



South Georgian Bay Lake Simcoe Source Protection Region

**SEVERN SOUND SOURCE PROTECTION AUTHORITY
MEETING NO. 01-24-SS SPA
AGENDA**

April 25th, 2024

9:30 a.m. - 10:30 a.m.

Harbour Shore Community Room (Victoria Harbour Branch Library – 145 Albert Street)

In-person and Zoom

1. WELCOME AND CALL TO ORDER

2. ADOPT AGENDA

3. DECLARATION OF PECUNIARY INTEREST

4. APPROVAL OF PAST MINUTES

4.1 Minutes of the SSSPA meeting held April 27th, 2023 were approved at the July 20th, 2023 SSEA Board Meeting (Motion 2023-028).


5. SOURCE PROTECTION COMMITTEE UPDATE

5.1 Staff report No.01-24-SSSPA from Lynn Dolin, Chair of the South Georgian Bay Lake Simcoe Source Protection Committee.

6. 2023 REGIONAL ANNUAL REPORTING

6.1 STAFF Report No. 02-24-SSSPA and presentation from SSEA Manager, Source Water Protection, RMO/RMI re: Regional Overview.

7. APPOINTMENT OF MEMBER TO THE SOURCE PROTECTION COMMITTEE

 7.1 Staff Report No.03-24-SSSPA and presentation from SSEA Manager, Source Water Protection, RMO/RMI re: Appointment of Member representing the Severn Sound Source Protection Authority (SS SPA) watershed on the Source Protection Committee.

8. DRINKING WATER SOURCE PROTECTION FUNDING & SOURCE PROTECTION AUTHORITY Q1 UPDATE

8.1 Staff Report No.04-24-SSSPA from SSEA Manager, Source Water Protection, RMO/RM re: DWSP funding & SPA Q1 Updates.

9. SOURCE PROTECTION PLAN AMENDMENT UPDATE

9.1 Staff Report No.05-24-SSSPA Re: SPP Amendments Update.

10. OTHER BUSINESS

10.1 Staff Report No.06-24-SSSPA Re: Potential Phase Out of Free Well Water Testing

11.ADJOURN



Lake Simcoe
Region
Conservation
Authority



South Georgian Bay Lake Simcoe Source Protection Region

**SEVERN SOUND SOURCE PROTECTION AUTHORITY
MEETING NO. 01-23-SSSPA
Thursday April 27th, 2023 9:37 a.m. to 10:11 a.m.
In-person and Zoom**

Present:

SSEA Chair, Councillor Steffen Walma
Councillor Danielle Alexander
Councillor Roberta Bald
Councillor Brian Bocek
Councillor Suzanne Marchand
Deputy Mayor Barry Norris
Councillor Mark Taylor

Township of Tiny
Township of Springwater
Town of Midland
Township of Georgian Bay
Town of Penetanguishene
Township of Tay
Township of Severn

Staff present:

Julie Cayley
Melissa Carruthers

Aisha Chiandet (via Zoom)
Cliff Evanitski
Judy Limoges

Lex McPhail
Nikki Priestman
Nicole Stott

Executive Director
Manager Source Water Protection,
RMO/RMI
Water Scientist/Limnologist
Office Manager
Financial Services
Coordinator/Treasurer
IT Manager/GIS Applications Specialist
Watershed Health Specialist
Source Water Protection Intern

Regrets:

Councillor Lori Hutcheson

Township of Oro-Medonte

Guests:

Bill Thompson

Manager, Watershed Plans & Strategies
Lake Simcoe and Region Conservation
Authority

1. WELCOME AND CALL TO ORDER

Chair Walma called the meeting to order at 9:37 a.m.

2. ADOPT AGENDA

MOTION: 2023-001-SSSPA

Moved by: D. Alexander

Seconded by: S. Marchand

RESOLVED THAT: the SSSPA approves the Meeting Agenda dated April 27th, 2023.

Carried;

3. DECLARATION OF PECUNIARY INTEREST

4. APPROVAL OF PAST MINUTES

4.1 Minutes of the SSSPA meeting held April 28th, 2022 were approved at the July 26th, 2022 SSEA Board meeting (Motion 2022-032).

5. SOURCE PROTECTION COMMITTEE UPDATE/PRESENTATION

5.1 STAFF Report No.01-23-SSSPA from Lynn Dolin, Chair of the South Georgian Bay-Lake Simcoe Source Protection Committee

MOTION: 2023-002-SSSPA

Moved by: B. Bocek

Seconded by: B. Norris

RESOLVED THAT: Staff Report No. 01-23-SSSPA regarding the Source Protection Committee update from Chair Lynn Dolin be received as information.

Carried;

6. PRESENTATION – SOURCE PROTECTION; A PARTNERSHIP TO PROTECT MUNICIPAL WATER DRINKING SOURCES

6.1 Presentation by Bill Thompson, Manager, Watershed Plans and Strategies at Lake Simcoe Region Conservation Authority

MOTION: 2023-003-SSSPA

Moved by: M. Taylor

Seconded by: B. Bocek

RESOLVED THAT: the Presentation by Bill Thompson on Source Protection; A Partnership to Protect Municipal Drinking Water Sources, be received as information.

Carried;

7. 2022 REGIONAL ANNUAL REPORTING

7.1 STAFF Report No.02-23-SSSPA Re: Regional Overview

MOTION: 2023-004-SSSPA

Moved by: R. Bald

Seconded by: M. Taylor

RESOLVED THAT: Staff Report No. 02-23-SSSPA by the SSEA Risk

Management Official/Risk Management Inspector regarding an overview of regional Source Protection Plan annual reporting implementation, be received as information.

Carried;

8. RISK MANAGEMENT OFFICIAL/RISK MANAGEMENT INSPECTOR UPDATE

8.1 STAFF Report No.03-23-SSSPA Re: DWSP and RMO updates

MOTION: 2023-005-SSSPA

Moved by: S. Marchand

Seconded by: D. Alexander

RESOLVED THAT: Staff Report No. 03-23-SSSPA by the SSEA Risk Management Official/Risk Management Inspector regarding the Severn Sound Source Protection Authority Drinking Water Source Protection and SSEA Risk Management Services updates, be received as information.

