

General Comments

Ch, Pg, Topic	Comment	Suggested Improvement	SPC Response
RMPs	Penetang-Are there any precedents on Risk management plans? What will the agreements between RMO and the landowner require from the municipalities? What happens if property is in one municipality but the water supply is in another. Who is responsible?	Penetang-Transparency between SPA so all municipalities can be on the same page	These questions will be addressed in an Implementation guide.
pg 107	Should mercury be classified as a DNAPL?		Mercury is not listed as a DNAPL in the provincial tables of circumstances and therefore is not considered a DNAPLs threat at this time.
Non-compliance	Penetang-What are the penalties to municipalities or landowners if they do not comply with the legislation? Will fines be dedicated to addressing risk or will this generate revenues and is so, for whom.	Penetang-Create a list fines or penalties for non-compliance. Clarity on who and how fines would be collected as well as where the money goes.	The Implementation guide will include a section that discusses non-compliance with the act.
Education/Outreach	Penetang-Because education and awareness programs are a must conform to policy and are required for several threats, can the SPA or province prepare the awareness programs?	Penetang-SPA or provincial body prepare the initial awareness program to be implemented by municipalities	Local SPAs have now been identified as the lead agency with some collaboration with municipalities
Cross-Boundary	Clearview-We note that one of our source areas extends beyond the boundary of our municipality into another municipality and, in fact into another County jurisdiction. It remains unclear as to how the municipality will be in a position to implement the Plan in this area.		This question will be addressed in an implementation guide.
Cost	Clearview-As an overall comment, we note that the implementation of a Source Protection Plan will result in very significant additional costs to municipalities. Of considerable concern is the fact that some of the potential very significant costs of the actions currently proposed to be required to be undertaken are not known, and will not be known, until risk management plans are undertaken. We conservatively estimate that the administrative costs of implementation of the plan will be in the order of \$250,000 annually. This does not include the additional costs which may arise from actions to be undertaken.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
Cost	Clearview-Our examination of potential costs also does not include the very significant costs which will have to be assumed by landowners affected by the plans. As these landowners have in many cases long established and fully approved land use practices in place and the majority will not receive any benefit from the imposition of the Plan it is unclear as to how it can be expected that they will have to accept significant additional costs and restrictions on their activities for ongoing or historic uses. It seems reasonable that such costs should not have to borne in part, or certainly not in their entirety, by these land owners. It is however equally clear that municipalities are in no financial position to provide complete or partial compensation for direct and indirect costs. The Province, which presumably has undertaken a cost-benefit analysis of the measures proposed and determined that the costs are warranted, needs to establish a sustainable funding program to assist municipalities and landowners in meeting the new standards it intends to establish in regard to source protection.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.

