

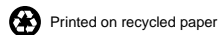
**Summary Report:
Consultation Sessions on the White
Paper on Watershed-based Source
Protection Planning**

March 1st to 23rd 2004

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Summary Report:
**Consultation Sessions on the White Paper on Watershed-based
Source Protection Planning**
March 1st to 23rd 2004

On February 12, 2004, the government released a White Paper on watershed-based source protection planning. The White Paper describes the proposed planning components of source protection legislation, including the process for preparing plans, roles and responsibilities, and the associated approval process. The White Paper also describes the government's intent to undertake improvements to the Permit to Take Water program as well as to consult with stakeholders on the principles and factors involved in charging for water.

The Ministry is consulting with stakeholders on the content of the White Paper through two mechanisms.

On February 12, 2004, the White Paper was posted on the environmental registry for a 62-day comment period. Any organization or member of the public may submit written comments on the White Paper to the Ministry of the Environment until April 14, 2004.

During the month of March, the Ministry also held a series of eight targeted consultation sessions across the province. A wide range of stakeholders were invited to attend the consultation sessions, including municipalities, conservation authorities, local health units, NGOs, industry (mining, water bottlers, aggregate producers, forestry), agriculture, First Nations and the public.

The purpose of this report is to provide a consolidated summary of the comments heard from stakeholders at the regional consultation sessions.

Regional Consultation Sessions:

- A total of 287 stakeholder representatives attended. Sessions were held in:
 - London, March 1st, 36 attendees;
 - Kitchener, March 2nd, 40 attendees;
 - Peterborough, March 4th, 35 attendees;
 - Kingston, March 5th, 23 attendees;
 - Ottawa, March 8th, 28 attendees;
 - Thunder Bay, March 10th, 14 attendees;
 - Sudbury, March 12th, 26 attendees; and,
 - Toronto, March 23rd, 85 attendees.
- At the sessions, stakeholders were divided into smaller groups to provide feedback on the content of the White Paper. Smaller groups allowed time for all participants to comment and for the comments to be recorded.

To help organize comments from stakeholders the Ministry prepared four sets of questions dealing with different aspects of source protection - the planning process, legislation, local representation, and water taking. Each set of questions contained 3 or 4 questions for a total of 15. Participants spent approximately 1 ½ hours providing comments on a set of questions before proceeding to the next set. While the purpose of the questions was to organize comments, the questions were worded broadly so as not to confine comments on an aspect of source protection. The questions are contained in Appendix 5 of the White Paper.

The responses that were received to the questions are summarized in the following pages. The Ministry has grouped the responses received for each question into sub-headings. The following does not include any individuals, but is a consolidation of all comments received.

Planning Process:

Question 1 – What are the advantages and disadvantages of this proposed approach to source water protection?

Watershed

- The watershed-based approach is fundamental to the success of source protection planning. Integrated ecosystem-based watersheds should be base of source protection planning.

Municipalities

- Proposed approach is positive and inclusive. Approve of the bottom-up process, and the goal of attaining 100% municipal resolutions.
- Some stakeholders felt that the proposed 100% municipal resolution goal is a disadvantage, which would result in watered-down plans to achieve consensus (“lowest common denominator”). 100% agreement counterproductive to process. Requiring “substantial majority” would be sufficient – 75-85%.
- Some stakeholders felt that the proposed 100% municipal resolution goal may give the impression that municipal approval of plans is more important than the views of other stakeholders. Proposed approach creates an imbalance for stakeholder in the make-up of the SPPC (in favour of municipal interests).
- Consensus will be difficult to achieve with multi-stakeholder approach:
 - must allow for disagreement without holding-up process; and
 - local values will differ.

Boundaries

- Watershed boundaries are not politically delineated, yet many decisions required during the planning process would be of a political nature, which may lead to conflict. A process needs to be established ahead of time for conflict resolution.
- Proposed approach unclear on how inter-jurisdictional issues will be addressed. MOE will need to be better linked to other levels of government (Federal government, Municipal, other ministries, the U.S.).

Governance

- Proposed approach is a disadvantage, as it creates more levels of bureaucracy which will be inefficient (too bureaucratic/complicated) – a model that centralizes accountability (MOE or provincial government), should be established instead.
- Concerns that it is counterproductive to develop planning aspects of source protection prior to implementation and funding details being made public.
- A lead CA will have difficulty properly representing the interests of all CA's within a watershed planning region, and potentially create conflict between CA's (need clear process on how lead CA is selected).
- Fewer resources are available in the North for the SPPB and the Source Protection

Planning Committee (SPPC). SPPC composition was said to be onerous for the North, presenting geographical and financial challenges, while not capturing the unorganized areas.

- Most watersheds in northern Ontario are secondary, while the south is mainly delineated into tertiary watersheds. Geographic scale could become an issue for Northern CAs.

Roles/Responsibilities

- Approach as described does not clearly define the roles and responsibilities of those involved. Establishing roles and responsibilities early on will help ensure an open and transparent process, and help avoid conflict. Need to clarify the roles and responsibilities of the different levels of municipalities (regional vs. local).
- Role of industry in process as described in the White Paper is unclear. There is a need to ensure proper industry representation in all stages of the planning process, as impacts of source protection plans will have important financial implications, both for some industries and the communities they operate in.

Funding

- Approach as described does not adequately address how source protection will be funded. The province should fund all planning aspects of the process.
- Adequate funding mechanisms need to be arrived at ahead of time, none apparent at this time. This will ensure success for the process – otherwise, process will lead to regions being out of compliance for lack of resources. Funding mechanisms need to have sufficient flexibility to meet local community needs/circumstances.
- Municipal tax base in many areas will be insufficient to fund the source protection planning process (provincial funding will be required).
- Proposed approach raises concerns that the various planning areas may dilute the already scarce availability/apportionment of resources.
- Conservation Authorities are already severely under-funded, which is particularly true in the north. Will need to introduce more funding for CAs in order for proposed approach to be successful.

Data/Science

- Proposed process will be a disadvantage, will be difficult to ensure consistent science across the region – existing data collection is done to different levels from watershed to watershed.
- Quality and quantity of scientific data available in the north is sparse (e.g. 1-20,000 mapping). Need process to renew northern data.

Building on Existing Work

- Proposed approach is advantageous, as it builds on work currently being done (e.g. groundwater studies, watershed-based approaches of CAs).

