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Maintaining the Right to Housing in a Changing Climate

Wildfire Displacement, Fire Mortality, and Emergency Management in First Nations Communities

Research from the Federal Housing Advocate

August 2026

Office of the Federal Housing Advocate, Canadian Human Rights Commission
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How to cite this report:
Office of the Federal Housing Advocate. (2026). *Maintaining the Right to Housing in a Changing Climate: Wildfire Displacement, Fire Mortality, and Emergency Management in First Nations Communities*.

Cat. No.: HR4-142/2026E-PDF
ISBN: 978-0-662-36549-5

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Abbreviations

AFN: Assembly of First Nations

AMC: Assembly of Manitoba Chiefs

EMA: Emergency Management Australia

FEMA: Federal Emergency management Agency

FNESS: First Nation Emergency Services Society

ICESCR: International Covenant on Economic, Social and Cultural Rights

IFSD: Institute of Fiscal Studies and Democracy

ISC: Indigenous Services Canada

MKO: Manitoba Keewatinowi Okimakanak

NIFSC: National Indigenous Fire Safety Council

OFHA: Office of the Federal Housing Advocate

UNDRIP: United Nations Declaration on the Rights of Indigenous Peoples

Foreword by the Federal Housing Advocate

Following a devastating wildfire season in 2025, the Federal Housing Advocate, in partnership with the Assembly of First Nations, launched joint research into emergency management and housing. Our goal was to gain deeper insights into the intersection of climate change, emergency management, and the human right to adequate housing.

As the second-worst wildfire season on record, with 165 emergency events, it impacted 134 First Nations and led to over 40,000 people being evacuated from their communities by mid-August 2025. Our findings show that emergency management systems do not work for First Nations communities. Instead, we consistently heard that First Nations are caught in a spiralling cycle:

- The ability of First Nations governments to protect communities from emergencies is compromised because cumulative housing and infrastructure deficits have made their communities far more vulnerable;
- The ability of First Nations governments to respond to emergencies is compromised because their jurisdiction is not recognized; and
- The ability of First Nations to retain dignity when vulnerable was compromised because of continuous systemic failures to meet First Nations' needs.

As a result, First Nations are at significant risk of catastrophic losses, which threaten the survival of their unique ways of life.

Many emergency evacuations occurred in remote communities with severe, long-term housing and infrastructure gaps. Already vulnerable, evacuees experienced unsafe conditions, separation from family, degradation, and an absence of cultural supports. With indefinite timelines to restore their homes to safety, many faced housing precarity and increased risks of homelessness. These experiences point to systemic practices that undermine dignity, safety, and the equal enjoyment of the right to housing.

More fundamentally, responses to calls for support by First Nations governments were delayed, pointing to the failure to recognize their jurisdiction. The risk of wildfires is not new to First Nations, but the authority and the resourcing First Nations need to manage emergencies and steward their territories with traditional knowledge have been undermined. Traditional knowledge should not only be respected but actively supported and funded as part of modern emergency governance and climate adaptation. Otherwise, the ability of First Nations to protect their communities is severely compromised.

Given the pace of climate change, wildfires and other climate-related events are now normal. The intersection of climate change, emergency management, and housing is part of everyday life for First Nations. Yet, the systems that are meant to support First Nations are reactive and focused on evacuation and recovery instead of prevention, sustainability, and long-term resilience. In addition, existing systems have led to human rights violations, an increased risk of homelessness, and failure to provide adequate housing. In other words, the failure to adapt systems to the people who need them most creates conditions that put those people at greater risk and compromise their rights.

This report makes ten recommendations that focus on better protection for the dignity, safety, and housing rights of First Nations communities. Ultimately, this report calls for a transformation: We need approaches that are preventative, rights-based, and grounded in First Nations leadership and ways of knowing.

I want to express my deepest gratitude to the individuals and organizations who generously gave their time to share their experiences with me. Your voices are critical to moving forward with constructive solutions. I call on all leaders at every level of government to work together to address the systemic failures that are all too quickly becoming normalized.

Sincerely,

Marie-Josée Houle
Federal Housing Advocate

Foreword by the Assembly of First Nations

In September 2025 the Assembly of First Nations (AFN) and the Federal Housing Advocate (FHA) initiated a collaborative research project that braids together key themes related to emergency management and First Nations housing conditions. Unfortunately, the frequency and severity of climate driven disasters is increasing and forcing thousands of people to evacuate every year. In fact, over 200,000 First Nations people have been evacuated due to various hazards since 2015. More recently, the 2025 season saw over 40,000 evacuees due to large-scale emergencies. In some cases, First Nations people may be evacuated and placed in hotels for several years during long-term evacuations. Significant gaps in First Nations housing, infrastructure and emergency management across the country continue to leave First Nations disproportionately vulnerable to the climate crisis, infrastructure failures, evacuations, and homelessness.

The intersection of these topics was explored through a series of technical interviews with diverse groups of working professionals across Canada that are being impacted by the climate crisis. These interviews helped contextualize a range of factors that have disproportionate impacts on First Nations emergency management, housing and evacuations. It provided a unique opportunity to discuss these issues with experts across regions and helped shape a practical report grounded in lived experience, technical knowledge, and First Nations realities. The evidence presented in this research shows that current systems fall short, with unacceptable levels of fire mortality rates, inadequate and unsafe housing, and fragmented emergency management structures. First Nations efforts and insights captured through this research show that it doesn’t have to be this way. The AFN along with the FHA call for Canada to work toward the better future described in this research, a future where housing is treated as a right, not a commodity, emergency systems prioritize prevention, stability, and dignity, and First Nations have the authority and resources to future-proof their communities.

The past few seasons have shown that the frequency and severity of wildfires and other emergencies are increasing as climate change accelerates. It is critical that the systems that respond to these emergencies impacting people across the country are effective and aligned with the rights and values of First Nations. We call on all levels of government to work in partnership with First Nations, so that future wildfire seasons do not continue to reproduce the harms of the past. I hope this report will be a helpful resource for First Nations as they pursue their advocacy objectives, and we extend our deep appreciation to everyone who contributed to this work, including our partners at the Federal Housing Advocate’s office, the Chiefs Committee on Emergency Management, and all those who shared their time, knowledge, and experiences with our AFN team and FHA colleagues.

Sincerely,

Tyrone McNeil, Tribal Chief Stó:lō Nation
Chiefs Committee on Emergency Management (CCEM)
Assembly of First Nations (AFN)

Acknowledgments

This report would not have been possible without the dedication of First Nations leaders, emergency management practitioners, fire safety experts, housing providers, insurers, and rights-holders with lived experience of evacuation and displacement.

I am grateful for the longstanding collaboration with the AFN. In particular, the AFN's Housing and Infrastructure Portfolio was an instrumental partner, providing valuable perspectives and facilitating many of the interviews that were completed. I want to particularly acknowledge Brenden Mercer for his very significant contributions to this report.