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LUP	KING-Land Use Planning tools can assist in the decision making process when considering new uses; however, creates situations of "non-conforming" uses after implementation of the by-law occurs for existing established uses. Often a threat could be related to a particular activity and as such, may not be known to the municipality. The determination of "non-conforming" status becomes difficult to determine and often results in disputes with property owners.	Non-conforming uses need to receive outreach and education with respect to their potential threats. Incentives and encouraging "best practices" may be a particularly good approach when dealing with businesses. Field work and consultation will be necessary to determine what properties would become "non-conforming" as a result of a passing of a by-law. Considerable out-reach and education would be necessary to build a relationship with the business community.	In general the revised Land Use Planning policies are for new or expansions of existing.
LUP	KING-Land Use Planning tools help to regulate uses but do not necessarily control activities. A commercial zone may permit a hotel, but it may be overlooked that the activity of cleaning rooms requires chemical storage and handling which may present a threat in the effected area. May not be appropriate to use Land Use Planning tools when the threat is related to an activity.	Community outreach and education is required in these instances to inform residents and businesses of the potential concerns with municipal water supplies. Need community to buy into protection plan and not fear it.	The committee has removed Land Use Planning Tools that apply to activities from the revised Source Protection Plan.
By-Laws	King-By-laws passed to implement the policies of the Plans will require enforcement when faced with potential complaints or violations.	Municipality may not have the expertise to evaluate situations where knowledge of materials and handling practices are required. RMO may need to consider enforcement responsibilities.	How to address these concerns is covered in the RMO/RMI training course.
Well Production	King-The level of sensitivity of each municipal production well does not appear to have been studied from a detailed geological perspective. Some wells may be more sensitive than others given the soil composition, gradient, and other physical attributes and yet the policies would apply all the same. Particular regard for the DNAPL impact on wells has wider implications given that the area of threat is larger and may encompass the commercial core of communities.	Where the area of significant threat is large and encompasses many properties and businesses, it may be prudent to conduct a further geological impact assessment as part of a wider risk management plan for the community.	The vulnerable areas delineated around each municipal were determined by completing a detailed study of the geologic conditions. Please the Chapter 13 of the Lake Simcoe Assessment Report for a detailed summary of the technical work completed in the Township of King. Please see Chapter 5 for additional information on the methodology used.
Transition Policies	King-Township Planning Staff understand that Transition Policies are currently under production. Transition policies, particularly with respect to the Planning Approvals process, will have implications on development applications in various stages of the approvals processes. For example, the location of stormwater management ponds, municipal infrastructure expansions. Township Planning Staff is very interested in reviewing the Transition policies when they become available.		The MOE is currently discussing the need for transitional policies within the Source Protection Plans and whether or not the approach should be consistent across the province. The SPC will fully consider the need for transitional policies at a later date when the MOE releases its guidance document.
Consistency with CTC	King Township will be required to implement the policies of both the CTC Plan and the SGBLS Source Protection Plan. A degree of consistency between the approaches taken by each Plan would be beneficial in allowing the Township to implement similar standards/policies across the Municipality. For example, the SGBLS Plan uses Land Use Planning as a tool to regulate threats related to ASM, NASM, fertilizer, pesticide, road salt, snow, organic solvents, and DNAPLs, whereas the CTC Plan does not. In light of concerns with respect to regulating activities versus uses, consistency across the Township, and using Land Use Policy to regulate activities in which Municipal Planning does not currently play a role, Planning staff question the use of LUP in so many threat areas. Further, there is a recognition in the CTC Plan that existing tools (such as Prescribed Instruments) can be utilized to regulate threats.	The Land Use Planning approach taken by the CTC Plan would be the preferred approach. In the spirit of minimizing duplication, the SGBLS Source Protection Committee may consider a similar Land Use Planning approach whereby LUP is not utilized to duplicate a tool that is already in place and functioning as intended, rather to implement new policies where they will be most effective in their regulation of land uses.	Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies.