Carried;

9. SOURCE PROTECTION PLAN AMENDMENT UPDATE

9.1 STAFF Report No.04-23-SSSPA Re: SPP Amendments Update

MOTION: 2023-006-SSSPA

Moved by: M. Taylor

Seconded by: B. Bocek

RESOLVED THAT: Staff Report No. 04-23-SSSPA by the SSEA Risk Management Official/Risk Management Inspector regarding the status of various Source Protection Plan amendments, be received as information.

Carried;

10. OTHER BUSINESS

11. ADJOURN

MOTION: 2023-007-SSSPA

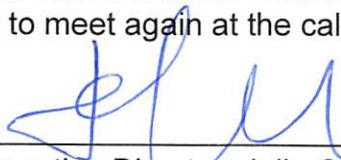
Moved by: R. Bald

Seconded by: B. Norris

RESOLVED THAT: this meeting of the Severn Sound Source Protection Authority held on April 27th, 2023 adjourn at 10:11 am to meet again at the call of the Chair.

Carried.


Chair, Steffen Walma


Executive Director, Julie Cayley

Approved this 20th day of July, 2023



South Georgian Bay Lake Simcoe Source Protection Region

**Severn Sound Source Protection Authority (SSSPA)
Regular Meeting
April 25th, 2024**

STAFF REPORT

No: 01-24-SSSPA
Date: April 25th, 2024
To: Chair and Members of the SSSPA Board of Directors
From: Lynn Dollin, Chair – South Georgian Bay Lake Simcoe Source Protection Committee

SUBJECT: Source Protection Committee Chair’s Update

APPLICABLE STRATEGIC PLAN GOAL:

Goal 1: Sound Science

- Continue to offer exceptional services as the Source Protection Authority for Severn Sound

RECOMMENDATION:

RESOLVED THAT: Staff Report No. 01-24-SSSPA by South Georgian Bay Lake Simcoe Source Protection Committee Chair Lynn Dollin regarding Source Protection Committee updates be received for information.

Chair’s Update:

Below is a brief update from the Source Protection Committee since the last meeting of the Severn Sound Source Protection Authority Board.

The Source Protection Committee has met four times in the past year and most recently received the annual report on implementation progress, which will be presented by Melissa Carruthers later today. The Committee was very pleased to see the level of progress that has been made in implementing the Source Protection Plan. We recognize that this has been challenging for all involved, from understanding new responsibilities that municipalities have under the plan, to staff recruitment and process development, and eventually having to deal with the disruption of the COVID-19 pandemic, the path to implementing this plan has been very challenging. The

Committee is very pleased to see that those difficult days are behind us, and thank member municipalities, provincial agencies, and others with implementation responsibilities for their hard work.

In submitting the annual report to the Ministry, the Source Protection Committee have the ability to provide our opinion on progress. In addition to recognizing the hard work of everyone involved, the Committee intends to also make use of this opportunity to share their concerns about recent proposed changes to Provincial policy. As we all know, the Provincial government have a strong focus on promoting housing development and have been revising policies to remove as many barriers as possible. Through some of that policy review unfortunately, some policy revisions would have the, perhaps unanticipated, effect of removing “tools” from the “toolbox” that the Source Protection Committee have relied upon to protect municipal drinking water sources. Authority staff have shared these concerns with the Ministry, and we hope that a resolution can be found which avoids unnecessary delay in housing development, without any increased risk to municipal drinking water.

The Committee is aware that, despite these concerns, the Province does remain strongly supportive of the Clean Water Act and the Source Protection Program, including the ongoing role of the Source Protection Committee. Our Committee in fact does remain engaged, despite several members having served since its inception. I am confident that those few Committee members who have had to step back due to job changes will be replaced, and that new members will add valuable new perspectives and new experiences to the Committee.

Respectfully submitted,
Lynn Dollin, Chair

Prepared by:

Original signed by _____
Melissa Carruthers, Manager Source
Water Protection, RMO/RMI

Approved for submission by:

Original signed by _____
Julie Cayley, Executive Director



South Georgian Bay Lake Simcoe Source Protection Region

**Severn Sound Source Protection Authority (SSSPA)
Regular Meeting
April 25th, 2024**

STAFF REPORT

No: 02-24-SSSPA
Date: April 25th, 2024
To: Chair and Members of the SSSPA Board of Directors
From: Melissa Carruthers, Manager Source Water Protection, RMO/RMI
SUBJECT: 2023 Regional Drinking Water Source Protection Report to the Province

APPLICABLE STRATEGIC PLAN GOAL:

Goal 1: Sound Science

- Continue to offer exceptional services as the Source Protection Authority for Severn Sound
-

RECOMMENDATION:

RESOLVED THAT: Staff Report No. 02-24-SSSPA regarding the 2023 Regional Drinking Water Source Protection Report to the Province be received for information.

Purpose of Staff Report:

To provide an overview of the Regional South Georgian Bay Lake Simcoe Source Protection Plan Annual Progress Report.

Background:

The South Georgian Bay Lake Simcoe Source Protection Plan (SPP) has been in effect since July 1st, 2015. The local Source Protection Authorities (SPAs), Severn Sound and Nottawasaga Valley, are required to monitor and report on the implementation of the SPP policies, by February 1st of each year and, that the lead Source Protection Authority (LSRCA) report to the Director of Source Protection (MECP) on the implementation of all policies by May 1st of each year. As part of this process, the Source Protection Committee is provided an opportunity to comment on the report before its submission.

A primary objective of monitoring and reporting is to assess if threats to municipal drinking water sources are being reduced through the implementation of the Plan's policies. This information will help support any future amendments to the Plan and provide accountability and transparency to stakeholders.

Across the Source Protection Region, essential implementation actions such as establishing a Risk Management Office and drafting policies for municipal Official Plans (OPs) have been completed. All municipalities have been negotiating Risk Management Plans (RMPs) with landowners, and many municipalities have successfully completed some or all of their required Risk Management Plans. Similarly, Ontario ministries have completed the task of reviewing previously issued provincial approvals (prescribed instruments such as Nutrient Management Plans) where they have been identified to address existing activities that may pose a risk to sources of drinking water.