Process

- Proposed approach will overlap with current municipal planning process, and may create conflicts with the municipal zoning process.

Areas Not Represented by CA

- Some areas outside CAs (e.g. Haliburton) need governance model to ensure ability to participate in the process, and have effective representation on various committees/boards.

Question 2 – Are there specific improvements that you would make to the proposed source water protection assessment or planning process?

Guidance

- Need templates/guidelines for all steps of source protection planning – to ensure that all watersheds are on the same page at the start of the process.
- Guidance should be provided by province to provide opportunities for discussion between SPPBs (SPPCs and all other sub-committees) – legislation has to ensure open/transparent process for sharing data and draft plans.
- Proposed approach needs to be tested with pilot projects, to work out the bugs and clarify roles and responsibilities before proceeding to province-wide mandatory planning. Northern stakeholders said it would be important to run pilot projects geared toward northern Ontario as well as in the south.
- Need clear process on how to create a Source Protection Planning Board (SPPB) in the north (often no CAs) and even fewer resources are available.

Process

- Implementation issues and mechanisms need to be identified up front, in conjunction with planning details, as well as the roles and responsibilities of all those involved.
- A review process, as proposed in the Advisory Committee report, needs to be included.
- Each area will need different approaches to address local differences (in geology, industry, and population density). The terms of reference will be critical to ensuring the planning process is successful.
- End result must be municipally driven but based on provincial legislation and funding.

Scope

- The Provincial Policy Statement should be strengthened to reflect source protection planning.
- Need an immediate freeze on development proposals, until source protection legislation receives royal assent.
- Ensure waste management (landfills) considered in process.
- Farm plans need to be taken into consideration – farmers should be faced with one requirement only, duplication needs to be avoided (particularly duplication of work

undertaken under the *Nutrient Management Act*). Funding should also be provided for farm plans.

- Need to categorize intensive livestock operations as an industry (not agriculture) – and treat waste accordingly.

Data/Information

- SPPC should be accountable for ensuring that information is made freely available throughout the planning process. SPPCs should be required to document how they made information available in consultation process.
- Province needs to provide a provincial technical team (provincially funded), which would provide scientific/technical expertise for the source protection planning process.
- More focus should be placed on technical issues (contaminants, water budgets, etc). Plans must be science based, not politically driven.
- Concern that precautionary principle could result in unwarranted actions – all decisions on required actions need to be based on sound science.
- Source protection planning presents an opportunity for education. A multi-media education campaign should be launched right away to make people across to province aware of the issue (this would help get public/industry buy-in, and help motivate high-impact early results, to build support). Education must be on going, long-term, focusing on individual responsibilities toward sustainable water resources.

Funding

- Adequate funding for the collection of technical information will need to be provided, to ensure consistency of data and analysis. Pilot projects should be established to determine level of funding that will be required.
- Priority and impact of risks in a watershed should be the focus of any funding mechanism.
- Where possible, source protection planning should be self-funded, to ensure efficient use of resources.
- Compensation should be required where land-uses will be required to change (e.g. if wellhead protection zones need to be increased).

Boundaries

- All Ministries, as well as all levels of government (federal, provincial and municipal) will need to coordinate efforts for both planning and implementation of source protection.
- A process should be developed for the province to empower municipalities to monitor discharges within their jurisdiction – data collected would then be provided to the SPPC for planning purposes.
- Relationships with First Nations need to be worked-out ahead of time, to ensure more inclusive planning. Resources and alternative means of representation (e.g. federal government) need to be determined to ensure adequate First Nation participation.

- Province needs to establish means to promote Ontario's approach to source protection planning (SPP) with other governments (federal, U.S.).
- Need mechanism/approach to deal with across boundary effects/impacts (e.g. watershed boundaries that fall within two or more jurisdictions, or flow into another jurisdiction).
- Great Lakes need to be more thoroughly considered in the planning process. Need to better recognize Great Lakes as a major source of drinking water within plans. Given the international nature of the Great Lakes, other jurisdictions (federal/U.S.) will need to be involved in the process.
- A method of equalizing relationship with border states will need to be arrived at (e.g. getting sign-off through IJC), to ensure source protection planning will not result in economic disadvantage for communities bordering the U.S. (i.e., need to ensure requirements are not less stringent in the U.S.).

Question 3 – What criteria should the Ministry of the Environment use to decide whether to approve a source water protection plan?

Content

- A broad range of risks, both short and long-term, should be looked at during the planning process. Range and type/priority of risks, as well as source (e.g. industry, agricultural) of risks for the watershed should be clearly identified within each plan.
- Plans should identify areas where further research is needed – and province should ensure adequate funding for this research to be undertaken.
- Plans should be flexible enough to deal with unique local watershed concerns. Plans should also have the flexibility to make changes down the road if required.
- Proposed plan should show that it is financially responsible/achievable. The plan should demonstrate long-term viability.
- Plan should be cognizant of potential impact on jobs – and ensure that the impact remains job-neutral.
- Plan should demonstrate that it is science-based (with peer review), prior to being approved.
- MOE should not scrutinize content of plan, unless there is a direct threat to human health.
- Plan needs to:
 - have stewardship mechanisms;
 - have shoreline management;
 - have measurable targets;
 - ensure ecological functions maintain;
 - have a sustainability – long-term focus;
 - meet technical standards;
 - have local approval in place;
 - demonstrate it can realistically (e.g. financially viable at ratepayer level) be implemented;

- be defensible to legal challenge;
- addresses cumulative impacts;
- yield desired outcome of protection of source water – quality objectives achieved;
- have a mandated review and updating process;
- identify relevant monitoring process, based on baseline data relevant (know pollutants in watershed) to watershed;
- build in long-term monitoring process, ongoing, long-term data collection and analysis – funding model built to support; and
- tailor criteria to local conditions.

Process

- Proper guidelines need to be provided ahead of time, for the required content of the Terms of Reference (ToR), as well as the required technical content of the plan. This would greatly facilitate the approval process once a plan is submitted. Approved ToR should be used as a guideline to facilitate approval.
- Need clarification on whom will ultimately approve the plan, and more importantly who will provide advice on whether or not to approve it.
- A professional geoscientist should be required to sign-off on plans.