A special thanks to the following individuals and organizations who generously gave me the time to share their insights, resources and concerns:

- Dillon Crema, Associate Advisor, Navacord Insurance Services
- Kukpi 7 Patrick Michell, Nlaka'pamux Nation
- Len Garis, Adjunct Professor, University of the Fraser Valley and Director of Research, National Indigenous Fire Safety Council
- Melanie Soler, Vice President of Emergency Management, Canadian Red Cross
- Guy Day Chief, Senior Lead, Indigenous Relations and Engagement, Canadian Red Cross
- Paul Syrette, Director of Operations, ISN Maskwa
- Brooke McIntosh, Community Business Development Specialist, ISN Maskwa
- Regina Jacobs, Emergency Measures Officer, Mohawk Council of Akwesasne
- Chris Stove, Technical Services Advisor, Interlake Reserves Tribal Council
- Daphne Sinclair, Housing and Infrastructure Manager, Assembly of Manitoba Chiefs
- Thomas Beaudry, Manager, Climate Change and the Environment, Assembly of Manitoba Chiefs
- Schuyler Hunt, Operations and Maintenance Coordinator, Assembly of Manitoba Chiefs
- Jamie Svendsen, Community Manager, First Nations Emergency Services Society
- Annmarie Garby, National Practice Leader—Indigenous Services, BFL-Canada
- Arjun Vinodrai, Senior Director, Policy and Program Development, Public Safety Canada
- Kristina Musca, A/Manager, Preparedness Policy-Indigenous Management, Public Safety Canada

- Robert Klinck, Director, Emergency Management Directorate, Indigenous Services Canada
- Susan Russell, Director, Housing and Infrastructure Service Reform Directorate
- Jenna Drummond-Young, Manager, Housing and Infrastructure Service Reform Directorate
- Tribal Chief Tyrone McNeil, Stó:lo Tribal Council

Executive summary

The 2025 wildfire season marked a watershed moment in Canada’s relationship with climate change, emergency management, and the human right to adequate housing for First Nations. One hundred and thirty-four First Nations were directly affected by wildfire events, at least eighty-eight communities were evacuated, and more than forty thousand First Nations citizens were displaced from their homes and homelands. These evacuations, often lasting weeks or months, exposed deep structural vulnerabilities in housing, infrastructure, emergency governance, and insurance systems.

Wildfire displacement is no longer an exceptional event. It has become a recurrent feature of life for many First Nations, and it is tightly linked to pre-existing housing and infrastructure deficits. Inadequate and overcrowded housing, aging and under-maintained infrastructure, and the absence of enforceable fire and building codes on reserve all heighten the risks associated with wildfires and other climate-related hazards. When an evacuation order is issued, the people forced to leave often come from homes already in major need of repair and communities that have long been asked to make do with less.

Fire-related mortality reveals the human cost of long-term, structural housing and infrastructure deficits. National data shows that First Nations people living on reserve face a fire-related death rate more than ten times higher than that of non-Indigenous people in Canada. Indigenous victims are, on average, two decades younger at the time of death, and a majority lived in dwellings reported as needing major repairs. Fire incidents in Indigenous communities are more likely to involve non-functioning smoke alarms, hazardous heating equipment, and delayed emergency response. These deaths are not accidents; they are the predictable outcome of structural neglect.

Insurance systems compound these risks. Many First Nations pay extremely high premiums for limited wildfire coverage, often capped at levels far below the value of their infrastructure and housing assets. Claim processes can take months or years, delaying the rebuilding of homes and prolonging displacement. Communities have described this arrangement bluntly: high premiums, low protection, and little accountability. Some communities, including those devastated by catastrophic wildfires, are effectively treated as uninsurable “no-go zones” by private markets.

Despite these challenges, there are powerful examples of Indigenous-led solutions. The ten-year tripartite emergency management agreement in British Columbia provides a model for integrated governance and sustained funding. Indigenous-led emergency operation centres, community-based fire training, cultural fire stewardship practices, and climate-resilient housing initiatives all point to what is possible when First Nations leadership is centred and supported. These are not pilot projects to be observed at the margins; they are models that should guide national practice.

This research highlight brings together quantitative evidence, community perspectives, and expert analysis to show how climate change, housing conditions, fire risk, insurance, and emergency governance interact to shape the lives of First Nations. It adopts a human rights lens, consistent with the National Housing Strategy Act and the United Nations Declaration on the Rights of Indigenous Peoples, and proposes a series of concrete recommendations. At their core, these recommendations call for a paradigm shift: from reactive, fragmented systems that assume stability to Indigenous-led, rights-based systems designed to future-proof communities in a changing climate.

1. Introduction: A new climate reality

First Nations across the country experience climate change as an immediate, lived reality. Wildfires start earlier, burn hotter, and last longer. Smoke seasons stretch far into the summer. Drought, heat waves, floods, and severe storms compound the pressures on communities whose housing and infrastructure are already stretched beyond capacity. In this context, wildfires are not isolated events; they are one expression of a broader climate emergency intersecting with longstanding social and economic inequities.

This report was developed as a joint effort between the Assembly of First Nations (AFN) and the Office of the Federal Housing Advocate (OFHA). It builds on engagement with First Nations leaders, emergency management practitioners, fire safety experts, housing providers, insurers, and rights-holders with lived experience of evacuation and displacement. It also draws on recent data and research on housing conditions, fire mortality, and morbidity, as well as the AFN's work to quantify the infrastructure gap facing First Nations and the OFHA's analysis of systemic barriers to the right to housing.

The objective is to provide a research highlight that is both analytical and practical. It is analytical in that it presents an integrated picture of how housing, fire risk, climate change, emergency management, and insurance systems intersect. It is practical in that it identifies specific levers—at the level of governance, funding, regulation, and practice—that can be used to reduce risk and uphold the human right to adequate housing.

A central theme that emerged across the interviews is the need for a paradigm shift. As Kanaka Bar Chief (retired) Patrick Michell observed in a conversation about rebuilding after the Lytton wildfire, the greatest risk is not climate change itself, but complacency and the assumption that "everything will be okay without effort." First Nations have already accepted that the climate has changed and that adaptation is necessary. The systems around them, however, often continue to plan and invest as if yesterday's conditions still apply.

This highlight therefore proceeds from two starting points. The first is that climate change and climate-driven emergencies are now structural features of the context in which First Nations live, work, and exercise their rights. The second is that any serious response must be grounded in First Nations values, knowledge systems, and leadership and must be evaluated against Canada's human rights obligations, including the recognition of adequate housing as a fundamental right and an inherent dimension of Indigenous self-determination.

2. Human rights analysis: The existing framework and a deeper application

The National Housing Strategy Act recognizes that the right to adequate housing is a fundamental human right affirmed in international law. For First Nations, this right is also inseparable from the inherent right to self-determination and the rights affirmed in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Climate change, housing inadequacy, and emergency displacement must, therefore, be understood not only as policy challenges but as human rights issues.

A rights-based approach requires governments to move beyond viewing housing as a commodity or a discretionary program. Instead, housing must be treated as a right that imposes concrete legal obligations: to ensure non-discrimination, security of tenure, habitability, cultural adequacy, accessibility, and affordability. In addition, as a signatory to the International Covenant on Economic, Social and Cultural Rights (ICESR),[i] Canada is obligated to take appropriate steps to realize the right to housing. This means deploying maximum resources for those most in need, avoiding the regression of rights due to reductions in funding, and prioritizing those who are most at risk. During climate-related emergencies, these obligations do not disappear; they become even more pressing.

UNDRIP Articles 21 and 23 are particularly relevant. Article 21 calls on states to take effective measures to improve the economic and social conditions of Indigenous Peoples, including in the areas of housing, sanitation, health, and social security. Article 23 affirms the right of Indigenous Peoples to be actively involved in developing and determining health, housing, and other economic and social programs through their own institutions.

