

18 July 2025

Hon. Becky Druhan
Minister, Department of Justice
1690 Hollis Street
Halifax, NS
B3J 2L6

(Delivered via email)

Dear Minister Druhan,

RE: Shaping the Future: Comprehensive Police Review 2025

We write you today to call for a deeper discussion on policing needs and opportunities in Nova Scotia. We would like to start by acknowledging the significant and complex nature of policing, which makes the pursuit of any improvements challenging. NSFM is built on the belief that complex challenges are best addressed with a collaborative approach. In the interest of taking a more collaborative and effective approach to public safety in Nova Scotia, this letter notes points of consensus as well as areas of concern that we find in your recently announced policing reforms, and invite you to meet with our members on August 14, 2025, for an in-depth discussion on the policing review.

NSFM is proud to have a strong dialogue with your department. Most recently, we submitted a letter on financial pressures of policing on September 17th, 2024, and received a response to this letter on December 16th, 2024. We were informed that our letter was forwarded to Deloitte to supplement the police review. Our perspective on opportunities and challenges for policing is informed by constant contact with our municipal membership, in-depth surveys on policing conducted in 2023 and 2024, and additional staff research. The dedication to community safety among our membership cannot be overstated and it is this dedication that motivates us to write this letter.

There are clear grounds for consensus in the Key Challenges, Opportunities for Improvement, Key Considerations, and the Six Design Principles presented in Deloitte's report. These issues largely mirror those that NSFM has identified with research and member engagement. The scope of policing has grown due to public expectations and the increased complexity of crime, and this has knock-on effects of increased costs and difficulties demonstrating responsiveness. NSFM supports the purposeful modernization of technology and shifting to a unified records management system. Our most recent survey on policing highlighted the need for expanded and more affordable training and we are happy to see this need accounted for in the review. We certainly welcome enhanced police resourcing, especially in rural areas as was recommended by the Mass Casualty Commission (MCC). Investing in layered policing that will help regular officers to focus on core policing duties is also welcomed based on longstanding issues caused by the Involuntary Psychiatric Treatment Act (IPTA) and the fact that police officers are often not the necessary nor appropriate first responders for those experiencing mental health challenges or

other social issues. The Foundational Changes recommended by Deloitte and adopted by your department could certainly chart a course to more coordinated and responsive policing in Nova Scotia.

There are some positive signs provided in your announcement that we require more information about to properly assess. We are interested in learning more about what implication the Community Safety Boards, which Deloitte referred to as a “revamp”, will have for current police boards. We agree that crime does not adhere to jurisdictional borders, but we do believe strongly in the value of focused, local, civilian oversight and would like to see this maintained. We are also interested to learn more about the new billing framework for municipalities that receive contract policing services. Aside from data management standards, we are interested in what new standards are being contemplated so soon after the first phase of standards have just been established. We are also wondering why enhanced police resourcing does not seem to include increased support for municipal police agencies, which do indispensable work in their urban centres and broader regions. Based on concerns that we expressed in the correspondence noted above, we had hoped that a new funding model for all municipalities and increased investment in the Additional Officer Program (AOP) would have been included in your announcement.

On behalf of our members, NSFM has also identified some concerning aspects of your announced police reforms and respectfully urge you to reconsider these decisions in the interest of public safety. We appreciate that you have already met with us as CEO and President to review some of these issues. We believe that such discussions will shed light on how your department can best support equitable and effective policing services in Nova Scotia.

In addition to Deloitte’s recommended Foundational Changes, you have introduced a new pay-for-use approach to specialized services, in which municipal police agencies must either provide all required services in house or purchase these services from the RCMP. This decision is not aligned with the recently established policing standards and auditing process nor Deloitte’s own recommendations. In Key Highlights of Option 3 (Hybrid Model), Deloitte advises that “this option challenges equitable access to police service given its continued reliance on pay-for-use specialized services”. As is allowed by Subsection 40(1) of the Police Act, municipal police agencies have proactively formalized police support service sharing agreements that are feasible and mutually agreeable. We believe that making the RCMP the sole provider of police support services runs the risk of driving up costs and perpetuating service delivery issues. We respectfully urge you to maintain subsection 40(1) of the Police Act and determine the viability of intermunicipal service agreements with a formal audit rather than a hunch.