Local Involvement

- When approving a plan, the province should take into consideration whether or not 100% municipal resolutions are achieved. 100% should carry significant weight with province when deciding whether or not to approve a plan.
- 100% municipal resolutions should be limited to municipalities who have a responsibility for production and distribution of clean water.
- Having municipal politicians involved in the approval process would help ensure local buy-in.
- Need to ensure the province evaluates any discrepancies across watershed boundaries, to ensure there is equity across the province. Need to examine equity issues within and between plans.
- Ongoing Ministry involvement throughout the process will facilitate approval (ensuring potential difficulties are dealt with in a timely manner).

Question 4 – What should happen if a source water protection plan is not completed in a timely way (e.g. fails to meet timelines as set out in regulation)?

Provincial Lead

- Province should takeover process if plans not completed on time.
- Bottom up approach may make decision making difficult, unwieldy, and make timelines difficult to meet. Source protection should be directed in a more top down approach, by the province (e.g. landfill example suggests SP should be directed from higher level).
- If province steps in, a process must be built in to allow stakeholders to become involved again at a future date should they become able to.

- Province must drive process with clearly defined roles and responsibilities for all those involved (willingness to participate will vary).
- Clear accountability needs to be defined, for timelines and implementation to be handled in a timely manner (province should ultimately be accountable).

Proactive MOE Involvement

- Provincial staff involvement should be consistent and supportive throughout process to ensure plans completed in a timely manner (rather than taking over at the first sign of trouble).
- Province should set key milestones/achievements throughout process to help SPPC and SPPB manage time and resources. Funding (for planning as well as implementation) should be tied to the completion of these milestones. Province should also provide a process for resolving delays that may occur, and provide support (staff, funding, etc) to help resolve delays.
- Need to prepare a detailed default mechanisms/process at all steps of planning ahead of time, to ensure planning continues on schedule.

Flexibility

- Will need flexibility in timing due to varying information/data, and resource (funds and staff) availability from watershed to watershed.
- Need appropriate time frames for implementation of different aspects of source protection planning (e.g. bacteria at beaches exceeding health standard). Strategy needs to be developed for longer-term work items/issues, while dealing with priorities first.
- Process should look at ORMCP example in setting timelines (e.g. short timeframes, impacted quality).
- Planning process should build on existing work to promote more timely completion of plans.
- Areas having difficulty completing plans on schedule should be teamed with more successful ones, to get process back on track.
- Timelines should be flexible, and based on priorities within the watershed, not arbitrarily set by province.
- A staged approach with clear milestones will ensure manageable timelines, and plans produced on time.

Funding

- Funding will be critical to completing plans in a timely manner, province needs to ensure proper funding is provided ahead of time to ensure deadlines are met (needs will be different across the province).
- Need sufficient funding to support the planning process, which will ensure that plans are prepared in a timely manner, by qualified professionals.

- MOE should provide incentives based on performance (e.g. financial) instead of punishment for not meeting deadlines.

Legislation:

Question 1 – Should any changes to the scope of source water protection legislation be made (provide details)?

Coordination

- Nutrient management is part of source protection, any source protection legislation will have to take into account and coordinate with requirements under the *Nutrient Management Act*.
- Legislation will need to take into account the range of programs/legislation (including federal) already in existence, to avoid creating duplication of work/costs. Legislation must clearly demonstrate how it will relate to/integrate with other legislation.
- MOE should take a role in regulating septic systems under source protection legislation.

Flexibility

- Legislation should provide flexibility to join/link watersheds for plan development/assessment where necessary. Legislation should also recognize the varying states of readiness across the province.
- Legislation needs to be clear that sub-committees and working groups can be established to accommodate specific and unique needs of watersheds.

Science/Standards

- Legislation requirements for source protection planning must be science-based.
- Discharge standards should be part of source protection legislation. Province should establish discharge standards for municipalities/industry to support source protection.
- Need to clarify/determine how health standards will fit into source protection legislation. Need to consider both acute and chronic health effects of contamination in drinking water.
- Legislation should have a provision that allows for periodic review of technologies/standards used for source protection, to ensure plans stay current.
- Legislation/regulations should ensure water is returned in better quality than when it is taken.
- Ensure water budgets are mandated in legislation.
- Legislation should require that water go back to where it is taken in the watershed.
- Specific details should be provided in regulations to allow for changes to be made more easily (e.g. components of assessment threats that must be addressed).

Boundaries

- Need for legislation to ensure townships are part of source protection plan development and implementation (i.e. non-point sources - e.g. septics)
- Legislation should clearly distinguish between regional boundaries and watershed boundaries.

Clarity/Roles and Responsibilities

- Legislation will need to include clear/specific compliance and enforcement provisions.
- Province needs to clearly describe approval process in legislation (roles and responsibilities).
- Legislation must clearly describe the purpose of plans, as well as the responsibilities of municipalities / CAs / stakeholders / and the province (who does what).
- Legislation should clearly apply to home uses/activities (e.g. fertilizers, snowmelt).
- Legislation needs to clearly layout a process for areas not covered by CAs.

Focus of Legislation

- Water conservation should be mandated in legislation as a component in all source protection plans.
- Legislation should recognize the wide range of water uses other than drinking water. A broader ecological focus is needed (integrity of ecosystem, not just drinking water).
- Legislation should place emphasis on drinking water first and foremost – other issues (broader conservation issues) will be dealt with indirectly by ensuring safe drinking water.

Implementation

- Those who will be faced with implementing source protection plans must be at the table during the planning phase (implementation impacts must be considered at planning stage).
- Legislation should have component regarding ongoing monitoring, compliance and implementation.

Communication

- Legislation should set requirement to hold public meetings during plan development.

Funding

- Other ministries should be included in legislation (MNR, MNDM, OMAF), to participate and provide funding for source protection planning in areas which are traditionally dealt with by other ministries.

Who Owns the Water?

- A clear statement of “ownership” of water as a resource is needed in legislation. The province should own water.

Outcomes

- Legislation should focus more on the outcomes of source protection planning (focus on results, not process).

Scope

- Legislation needs to address the Great Lakes. The Great Lakes are the main source of drinking water for over 70% of the province. A Great Lakes agreement/programs should be required by legislation.

Education

- Education aspect will be crucial to the success of source protection, and so should be built into legislation.

Authority

- CAs will need authority over local municipalities, will need to supersede or amend the *CA Act*.

Question 2 – To make sure that source water protection legislation can achieve its objectives (the protection of public health) should there be a specific primacy provision in the legislation (i.e. primacy means that the law would take priority over other laws when there is conflict)?