Canada has also committed to informative frameworks related to climate change and emergency management. These include:

- Canada's National Adaptation Strategy: This strategy is based on a set of guiding principles that focus on building resilient communities, including reducing the impacts of climate-related disasters[ii]
- Canada's Emergency Management Strategy Toward a Resilient 2030: This strategy sets out principles to guide federal, provincial, and territorial governments and their emergency management partners in establishing priorities to strengthen resilience by 2030[iii]
- Sendai Framework for Disaster Risk Reduction: A UN-led agreement focused on preventing, reducing, and mitigating disaster risks[iv]

Applying these frameworks to wildfire displacement and fire mortality means asking a different set of questions. Instead of asking only whether an evacuation was carried out according to procedure, a rights-based analysis asks: Were people able to remain with their families and communities? Were accommodations culturally appropriate and physically accessible? Were children able to continue their education? Were people with disabilities able to access the supports they need? Were Indigenous governments meaningfully involved in planning, decision-making, and evaluation? When evacuees returned to their communities, was their housing safe?

To operationalize a rights-based approach, this report proposes the creation of a national, Indigenous-led monitoring framework. Such a framework would track not only the number of evacuations and the costs incurred, but also their impacts on housing, health, and community well-being. It would identify patterns of discrimination or exclusion and would provide early warning when policies or practices are putting rights at risk. Most importantly, it would create a structure in which First Nations themselves define the indicators of success and hold governments accountable.

3. Climate displacement: Scale and human impact

Over the past five years, Canada has recorded its most severe wildfire seasons on record. Extreme heat combined with wildfires drove the destruction of the town of Lytton in 2021. In 2023, Canada suffered its most destructive wildfire season, with 16.5 million hectares of land destroyed, large-scale evacuations, and smoke pollution across the country. A year later, in 2024, Jasper National Park was nearly destroyed by one of the costliest natural disasters in Canada. In 2025, Canada recorded its second-worst wildfire season on record.

Climate change has led to more intense and severe wildfires. Warmer winters, decreased snow accumulation, and less rainfall have created drier conditions that not only increase the risk of igniting fires but also rapidly spread fires so that they more easily become uncontrollable. While fires are not necessarily increasing in frequency, they are exponentially increasing in intensity and severity. Wildfire seasons are longer, and fires are much larger and more destructive. Common firefighting tactics have limited ability to put out fires and, at best, fires are contained as opposed to being extinguished.[v]

Climate change is evolving faster than we can adapt our own behaviours, our responses and, ultimately, our relationship with the natural world. Wildfires are symptomatic of these changes. Many fires are human caused, and yet, we do not focus on preventative measures. We have yet to accept, despite the evidence, that the changes in our climate are leading to more extreme and frequent events. Our systems are behind, and our priorities need to be reset. As noted by Kukpi7 Patrick Michell, adapting to climate change means investing in prevention and stability.

As wildfires have become more prevalent, seasonal smoke pollution across the country has brought the threat that wildfires pose to our doorsteps. In addition to weeks of poor air quality every summer over the past five years, our homes and buildings are vulnerable. Approximately 14.3% of houses and buildings in Canada are located within natural habitat areas, while 79% are within one kilometre of a natural habitat area.[vi] However, First Nations are nearly 100% located within natural habitat areas and have been seeing the impacts of climate change and wildfires firsthand.

During the 2025 wildfire season, 134 First Nations were directly impacted, with at least 88 communities evacuated and more than forty thousand First Nations citizens displaced from their homes. Evacuation orders were issued for communities across multiple provinces and territories, often with little or no advance warning and in rapidly evolving conditions.

Many communities needed a combination of air, surface, and water transportation to evacuate their members. This included any combination of float planes, helicopters, barges, and buses. Often the logistics of the evacuation were improvised, as though this was occurring for the first time. In Manitoba, the Red Cross coordinated 1,500 evacuation flights and 900 cargo flights and delivered countless supplies.

How an evacuation is sequenced requires careful planning. Those who have critical health conditions and those who are sensitive to smoke need to be evacuated first. In addition, supports need to be put in place for people with medical needs once they are evacuated. Community members may require kidney dialysis, have chronic illnesses, or experience mobility limitations.

The experience of evacuation and temporary relocation varied widely. Some municipalities and Indigenous service organizations mobilized quickly, working with First Nations to provide culturally safe spaces, on-site health supports, and opportunities for community members to stay together. Other host communities were unprepared for the number of evacuees, long-term displacement, and evacuees' medical and cultural needs. These gaps highlight the need to work more closely with First Nations at the local government level, including the need for cultural training, particularly when the likelihood of evacuation is high and increasingly to be expected.

Some communities were unwilling to receive evacuees, citing capacity constraints, lack of prior agreements, or competing demands. Several First Nations leaders reported being told, in effect, that their people would have to look elsewhere—or that they could be housed only in scattered locations without regard for kinship, disability, cultural needs, or safety. Without any monitoring or planning, urban centres already dealing with an ongoing homelessness crisis faced increased pressure.

In some cases, gymnasiums, arenas, and community halls were set up as temporary reception centres. Often, these temporary centres grouped everyone together, without regard to age, health, or family situation. Elders and some who were medically fragile were sleeping on cots for days before being accommodated in a hotel. Also, by failing to work with First Nations leadership, critical community knowledge about families was not shared. This meant that victims of abuse were staying in the same centres as their abusers. Families were routinely separated. The gap in communication and coordination compromised the safety and the dignity of people who were already vulnerable.

In other cases, evacuees were accommodated in hotels or motels. In Manitoba alone, the Red Cross booked 275,000 nights. There were many reports of evacuees receiving different and more limited services relative to guests. No areas were designated for cultural practices, and traditional foods were not made available. Some hotels did not permit the use of facilities like the gym or the pool. Some evacuees were told to collect their meals from a back entrance and were not allowed access to the restaurant. As well, some hotels withheld or provided limited toiletries and towels. Elders with mobility aids who required accommodation on the main level were often assigned rooms on upper levels. In some cases, staying in a hotel became unbearable, and as a result, people camped in their cars or in rough conditions.

First Nations members who had been displaced from their homes, some of whom were leaving their communities for the first time, experienced trauma and uncertainty. Instead of establishing safety and stability, their vulnerabilities were compounded and the risks they faced were increased. Families were separated and placed in different hotels, Elders were often moved far from their supports, and children’s schooling and routines were disrupted for extended periods. First Nations women, children, and youth became magnets for human traffickers, who, along with drug dealers, gained easy access to the hotels they were staying in. Many returned to their communities ill or in worse health.

For many, evacuation is part of a recurring pattern of leaving, waiting, and returning to uncertainty. These evacuations are not limited to wildfire season and are becoming increasingly common throughout the year as Canada endures more extreme weather. In January 2026, Pimicikimak Cree Nation was forced to evacuate their community in northern Manitoba due to a power outage. The extreme cold froze pipes and then caused flooding, which, in turn, compromised the safety of houses, leading to delays in returning to the community. These delays then increase the risk of falling into homelessness and not returning to the community at all.

Indigenous service organizations have called for the development of Indigenous-led emergency housing standards for host communities. These standards would include trauma-informed reception shielding, cultural safety protocols, family unity protocols, and safe overnight supervision in hotels. Alongside a set of standards, it was noted that First Nations evacuees should have a declaration of rights that sets out what they are entitled to so that they can challenge dehumanizing treatment.