Discussion/Issues:

At their most recent meeting in March 2024, the Source Protection Committee reviewed Source Protection Plan implementation progress data and identified the following key findings for the region:

1. All municipalities submitted their 2023 annual reports to the Source Protection Authority. Municipalities in our Source Protection Region have processes in place to ensure that their day-to-day planning decisions conform to our Source Protection Plan.
2. 98% of the policies that address significant drinking water threats have been or are being implemented.
3. Approximately 96% of the existing threats have been addressed through policy implementation.
4. While 314 RMPs have been established as of December 31, 2023, an estimated 27 outstanding RMPs remain to be completed by the July 1, 2024, deadline.
5. 12% (250 of the estimated 2,106) of round three, on-site septic system inspections have been completed by municipal staff. Most municipalities in our region have several years remaining to complete their remaining inspections.

Summary and Recommendation:

The various implementers of the South Georgian Bay Lake Simcoe Source Protection Plan have submitted their 2023 annual reports to the Source Protection Authority as required under the *Clean Water Act*. These reports show that across the region the implementation of the Plan is currently progressing well and are on target to meet implementation deadlines, most specifically the July 2024 Risk Management Plan deadline.

Prepared by:

Approved for submission by:

Original signed by
Melissa Carruthers, Manager Source
Water Protection, RMO/RMI

Original signed by
Julie Cayley, Executive Director

Annual Report to the Ministry - Progress Made in Protecting Sources of Drinking Water

Melissa Carruthers,
Manager Source Water Protection, RMO/RMI

April 25, 2024



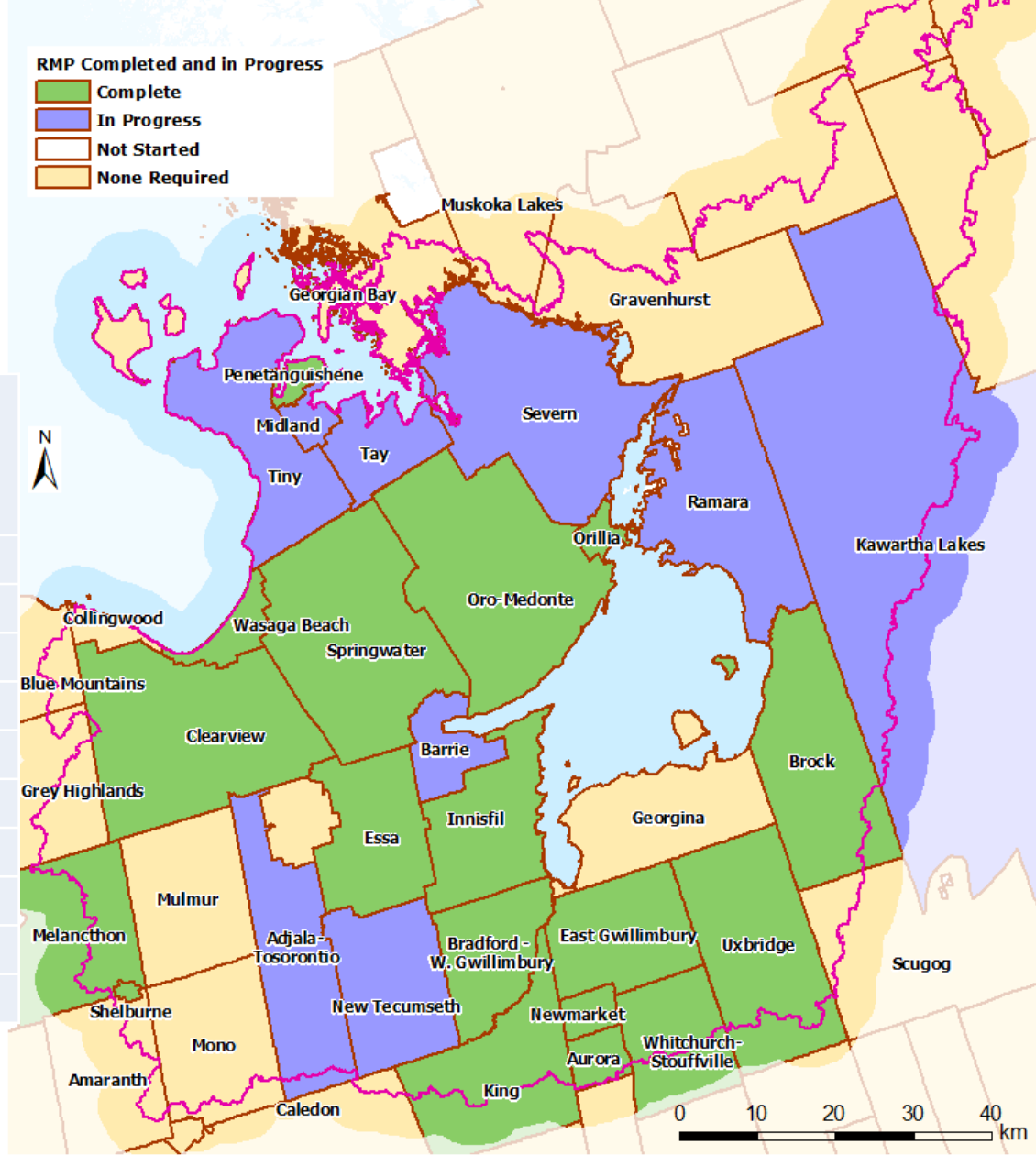
Water
is life.
Protect
Yours.

Presentation Outline

- Progress update (risk management plans and official plan amendments)
- Potential issues
- Solutions
- Source Protection Committee's comment on progress
- Questions?