Primacy

- Existing requirements under other legislation (e.g. *planning act*) may not provide adequate protection to human health, source protection legislation will need to have primacy where this is the case. Primacy is needed for the protection of human health (i.e. human health would always take precedent to economic development)
- SP Legislation should supersede other legislation where public health is at issue; focus of SP is too narrow however, it should encompass more than public health, and also address water resource management/ecosystem.
- The *Health Protection and Promotion Act* has primacy provision re health. This needs to be taken into consideration when determining primacy provisions for source protection legislation.
- Where requirement of source protection are in conflict with another Act, source protection should have primacy.
- Primacy is needed to help guide local decision making, by eliminating conflicting requirements between existing legislation and source protection legislation.
- Primacy needed to ensure implementation happens in a coordinated and consistency fashion.
- Source Protection should have primacy over the *Nutrient Management Act*.

- Primacy should be considered at the local level and as part of the water allocation plan.
- Primacy should be considered in re-charge areas to prevent development – without exception.
- Source protection legislation should have primacy over land-use decisions.

Conditional Primacy

- Supremacy of Legislation is unclear in process. Primacy will need to be clearly defined, and the new act will need to be well coordinated with other related legislation (e.g. *Nutrient Management Act, Planning Act*).
- Co-ordination between ministries needed to ensure all linkages to source protection are considered under existing legislation (for which other Ministries currently have responsibility).
- Primacy must consider science and circumstances of the watershed – time will be required to develop adequate information to inform whether or not primacy is needed.
- A review board should be established to decide where primacy needs should be applied.

No Primacy

- There should be no primacy provisions within the legislation. Source protection should have “regard for” or “be consistent” with other legislation (e.g. sec. 71 of *Planning Act*), not have primacy.
- Achieving balance with other legislation would be too difficult; source protection planning will affect a wide range of existing legislation. Existing legislation should be amended instead.

Other

- Source protection legislation should not usurp the municipal planning process. There is concern that primacy will limit municipal powers (e.g. land use planning) therefore limiting ability to for municipalities to govern.
- Mining and other natural resource industries are governed by provincial and federal legislation; source protection legislation must take this into consideration, cannot have primacy over federal legislation.

Question 3 – How can source protection planning best achieve a balance between achieving some consistency across the province and the need for flexibility to deal appropriately with local conditions and priorities?

Equity

- Equity between land sources of drinking water and Great Lakes. Great Lakes users should be included in the source protection planning process, or be faced with equivalent requirements.

Funding

- Consistent funding from province will help with consistency of assessment and plans.

Flexibility

- Local interests must be adequately represented in source protection work, to ensure flexibility to represent local conditions, while maintaining consistency.
- Put as much as you can in regulation so they can be changed as process unfolds if necessary.
- Should allow for flexibility in terms of timelines (some more capable of completing plans quickly).
- Sharing of information across watersheds will ensure flexibility and consistency.

Clarity

- Clear requirements for the terms of reference should help to provide consistency.
- Need to clearly define (early) what source protection plans are and will require for implementation. This will help with all other decisions, and with consistency.
- Comprehensive set of criteria for planning is needed to help SPPCs and SPPB accommodate a wide range of circumstances that may occur in watersheds.

Prioritizing

- Legislate/regulate only where enforcement is important/critical – other areas should receive guidance only, which would help provide flexibility.
- A thorough risk assessment should be completed first, which would allow prioritizing for implementation, and balance and flexibility from watershed to watershed.

Outcome

- Flexibility required for technical assessment and tools – each will meet requirements in a different way (“Tell us what you want and let us find ways”). Focus on outcome(s) not process to get there.
- Desired outcomes need to be clearly defined, in order to ensure consistency across province.
- Minimum requirements for source protection plans and terms of reference (ToR) should be mandated in legislation – outcome specified, but not processes, which allows for flexibility.

Terms of Reference

- Province should review the ToR, and the source protection plan, as an assurance of consistency.
- Content of ToR should be flexible enough to allow SPPC to deviate where necessary according to local circumstances.

Standards

- Provincial models and standards for source protection planning must be in place before local implementation to ensure consistency across the province.

- MOE should work with local stakeholders to develop source protection plans. MOE has the authority and the experience, and so would provide consistency across the province.
- Legislation should define major (local and regional) Source protection planning components (e.g. WHPAs, recharge areas), minimum standards and then allow flexibility for local to deal with unique circumstances.
- Need better definition of technical and scientific roles of SPPB/SPPC – definition of roles/responsibilities of all participants, including ministries, to ensure consistency across the province.
- Minimum standards (for all aspects of source protection planning) need to be identified early, in order to ensure consistency across the province.
- Need benchmarks for all watersheds to insure consistency in methodologies used.

Local Representation

Question 1 – Source Protection is a complex undertaking. What is the best approach to ensuring that the process is open to input from those it may affect?

Communication

- Meetings of the SPPC should always be open to the public, with good public notification of meetings well ahead of time.
- Each watershed region should have a communications specialist as an expert resource for watersheds to call upon. Communication specialists could help identify all relevant stakeholders and communicate source protection process throughout the region.
- There should be a requirement to post status reports and the terms of reference in the community (e.g. newsletters, websites, papers, etc.).
- There should be regular meetings between the chairs of all SPPCs across the province.
- MOE should immediately launch a multi-media education campaign on watershed-based source protection planning. As many forms of media as possible should be utilized (newspapers, TV, radio, Internet, etc.) to ensure all members of the public are reached at least once.
- Use local communication mechanisms that work and are known by the community (e.g. CAs, municipalities).
- Need to encourage strong/varied stakeholder involvement in the sub-committees/working groups.

Adequate Representation

- Assurances are needed that municipalities are well represented and included throughout the planning process.
- Need to clarify who will represent the interests of private well owners on all committees (through Health Units? Municipal representatives?).
- Key audiences (i.e. local municipalities and NGOs) need to be involved from the outset. Although there is a need to think strategically about who you want to be engaged at the local level (if too many people are involved, process will get bogged-down).

Education

- Data/information to help people understand the SPP process should be provided to public/stakeholders (e.g. through the Internet).
- It will be difficult to get/maintain public interest; SPPCs will need to relate local issues to the community to ensure public engagement.
- Need to make landowners aware of process, and encourage to them participate (rural landowners will be difficult to reach).

- This process is creating fear in some stakeholder groups (e.g. farmers feel threatened, one more requirement to meet), need to deal with this fear through education.
- Open-house forums should be held across the watershed on a regular basis (with prior advertisement of the event), to help educate broader public on source protection planning in their area.