While the preference is for First Nation members to safely stay in communities during emergencies, this option is not always possible.

4. Housing conditions and structural vulnerability

Climate displacement intersects directly with the broader housing and homelessness crisis. When evacuation orders are lifted, the assumption built into many emergency plans is that people will simply return home. In reality, some homes will have been destroyed outright, while others will have been damaged but repairable and still others are structurally intact but in such poor condition that they no longer provide safe shelter. Delays in damage assessment, funding, and insurance processing mean that families can remain in a state of uncertainty and displacement for months. For those already on the edge of housing precarity, displacement can become long-term homelessness. Evacuation is a risk factor for housing precarity and homelessness.

Climate displacement, then, is not a temporary disruption. It is part of a cycle in which climate hazards, inadequate housing, fragmented emergency response and governance, and slow recovery processes reinforce each other and compound challenges. First Nations leaders repeatedly stressed that any meaningful strategy must address evacuation, reception, and return as linked phases of a single continuum, rather than as isolated events with diffuse responsibility. A meaningful strategy must be linked to a housing strategy that focuses on pre-evacuation housing continuity planning, housing protections during evacuation, and post-evacuation housing standards that ensure there is housing that is safe to return to. Without a link to housing, evacuation leads to an increased risk of homelessness.

Climate change magnifies existing structural housing deficits. In other words, housing conditions are a central determinant of how communities experience wildfires and other climate-related events. The state of housing in a community will determine whether community members become evacuees in an emergency or are displaced. Evacuees will have homes to return to, but those who are displaced will have suffered the loss of their homes. The latter face uncertain timelines for rebuilding and are on the precipice of housing precarity. First Nations people are more likely to be displaced and forced into housing precarity.

On-reserve housing data show that approximately 43.9% of on-reserve homes do not meet at least one of three housing standards.[vii] This means that many First Nations households are overcrowded, in need of major repairs, or both. These deficiencies are not minor. Reports describe leaking roofs, windows that do not seal, wiring that is outdated or unsafe, and heating systems that are unreliable or improvised. In addition, it is likely that there is insufficient fire detection equipment, like smoke alarms, and a lack of fire suppression equipment (e.g., portable fire extinguishers). As noted in a March 2024 Auditor General of Canada's Report, Housing in First Nations Communities,[viii] housing in First Nations communities is six times more likely to require major repairs. Mould in First Nations homes is a significant and common issue that compromises health outcomes. This issue remains unaddressed and is the direct result of poor-quality housing.

The data shows that people in First Nations communities are four times more likely to live in crowded housing. A single-family home may accommodate multiple generations, with limited space for privacy or mobility. In an emergency, this can mean more people needing rescue from a single structure and more households requiring interim accommodation elsewhere. Children, Elders, and people with disabilities face additional risks when housing lacks ramps, safe exits, or adequate ventilation. Overcrowding increases the number of people at risk during a fire and complicates both evacuation and shelter planning.

The Auditor General's report noted that to close the housing gap, 55,320 new housing units were needed on First Nations communities and 80,650 existing units required repair at an estimated cost of $44 billion. However, only $3.86 billion has been invested in improving First Nations' housing between 2018 and 2023: 11,754 housing units were built, and 15,859 housing units were repaired. In other words, only 21% of the needed housing units were built and only 20% of the needed repairs were completed. A key finding by the Auditor General is that there has been no notable improvement in First Nations housing conditions in 20 years. In other words, houses are deteriorating faster than they are being repaired and made safe.

More broadly, these conditions have developed over decades of chronic underfunding. In 2021, the AFN and Institute of Fiscal Studies and Democracy (IFSD) conducted national costing work that demonstrated that $60 billion was needed to bring First Nations housing up to the same standards as the rest of Canada.[ix] Even where new homes have been built in recent years, maintenance budgets have often been insufficient to keep up with wear, weather, and climate events. The result is a housing stock that is both younger on paper and more fragile in practice than comparable housing elsewhere in Canada. The adequacy of First Nations housing is in significant deficit.

Alongside a housing deficit on First Nations communities is an infrastructure deficit. First Nations communities do not experience the same standards or services as non-Indigenous communities. As a result, without essential services like clean drinking water and education, communities are severely limited in their ability to protect themselves and ensure safety. Beyond survival, their ability to grow and thrive is undermined. The health and safety of children, youth, Elders, and families is severely compromised. Without essential infrastructure, their ability to participate in Canada's economy and contribute to economic growth is severely restricted. In 2024, a joint AFN and Indigenous Services Canada (ISC) report[x] calculated a $349 billion infrastructure gap on First Nations communities. This gap includes housing, clean water, schools, health care, and roads. Failing to invest and delaying investments in infrastructure ultimately compromises Canada's economic growth.

It needs to be emphasized that these conditions are not the result of poor choices by individual households, Chief and Council, or the community. Rather, they reflect a system where tools like law and policy have been used to isolate and marginalize First Nations. Already in a system that positions them as lower priority, First Nations are consistently forced to operate from a position of deficit, with inadequate resources, inflexible program rules, and limited control over design and construction standards. Houses were built with no regard to the context they exist in and barely meet minimal standards. Ultimately, they were built poorly with inadequate materials. In some regions, the absence of enforceable fire or building codes on reserve has meant that safety features taken for granted elsewhere, such as interconnected smoke alarms, safe egress routes, and fire-resistant materials, are neither required nor funded.

In the context of wildfires, the implications are stark. Houses requiring major repairs are more likely to ignite from embers, allow smoke to infiltrate, and fail structurally when exposed to extreme heat. Communities without adequate fire halls, hydrant systems, or access roads face longer response times at a time when every passing minute is critical. When evacuation becomes necessary, the lack of safe, resilient housing means that returning home does not necessarily mean returning to safety. The combination of substandard housing, an infrastructure deficit, and elevated risk due to climate events like wildfires means that First Nations are more vulnerable to catastrophic losses.

5. Fire mortality and injury: Evidence of structural failure

As climate change intersects with housing and infrastructure gaps, fire mortality data is an indicator of the resiliency of a community and its ability to manage these factors. Fire mortality data set out a baseline threshold for how vulnerable housing on a First Nations community already is. In addition, these data point to how damaging a climate event like a wildfire could potentially be, and relatedly, how prepared a community can be to address its aftermath. The everyday risks related to housing in First Nations communities is a rights crisis that is exacerbated by climate events.

Fire-related mortality is a critical indicator of whether housing and emergency systems are protecting people. Statistics Canada mortality data for fire-related deaths between 2011 and 2018 show that mortality for the Indigenous population is 5.3 times higher than the non-Indigenous population, 10.6 times higher on reserve, and 17.6 times higher for the Inuit. Residential fires account for many fire-related deaths in both First Nations and non-Indigenous communities, and these occur most often during the winter months.

However, for First Nations, the differential data is deeply concerning. Studies conducted by the National Indigenous Fire Safety Council, drawing on national fire incident databases and mortality records, have found:

- First Nations individuals are five times more likely to die in a fire in an Indigenous community compared to a non-Indigenous community;
- The mean age of Indigenous individuals who died from a fire-related event is 39, compared to 59 for non-Indigenous individuals;
- About 56% of Indigenous people who died in a residential fire lived in a house that needed major repairs, compared with 13% of non-Indigenous people; and
- Over two thirds (68%) of Indigenous people who died in a fire lived in rural areas, compared with one third (34%) of non-Indigenous people who died in a fire.