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LUP	Township Planning Staff caution the implementation of Land Use Policy in instances where the approval authority is not the Municipality. The Township Planning Department does not have a role in the province's Certificate of Approvals process, specifically as they relate to the Agricultural Threats. Therefore, the Planning Department would not be notified by the Ministry prior to the issuance of a Certificate of Approval. Requiring Municipal Planning Departments to implement policies in their Official Plans relating to approvals processes in which Planning is not involved could create situations where the Municipality is unable to enforce the Official Plan policies, or apply the policies effectively. Caution should be exercised in requiring Municipalities to amend their Official Plans to regulate processes and/or activities that are not under Municipal Planning jurisdiction.	Where a threat is currently regulated by a provincial approval authority, it would be beneficial to continue to allow the province to regulate the activity/threat, rather than introducing liability to the Municipality through Land Use Planning where the Municipality does not play a role in the review/approval process.	Noted
Who's Responsible?	King-It would be beneficial to identify the level of municipal government (Regional or Local) that would be responsible for the development and implementation of policies where the Municipality is cited as the implementer. Understanding the role the Township will play in the implementation of the Plans would assist staff in understanding and preparing for the financial, resource, and workload implications of implementing the Plans.	Indicate the level of Municipal government responsible for implementing policies in the Plans that specify the Municipality as the Implementer.	Many of the policies have been revised to say the municipality responsible for waste or water to help clarify who should take the lead in multi-tier municipalities.
Education/Outreach	King-Further to the above comment, it would be beneficial to identify/understand how the Education and Outreach programs will be developed and implemented, and the associated costs/benefits and timelines. For example, are the programs to provide for a consistent approach/standard across the Region for those where the Municipality is the implementer, or would each local Municipality be required to develop their own program based on the local situation?		Local SPAs have now been identified as the lead agency with some collaboration with municipalities
LUP	King-Land Use Policies speaking to activities that are not controlled/licensed by municipalities, will only capture a portion of future land use-based threats. This is particularly the case with Agriculturally related threats, where a provincial Ministry is the approval authority, and in most cases, suitable lands for agricultural uses are already designated and zoned for that purpose. The Committee should be cognizant of the policy gap that exists with a Land Use Planning approach.		Noted
Monitoring Policies/Work load	The Monitoring Policy associated with each of the policies is likely to result in a significant increase in record keeping/reporting. Staff/financial resources required to develop and implement new/amending processes to track the impacts of the relevant policies will have to be assessed.		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
Formatting	King-The Explanatory Notes Column in the CTC Threat Table is very helpful in understanding the intent of the Committee in drafting the policy.		Although, it would be helpful to have the explanatory notes beside the policies, the Clean Water Act does not allow the SPCs to do so.

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Formatting	King-The Threat Chart is not clear as to whether the policy will apply to existing or future threats. Notwithstanding the information is contained within the Explanatory document, it would be helpful to include this information in the chart itself, to ensure that the policy is clear in its direction and the implications for municipalities, residents, and business owners.		Each policy now states whether it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats.
Formatting	King-The Threat Chart is generally difficult to follow.	Introduce gridlines and floating headers.	The formatting of the revised plan has been altered to include gridlines and floating headers.
Policy Wording	Shelburne- Some policies begin "The municipality responsible for water systems shall... While others simply say "The municipality shall.	Use consistent language "The municipality shall....."	All policies have been revised and placed into standard wording by tool used to remove the inconsistencies.
Policy Wording	ShelburneInconsistent wording-examples: -in areas where they would be a significant threat -within WHPA-A -Within vulnerable areas -in highly vulnerable areas -where they would be a significant drinking water threat -the vulnerable area where there would be a significant drinking water threat -in vulnerable areas that would be a significant threat.	use consistent and prescriptive language in reference to specific territory(ies) subject to each policy.	All policies have been revised and placed into standard wording by tool used to remove the inconsistencies.
Prohibitions	Shelburne- prohibition for threats that are prohibited by the SWP, how will the prohibition be implemented for existing threats? Or does this only apply to new? Some policies use the word "restricted" while other say "prohibited". Is there a difference? Is an unqualified restriction the same as a prohibition? Previous OMB decisions and agency comments have been established that certain threats to be prohibited by amended OP and Zoning under the Planning Act. Example, snow storage, grazing and pasturing or livestock, etc- are these land uses or land activities? Can it be regulated under the PPS. All types and intensities are agriculture shall be permitted...?	Clarify application of prohibition policies to existing vs. new. Clarify use of restricted vs. prohibited. Clarify scope of municipal authority to regulate threat under Planning Act and/or if CWA confers new/additional powers to municipalities and regulatory scope of planning documents.	The revised formatting of the Source Protection Plan clearly states whether the policy has been included to address existing or future Significant Drinking Water Threats.
Implementation Guide	Barrie-At the November 3, 2011 Municipal Workshop in Midhurst, we were asked whether we felt an Implementation Guide would be helpful. This would be beneficial as there are many common challenges among all municipalities in the watershed.	SPC prepare a guide to assist municipalities with the implementation of the SPP. We suggest it include examples of OP policies, disclosure forms and complete application requirements, risk management plans, education and outreach resources, and monitoring formats.	An Implementation Guide will be prepared at a future date
Decommissioned Well	The City of Barrie needs to go through the process required to eliminate some wells (such as Well # 10) from the capture zones established under the Assessment Report.	Advise the City on the list of things the committee needs to remove a well from the Terms of Reference.	