Consultation

- Clear consultation process should be mandated to ensure different interests/views of local stakeholders are considered during the planning process. A minimum set of criteria needs to be established for the consultation aspect of source protection planning.
- Meetings should be rotated around the watershed area, to ensure all communities have a chance to participate. Ensuring rural community participation will be a big challenge
- The Environmental Commissioner's Office should prepare annual source protection planning report, to help keep the process open and on track.

Conservation Authorities

- Should make use of Conservation Authorities (CAs) to ensure process is open to input. CAs are well equipped to deal with communication/education process.

Appeals

- Should use a public notification and appeal process similar to the one used for the land use planning process (*Planning Act*).

Process

- More definition is needed on the roles and responsibilities of stakeholders represented on the SPPC and associated working groups. Need to clarify how the working groups/sub-committees will influence the work of the SPPC and SPPB.
- How stakeholders are identified should be justified to the Ministry (MOE should provide guidelines to ensure a consistent approach across the province).
- Water Quality Advisory Committees are already established (with various stakeholders) in many watersheds. This process should be looked at for best practices.

Question 2 – What mechanisms would help the Source Protection Planning Committee to effectively manage the process, set priorities and reach timely conclusion to the planning process?

Source Protection Planning Committee

- Participants will need to have specific professional expertise in:
 - communications;
 - project management; and
 - technical expertise.
- A forum for SPPCs to meet and develop management tools should be set-up and maintained by the province. This would enable SPPCs to share resources and experience.

- Clear lines of accountability need to be established ahead of time for all those involved in the SPPC.
- Chairs should serve as Facilitators / “champions”, with both professional management and technical skills, to both run meetings and provide direction to SPPC.
- Legal agreements should be entered into between the SPPC and the province, requiring the SPPC to have plans submitted and implemented on schedule.

Education

- Work needs to be collaborative at the community level:
 - background/education work needs to be done ahead of time to deal with fears about the source protection process;
 - need to demonstrate positive aspects/outcomes of source protection, and the benefits it will have for specific sectors.

Funding

- Compensation must be provided for administrative aspects of groups (e.g. travel, per diems, meeting time). Without this, many people will be unable to take time to participate.
- Funding incentives/ disincentives should be mandated to encourage the development and implementation of plans on time.
- Rewards/incentives should be provided for innovation in managing the process, to encourage quicker development and implementation.

Timing

- Phased in requirements/phased in approval process, and shorter deadlines would allow the process to be managed more effectively, and reach timely conclusion.
- The first source protection plan will evolve with over time:
 - need to recognize that first go-around will not be perfect;
 - need to identify scale of work to be done; and
 - optimize resources accordingly.
- Sub-committees should be established to undertake specific, time limited task to help manage the process.
- The terms of reference needs to be clear about issues, timelines and milestones the SPPC will need to deal with.

Assistance

- Need to establish mechanisms to get over technical roadblocks that could occur along the way (province should supply technical assistance).
- MOE needs to be involved at all steps of the planning process with the SPPC, to ensure oversight and progress. Ministries in the north may not have the resources and staff necessary to support the source protection planning process.

- A strong (provincially funded and run) technical resource office should be established to provide solutions, recommendations and standards to SPPCs.

Data/Existing knowledge

- SPPC needs to take into account experiences in source protection from other Jurisdictions (e.g. Florida, New York City). Of particular interest would be New York City's easement purchasing program to protect land from development in watersheds.
- An inventory of existing studies/work/data on Source Protection should be created to help set priorities, and avoid duplication of effort (province should create freely accessible database).
- All technical reports should be held in a central registry, and be freely available.

Process

- Ensure that there is a mechanism for closure and decision making, to ensure that the process does not become bogged down in negotiations.
- Clear process needs to be established to ensure qualified representatives are identified.
- The *Aggregate Resources Act* should be used as a model for the process, which would ensure professional sign-off of technical components.

Conservation Authorities

- Conservation authorities should be established where none presently exist.

Question 3 – Is the proposed composition of the Source Protection Planning Committee appropriate (why or why not)?

Municipalities

- Seems to be an imbalance toward municipalities on SPPC and planning process (too much municipal representation).
- Needs to have representation from local/county municipal planners on the SPPC.
- Adequate municipal representation would be difficult in the north because it fails to capture unorganised townships and lack of financial and technical resources.

Composition of SPPC

- One public member on SPPC insufficient to ensure local buy-in – one rep would not represent all interests.
- Proposed SPPC composition is fair, and should not be changed.
- Maximum number of reps on SPPC should be set, too large a committee will be ineffective.
- Adjust membership to reflect characteristics of a specific watershed (allow flexibility), this would improve local buy-in of process. ToR could be mechanism to allow for a change in make-up of the SPPC to allow for local differences.

- Agriculture should have more members on SPPC and other committees given large share of land base – need balance between population and land ownership.
- Industry sectors must be represented on the SPPC.
- SPPC will need representation from sewage treatment sector.
- Environmental constituents/NGOs need to be represented on SPPC. They would bring expertise, and drive political will when decisions are required.

Chair of the SPPC

- Need to identify clear process for selecting chair of SPPC. Appointment of Chair crucial – must be neutral (strong MOE leadership to ensure this) - challenging to identify neutral chair.
- Members of the SPPC should appoint the Chair, not the province/MOE.
- Need to clarify how the Chair of the SPPC will manage members that do not report directly to him/her (from another organization).

Conservation Authorities

- Need CA representative from each watershed on the SPPC. CAs should be represented at least in an “ex-officio” role on the SPPC.
- CA’s should appoint members of the SPPC. There is a need for more flexibility on the membership of the committee (should not be prescribed).

Clarity

- Need exact definition/guidelines to structure the membership of committees. This would help ensure the inclusion of all users involved.
- Concern about selection of stakeholder representatives at a watershed-region scale:
 - representatives must be seen to be credible by stakeholders they are selected to represent;
 - need criteria for selection and involvement; and
 - may need to adjust numbers of stakeholders to reflect local landowner composition.
- Need to ensure SPPC representatives are qualified, province must provide a clear selection criteria.

Role of Government (provincial and federal)

- Ministry representatives should only serve an advisory role (non-voting)
- There is a need to clarify if Federal Fisheries and Oceans will have a role on the SPPC (even if only ex-officio).