When disaggregated further, the disparities are even greater in some provinces. In Quebec, fire-related mortality on reserve is 8.5 times higher than in non-Indigenous communities, in Ontario, it is 10.3 times higher, and in Alberta, it is 15.3 times higher.

In BC, the mortality rate was much lower. The lower rate is mostly attributed to the BC Smoke Alarm Program, which has installed 30,000 smoke alarms in First Nation communities. The number of fire deaths in participating communities dropped to zero. This simple preventative measure has saved multiple lives.

The profile of victims highlights the structural nature of the problem. Indigenous fire victims are, on average, younger than their non-Indigenous counterparts, with many deaths occurring among children, youth, and working-age adults. Many victims lived in homes identified as needing major repairs. Fires in Indigenous communities are more likely to be associated with non-functioning or absent smoke alarms, unsafe heating equipment, and cooking. They are also more likely to occur in rural or remote settings where firefighting resources are limited and response times are longer.

At the same time, a deeper examination of the available data was not possible. Prior to the establishment of the National Indigenous Fire Safety Council, Indigenous fire incidents were not tracked in a standardized way. For example, coroner reports often omit Indigenous identity, and medical examiner systems do not use consistent standards across the country. As a result, fire investigation reports vary dramatically in terms of who does the investigation, what information is collected, and how that information is reported. Many reports are handwritten, unverified, and incomplete, with several fires incompletely investigated. Without an understanding of Indigenous communities and without any Indigenous reporting standards, investigators are likely to be biased in their approach, which results in reports that are of limited utility. The gap in collecting Indigenous-specific data is systemic discrimination.

To address this bias, the National Indigenous Fire Safety Council is advocating for race-based data collection, standardized investigative expectations, mandatory reporting tied to service agreement, and oversight mechanisms. In addition, they are working with Statistics Canada to develop geospatial mapping that includes housing condition overlays and fire injury hospitalization information. While these are innovative approaches, challenges related to fragmented systems and underfunding still exist.

Without the data related to the causes of fatalities or fires, it is impossible to understand where risk is the highest, where investments should be made, what the rate of decline in safety is, and whether prevention programs (e.g., BC smoke alarm program, FireSmart) are working. From a governance perspective, making decisions is nearly impossible and severely restricts accountability. Without this information, the federal government’s ability to fulfil the right to adequate housing for First Nations on reserve is limited. Without data sharing, provinces are unable to ensure coordinated investigations and enforcement mechanisms. In addition, First Nation governments do not have adequate information to support decision-making in order to protect their communities and members and provide adequate housing. What cannot be measured cannot be governed, and without governance, there is no accountability.

These patterns are not simply the result of individual behaviour or isolated accidents. They reflect systemic conditions: inadequate housing, under-resourced fire services, lack of codes and standards, and the absence of a coordinated national Indigenous fire safety strategy. When smoke alarms are not installed, when electrical systems are outdated, when families rely on space heaters or wood stoves because central systems are unreliable, and when firefighters are volunteers without adequate equipment, the probability of a fire becoming deadly increases dramatically.

Several Indigenous fire safety experts have described the situation as a knowing-doing gap. The risks are well documented. The measures needed to reduce those risks—from installing working smoke alarms and modern heating systems to training and equipping local fire departments—are well understood. Yet without sustained, predictable funding and Indigenous-led governance, these measures are not implemented at the scale required.

From a human rights perspective, these fire deaths are preventable losses of life that directly engage the right to adequate housing, the right to life and security of the person, and the right to equality. Strengthening prevention and putting measures in place to protect housing ensure greater sustainability during a climate event. Instead of a catastrophic loss, housing that receives protection is likely to be more resilient, which increases the likelihood of a return to the community. A climate resilience strategy needs to include fire mortality as part of managing the risks from a climate event and address the most serious harms.

6. Emergency management system failures

Emergency management systems are meant to provide a coordinated response when hazards threaten lives and livelihoods. Ultimately, the goal is to prevent the loss of lives and, secondarily, mitigate damage to property. For many First Nations, however, the experience of emergency management is one of fragmentation and uncertainty.

In May 2025, early calls from First Nations governments for support as wildfires gained momentum were ignored.[xi] In Manitoba, the Assembly of Manitoba Chiefs (AMC) and Manitoba Keewatinowi Okimakanak (MKO) called for support from all levels of government for remote First Nations in northern Manitoba who had declared a state of emergency due to wildfires. The province did not respond until 10 days later, declaring a province-wide state of emergency. In Saskatchewan, First Nations in the northern part of the province demanded direct meetings with the provincial and federal governments to coordinate the wildfire response in May 2025,[xii] but also experienced a slow response from the province.

Without provinces declaring a state of emergency, the federal government's involvement cannot be triggered. Indigenous Services Canada (ISC)'s role is to co-ordinate support for First Nations using emergency service agreements with the provinces. The provinces are responsible for appointing an emergency management coordinator once a state of emergency has been declared. In Manitoba, the service provider is the Red Cross, which has a mandate to provide emergency response services and mitigation support.

Responsibilities are split among federal departments, provincial agencies, municipalities, and non-governmental organizations, with First Nations often left navigating multiple systems at once during a crisis. During the 2025 wildfire evacuations, the following mix of governments and organizations that were involved included:

- ISC
- Public Safety Canada
- Provincial government departments
- Municipalities
- AFN
- Local emergency support groups
- Red Cross
- First Nations Emergency Services Society (FNESS) or National Indigenous Fire Safety Council (NIFSC)
- First Nations governments
- Various contractors for services, including hotels, meals, supplies, and social services.

While some of these groups were coordinated, there was no integrated command structure for all the groups. In addition, Canada lacks a national coordinating body for emergency management, like the Federal Emergency Management Agency (FEMA) in the US or Emergency Management Australia (EMA). Both agencies coordinate federal responses to disasters and support states, territories, and tribal governments before, during, and after disasters. Included in their role are preparedness and protection. Without a central coordination mechanism, the immediate response is completely reactive and results in multiple gaps related to how evacuations are conducted, where evacuees are accommodated, and how they are supported. In addition, the opportunity to be prepared and put in place preventative measures is lost.

Participants in the AFN's emergency management sessions frequently described the system as reactive rather than proactive. They spoke of raising concerns about fuel loads, access roads, or water systems years in advance, only to see those concerns go unaddressed until a fire was already burning. As one representative remarked, "This is not response—this is reaction." The absence of a true prevention mandate, backed by adequate resources, means that emergency management often begins when it is already too late.

Communication and coordination challenges during evacuations further undermine safety and dignity. Confusion over who has authority to issue orders, which routes are safe, where evacuees will be received, and who will pay for lodging and meals creates stress for leaders and residents alike. These challenges are magnified when there is no dedicated Indigenous-led emergency operations capacity, when telecommunications infrastructure is weak, or when communities are dealing with concurrent crises such as COVID-19 outbreaks, flooding, or boil water advisories.

In 2025, the Auditor General followed up on programs for First Nations implemented by ISC, including emergency management[xiii]. The Auditor General had previously recommended that ISC establish emergency management service agreements and wildfire agreements with the provinces to ensure that all First Nations have access to timely and coordinated emergency services. Although ISC agreed to implement the recommendations, the Auditor General found that only four emergency agreements and five wildfire agreements were in place and that there were fewer agreements in 2025 than in 2022. Also, the Auditor General found that four of the five wildfire agreements did not include all the First Nations in the relevant province.[xiv] This means that some First Nations will not receive emergency services when most needed.