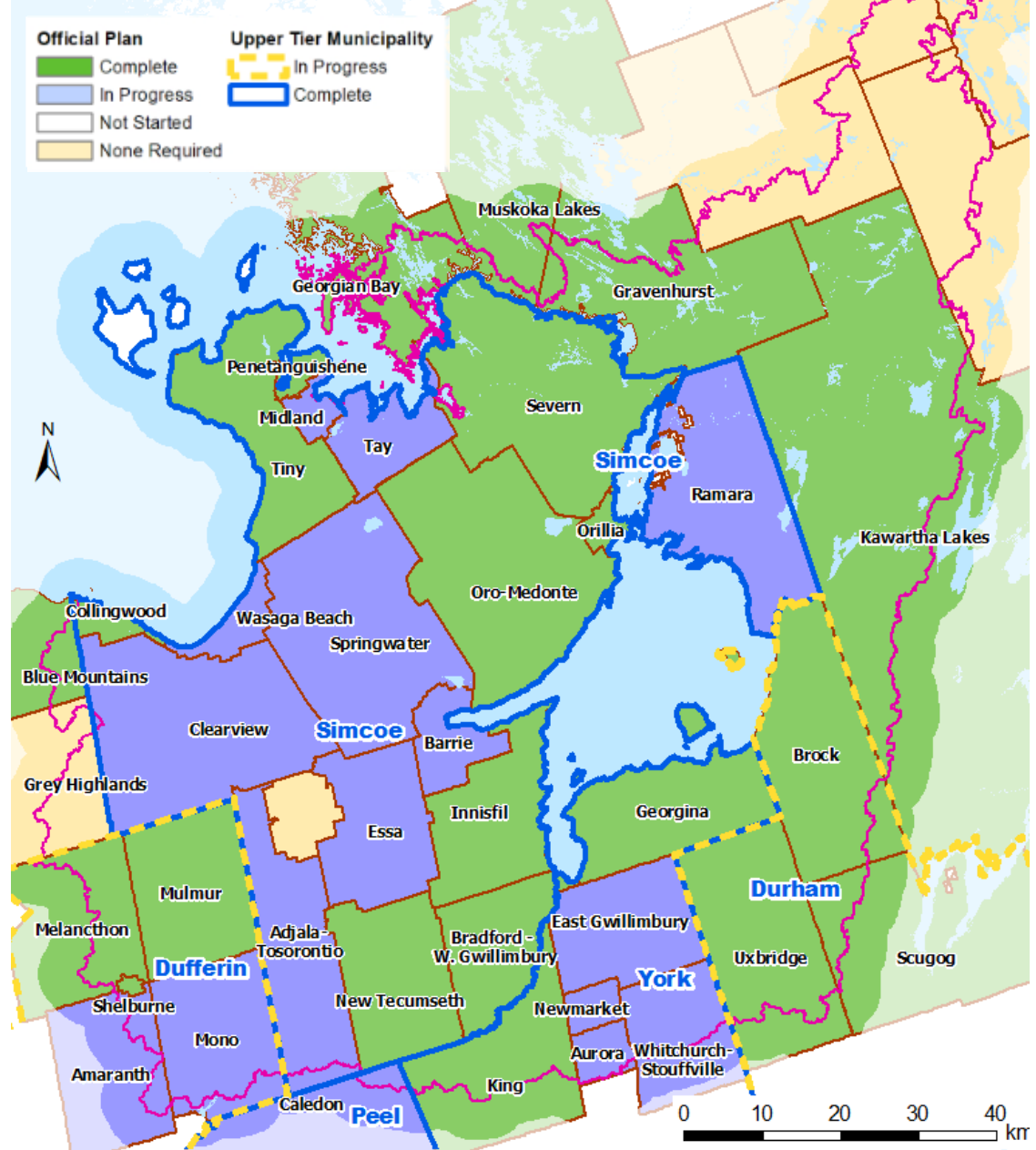
Risk Management Plans Progress to Date

Reporting Period	Number of Risk Management Plans Completed	Estimated Number of Risk Management Plans Required
Half of 2015	25	No Data
2016	32	691
2017	49	476
2018	72	360
2019	54	140
2020	19	119
2021	14	103
2022	6	92
2023	43	27
Total	314	



We have approximately 27 risk management plans left to negotiate.

Official Plan Updates Progress to Date



Potential Issues – Risk Management Plans

- There are 27 or fewer risk management plans, spread over 9 municipalities to complete before the July 1, 2024 deadline (2 months away).
- RMOs may need to issue orders for contravention of Section 58 (risk management plans) to landowners who are procrastinating or not cooperating.
- Orders will not negate the need for positive working relationships with landowners.



Solutions – Risk Management Plans

- Risk Management Officials have workplans in place to complete the remaining risk management plans by the July 2024 deadline.
- Risk Management Officials with risk management plans remaining to negotiate will be encouraged to issue orders to landowners who are procrastinating on risk management plan negotiation.
- Source Protection Authority staff will assist Risk Management Officials in completing outstanding risk management plans.
- Source Protection Authority staff will monitor progress on risk management plan completion closely and report back to the Source Protection Committee prior to the deadline.

Recommended progress score

The Source Protection Authority recommends that the Source Protection Committee provide a progress score of:

Progressing Well/On Target

on achieving source protection plan objectives this reporting period.

Progressing Well/On Target means the majority of the source protection plan policies have been implemented and/or are progressing in accordance with the timelines specified in the source protection plan.



**A clean glass of water starts
long before you turn on the tap**

Thank you!

Questions?

Melissa Carruthers,
Manager Source Water Protection,
RMO/RMI
Severn Sound Environmental Association
705-534-7283, ext. 205
mcarruthers@severnsound.ca



South Georgian Bay Lake Simcoe Source Protection Region

**Severn Sound Source Protection Authority (SPA)
Regular Meeting
April 25th, 2024**

STAFF REPORT

No: 04-24-SSSPA
Date: April 25th, 2024
To: Chair and Members of the SS SPA Board of Directors
From: Melissa Carruthers, Manager Source Water Protection, RMO/RMI
SUBJECT: **Drinking Water Source Protection Funding and Severn Sound Source Protection Authority (SS SPA) 2024 Q1 Update**

APPLICABLE STRATEGIC PLAN GOALS:

Goal 1: Sound Science

- Continue to offer exceptional services as the Source Protection Authority for Severn Sound
-

RECOMMENDATION:

RESOLVED THAT: Staff Report No. 04-24-SSSPA regarding an update on the status of Drinking Water Source Protection Funding and Severn Sound Source Protection Authority activities during Q1 of 2024 be received for information.

Purpose of Staff Report

Serves two purposes:

1. To provide an update on the status of Provincial drinking water source protection funding that is used to support the work of the SS SPA.
2. To provide an update on activities undertaken during the first quarter of 2024 by the SS SPA.