Work of the SPPC

- All water users have to be involved with the work of the SPPC.

- Membership of the SPPC should bring together existing information, and reflects existing processes within the watershed.
- Option should be included for a replacement/alternate where primary representative cannot attend meetings.

Question 4 – Partnerships will be a key success factor in the development of source water protection plans and in their implementation. How can the process build on existing partnerships that support source water protection-related activities? What is the best way to facilitate new partnerships that may be needed?

Building on Existing Partnerships

- Build on existing partnerships (e.g. through agricultural communities). Existing partnerships should be utilized to help explain to local stakeholders how to provide input into the process.
- A link to existing voluntary measures is needed as part of the source protection planning process (e.g. stewardship, land trusts).
- Difficult to get information from First Nations groups because of their governance structure – their cultural and political process needs to be recognized and incorporated into the source protection process in order to form a cooperative relationship.
- Proposed process will allow local partnerships to evolve because of its “bottom-up”/local representation philosophy. Partners directly affected and responsible for costs need to be involved at all steps in the process.
- Conservation Ontario should put together a workshop that profiles successful partnerships CAs have already established and depend on.
- Existing obstacles in relationships (e.g. between municipalities and CAs) need to be identified and addressed up-front.
- Building on existing relationships between CAs and municipalities.

Building New Partnerships

- Local Universities/special interest groups should be considered to support the work of the technical sub-committees (can fill in information gaps, future research, plan development).
- Sub-committees should be comprised of agricultural representatives, groundwater experts, and the industry sector to build partnerships and foster understanding of different sector interests.
- Only voluntary partnerships will work and be productive, involvement should not be forced but “solicited”.
- Partnerships will need to be established with developers, which will facilitate source protection planning in the long run.

- Hiring young people with new and fresh ideas to help with successful implementation, (partner with schools/colleges and universities/chamber of commerce), and will help build partnerships for long-term source protection planning.
- Industry has a large role to play, and so will be a key partner in insuring that source protection is successful.

Education

- Education of urban residents about their role in source protection planning and how they may be affected by it, will get buy-in and help build partnerships.

Funding

- In order to build a cooperative relationship with farming (and other) communities, and help different farm commodity groups to participate in SPP process, will:
 - need a “per diems” for farmers (and other groups) involvement; and
 - need new funding to support farmers involvement in SPP.

Clarity

- Roles and responsibilities of SPPB and SPPC need to be clearly defined, this will help resolve misunderstandings and conflict, and so facilitate the building of relationships.
- The terms of reference should have a definition of partnerships and a description of how they will be build and maintained throughout the planning process.

Government Partnerships

- MOE will need to provide staff at all levels of the SPP process – this will be a key partnership to maintaining momentum.
- MOE/province needs to build relationships with technical organizations (e.g. OWWA, OFEC).
- Partnerships should be established with boundary partners (e.g. Quebec, Manitoba, U.S.).
- Partnership across government ministries should be built upon to help ensure a “one window” approach for stakeholders.

Incentives

- Proper incentives will be required (positive and negative) to sustain and build on relationships.
- Tax incentives (e.g. land donations, land trusts) should be utilized to ensure the building of partnerships with private landowners. Ministry of Finance needs to be brought into the process to help build proper tax incentives.

Water Taking Charges & Permit to Take Water

Question 1: Should water taking charges be fixed for all users, or scaled according to factors related to the taking, such as volume, consumption, or water source?

Discharge Water Quality

- Charges should be higher where the quality of return water has been reduced
- Implement a credit system for cleaner return water; incentives for water quality improvements (mandate this)
- Charges could be tied to the risk to the environment of the discharge water
- There should be charges for municipal water treatment of industrial discharges
- Agriculture should be excluded from a charge for water quality
- Discharge may be too far out of scope for application of water charges
- Companies could see costs for discharging poor quality water as a cost of doing business (i.e., would be a disincentive to improve water quality). Therefore, don't charge more for poor quality

Consumption

- Consumptive use should be considered as part of a water charge
- Consumptive use must be well defined
- There should be charges for those who use/consume water
- There should be no charge or a lower charge if water stays in the watershed. Charges would be higher for consumptive users – where fixed in product (e.g., food processing, water bottlers, beverages)
- Leave consumption out of cost structure because it is too difficult to define
- A charge for consumption would lead to water conservation
- There should be an 8% royalty charge on 100% consumptive users

Water Availability/Impact

- There should be a higher charge where there is lower availability of water (would encourage use of water in areas where there is less demand)
- Level of impact from water takings should be considered if charges applied (i.e., higher rate where higher impact)
- Premiums should be charged where water is taken out of sensitive areas

- Could be penalties for wastage or use in higher risk more sensitive areas (e.g., pay less for L. Ontario and more for sensitive aquifer water)

Water Use/Purpose

- There should be different charges based on the purpose of the water taking
- Those using water for profit should be charged for water
- There should be some appreciation of water conservation measures in the charge
- Consider charges in terms of whether the taking is critical or non-critical

Source

- Should consider ratio of amount of water available to amount taken (lake, surface, groundwater)
- Scarcity of water in some areas should be considered (e.g., deep water aquifer, surface water)
- South – high demand – high price; North – low demand – low price
- It would be difficult to charge based on source (e.g., groundwater vs. surface water)
- The water source is not relevant to a charge, e.g., headwaters or downstream, surface water or groundwater
- Use charges to encourage surface water over groundwater use

Season

- Need drought definition for the Ontario Low Water Response
- Consider a seasonal charge (e.g., charge for amount of water allowed in direct proportion to available flow)

Volume

- There should be a charge by volume
- Charge based on actual volume to promote efficient use, water conservation
- Offer incentives for recycling/conservation efforts; Credits should be based on conservation; Recognize efficient use/conservation (e.g. hydro generation uses a lot of water but efficiently)
- Volume is not a determining factor, don't charge by volume
- If there is a charge by volume, there will be no incentive to conserve
- Larger volume users should pay more
- For agriculture, charges should be based on volume/acre/day vs. total amount of taking

- Need to audit actual amounts
- Charge on PTTW maximum permitted amount (prevents others from using the water)
- Charge based on a minimum acceptable volume
- Should be linked to reporting of actual use (bring this data together for use, e.g. water budget)
- Municipal domestic uses should be excluded from volume charges. Could have charges per capita for municipalities