In 2022, ISC and Ontario had jointly established standards for services to evacuees. These include security services, food, child and family services, mental health, health care, emergency clothing, and transportation. However, the Auditor General noted that ISC had not established any new evacuation standards[xv] with the other provinces. The lack of standards creates a situation where every emergency is treated like it is a first-time occurrence, resulting in uncertainty and inconsistency in how emergency services are delivered.

Multiple trilateral agreements are currently being developed between the federal government, the provinces, and First Nations. Outside of British Columbia, few regions have comprehensive tripartite emergency management agreements that clearly set out roles, funding mechanisms, and service standards for First Nations. In BC, the first phase of the agreement created 34 emergency coordinator positions to support 30 mitigation projects.[xvi]

Without an agreement or standards in place, emergency responses may rely on ad hoc contracts, historical practice, or informal relationships. This can work reasonably well when key individuals know and trust each other, but it does not provide a reliable foundation for planning, preparedness, or accountability.

From a rights-based perspective, these governance gaps mean that First Nations cannot rely on emergency management systems to protect their right to safe, adequate housing in times of crisis. Instead, communities are left to fill the gaps themselves, drawing on their own limited resources and networks to keep people safe.

What is evident is a gap in aligning emergency management with what First Nations need in terms of being able to manage emergencies as part of their jurisdiction. Doing so would enable First Nations to respond to emergencies without having to navigate a diffuse system of government departments, agencies, and organizations when response time is critical. This is not just about improving emergency response; it is about improving emergency preparedness and ensuring that the government directly facing an emergency in their community has the tools to respond to it.

A critical starting point is to recognize the role of First Nations governments in protecting their communities. The 2025 wildfire season demonstrated that First Nation governments and their jurisdictions were ignored. Communication was weak, roles were unclear, and prevention and planning were not prioritized. As a result, First Nations governance was undermined, with the ability of First Nations to protect their members compromised.

Jurisdiction over emergency management services can be transferred back to First Nations governments through structured, multilateral agreements that set out their authorities, provide secure funding, and allow for multi-year planning for response, recovery, and readiness. Data should be included as part of this agreement, especially to address data sharing with federal and provincial governments, including the ownership, collection, and sharing of data for planning purposes. In addition, investment into capacity building for First Nations is necessary to ensure sustainability.

7. Insurance inequities and the case for a First Nations captive

Insurance is designed to manage risk and provide financial protection against unexpected losses. Through a contract, an individual or business pays an insurance premium which transfers the risk of unexpected loss to the insurer. In the event of a loss, the individual files a claim, and the insurer then compensates the individual for the loss within the terms of the contract. Claims are paid out from the premiums that have been collected. In 2021, for every $1 collected in premiums, an average of $0.60 was paid out in claims, and $0.40 covered the insurance company's expenses and profits.

Having insurance plays a role in financial stability by guarding against unexpected, and potentially quite high, costs. For example, insurance can provide the funds needed to repair or replace homes and infrastructure after a disaster. Insurance is a crucial component of resilience. The insurance industry has warned that climate events like wildfires are changing risk profiles, and with them, the cost of premiums and coverage. In California, some insurance companies have announced that they will no longer provide home insurance due to repeated wildfires, and in Canada, there are discussions related to a public insurance program for wildfires.[xvii]

The federal government provides funding for emergency management to support First Nations[xviii] but the federal government has no policy oversight related to the insurance industry for First Nations. At the same time, both the Canada Mortgage and Housing Corporation and ISC require First Nations to have their assets insured to receive capital funding.

For First Nations, the insurance industry functions in ways that deepen vulnerability rather than reduce it. On reserve, First Nations communities face elevated risks related to disasters driven by climate change, like wildfires. Their location in a natural or wildland area is not the only factor in this increased risk—the state of their housing also plays a role. On reserve housing with wood frames, which are generally lower quality, and minimal fire suppression is viewed as high risk. Also, individual members cannot insure their homes, as the homes are owned by the community. Instead, First Nations governments insure the homes. All of these factors make Indigenous communities different, but insurance companies do not account for these distinctions and assess First Nations as if they were a non-Indigenous community or municipality.

The preventative measures that First Nations take to protect their communities are not considered by insurance companies. Important cultural stewardship practices, like controlled burns, and significant Indigenous knowledge about ecology, like understanding the work of beavers in water management, are ignored. The programs First Nations governments have put in place to support the community are also not considered. Some examples of these programs are equipment maintenance and volunteer fire forces. These gaps reflect a failure to understand First Nations communities and their governance, which leads to insurance not meeting their needs.

As a result, the premiums that First Nations must pay for insurance coverage are inflated relative to the coverage provided and the claims paid out. In addition, even with insurance, some First Nations cannot secure full property coverage, as all insurance policies contain risk classes that exempt claim coverage. Community leaders reported paying very high premiums for wildfire coverage that is capped at relatively low limits—for example, $10 million in coverage for asset portfolios worth many times that amount. In effect, communities are asked to pay more to be underinsured.

According to industry information, Indigenous communities across Canada pay approximately $1.1 billion in total annual insurance premiums. The following table shows the typical premiums incurred by size of community[xix]:

	Small Nation	Medium Nation	Large Nation
Total insured values (approximate)	$25,000,000	$100,000,000	$250,000,000 +
Typical on-reserve population	100 - 1,500	1,000 - 3,500	2,500+
Insurance premium cost per year: range	$80,000 to $390,000	$295,000 to $895,000	$675,000 and up
Insurance premium cost per year: Average	$200,000	$600,000	$1,100,000
Average number of claims per 5-years	0-3	3-5	5+

Figure 1, Insurance Economics and Nation Size [1]: This table demonstrates that the premiums collected by insurance companies relative to the number of claims paid out over time are above the industry average. Information from the Insurance Bureau of Canada states that $0.55 of every dollar collected from the payment of a premium goes to paying out insurance claims.[xx]

[1] Methodology:

- Nation tiers defined by Total Insured Values (TIV). Small Nation: <$49M TIV | Medium Nation: $49M – $149M TIV | Large Nation: $150M+ TIV
- Premiums modeled via rate-on-line applied to property TIV; liability lines (general liability, public officials' liability for Chief & Council, professional liability, cyber, auto, etc.) are exposure-rated and add premium on top, so the blended figure is a planning estimate.
- Figures are modeled to an average 70% loss-ratio (LR) benchmark (not a verified third-party figure).
- Remote, flood, and wildfire-exposed communities carry higher rates-on-line.
- This is an industry-wide estimate (not internal data).

The process of filing a claim introduces additional barriers and affects timelines for rebuilding after an event. Adjusters may lack expertise in working with First Nations, be unwilling to travel to remote areas, or apply standards that do not reflect local realities. Disputes over the scope of damage, the cost of repairs, or the interpretation of policy language can delay settlements for months or years. In addition, the Disaster Financial Assistance Arrangements[xxi] program operated by the federal government is only accessible after insurance is exhausted. With this program acting as a backstop to cover the costs of loss, insurance coverage tends to be lower. During this time, families remain in temporary accommodation, and First Nations governments cannot effectively plan for reconstruction.