Background

Historically funding from the Province to support Source Protection Authority work has been primarily on a one-year basis. The last funding agreement was for two years, ending in March 2024, currently negotiating a potential three-year agreement. A draft work plan and budget were submitted to the Ministry of the Environment Conservation and Parks (MECP) in January 2024 through the lead Source Protection Authority in our region (Lake Simcoe Region Conservation Authority). With this funding application

MECP had added additional eligible items to be included with most across the province applying for the increased funding. So much so, that the program was approximately 34% over subscribed and all Source Protection Authorities across the province were asked to reduce their asks and resubmit. The resubmission took place mid-March and no further comment from MECP have been received to date.

Severn Sound Source Protection Authority 2024 Q1 activities:

- Submitted a draft 3-year workplan and budget to the Ministry of Environment, Conservation and Parks for Source Protection Authority work; negotiations are ongoing.
- Assisted seven of the SSEA member municipalities with completing their February 1st annual reporting deadline under the Clean Water Act.
- Continued to work on current and predicted water system changes within the Towns of Midland and Penetanguishene, and Townships of Tiny, Springwater, and Severn. Most notable, Cassell Drive in the Township of Springwater has moved into the pre-consultation period with implementing bodies.
- Gave a virtual “Drinking Water Source Protection 101 and What it Means to Realtors” presentation to The Lakelands Association of REALTORS®. Submitted and resubmitted a three-year work plan and budget.

Prepared by:

Original signed by
Melissa Carruthers, Manager
Source Water Protection, RMO/RMI

Approved for submission by:

Original signed by
Julie Cayley, Executive Director



South Georgian Bay Lake Simcoe Source Protection Region

**Severn Sound Source Protection Authority (SPA)
Regular Meeting
April 25th, 2024**

STAFF REPORT

No: 05-24-SSSPA
Date: April 25th, 2024
To: Chair and Members of the SS SPA Board of Directors
From: Melissa Carruthers, Manager Source Water Protection, RMO/RMI
SUBJECT: **Source Protection Plan Amendment Update**

APPLICABLE STRATEGIC PLAN GOALS:

Goal 1: Sound Science

- **Continue to offer exceptional services as the Source Protection Authority for Severn Sound**

RECOMMENDATION:

RESOLVED THAT: Staff Report No. 05-24-SSSPA amendments to the South Georgian Bay Lake Simcoe Source Protection Plan submitted to the Minister of Environment, Conservation and Parks be received for information.

Purpose of Staff Report

The purpose of this Staff Report No. 05-24-SSSPA is to provide an update to the Source Protection Authority Board of Directors on amendments to the South Georgian Bay Lake Simcoe Source Protection Plan that have recently been submitted for approval.

Background

Regulation 205/18 under the Safe Drinking Water Act requires that any amendments to municipal residential Drinking Water Works Licences and Permits be accompanied by an amendment to the appropriate Source Protection Plan. The intent of this regulation is to ensure that raw sources of municipal drinking water remain protected, even as drinking water systems change (or expand). As such, new or upgraded municipal wells or water treatment plants generally require new or revised Wellhead Protection Areas and Intake Protection Zones in Source Protection Plans which may lead to new restrictions associated with Source Protection Plan policies in those areas.

As a Source Protection Authority, we are responsible for ensuring these amendments are completed, and ultimately approved by the Minister of Environment, Conservation and Parks. The process we are directed to follow is a consultation-rich one, with engagement occurring with MECP staff, municipal staff and councils, implementing bodies, and affected local landowners. After completing that consultation, and drafting the amendment to the Plan, we are to submit to the Minister for approval.

Issues/Analysis:

At the July 26th, 2021 meeting, the Severn Sound Source Protection Authority Board delegated authority to submit such amendments to staff (Motion #2021-09), with a commitment from staff for annual updates on any such amendments submitted.

Over the course of the past year, Source Protection Authority staff has submitted to MECP one amendment to the Source Protection Plan for approval, as follows:

- Township of Oro-Medonte, to incorporate a third well at the existing Horseshoe Highlands drinking water system. This amendment was submitted in May 2023 and approved in April 2024.

Summary:

Working in partnership with the lead Source Protection Authority, the Severn Sound Source Protection Authority is responsible for ensuring that the Source Protection Plan is amended to account for new or expanded municipal drinking water systems. Over the course of the last year, one amendment to the source protection plan to address changes in local municipal drinking water systems was submitted to the Minister of Environment, Conservation and Parks for approval, and approved.

Prepared by:

Approved for submission by:

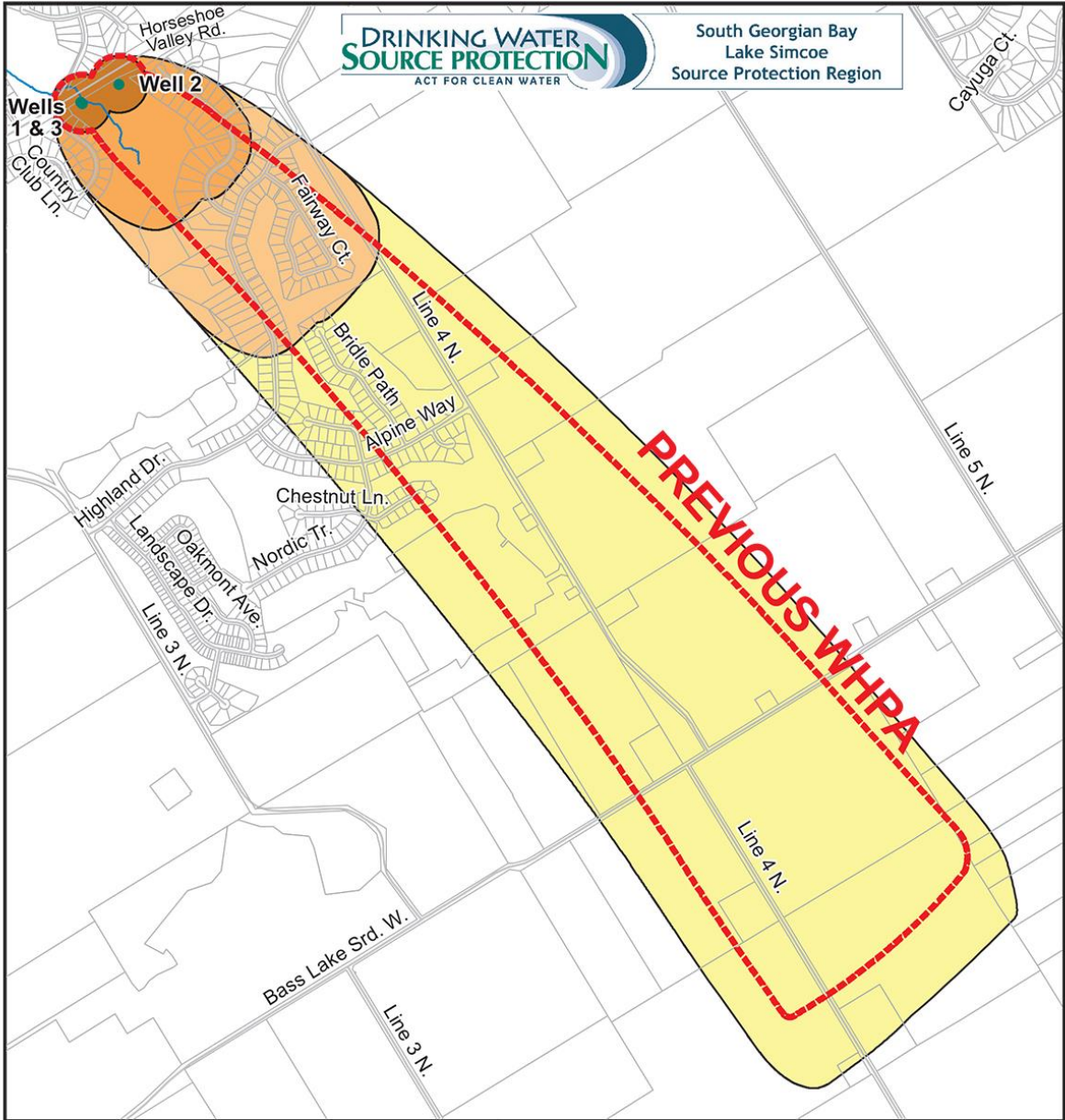
Original signed by
Melissa Carruthers, Manager
Source Water Protection, RMO/RMI

Original signed by
Julie Cayley, Executive Director

Attachments

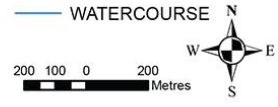
Revised wellhead protection area mapping

- A. Horseshoe Highlands drinking water system, Oro-Medonte



Legend

- ROAD
- PROPERTY BOUNDARY
- WATERCOURSE
- WELLHEAD PROTECTION AREA
- WHPA-A: 100 m RADIUS
- WHPA-B: 2-YEAR TIME-OF-TRAVEL
- WHPA-C: 5-YEAR TIME-OF-TRAVEL
- WHPA-D: 25-YEAR TIME-OF-TRAVEL



WELLHEAD PROTECTION AREAS - HORSESHOE HIGHLANDS

ASSESSMENT OF DRINKING WATER THREATS
 SELECTED MUNICIPAL GROUNDWATER SUPPLIES
 South Georgian Bay Lake Simcoe
 Source Protection Region

DATE: OCTOBER 2022 SCALE: 1:20,000

This map was produced for the South Georgian Bay Lake Simcoe Source Protection Region for the purposes of completing the South Georgian Bay Lake Simcoe Assessment Report. Base data have been compiled from various sources, under data sharing agreements. While every effort has been made to accurately depict the base data, errors may exist.



FIGURE
9a-1



South Georgian Bay Lake Simcoe Source Protection Region

**Severn Sound Source Protection Authority (SPA)
Regular Meeting
April 25th, 2024**

STAFF REPORT

No: 06-24-SSSPA
Date: April 25th, 2024
To: Chair and Members of the SS SPA Board of Directors
From: Melissa Carruthers, Manager Source Water Protection, RMO/RMI
SUBJECT: Potential Phase Out of Free Water Testing

APPLICABLE STRATEGIC PLAN GOALS:

Goal 1: Sound Science

- Continue to offer exceptional services as the Source Protection Authority for Severn Sound

RECOMMENDATION:

RESOLVED THAT: Staff Report No. 06-24-SSSPA regarding the potential phase out of free water testing be received for information and

FURTHER THAT: The SS SPA Board provide direction to staff in this regard.

Purpose of Staff Report

The purpose of this Staff Report No. 06-24-SSSPA is to provide an update to the Source Protection Authority Board of Directors on the potential phase out of free private well water bacteria testing and to seek the boards direction on this matter.

Background/Issues

The Auditor General's "Value-for-Money" Audit of Public Health Ontario (PHO) report released in December 2023 included a recommendation (number 5) that PHO, in conjunction with the Ministry of Health (MOH), are to update and implement a laboratory modernization plan within 12 months to streamline the laboratory's operations.

This stemmed from a 2017 proposal by PHO, collaboratively with the MOH at the request of the Deputy Minister to close six of the 11 public health laboratory sites (Hamilton, Kingston, Orillia, Peterborough, Sault Ste. Marie and Timmins) and gradually discontinue private drinking water testing. The justification:

- Mitigating rising costs of maintaining facilities
- Establishing a more efficient operating model that reduces the rerouting of samples to other PHO laboratory sites

Private water well testing is important in the Severn Sound watershed as only a portion of residents are on municipal water.

Summary

The Severn Sound Source Protection Authority staff are concerned about the potential phase-out of free water testing for private drinking water wells and the associated risk to public health. Private systems lack legislative protection and free testing reduces financial and logistical barriers for residents, enabling regular testing that helps ensure safe drinking water sources.

