council](#), at page 2 [“*Deadly Disparity*”].

<sup>2</sup> *Department of Indigenous Services Act*, SC 2019, c. 29, s. 336, s 6.

<sup>3</sup> ISC, [National On-reserve All Hazards Emergency Management Plan](#), (last modified 2 May 2024).

<sup>4</sup> *Deadly Disparity*, supra note 1, at page 3.

the Respondent’s own –demonstrates and confirms that Indigenous peoples are dying and being harmed by fires disproportionately than other Canadians.<sup>5</sup>

7. First Nations peoples who live on a reserve are, on average, **ten times more likely** to die in a fire than non-First Nations peoples.<sup>6</sup> In Ontario, First Nations children under 10 years old are **86 times more likely** to die in a fire than non-First Nations children.<sup>7</sup> On-reserve fire-related injuries are **4.3 times greater** for on-reserve First Nations people; fire-related hospitalizations occur **five times more often**, and burns associated with fires occur at a rate **4.5 times higher**.<sup>8</sup> Importantly, these statistics include residential fires only, and do not reflect the devastating effects of wildfires or other fires, for which the Respondent has failed to adequately track data despite its commitment to improve on-reserve fire safety outcomes. Further, to the extent children are affected by fire, Jordan’s Principle has been inadequate to deal with such devastating effects.
8. This fatal reality is the “predictable result of systemic neglect.”<sup>9</sup> This systemic neglect is widespread and long-standing, increasing risk factors such as inadequate housing, overcrowding, lack of smoke detectors, underfunding for fire safety services on-reserve, a lack of fire halls, and inadequate firefighting equipment. These factors are, of course, exacerbated by the systemic poverty, remoteness, and infrastructure challenges faced by these communities, which are often remote and, in a sense, forgotten by the Respondents.<sup>10</sup>

A. Once Canada Decides to Become Involved in the Provision of a Service, it cannot do so in a Discriminatory Manner

9. ISC’s *First Nations Fire Protection Strategy, 2023 to 2028* (the “Fire Protection Strategy”), sets out the Respondent’s policy commitment to improve “fire and life safety for all First Nations.”<sup>11</sup> Canada, through ISC, has chosen to provide the benefits that come from fire safety services, which not only includes funding, but other benefits associated with the implementation of this service.
10. Canada, having committed to “occupy this space”, is legally responsible for providing sufficient, equitable funding levels and resources to ensure on-reserve fire safety services are comparable to those available to other (non-Indigenous) communities. As this Tribunal has previously observed in the context of child and community safety, once Canada chooses to become involved in the provision of an on-reserve service to First Nations, it is legally bound to deliver that service in a non-discriminatory manner.<sup>12</sup>
11. For reference, the Complainant KI is a fly-in community with a population of 1,500, located 600 km northwest of Thunder Bay. In comparison, the road connected town of Ignace is 250 km northwest of Thunder Bay with a population of 1,200. In 2024, Ignace budgeted a total

---

<sup>5</sup> *Deadly Disparity*, *supra* note 3 at page 3; Jeannette Eduful, *Circumstances surrounding fire-related deaths among Indigenous people in Canada, 2011 to 2020*, [Statistics Canada](#), July 4, 2025 at p. 5 [“Circumstances of fire deaths”].

<sup>6</sup> National Indigenous Fire Safety Data Collection Evaluation: Review of Existing Practice and Recommendations for the Future, by Associate Professor Joe Clare, [University of Western Australia](#), March 2023, at page 3.

<sup>7</sup> *Ontario Chief Coroner’s Table on Understanding Fire Deaths in First Nations*, [Office of the Chief Coroner of Ontario](#), July 2021, Appendix 3: Residential Fire Mortality Rate Calculations, at page 65.

<sup>8</sup> Mortality and morbidity related to fire, burns and carbon monoxide poisoning among First Nations people, Métis and Inuit, by Mohan B. Kumar, CISP, [Statistics Canada](#), updated Mar. 25 2021, at page 9-11 [Fire Mortality].

<sup>9</sup> *Deadly Disparity*, *supra* note 1, at p. 3.