In the aftermath of catastrophic events, such as the Lytton wildfire, some communities have found themselves labelled as high-risk or even as uninsurable. As Kukpi7 Patrick Michell observed, Lytton has become a "no-go zone for insurance." This kind of market withdrawal leaves communities without a viable path to rebuilding. Even where coverage is technically available, insurers may impose exclusions, high deductibles, or conditions that make policies unaffordable or impractical.

Being distinct communities, First Nations contend with inflated insurance premiums that offer less coverage, which is exploitive of First Nations. As the distinct aspects of First Nations communities are not recognized in insurance assessments, the insurance needs of First Nations are not being met. The insurance industry for First Nations is unregulated and needs oversight from the federal and provincial governments. Federal and provincial governments need to reform regulatory frameworks, contribute to capitalization, and ensure that public programs complement rather than displace Indigenous-led mechanisms. The industry also needs to build capacity to understand First Nations governance and communities, including by recognizing that Indigenous knowledge plays a role in mitigating and lowering risk. At the same time, the industry needs to build a partnership with First Nations that is not solely transactional and is instead focused on the needs of First Nations to adjust the assessment process in order to meet their needs.

Insurance policies are evolving to mitigate risks. For property owners who are proactive and put measures in place to protect their property from potential damage, some insurance companies offer discounts, as the property is “de-risked.” There are also more opportunities for customized coverage as insurance companies adapt to a changing market. Driven by catastrophic claims arising from increasingly frequent events like wildfires, insurance companies are developing options that reduce volatility. For example, some insurance companies are contracting with companies that specialize in loss mitigation and emergency response. As part of policy coverage, the insurance company registers the insured property with the third party company. With geospatial mapping and climate information, this third party then tracks events like wildfires and, if the wildfire is on a path to damage the registered property, the third-party company immediately deploys a team to set up protective measures.

Insurance plays an understated and often overlooked role in First Nations governance of housing, infrastructure, and emergency management. In this context, insurance is not simply a loss policy; it can also be a tool to support the maintenance of on-reserve capital assets.

One approach is community-based catastrophe insurance.[xxii] This model allows for a community group or local government to organize insurance that covers the individual properties within the community. Key benefits of this model include financial resilience, affordable insurance, and scaling preventative measures from single homes to the entire community. Community-based catastrophe insurance models exist alongside government emergency aid programs.

Taking this model one step further, many experts and leaders have called for the creation of a First Nations insurance captive. This is a First Nations-led model where participating First Nations would operate their own insurance company, collectively managing the premiums they would normally pay and reinvesting the profits in their own communities. Key benefits include aggregating risk, negotiating more favourable reinsurance arrangements, and designing coverage terms that meet their actual needs. It would also recognize how communities are already protecting themselves while providing flexibility, which is currently missing. This could also involve integrating prevention and cultural stewardship measures, such as fire-resistant construction, cultural burning, and upgraded infrastructure, into First Nations-defined premium structures and loss prevention programs.

A First Nations insurance captive is not a complete solution. However, a captive model would close the gap between premiums and coverage, build prevention capacity, and strengthen local governance. A captive model provides a pathway toward financial sustainability and sovereignty in the face of escalating climate risks.

8. Promising practices and Indigenous-led solutions

Amid the challenges documented in this report, there are also numerous examples of First Nations and their partners developing effective, innovative approaches to climate resilience, fire safety, emergency management, and prevention. These promising practices demonstrate that alternative models are not only possible, but already in operation.

In British Columbia, a ten-year tripartite emergency management agreement between First Nations, the province, and the federal government has provided a more stable and coordinated foundation for emergency planning and response. Discussions have included a multi-hazard assessment that considers impacts for seven generations as well as distinctly First Nations understandings of land. In addition, discussions have linked housing and infrastructure, as both need to be addressed to increase community resiliency. Other solutions, like fast tracking additions to reserves, may be needed so that communities can be rebuilt faster. While not perfect, this agreement offers lessons on how long-term agreements can clarify roles, improve communication, and support community-based capacity.

Indigenous-led emergency operations centres show the value of culturally grounded, trauma-informed approaches to disaster response. These centres place Indigenous governance at the heart of decision-making, ensuring that responses reflect community priorities, cultural protocols, and traditional knowledge.

One example is ISN Maskwa.[xxiii] Based in Sault Ste. Marie, Ontario, ISN Maskwa is the first and only First Nations–led emergency operations centre of its kind in Canada, providing a range of services for First Nations experiencing floods, fires, and other emergencies. ISN Maskwa was heavily involved in the 2025 wildfire season that was preceded by severe flooding. Staff sometimes worked 96 straight days without a break, moving from flood evacuations directly into fire evacuations. Since inception, ISN Maskwa has worked with about 75% of the 133 First Nations in Ontario, delivering training, staffing reception centres, and supporting evacuations.

The ISN Maskwa model integrates important health supports. In previous evacuations, they have coordinated mobile dental clinics, optometry, foot care and medical testing. They work with the non-insured health benefits program for First Nations and Inuit as well as ISC to ensure nursing station support, medical escorts, and continuity of care between the home community and host sites. They coordinate logistics such as wheelchairs and walkers, and ensure prescriptions are transferred to local pharmacies for the duration of the evacuation.

ISN Maskwa is currently working with the Missanabie Cree First Nation to develop an evacuation centre at Island View Camp. The Camp can currently host 125 evacuees, but construction is underway to expand capacity to host an additional 800 evacuees using a repurposed mining camp. The completed centre will include flexible accommodations to host families, Elders, and children, a gym and recreation spaces, laundry facilities, a children's area, and a space that can function as a band office or meeting area during evacuations. The goal of the centre is to provide remote communities a safe evacuation space that meets their needs without requiring them to go to an urban centre, like Toronto. Many First Nations do not want to be evacuated to larger urban centres, with exposure to drugs, alcohol, and predators around airports and hotels. Urban centres can worsen stress, addictions, and mental-health challenges. In contrast, Island View Camp offers a land-based environment that provides continuous cultural connection and stability.

Outside of seasonal emergency management services, ISN Maskwa focuses on training and capacity building, often in partnership with ISC. They run courses such as Community Support Personnel and Incident Management System training so First Nations can staff their own command tables. In one example, they supported the first fully Indigenous incident command team responding to a chemical leak in Sarnia. ISN Maskwa's work has expanded into complex investigative work, including following up on missing and murdered Indigenous women and girls cases. Their role is to listen to families, review files, and liaise with police services to ultimately fill a gap related to community safety, trust, and trauma. ISN Maskwa is also engaged in First Nations policing and training.

In BC, the First Nations Emergency Services Society (FNESS) is a provincial First Nations service organization that originally provided community support and training but now focuses on full-spectrum emergency management. This includes supporting communities with preparedness, mitigation, response, and recovery. One example is the Rapid Wildfire Risk Assessment program, which sees FNESS go to communities under evacuation and quickly assess what measures can be immediately taken to mitigate damage from an approaching wildfire. Removing wood stacked against a house, clearing debris close to houses, and ensuring that the lawns are cut are all immediate measures that make a difference in how much a house is impacted by a wildfire.[xxiv] However, FNESS is not formally recognized as a response organization, despite deep technical expertise and relationships with First Nations communities.