Further, we would be remiss if we did not note that the continued downloading of police support services and highway patrol is in contravention of the 1995 Service Exchange Agreement and the new Service Exchange Memorandum of Understanding (MOU) signed on March 28, 2024. Your department is referenced in Schedule A of this MOU, and we invite you to engage in this renegotiation at your earliest convenience.

NSFM is happy to see you reference the long history of municipal police agencies in Nova Scotia. However, it is not this history alone that requires them to be maintained but rather the distinct and complicated public safety needs in urban centres. Your Shaping the Future of Policing document inaccurately characterizes provinces with their own police agencies as featuring municipal police agencies in large cities alone. Ontario features 40 municipal police agencies and Quebec features 16 municipal police agencies, many of which provide services to towns and broader regions. The fact of the matter is that municipal police agencies are indispensable in efforts to increase standards of public safety. We are confused by

your department's continued underestimation of the potential of municipal police agencies, especially when compared to the optimistic view of what the RCMP can accomplish.

As stated above, NSFM is generally in agreement with Deloitte's account of pressing challenges in policing as we have long identified many of these issues as well. It is unfortunate to find that issues that are attributable to the RCMP specifically (i.e.: lack of responsiveness in rural areas, lack of community presence and connections, creation of backlogs due to vacant positions, etc.) are occasionally generalized and treated as though they are found in municipal police agencies. This is a move away from the evidence-based decision-making that the review is supposed to support. The MCC was largely focused on shortcomings of the RCMP, and we are confused by your department's shift to focusing criticism on municipal police agencies following this MCC mandated review. Many of our members will be quick to agree that the RCMP is an important partner. However, efforts to strengthen this partnership cannot undermine the pursuit of the necessarily collaborative effort of pursuing the highest possible standard of public safety.

It was surprising that, despite a nation-wide jurisdiction scan, the provincial policing review did not acknowledge that the number of municipal police agencies is increasing across Canada due to dissatisfaction with service and lack of cost containment in contract policing. Examples of these transitions can be found in Surrey, B.C., and Grand Prairie, Alberta and are being considered in a number of other jurisdictions. These transitions have been supported by provincial governments vying for the same improvements to public safety that are stated in Nova Scotia's provincial policing review.

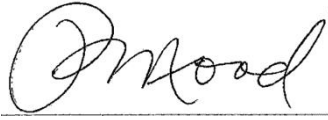
Following our analysis of Deloitte's report, we are left seeing the Government Response as mostly resembling Option 3 (Hybrid Model) or even Option "0" (Status quo with Implementation of Foundational Changes) more than Option 1A (Expansion of RCMP). These options were explicitly not recommended in Deloitte's report. This appears to jump over Option 2 (Regionalization), a scenario in which Deloitte's report states services "may be equitable and optimized at a regional level [but] there will be less consistency province-wide". With the current and oncoming policing standards addressing consistency concerns, we must ask why the option of regionalization was not considered. Due to the diminishing returns that investments in the RCMP are now subject to, expansion of municipal police agencies is where economies of scale can be accomplished; municipal police agencies provide notable value for money as expressed in former correspondence. We believe further research is necessary to assess the viability of Deloitte's Option 2 and we would be happy to conduct this research jointly with your department.

As a recap of our top concerns, we would like to reiterate that:

- NSFM believes that you should maintain Subsection 40(1) of the Police Act and reconsider the pay for service model that you've introduced to Nova Scotia.
- NSFM strongly encourages you to learn more about the untapped potential of municipal police agencies to play an active and dignified role in province-wide efforts, including regionalization.
- NSFM invites you to meet with our members to engage in the in-depth discussion that this province-wide decision deserves on August 14th, 2025.

We appreciate your attention to this letter and will liaise with your designated staff to develop an opportunity to learn from our members at the August 14th meeting. NSFM is happy to help fill gaps in information in order to support an evidence-informed basis for this important decision and facilitate communication with municipal officials during this important point in Nova Scotia's history.

Kind Regards,



Mayor Pam Mood
President, Nova Scotia Federation of Municipalities



Juanita Spencer,
CEO, Nova Scotia Federation of Municipalities

cc: Hon Tim Houston (Premier of Nova Scotia)
Hon John Lohr (Minister, Department of Municipal Affairs)
Jennifer Glennie, K. C. (Deputy Minister, Department of Justice)
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