Prepared by:

Approved for submission by:

Original signed by _____

Melissa Carruthers, Manager
Source Water Protection, RMO/RMI

Original signed by _____

Julie Cayley, Executive Director

Attachments

- Ausable Bayfield Maitland Valley Source Protection Region – February 26th, 2023 – RE: Recommended Phase Out of Free Well Water Testing in the 2023 Auditor General’s Report
- 2. Halton-Hamilton Source Protection Region – April 12, 2024 – RE: Recommended Phase Out of Free Well Water Testing

February 26th, 2023

Honourable Lisa Thompson, Ontario Minister of Agriculture, Food and Rural Affairs

Via e-mail: lisa.thompsonco@pc.ola.org

Re: Recommended Phase Out of Free Well Water Testing in the 2023 Auditor General's Report

Dear Minister Thompson,

In the 2023 Auditor General's Value-for-Money Audit of Public Health Ontario (PHO) released in December 2023, recommendation number 5 states that PHO, in conjunction with the Ministry of Health (MOH), are to update and implement a laboratory modernization plan within 12 months to streamline the laboratory's operations.

https://www.auditor.on.ca/en/content/annualreports/arreports/en23/AR_publichealth_en23.pdf

This stemmed from a 2017 proposal by PHO, collaboratively with the MOH at the request of the Deputy Minister to close six of the 11 public health laboratory sites (Hamilton, Kingston, Orillia, Peterborough, Sault Ste. Marie and Timmins) and gradually discontinue private drinking water testing. The justification:

- Mitigating rising costs of maintaining facilities
- Establishing a more efficient operating model that reduces the rerouting of samples to other PHO laboratory sites

About 50% of the Ausable Bayfield Maitland Valley Region population is serviced by private wells. The proposed removal of PHO's free private drinking water testing is of concern to our Ausable Bayfield Source Protection Committee, particularly when Source Protection Regions have been directed by the Ministry of Environment, Conservation and Parks, Source Protection Branch, to deliver education and outreach to private well owners under the new Best Practices initiative.

In our region, we have been working with service and community organizations such as the Lions, Optimists and Lakeshore Residents Associations to co-host very successful Best Practices 'Water Wise' events that encourage private well owners to sample their drinking water using the free microbial testing provided by the province. By distributing water sample bottles ahead of the event and delivering the samples to Huron Perth Public Health for lab analysis, most of

the barriers to water sampling are removed. At these events 25% to 50% of a communities well water will be sampled in one day or night.

Well owners understand the importance of testing their well water; it is the inconvenience of doing so that is the barrier. One of the goals of the 'Water Wise' events is to encourage well owners to get in the habit of testing their water regularly as part of Best Practices for protecting their drinking water. The hope is that the community groups and service clubs that Source Protection staff work with will make Water Wise water sampling events part of their regular activities.

Private drinking water systems in Ontario do not have the legislated safeguards that are required for municipal/communal/public systems under the *Safe Drinking Water Act, 2002*. Only municipal water supply systems fall under the *Clean Water Act, 2006* and the Source Water Protection program. Health Canada's guidance on waterborne pathogens references three studies that determine that private systems are vulnerable and there is evidence that demonstrates they are more likely to contribute to gastrointestinal illness than public drinking water systems.

If the free water testing phase out recommendation is approved, well owners would have to use a commercial lab for a fee, which disincentivizes testing. When water is not monitored regularly, there is no way to know the true quality of the water, which puts people at increased risk of becoming ill. With private systems being stand-alone systems, any associated illnesses are isolated sporadic events and do not come to public attention like those seen during the Walkerton outbreak.

The private drinking water test data maintained by PHO has been used by researchers to publish evidence that helps support public health policy. Source Protection Committees can access data associated with their area, as was presented at our March 2023 meeting. The data can be used to inform well owners of regional water quality concerns and associated health risks. If PHO stops testing, this data and affiliated research will no longer be available.

In the Walkerton Inquiry Report Part 2, Justice O'Connor concluded the privatization of laboratory testing of drinking water samples connected directly to the *E. coli* O157:H7 outbreak in Walkerton Ontario in May 2000. Twenty-four years later, there is a proposal to privatize water testing once again.

At the January 31st meeting of the Ausable Bayfield Maitland Valley Source Protection Committee the following resolution was unanimously approved:

MOTION #SPC: 2024-02-04

Moved by Philip Keightley

Seconded by Mary Ellen Foran

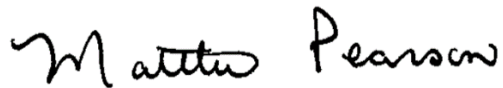
“THAT the Source Protection Committee direct a letter to Minister Thompson requesting that the province not proceed with the recommended phase out of free private well testing in Ontario, and

“FURTHER, THAT area municipalities, the Minister of Environment Conservation and Parks, the Minister of Health and Long-Term Care, other Source Protection Committees, and local health units be forwarded the letter and asked for their support. “

Carried.

Thank you for your consideration of this request.

Sincerely



Matthew Pearson

Chair

Ausable Bayfield Maitland Valley Source Protection Committee

Cc Honourable Sylvia Jones, Minister of Health and Long-Term Care
Honourable Andrea Khanjin, Minister of the Environment, Conservation and Parks

Municipalities of Adelaide Metcalfe, Ashfield-Colborne-Wawanosh, Bluewater, Central Huron, Goderich, Howick, Huron East, Lambton Shores, Lucan Biddulph, Mapleton, Middlesex Centre, Minto, Morris-Turnberry, North Middlesex, North Perth, Perth South, South Bruce, South Huron, Warwick, West Perth, Wellington North
Townships of Huron-Kinloss and North Huron

Huron Perth Public Health, Lambton Public Health, Middlesex-London Health Unit, Wellington Dufferin Guelph Public Health

Source Protection Regions: Cataraqui; Central Lake Ontario, Toronto, Credit Valley; Essex; Hamilton Halton; Grey Sauble, Saugeen, Northern Bruce Peninsula; Lake Erie; Lakehead; Mattagami; Mississippi-Rideau; Niagara; North Bay; Quinte; Raisin South Nation; Sault Ste. Marie; South Georgian Bay Lake Simcoe; Sudbury; Thames -Sydenham and Region; Trent Conservation Coalition

April 12, 2024

The Honourable Andrea Khanjin, Minister of the Environment, Conservation and Parks
The Honourable Sylvia Jones, Minister of Health

Via email: minister.mecp@ontario.ca
sylvia.jones@ontario.ca

RE: Recommended Phase Out of Free Well Water Testing

Dear Ministers,

The 2023 Auditor General's audit of Public Health Ontario (PHO) recommends that PHO, in conjunction with the Ministry of Health, update and implement a plan to streamline public health laboratory operations. In response, the Halton Hamilton Source Protection Committee passed the following resolution at their meeting on March 19, 2024:

***THAT** the Halton-Hamilton Source Protection Committee direct staff to write a letter to the Minister of the Environment, Conservation, and Parks, the Minister of Health, area municipalities, other Source Protection Committees and local health units requesting that the province does not proceed with the recommended phase out of free private well water testing in Ontario.*

The Halton Hamilton Source Protection Committee is concerned about the proposed phase-out of free water testing for private drinking water. Approximately 50,000 residents in the Halton Hamilton Source Protection Region rely on non-municipal water sources, like private wells, which lack legislative protection. Free testing reduces financial and logistical barriers for residents, enabling regular testing that helps ensure safe drinking water sources. The committee urges the province to not proceed with the phase-out, as outlined in the attached March 19, 2024 committee report.