FNESS is constrained by limited funding, fragmented jurisdiction, and the need for provincial approvals. There is a systemic misalignment between what First Nations need, how First Nations organizations provide services that meet these needs, and what the provincial emergency management system permits. Before FNESS can be deployed, they must obtain clearance from BC Wildfire Service, even when a community is visibly threatened. Also, structure protection trailers and equipment cannot be put in place until the province approves. Any delays can render the provision of services and support meaningless, especially for remote communities that are difficult to access.

For example, during an atmospheric river event, approvals took five days for trailers and support equipment to be deployed.

FNESS understands the priorities of First Nations in an emergency and acts to fill gaps where provincial policies do not reflect First Nation realities. Cultural sites, like medicine fields, sweat lodges, and sacred sites, are often overlooked. Provincial frameworks focus only on capital assets and do not consider the spaces that are necessary for cultural survival and distinct ways of life. To build capacity, FNESS delivers training tailored for First Nations contexts and integrates cultural knowledge into prevention measures. For example, ecological signs, such as leaf colour changes, animal movement, and water behaviour, are ignored in provincial emergency models, but FNESS training includes Traditional Knowledge and science. These practices are grounded in generations of observation and experience, and they offer scalable, climate-adapted tools for risk reduction. To be effective, training and prevention in a First Nations community must relate to culture.

Yet, despite a promising model that is culturally driven, FNESS can only access limited funding that is based on an annual renewal cycle, as opposed to sustainable core funding. Many of the prevention programs that FNESS operates, like fire safety, youth engagement, and school fire prevention, are unfunded. An annual funding renewal cycle means that it is challenging for communities to hire and retain emergency services coordinators. Also, communities contend with fire halls without heat, gear containing asbestos, and older trucks. Considering that Canada spends $340 million importing international firefighting crews each year, Indigenous firefighters and community crews are grossly underfunded.

At the community level, First Nations can take steps to build climate resilient communities. Kanaka Bar, one of the communities that form the Nlaka'pamux Nation, is building itself for the future.[xxv] Early on, Kanaka Bar accepted that climate change was not just a reality, but an emergency. Changes in the climate that were inconsistent with Traditional Knowledge were noted as warnings. The community built its governance around ensuring that the community would always be able to access clean air, water, food, and shelter. Then the community conducted its own climate change assessment, identified gaps, and put tools in place based on those gaps to supplement and amplify their Traditional Knowledge and science. In effect, the community started collecting its own data so it could make decisions related to risk mitigation. In addition, the community implemented clean energy projects, like solar panels and hydroelectricity, as well as food security projects.[xxvi]

Emergency management is focused on prevention. Kanaka Bar residents cut down trees that were too close together so that fires would be limited in their spread. The community regularly clears dead branches and debris that could ignite and spread fire. Any potential fire hazard was removed and what could not be removed, measures were taken to mitigate the hazard. In many ways, prevention measures are, in fact, climate adaptation measures. To survive, a community needs to adapt to the changes around it.

Traditional knowledge related to fire and ecological stewardship has a key role. Cultural burnings that were once banned by provincial legislation clear land of highly flammable forest matter and protect communities against larger fires. Another aspect of cultural burning is regrowing traditional plants and foods in certain areas to provide vital medicines to the community. These deep cultural approaches to managing lands and preventing wildfires offer broad lessons.

Housing is another area of innovation. Kanaka Bar owns the majority of its land base and provides members with secure life estate housing, demonstrating an Indigenous housing paradigm centred on stability rather than speculation. As Kukpi7 Patrick Michell emphasized, the goal is not to maximize profit, but to ensure that everyone has a secure place in the community now and into the future. This "break-even" value system stands in contrast to market-driven approaches that have contributed to housing unaffordability and financialization elsewhere in Canada.

In the aftermath of the wildfires, Kukpi7 Michell questioned whether the expectation should be that a home is destroyed. Houses can be rebuilt with fire-resistant materials that cost less and in the long run because they have a better chance of surviving fires. Building codes should be updated to require fireproof building materials. Yet, new houses are built with the same construction techniques and materials as the house that was destroyed, and building codes continue to not require fireproof building materials. While Kanaka Bar is being proactive, their work is being slowed by frameworks that have yet to accept the reality and urgency of climate change.

9. Recommendations

Addressing climate urgency

A. Prioritize climate action by incorporating climate risk modelling in planning and strengthening the climate resilience of housing for First Nations, which includes respecting, promoting, and safeguarding First Nations knowledge systems, rights, and self-determination.

B. Work in full partnership with First Nations to identify the priorities, objectives, and resources needed to respond to climate emergencies impacting First Nations lands, waters, and air.

Addressing emergency management, including prevention, response, mitigation and recovery

C. Establish an integrated, national, tripartite emergency management governance authority that sets out clear roles and accountability across all federal and provincial government departments and First Nations governments. This includes improving data sharing between all governments and ensuring First Nations access to data.

D. Work in full partnership with First Nations to establish a national, First Nations-led fire safety and stewardship institution to support the development, implementation, and monitoring of emergency management and prevention strategies, action plans, and risk assessments.

E. Strengthen and invest in First Nations-led emergency management at the community, regional, and national level by enhancing First Nations’ financial, technical, and human capacity to conduct community-based, climate-related assessments and monitoring. This includes addressing data availability, operations capacity, local fire services, and youth training pathways in emergency management and fire stewardship.

F. Work in full partnership with First Nations to develop and implement a First Nations climate emergency housing strategy to address evacuation lodging, urban reception, rapid return-home funding, and climate-resilient reconstruction. It should include standards for host communities that meet the needs of First Nations evacuees.

G. Establish a national, Indigenous-led human rights monitoring framework for climate displacement and housing, with public reporting and clear accountability mechanisms.

H. Compensate First Nations with new or additional lands for any lands that First Nations have lost or may lose in the future due to climate change.

Addressing structural housing and infrastructure deficits to improve climate resiliency

I. Invest maximum resources to prioritize First Nations communities at risk of catastrophic loss, and close the $349.2 billion First Nations infrastructure gap through sustained investments in housing, water, and emergency services. This should include $30.0 billion for climate adaptation, as guided by the AFN's Closing the Infrastructure Gap by 2030 report.

J. Work with First Nations to support the development of a First Nations insurance captive to address the systemic inequities in insurance coverage for First Nations infrastructure and housing. Provide a tool to support the maintenance of on-reserve capital assets and strengthen governance.

10. Conclusion

Canada stands at a crossroads. As climate change accelerates, the frequency and severity of wildfires and other emergencies will continue to increase. The question is not whether these events will occur, but whether the systems that respond to them will be just, effective, and aligned with the rights and values of First Nations.

The evidence presented in this research highlight shows that current systems fall short. Fire mortality rates remain unacceptably high in Indigenous communities. Housing conditions are inadequate and unsafe for too many families. Emergency management structures are fragmented, insurance markets leave communities exposed, and human rights obligations are not being fully met.

At the same time, First Nations are leading the way in designing and implementing solutions: in community-based fire prevention, in innovative housing governance, in emergency operations, and in climate adaptation planning. These efforts demonstrate that a different future is possible: one in which housing is treated as a right, not a commodity; in which emergency systems prioritize prevention and stability; and in which First Nations have the authority and resources to future-proof their communities.

As the Federal Housing Advocate observed, “We do not lack mechanisms; we lack the decision to use them.” The challenge before all levels of government is to make those decisions now, in partnership with First Nations, so that the next wildfire season does not simply reproduce the harms of the last.

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