



Heather Malcolmson
Director, Source Protection Programs Branch
Ministry of the Environment and Climate Change
Foster Building 14th Floor
40 St Clair Ave W.
Toronto, ON M4V 1M2

January 25, 2018

Dear Heather,

RE: **Source Protection in Rural and Northern Facilities**

During this time of policy change and potential program expansion, the Chairs generally voiced concerns that the Source Protection Program ought to be expanded and adapted to ensure that vulnerable populations (in certain types of facilities) in southern Ontario and in many more areas in northern Ontario (where there are no conservation authorities covered by the *Clean Water Act*) are protected.

It is the concern of many Chairs that the multiple barrier concept implemented in southern Ontario capturing municipal water supplies, has not been extended to vulnerable populations in other situations.

It has been our experience that there is a risk to public health evident in community clusters served by individual wells and private sewage systems. It is recognized that municipalities have the legal power to impose source protection in these rural areas but as Justice O'Connor said in the Walkerton Report, there are many municipalities that simply cannot afford to pay for this protection and will require subsidy.

In many rural and northern areas, outside of conservation authority boundaries, the cost of doing detailed source protection planning could be well beyond the financial capability of the municipality.

In southern Ontario, facilities in rural areas such as seniors' homes and schools, although subject to inspection by public health authorities, have no requirement that they be assessed to ensure that their water supplies are not at risk from activities on adjacent lands. The establishment of new institutions of this nature should be required to undergo risk assessment as required by the *Clean Water Act* and regulations. In addition, there should be a program established whereby all of these facilities throughout the province are identified and there be a requirement that a process

of source protection planning be put in place for each of these facilities on a retroactive basis. In many cases, this may require that special funding be made available through provincial grants to cover technical evaluations and the preparation of a source protection plan for each facility.

Now that changes and adjustments are being made to the policies and potentially to the source protection legislation, it is the sentiment of the Chairs that this is an opportune time to consider the development of guidelines and the establishment of a program, including funding, to extend protection offered by the *Clean Water Act* to an even greater number of the most vulnerable citizens of Ontario.

This letter is being forwarded with the endorsement of Source Protection Committee Chairs Jim Hunt, John Williamson, Ken Graham and the undersigned. We would be pleased to discuss this with you further at your convenience.

Yours very truly,

A handwritten signature in black ink, appearing to read "M.G. Christie". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

M.G. (Max) Christie
Chair, Quinte Source Protection Committee Chair

cc: Source Protection Committee Chairs