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Monitoring Policies	Barrie-For the results of the monitoring to be synthesized and compared some basic guidelines and reporting methods should be in place. For example Annual Risk Management Report can this be standardized.	Consider developing a standardized Monitoring reporting system for Municipalities such as OMBI to facilitate consistent reporting.	It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
LUP	Barrie-The recommendations will involve Official Plan and Zoning amendments which are appealable processes; what technical and financial support can be provided to municipalities in defending these changes if appealed to the OMB.	Clarification as to support role in defending these policies.	The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP.
MON	Barrie-That the South Georgian Bay Lake Simcoe Protection Region provides a template for the overall Report Structure that is to be presented annual. In addition a central reporting point similar to the National Pollution Release Inventory (NPRI) reporting structure. Municipalities must prepare annual reports annual for the MOE as described in the associates C of A's the submission date is March 31 it is recommended that the submission date for the SPA reports are consistent.	Report structure template/central online reporting site/report submission date by march 31.	Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies. How monitoring policies need to be addressed will be included in an implementation guide.
Education/Outreach	BarrieAwareness Programs could be targeted at a watershed level and not solely the responsibilities of the municipality to development and implement. The content of the messaging would not vary from municipality to municipality; a greater audience could be reached with less financial resources to achieve to the same goal.	Watershed based approach for Awareness Programs	Local SPAs have now been identified as the lead agency with some collaboration with municipalities
Education/Outreach	Barrie-The Ontario Drinking Water Stewardship Program Early Response currently does not provide funding for monitoring, sampling or outreach programs.	Expand existing funding program to include new monitoring and outreach required under the SPP.	The ODWSP program funding qualification change from time to time. Please contact your local stewardship representative for additional information regarding eligible projects.
Education/Outreach	Barrie-The Ontario Drinking Water Stewardship Program Early Response deadline is December 3, 2012.	Please extend the deadline and continue to provide funding in the early period of implementation.	Noted
Threat enumeration	Barrie- In determining situations where a significant threat was not included in the Assessment Report and since identified, it would be helpful to have a program to identify the circumstances to calculate the vulnerability score.	Need a tool to determine new significant threats.	Noted

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Need for Workshops	Barrie-Provide more opportunities, such as the workshops previously held, for municipalities to network on aspects of implementation such as the Risk Management Official and Inspector positions.		Noted- the SPC may consider holding an implementation workshop once the plan is approved.
Consistency	York-There should be an effort to move towards consistency, to the extent possible, in the CTC and SGBLS policies.		Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies.
Format	York-As well as content, the format of the policies needs to be harmonized (recognizing that all SPCs will be dealing with multiple municipal overlaps). The regime is complex enough without having policy formats that differ. Where policies have been developed for the same threats, the numbering should be consistent.	I suggest SPCs try to harmonize policy formatting across the board. It is unfortunate the Province has not provided a consistent template.	Considerable effort has gone towards ensuring consistency with neighbouring Regions.
Implementing Body		I suggest where a municipality is being designated as the implementing body, wording be included to clarify which level of government is being designated (e.g. "the municipality with primary responsibility for issuing a planning approval"; "the municipality that has authority to pass by-laws respecting water production, treatment and storage under the Municipal Act, 2001).	Many of the policies have been revised to say the municipality responsible for waste or water to help clarify who should take the lead in multi-tier municipalities.
Policy Wording	York-Wording in policies: "the RMO shall negotiate".	I suggest the wording should be changed to "RMO shall, in accordance with s.58 of the CWA, agree to or establish an RMP"	All policies have been revised and placed into standard wording by tool used to remove the inconsistencies.
RMPs	York-The policies that require RMPs should be reviewed to ensure: 1) they are not so prescriptive that the RMO cannot meet the criteria of s. 58(15); and 2) they are prescriptive enough to allow the RMO to implement it (for example, those policies directing an RMP when there is an "increasing trend" in groundwater – what constitutes an 'increasing trend'?).		Many of the RMP policies have simplified so they are not as prescriptive.
Grammer	York-• First sentence: "The Source Protection Plan is a plant developed through collaborative efforts to protect water quality and quantity for municipal drinking water systems within a watershed. • Third sentence: "The plan will establish policies to enable ways in which..." • The climate change policy under the strategic action policies provides no direction. It appears to be more of a discussion on climate change impacts without pointing to actions that should or could be taken.		These have been corrected.
Existing vs. Future	York-Inconsistencies are noted where 'expansions' on existing or future activities	should treat expansions as 'existing' approaches, manage by risk management;	The revised policies now treat expansions to existing facilities consistently throughout the document.