Use of Funds

- All money received should go into a special fund (part of charges rationale); All who take water, should pay into fund
- Need a dedicated fund for water management on a geographic basis
- Disagree with water charging – does not fix the problem (low credibility of government fees) – should go back to the issue – special purpose fund
- Need a clear definition of the use of the funds
- Funds should be used to fund and manage the program; improve services (e.g., timely processing); source water protection; impact assessment; municipalities to deal with approvals, appeals, implementation; database management; to the region for implementing source protection; water management
- Fee should not be directed to general revenue
- Need mechanism to ensure money goes into protection of the resource (therefore questions the one time fee – fee should reflect remediation)
- Where you collect the fees should not necessarily be where the money is spent – may need to allocate money collected; Reallocation of fees from different areas is an issue
- Establish a trust fund in each planning area – money from users, for watershed protection and stewardship
- If there is improved service on PTTW, there will be better buy-in for charges; If pay a charge, need service

Why Charge

- There should be charges for water on principle since water is not an unlimited resource
- Conservation as a goal; a greater charge for water will lead to conservation; conservation is an important rationale/incentive (all users will benefit)
- Need for long term sustainable funding

- If the purpose of the charges is to generate revenue – not helping source protection

General

- There should be an administrative fee at minimum
- Charges should not be fixed for all users
- There needs to be a strong justification/rationale for charges (e.g., conserve? quality? land use?; cost recovery, source protection, economic instruments, behaviour changes)
- Stakeholders that could be directly affected by charges, should be involved in how the charges are determined (e.g., consulting with small municipalities)
- Paying for water leads to “ownership” – becomes product, won’t necessarily see reduction in takings during low response periods
- More users need to pay than just those taking out of the watershed (if goal is water management)
- No double charging (e.g., individuals on municipal system – passes on the charges); Consider economic competitiveness if hooked to municipality or not (pay for service)
- Charges will impact on the location of individual water takers (e.g., piggyback on municipal system)
- Consider link to Bill 175
- Consider logistics to administer charges; If amount charged is too low, would be more of a hassle to implement
- Charge framework must be simple – see municipal models
- Need clear ownership in order to charge; Will ownership of water by province translate into liability (water safety, economic...)
- Consider input of company to community when formulating charge
- Consider frequency of water use (e.g., agriculture does not irrigate some days)
- Annual fee – question of whether an ongoing fee is appropriate as the water is always there (one time fee)
- Need a fair charge, not exorbitant
- What will be the impact on existing permits – transition; Need a plan for existing permits
- Need for equity; same principles for every user

- This is essentially a tax and should be an individual tax within the tax structure so that all people pay – and so that there is equitable distribution across the population (not targeted at industry)
- Economic feasibility of charges – Industry, Impacts on sectors, Competitiveness within/between jurisdictions, Import/export
- Need science and cumulative effects before charging; Hold off on charges until the water budget is complete
- Consider NAFTA implications of charging for water
- Government must communicate to rate payers as to why there would be charges
- Any new legislation has to consider financial funding impacts to municipalities, especially small ones
- Consider competitiveness on water costs vs. other jurisdictions (e.g. U.S. have funded water supply) and with other provinces (trade impacts)
- Better to solve environmental problems through economic instruments than with regulations
- If pay a fee, could encourage more use of water – unintended consequences (e.g. bottling place at industry outflow)

Question 2: Should certain purposes of water taking be exempt from a charge?

Charges and exemptions

- There should be a fee for all who benefit from source protection
- No exemptions for rural areas, large users, water taken from a threatened source, small takers (i.e., < 50,000L/d), water bottlers,
- Exemptions should be considered for fish ladders, fire-fighting, dams, human consumption (apply a minimum allowable volume), home owners, public good, environmental preservation, during drought conditions, agriculture, if water quality and quantity are sustained, use of recycled water
- Incentive for improved water quality, re-charge, re-use; rewards for managing water properly
- No exemptions should be considered; all should pay “fair share”
- All water takings should have meters, premiums should be charged to those who do not meter water use
- Apply a \$5/capita levy on households; e.g., \$5/person to pay for protecting water resources; ensure that it goes to SPP and that the public sees this
- Charges that are not related to white paper objective should be exempt

- Highest charge to those who remove water from watershed
- Need charge scales not exemptions
- Consider socio-economic impact of charges; e.g., impact to business
- Charge only surface water withdrawal – focus where resource use is greatest
- No right to charge for water use: “I own the water”
- Have a water conservation fee on tax bill
- Reward good stewardship (quality, quantity) with lower fees
- Province should take its time in allowing for exemptions (Proceed with user pay concept; Phase in who pollutes water first; Consider how the use affects the future use of the water)
- Enforcement and compliance would be a burden to municipalities.
- Phase in charges
- Link fees to those who have permits, can’t police minor uses
- Re-invest money in the same industry; provides incentive, acceptance, understanding

Agriculture

- Exempt agriculture including small farms, livestock farms
- Can’t charge where monitoring not possible (agriculture)
- Need to conserve water used in agriculture – offer rebates
- Could set thresholds (especially for agriculture); But threshold may encourage operators to get around them (e.g., by dividing properties)
- No charge to livestock farmers
- Charge larger intensive agriculture, green houses, vegetable production, and industrial farm operations

Municipalities and Domestic Use

- Exempt small municipalities, domestically drawn drinking water (private & public supply), those providing potable water in non-potable areas, all municipalities
- Do not exempt rural domestic use (individual wells), “Culligan” type of water, cottagers, municipalities
- Public water supply systems should be given preference (price advantage)

- If municipalities are charged, they will pass on the fee to users
- Charging municipal systems could become a public health issue
- Could charge municipality above a threshold for water used (e.g., by industry, commercial uses, households)
- Should be a cap on water use per household; extra charges for use beyond cap

Industry

- Do not exempt for profit, commercial uses, bottled water, business
- Industry has ability to reduce costs; therefore, need an incentive to conserve
- Industries on a public supply could be required to apply for a permit and therefore be charged
- Exempt Hydro, run of the river uses, industry (if industry provides an economic benefit to the region), hydraulic control projects related to source protection, pre-existing dewatering structures, temporary construction should be exempt
- If water is used to generate revenue, should be higher charges for water (vs. municipal use for drinking water); but should not be a disincentive to business

Question 3: Should reporting of water takings in Ontario be mandatory, and which sectors should receive priority?