<sup>10</sup> Fire Mortality, *supra* note 10, at p. 2; *Deadly Disparity*, *supra* note 1, at p. 1.

<sup>11</sup> ISC, [Level of Service Standards for Fire Protection Services](#), (last modified 2 July 2024) [*Service Standards*].

<sup>12</sup> *Dominique v. Public Safety Canada*, [2022 CHRT 4](#), at para 50 [2022 CHRT 4]; and *First Nations Child and Family Caring Society of Canada et al v Attorney General of Canada (for the Minister of Indian and Northern Affairs Canada)*, [2016 CHRT 2](#), at para 403 [2016 CHRT 2].

of \$360,400 for its fire department. In contrast, in 2024/25, KI received \$132,000 from ISC strictly for fire protection and training, a limitation Ignace does not experience. KI has one fire truck that was donated by a private party, but lacks personnel to operate and maintain it.

**B. Canada Perpetuates Inequitable Fire Safety Services in First Nations**

12. Where other Canadians benefit from legislatively-backed safety standards for fire services, First Nations are excluded from such protections.<sup>13</sup> In Ontario, fire safety services for non-First Nations peoples are governed by the *Fire Protection and Prevention Act, 1997*, S.O. 1997, c. 4 (the “Act”) and its Regulations, which includes O. Reg. 213/07 (the “Fire Code”). Despite Canada’s express obligation to ensure on-reserve First Nation safety, as reflected in s. 91(24) of the *Constitution Act, 1867*, in the *Department of Indigenous Services Act*, and in the relevant ISC policy documents described above, no such legislative standards exist for First Nation fire safety services funded/implemented by the Respondent.
13. ISC’s existing Fire Protection Strategy imposes arbitrary, discriminatory restrictions which limit the ability of First Nations to implement fire safety services. In particular, funding for on-reserve fire services is restricted to a “sub-asset” of larger funding mechanisms related to core capital funding, as described in the ISC *Level of Service Standards for Fire Protection Services* (the “Service Standards”), updated August 2025.<sup>14</sup> This means that, in order to try to implement fire safety services that the Respondent is required to deliver, First Nations are forced to compete for a finite pool of funding, of which fire safety is but a very small piece.
14. Even then, these funding pools are primarily centered on capital funding, disregarding the associated requirements of recruitment, training, employment, and other aspects of fire services. Inevitably, First Nations wind up carrying the additional burden of trying to establish, fund, manage, and maintain on-reserve fire safety services without the resources they deserve – and which Canada has expressly committed to provide.

**III. Relief Requested**

15. Once Canada chooses to become involved in the provision of an on-reserve service to First Nations, it is legally bound to deliver that service in a non-discriminatory manner,<sup>15</sup> even if implementation is via a tripartite agreement or third-party service providers<sup>16</sup> – including provincial agencies<sup>17</sup> – and even in the absence of federal legislation expressly outlining Canada’s commitments.<sup>18</sup> In the circumstances, the Respondent has already adopted both legislation and policies affirming its duty to deliver equitable on-reserve fire safety services to the Complainants, and has profoundly failed to deliver on that promise.
16. In light of the Respondent’s failings to fulfil its own equitable commitment, the Complainants seek compensation pursuant to s. 53(2)(e) of the *CHRA* in the amount of \$20,000 per person, based on the total resident populations of IFNA-member Nations. The Complainants seek additional compensation pursuant to s. 53(3) of the *CHRA* in the additional amount of \$20,000 per person, reflecting Canada’s wilful and reckless conduct.<sup>19</sup>
17. Further details of this Complaint are described in the enclosed Schedule “A.”

---

<sup>13</sup> *Ibid*, at page 2; *Deadly Disparity*, *supra* note 3 at page 1.

<sup>14</sup> Service Standards, *supra*, note 11.

<sup>15</sup> 2016 CHRT 2, *supra* note 13, at para 403; 2022 CHRT 4, *supra* note 14, at paras 50-51.

<sup>16</sup> 2022 CHRT 4, *supra* note 14, at paras 53-55.

<sup>17</sup> 2016 CHRT 2, *supra* note 13, at para 84 [emphasis added].

<sup>18</sup> *Ibid*, at para 83 [emphasis added].