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Policy Wording	York-Some policies are wordy.	Where there are suggested conditions for RMP's they should be removed and put in rationale document.	All policies have been revised and placed into standard wording by tool used to remove the inconsistencies. Many of the specific RMP requirements have been removed from the policies.
Policy Wording	York-As of October 31, 2011 Certificates of approval for waste, air and sewage works issued or amended after this date will be under the new Environmental Compliance Approval system (with certain activities being subject to the Environmental Activity and Sector Registry).	The SPP wording that refers to these types of CsofA should be modified to include the broader suite that may be issued under the sections set out in the CWA as prescribed instruments, namely "certificates of approval, provisional certificates of approval and environmental compliance approvals". This could be done by referring to each type as in the preceding wording or by referring to a "prescribed instrument" for the specific threat activity.	The revised policy wording now references Environmental Compliance Approvals.
RMPs	York-The RMP and PI policies that include a series of conditions can be unnecessarily lengthy	Where there are suggested conditions for RMP's they should be removed and put in rationale document.	Many of the specific RMP requirements have been removed from the policies.
LUP	York-Looking forward to implementation, there could be instances where a new land use is permitted in a significant threat area (eg a gift shop in a commercially zoned area) that undergoes changes that are not subject to a planning act or building code application (eg change of ownership and change of use from gift shop to hardware store that includes storage of organic solvents). There is no mechanism in the SPP to catch this kind of change of use.	An additional policy to consider is the requirement for 'change of use' permits under the Building code in significant threat areas, and a requirement for the change of use application to be accompanied by a 'conformity to Source Protection Plan' report.	Noted
Existing vs. Future	York-Although in most policies the wording implies whether it applies to existing or future activities, it is not explicitly stated.	Add a column indicating whether the policy applies to existing activities, future activities, or both.	Each policy now states whether it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats.
Policy Wording	York-Although in most policies the wording implies whether the threat would be managed or prohibited, it is not explicitly stated.	Add a column indicating whether the policy is to manage or prohibit the threat.	All policies have been revised and placed into standard wording by tool used to remove the inconsistencies.
Formatting	York-In the vulnerable zone tables within the threat description, many of the scores are not applicable to the associated WHPA (i.e impossible to have a score of 10 in WHPA-D).	Review and correct vulnerable zone tables within the threat description.	The introductions to the threats policies have been revised.
Implementing Body	York-Municipality is listed as implementer for those policies which apply to Part IV Powers (RMP, Prohibition and RLU).	List RMO as implementer for those policies which apply to Part IV Powers (RMP, Prohibition and RLU).	Noted
Waste Disposal	York-Waste policies appear to be missing waste generators who are not captured under Part 5 of the EPA	Need to clarify if waste generators are captured.	The waste policies have been revised to state those that require approvals under the EPA.