Yours truly,



Robert Edmondson
Chair, Halton-Hamilton Source Protection Committee

Cc. Source Protection Committee Chairs and Program Managers
City of Hamilton Public Health
Halton Region Public Health

City of Hamilton, Town of Grimsby, Niagara Region, Township of Puslinch, County of Wellington, Halton Region, City of Burlington, Town of Halton Hills, Town of Milton, Town of Oakville, Peel Region, City of Mississauga

Report To: Halton-Hamilton Source Protection Committee
Report No.: SPC-24-03-09
From: Martin Keller, Senior Manager, Watershed Planning and Source Protection
Date: March 19, 2024
Subject: 2023 Auditor General Report – Proposed Phase Out of Free Well Water Testing

Recommendation

THAT the Halton-Hamilton Source Protection Committee receives for information the staff report SPC-24-03-09 2023 Auditor General Report – Proposed Phase Out of Free Well Water Testing;

AND THAT the Halton-Hamilton Source Protection Committee direct staff to write a letter to the Minister of the Environment, Conservation, and Parks and the Minister of Health requesting that the province does not proceed with the recommended phase out of free private well water testing in Ontario.

Executive Summary

The 2023 Auditor General’s Value-for-Money audit of Public Health Ontario (PHO) recommended that PHO, in conjunction with the Ministry of Health, update and implement a plan to streamline public health laboratory operations. The plan included gradually discontinuing free private drinking water testing. The proposed phase out of free water testing for private drinking water is of concern. Private systems are not protected through legislated requirement under the *Safe Drinking Water Act, 2002*, and *Clean Water Act, 2006*, but are more likely to contribute to cases of gastrointestinal illness than municipal systems. In the Halton Hamilton Source Protection Region, about 50,000 resident do not receive water from municipal systems, with many relying on private drinking water system, including wells. Currently, both the City of Hamilton and Halton Region offer free well water testing. In 2012, a quarter of all samples from private residential wells and cisterns in Hamilton had unsafe levels of bacteria. Free private well water testing reduces barriers for residents to regularly test their wells. If implemented, the proposal to privatize well water testing will increase the risk for residents on private systems becoming ill.

Report

In December 2023 the Auditor General released its [Value-for-Money Audit of Public Health Ontario \(PHO\)](#). The audit, among other items, found that PHO’s laboratory sites were not operating efficiently. In 2017, PHO developed a plan collaboratively with the Ministry of Health to modernize its laboratory operations by consolidating resources into

fewer laboratory sites and discontinuing or restricting eligibility for certain tests. This plan has not been approved and implemented. According to the audit, implementation of this plan was put on hold due to the construction of the new London public health laboratory, as well as increased capacity required from all PHO laboratory sites for COVID-19. Audit recommendation #5 states that PHO, in conjunction with the Ministry of Health, should update and implement a plan within 12 months to streamline public health laboratory operations.

The 2017 plan proposed to gradually close six of the 11 public health laboratory sites (Hamilton, Kingston, Orillia, Peterborough, Sault Ste. Marie and Timmins) and changing the types of test offered at the PHO laboratory sites, including gradually discontinuing free private drinking water testing. Mitigating rising costs of maintaining facilities and establishing a more efficient operating model that reduces the rerouting of samples to other PHO laboratory sites are stated as the main reasons for the plan.

The proposed phasing out of free private drinking water well testing is of concern. Private drinking water systems do not have the legislated safeguards that are required for municipal, communal, and public systems under the *Safe Drinking Water Act, 2002*. Neither are the water sources of private drinking water systems protected through the source protection program under the *Clean Water Act, 2006*. Under the *Clean Water Act, 2006*, only municipal drinking water systems are mandated to be included in the source protection program. According to Health Canada's guidance on waterborne pathogens, private and small community water systems are vulnerable and recognized as being more likely to contribute to cases of human gastrointestinal illness than municipal systems.

In the Halton Hamilton Source Protection Region, 95% of the population receive their drinking water from municipal systems. The remaining 5%, or about 50,000 residents, receive their drinking water from non-municipal systems, many of them private drinking water wells. Testing of private well water is one of the only avenues for residents on private systems to ensure their drinking water is safe. Well water testing of private wells is the responsibility of each well owner. Currently, both the City of Hamilton Public Health Services and Halton Region Public Health offer free private drinking water testing through the PHO Hamilton laboratory site. The City of Hamilton Public Health Services recommends testing at least three times a year for bacteria. In 2012, about a quarter of all water samples from private residential wells and cisterns in Hamilton had unsafe levels of bacteria.

Free private well water testing is important to reduce barriers for residents to test their wells on a regular basis. Without free water testing, well owners would need to use commercial labs for a fee, which disincentivizes testing. Without regular testing, water quality is unknown, and residents are at increased risk of falling ill.

In the Walkerton Inquiry Report Part 2, Justice Dennis O'Connor concluded the privatization of laboratory testing of drinking water samples contributed directly to the E. coli O157:H7 outbreak in Walkerton, Ontario in May 2000. Twenty-four years later, there is a proposal to privatize water testing once again.

Signed & respectfully submitted:

A handwritten signature in black ink, appearing to read "MKeller".

Martin Keller
Senior Manager, Watershed Planning and Source Protection

A handwritten signature in black ink, appearing to read "MBergen".

Mardi Bergen
Source Water Information Coordinator, Watershed Planning and Source Protection