Monitoring and Reporting Issues

- All PTTW should have reporting requirements
- Must make reporting consistent across the board and purpose of reporting must be clear; must inform on condition of the watershed, similar to ON AIR reporting; not onerous; have standard for greater accuracy
- Reporting data should be used for water management purposes, water budgets, to determine aquifer levels, impact assessment
- All water monitoring information gathered should be made available to all those interested in using it (users, public, conservation authorities; SPP planning committee)
- Concerns with how to monitor agriculture, Ministry's ability to enforce and monitor compliance of reporting,
- Meters can be costly
- 'Meter man' – a third party comes and reads meter; Independent 3rd party evaluation
- Monitoring should be tied to charges/water use

- Estimates for irrigation are good enough – easy and effective; accuracy can be difficult (e.g., mines can return more water than is extracted)
- Do not have monitoring for dams
- If mandatory, must be user friendly (e.g., estimated off a pump or from a meter, not like Reg. 127; annual report to answer simple questions; don't want to hire a consultant or need a PhD); not taxing to users; consider what is already being reported
- Law of diminishing returns – a lot of data exists and should be used before collecting a lot of new data
- Distinguish between actual vs. permitted use – need actual use and how much is planned for removed (e.g., municipalities and peak amounts)
- Consider cost of monitoring and reporting to users (e.g., small farmer)
- Reporting may be an issue – trade secrets
- Frequency of reporting should be monthly, weekly, annual; daily is not essential; more during low flow periods; more for larger takings; seasonally
- Data reported must be used for something (don't collect needlessly)
- Consider cost/benefit of capturing water use information from some sectors
- Consider the cost of rolling out monitoring and reporting
- Have good methods for estimating water use where needed (e.g., agriculture)
- Water managers need actual consumption data, not permitted amount
- Report on water quality, not just quantity
- Link reporting to charges to efficiency (water management)
- Different types of reporting for different industry (e.g., meters, professional estimates, estimates)
- Data should be consolidated into one database, organized by watershed

Priority for Monitoring and Reporting

- Mandate water meters in areas where there are shortages; Most vulnerable aquifers should be first
- Phase in reporting starting with: larger permits or sectors; large users; bottlers; those who already report/record (e.g., mining, power, municipalities); users currently non-compliant; well drillers
- Municipalities already report annually; reporting during low flow should be done seasonally

- Have one report, e.g. integrate Certificate of Approval reporting and SPP reporting
- Water bottlers should report in 1st phase and others that have the information now
- No phase in needed; everyone should monitor/report
- Commercial water takers should report
- Report on groundwater and surface water
- Reporting based on where impact greatest (conditions of watershed), not sector based
- Seasonal uses – agriculture, golf, recreation – should monitor more frequently
- Non-permit holders (livestock farmers) must report for inventory purposes

Question 4: How can watershed scale impacts be addressed in the Permit to Take Water Program, and what should the applicant be responsible for assessing?

Addressing impacts

- Scale of impact assessment should be at the watershed
- Where will funding come from?
- Information for water budgets is not available – need to collect data
- Should distinguish between depth of wells in assessing impacts; also sensitivity of source
- Impact assessment should be undertaken through watershed planning process (e.g., conservation authorities)
- Expertise must come from MOE
- Prioritize watersheds where greatest need (for low water management)
- Where there is an imbalance in water input/output in watershed, need to take certain actions, e.g., conservation measures, incentive programs
- Cumulative impact needs to be considered
- Water availability/allocation – how much is available and prioritize if not enough water
- Consider impact on wildlife/ecosystem
- Need a water budget to better advise the permit process; Develop models/watershed plans to identify when watershed reaches a critical period; need policy direction to say what to do if that point is reached

- Ensure there are resources at MOE or municipality to review studies
- Make watershed plans a requirement; otherwise do not give planning approval
- Can have less detailed assessment in less stressed watersheds
- Operate on watershed basis (locally monitored and administered); encourage information sharing; all relevant information should be available to decision makers
- Content of source protection plans should include information that could be used to assess impacts of PTTW
- Municipalities should be involved – consultation with ministry, opportunity to comment, water taking as land use
- Water budgets should look at permits in other watersheds, include rain

Applicant responsibility

- Requirements need to be reasonable, simple (not onerous for applicant), consistent rules, fair; Ensure applicant will be able to produce information (has expertise/resources)
- MOE should be responsible for assessing watershed scale impacts
- Impact assessments could cross municipality boundaries, conservation authorities; Costs could be high
- Other users in watershed – will they share info? Is it the first water taker who does all the work?
- Increased costs will be transferred to consumers
- Should be asking more of some applicants – scale of study required could be tailored to applicant (e.g., larger does more; pits and quarries have greater responsibility)
- Need long-term ambient monitoring program to assess how much water is there (not applicant's responsibility)
- Put PTTW within SPP context; Once have assessment studies and SPP, people applying for PTTW won't have to evaluate impacts
- Until water budgets are prepared, applicants should do the evaluation
- Applicant should pay for assessment, demonstrate fit with watershed management plan, assess impact of their proposal, conduct site specific assessments, consider seasonality
- Up to the ministry/other body/conservation authority to manage the impacts
- Should have tools for applicant (a checklist; different requirements for different takers; not a cookie cutter approach)

- Burden of proof should lie with applicant – use interim control, e.g., Oak Ridges Moraine Conservation Plan
- Small takers – don't expect them to do watershed-size impact assessment
- Applicant should not be responsible for assessment (just data collection and reporting); need independent third party
- Applicants should be responsible for assessment
- Understand triggers that would dictate how much information/effort is required to understand impacts; need a good base of information in order to understand triggers

Additional comments heard that are not specific to the questions posed

- PTTW section appears “tacked on” to the end of the White Paper – it has nothing to do with source protection
- Current system (PTTW) is fine, why do we need to replace it?
- Reexamine necessity for 50,000L threshold (e.g., agriculture often bottle water for sale)
- Have different requirements for those taking less than 50,000L
- Make livestock operators get a PTTW
- SPPC should be given the mandate for PTTW (not MOE)
- Need to enhance EBR commenting period/process
- More MOE staff needed to process applications, improve response time
- Guidance on when to issue permits required (sustainable science)
- Establish priority of users for our water and reconsider ‘automatic’ renewals
- Harmonize sewage works approvals within PTTW
- Consider a different classification of permits for metered vs. non-metered municipal water users
- PTTW – have more scrutiny for water exported (international, inter-provincial)