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Reporting Date	Tiny-Reporting time should be extended until March 31 st each year.	<i>Standard forms should be created by SPC to maintain consistency in reporting.</i>	Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
	Please note this is a consistent statement throughout the SWP and will need to be clarified in each section/policy.	Please note this is a consistent statement throughout the SWP and will need to be clarified in each section/policy.	Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in
Existing vs. Future	Tiny-Policy 3.3 should clarify "existing properties", RMO will negotiate.		Each policy now states whether it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats.
	Please note this is a consistent statement throughout the SWP and will need to be clarified in each section/policy.		
Places to Grow	A/E-Places to Grow Act- As you can appreciate, growth is very important to the sustainability of any municipality. Some of the identified growth areas are situated within close proximity to existing municipal wells. It is important that these growth areas be protected. The Townships have been consistent in their message to SPCs- we will not accept policies that prohibit the implementation of approved Official Plan land use designations intended to facilitate much of the expected growth within the Townships..... Any policy that suggests reopening the Growth Plan is not supported by the Townships.		Noted
Inconsistency	A/E-One of the fundamental concerns of both Townships is the inconsistency of draft policies between the various Source Protection Regions, not only in their presentation format but also the anticipated difficulty with the implementation of such policies in the Township Official Plans. It would be an administrative nightmare to develop and apply different policies in the Official Plan depending on which Source Water Protection Region the lands are located. Policies at all levels of government must harmonize their policies and create policies that are broader in nature to allow the municipalities to formulate more specific policies to meet their individual needs.		Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies.
Where do the policies apply?	A/E-The draft policies lacked clarity in a number of areas. It is not clear for example the level of restriction beyond the 100 metre wellhead protection areas and whether there is enough quantitative data/evidence to place restrictions beyond the 100 metre radius. There is also confusion where certain policies apply.		Many of the policies apply where the activity would pose a Significant Drinking Water Threat. The revised introductory material to the Source Protection Plan now contains a section that summarizes how to determine where the Source Protection Plan policies apply.

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Cost	A/E-The draft policies are silent on key matters such as implementation costs and the availability of Provincial Funding.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
Places to Grow	A/E-Townships are very concerned with the implications of new policies on the existing growth designations. For example, the SE portion of Amaranth consists of various development related land use designations with an approved Official Plan. This area of Amaranth also contains Orangeville well (5, 5A & 6). While we are sensitive to the need to protect these wells for the future, the creation of prohibitive policies that will prevent development is not the answer nor is this acceptable to the Township.		Noted
Implementation Costs	A/E-Both Townships are very concerned with the financial implications of implementing policies under the CWA. There is concern regarding the need to hire more staff (RMO) in addition to what appears to be an expanded role and duties of the CBO beyond the scope of the OBC. For example, the additional septic reinspection program.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
RMPs	A/E-The cost and review of RMP is also a concern. Municipalities simply don't have the experience to review these plans.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP.
Monitoring Policies	Mono-The monitoring and implementation component of these policies is excessive when considered as a whole. Most policies result in an annual report to be prepared on a policy for submission to various levels of public agencies, by various parties. Many of these annual reports are being prepared by the local municipalities (RMO, etc.). Again this is excessive. While the Town understands the necessity to monitor policy, we would suggest the reports be submitted on a 5yr time period and the policies also be formally reviewed at that time.		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
Monitoring Policies	Mono-The monitoring and implementation policies as proposed are double-dipping on the municipal tax bill. Municipalities will pay for the preparation of numerous reports under these proposed policies, and then pay again for the review by the SPA, primarily funded through the municipal Conservation Authority levy.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.