<sup>19</sup> First Nations Child & Family Caring Society of Canada et al. v. Attorney General of Canada (representing the Minister of Indigenous and Northern Affairs Canada), [2019 CHRT 39](#), at para. 13.

## Mediation

In mediation a trained Commission mediator works with you and the Respondent to find a solution to the complaint (settlement). Mediators are impartial. This means they do not represent you or the Respondent. Mediation and settlement are both voluntary.

### Benefits of mediation include:

- **Comfortable.** You don't have to be in the same room as the Respondent to participate.
- **Confidential.** What is said during mediation is not shared with anyone.
- **Efficient.** The process is much faster if you and the Respondent can settle the complaint.
- **Flexible.** You can seek solutions through mediation that are not available from the Canadian Human Rights Tribunal (Tribunal).
- **Fair.** You can bring your representative or a support person.
- **Free.** It does not cost you anything to participate in mediation.

**Please note that this may be the only opportunity you will have to access mediation through the Commission's process.**

### Do you agree to participate in mediation?

- Yes.
- No.
- I am unsure. I would like more information about mediation before I decide.

## AGREEMENTS

**The Canadian Human Rights Commission (Commission) needs your consent to each of the following three statements to accept your complaint. The Commission will protect all of your personal information under the *Privacy Act*.**

- The information in this Complaint Form is true to the best of my knowledge and belief.
- I authorize the Commission to collect my personal complaint information (such as the information about me in this complaint form) and use it to process my human rights complaint.
- I understand that in order to process my complaint, the people and organizations who have been involved in what happened to me may need to provide the Commission with information, either orally or in documents, that relates to me and to my complaint. I therefore authorize those individuals identified by the Commission to provide it with the information that it needs to process my complaint. For example:
- If your complaint is about your employment, the Commission might need your employment records.
  - If your complaint is about a disability, the Commission might need your medical records.
  - If your complaint is relates to the *Income Tax Act*, including your taxes or tax benefits, the Commission may need your taxpayer information from the Canada Revenue Agency.

**The next three consents are optional. I understand that if I do not agree to them, the Commission will still process my complaint.**

**In some cases another federal agency (ex. the Canadian Transportation Agency or the Canadian Radio-television and Telecommunications Commission) may have jurisdiction to deal with the issues raised in a complaint. If that is the case, providing us with consent to share your complaint with the appropriate body can help to process your complaint faster.**

**(Optional)** I authorize the Commission to share my complaint and contact information with another agency, to determine the appropriate body to address my complaint and to transfer my complaint to that organization where it can more appropriately deal with the complaint.

## AGREEMENTS (Continued)

The Commission administers the *Canadian Human Rights Act (CHRA)*. The *CHRA* only applies to federally regulated service providers and employers. The provinces and territories each have their own human rights agencies and laws that protect people from discrimination. Sometimes it can be unclear if a complaint is federal or provincial.

If it appears that your complaint comes under a provincial or territorial law, providing us with consent to share your complaint with the appropriate provincial or territorial human rights commission or tribunal can help to process your complaint faster.

(Optional) I authorize the Commission to share my complaint and contact information with the provincial or territorial human rights body that appears to have the necessary authority to deal with my complaint and to transfer my complaint to that human rights commission or tribunal.

The Commission sometimes develops policies and guides, and prepares reports or other statistical information for policy, research and public education purposes in support of its mandate under section 27 of the *CHRA*.

(Optional) I agree that the Commission may use the information provided in my complaint to assist it in researching issues and in addressing human rights issues in Canada. I understand that the Commission will never include my personal or other identifying information in any public report, and that my personal information is still protected by privacy laws.

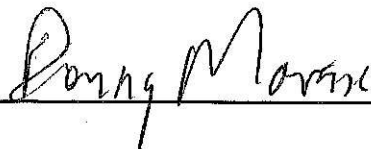
Complainant's signature: \_\_\_\_\_



Name (printed): Jonathan Gregg, IFNA CEO

Date: August 29, 2025

Complainant's signature: \_\_\_\_\_



Name (printed): Chief Donny Morris, KI First Nation

Date: Aug 29/25