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Formatting	<p>Mono-I have already expressed my displeasure to both of you and some of your staff regarding the presentation of the information provided to municipalities for comment. The Source Protection Committees are all functioning under the same deadlines, regulations etc., and in my opinion there was no reason that this information could not have been provided in the same format to municipalities which have multiple source protection regions and draft policies to consider. Having multiple Source Protection Regions and different draft policies within a single municipality will lead to inconsistencies and multiple policies within the same community if this coordination is not undertaken at the Source Protection Committee level. It is hoped that municipalities will not be left with two and/or three separate policies for the same issue from two or three SPCs.</p> <p>We would request that all future documents and policy developments be forwarded by Provincial Source Protection Committees be coordinated and placed in the same presentation format for ease of reviewers and proposed implementing authorities.</p>		<p>Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies.</p>
Timelines	<p>Mono-The Current time frame for commenting in detail on these draft policies was not sufficient. Our council has not prepared a formal response to these policies and no further Council meetings are proposed prior to the commenting deadline. Town Council may have additional comments on these policies after the formal commenting period expires.</p>		<p>A letter has been sent to Minister Bradley requesting a 60 day extension to the submission date. If granted, this extension will enable the formal consultation period to be extended by a similar period of time</p>
Compensation	<p>Mono-Prior to the introduction of the CWA and Creation of SPCs across the province, the Town of Mono developed and adopted detailed OP policies for WHPAs in 2004. The Town's pro-active approach to protect municipal wells, which was implemented simply, at the local level, is proposed to be replaced by a mandatory, complex and convoluted process imposed by Provincial Legislation with no additional funding proposed for this additional bureaucracy.</p>		<p>The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.</p>
Cost	<p>Mono-The policies currently proposed will be onerous, inconsistent, and expensive to implement by smaller municipalities..... These policies cannot be implemented without the local municipalities hiring/contracting a RMO as Legislated..... this represent a 10-20% increase in the staff load..... In smaller municipalities with staffing levels of 4-10 people this represents a significant and unnecessary increase to the staff complement.</p>		<p>The SPC is drafting a letter to Minister Bradley requesting funding for implmentation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.</p>
Education/Outreach	<p>Mono-The draft policies, as currently set out, require most education and outreach to be completed by the local municipalities, including monitoring results. There has been no indication that there will be any monies provided to the local municipalities to complete this education and outreach as suggested within the draft policies. Provincial funding of this education and outreach as suggested within the policies.</p>	<p><i>Provincial funding of this education and outreach should be resolved prior to agreeing to implement and monitor these policies.</i></p>	<p>Local SPAs have now been identified as the lead agency with some collaboration with municipalities</p>

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Transportation Corridors	Mono-The Town is concerned that threats arising from highway accidents are not included as part of the Source Water Protection Process.		Transportation corridors and associated threats were not considered for this round of technical work and Source Protection Planning. The SPC would like to explore this option in the future.
Education/Outreach	CKL-All E&O policies should have the option to harmonize with current Stewardship or SPA programs for increased cost effectiveness and efficiency. Following this method would ensure a consistent message is being delivered by conservations authorities and municipalities across the regions		Local SPAs have now been identified as the lead agency with some collaboration with municipalities
Building Code	Muskoka-That the SPC recommend to the Ministry of Municipal Affairs and Housing that the Building Code Act be amended to permit the implementation of site specific siting and water setback recommendations that are great than 15 metres on site waste disposal systems.		Noted
Monitoring Policies	Muskoka-That the SPP be amended to ensure that any annual reporting requirements are harmonized with the annual reporting requirements of the Ministry of Environment under the Certificate of Approval program.		The February 1st reporting deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
Formatting	Newmarket-Several Threats include similar requirements e.g.: <ul style="list-style-type: none"> • municipalities prepare annual reports to be submitted to the Source Protection Agency (SPA); • that disclosure reports be prepared as part of complete applications; • that Official Plans be updated to include policies and such policies reported to the Source Protection Agency, etc., Perhaps the policies would be clearer if written in a matrix/chart approach that removes the duplication of the policies and identifies under which threat the policy applies.	Perhaps the policies would be clearer if written in a matrix/chart approach that removes the duplication of the policies and identifies under which threat the policy applies.	Policies have been combined where possible (e.g. Monitoring, Education and Outreach, and LUP, RLU, Incentives and Stewardship) resulting in a significantly shortened policy table.
Formatting	Newmarket-Add regional mapping at a minimum to show vulnerable areas (WHPAs, IPZs HVAs, Recharge Areas)		The revised Source Protection refers the reader to the appropriate assessment report to find the detailed mapping.
Glossary	Newmarket-Several terms would benefit from definitions in the Glossary of Terms including, agricultural source material, non-agricultural source material, non-aqueous phase liquid and organic solvents.	Define the following terms: agricultural source material, non-agricultural source material, non-aqueous phase liquid and organic solvent.	The revised introductions to each threat defines each of these terms. In addition many of these terms have been included in the updated glossary.

General Comments

Ch, Pg, Topic	Comment	Suggested Improvement	SPC Response
Terminology	Newmarket-Figure 1 and 2 along with Sections 5.4.1 and 5.4.2 would be easier to understand if the programs and terminology were aligned, e.g., Two categories - Voluntary Measures and Incentives and Regulatory Measures, wherein the regulatory measures could include the continuum of measures from statutes, policies, directives, procedures and guidelines. The inclusion of operational policies that incorporate statutes appears misplaced under "Informal and Non-binding", if this table is to remain.	Realign the tables and the sections to be more understandable with respect to the distinction between voluntary measures and incentives and regulatory measures as discussed in the comments column.	This section of the plan has been revised to provide greater clarity to the reader.
Terminology	Newmarket-Throughout the policy there is reference to the implementer as simply municipalities (Mun.). Given the different roles and responsibilities between the upper and lower tier municipalities a distinction should be made between which municipal government will be responsible for the specific municipal recommendations. E.g., do both the upper and the lower tier municipalities report on the same implementation measures; will both the upper and lower tier municipalities be responsible for stewardship programs and if so will funding be provided for such programs.	The implementation section of the Policy should distinguish where the upper and lower tier municipalities are responsible for the implementation of the policies.	Many of the policies have been revised to say the municipality responsible for waste or water to help clarify who should take the lead in multi-tier municipalities.
Policy Duplication	Newmarket-There is significant duplication among the policies, and consideration should be given to amalgamating and simplifying the policies to reduce duplication.	There is significant duplication among the policies, and consideration should be given to amalgamating and simplifying the policies to reduce duplication.	Policies have been combined where possible (e.g. Monitoring, Education and Outreach, and LUP, RLU, Incentives and Stewardship) resulting in a significantly shortened policy table.
Formatting	Newmarket-In general, the policy direction should be more specific in order to guide municipalities to ensure consistent development and implementation of policy and reduce resource requirements to implement the policy.	In general, the policy direction should be more specific in order to guide municipalities to ensure consistent development and implement of policy and reduce resource requirements in the long term implementation of the policies.	Each policy now states whether it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats.
Terminology	Mulmur-The excessive use of abbreviated terms made the documents very difficult to read and understand.		Many of the abbreviated terms have been removed from the document. A list of acronyms has been included as a quick reference guide for those that remain.
Cost	Mulmur-The Committee needs to rationalize the costs and benefits and find ways to streamline the requirements (eg. reporting requirements) to reduce costs, especially for smaller municipalities and smaller water supply systems. Significant and sustained Provincial funding will be needed to off-set the costs to municipalities, especially the smaller municipalities.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
RMO	Orillia- The items assigned to the RMO evolve through the document. This should be reviewed for consistency. It may be that some items should just be noted as municipal responsibility.		All Part IV power policies are required to be implemented by the RMO.

General Comments

Ch, Pg, Topic	Comment	Suggested Improvement	SPC Response
Policy Duplication/Monitoring	Can similar policies be grouped. Cannot see a mechanism for effective monitoring and compliance.		Policies have been combined where possible (e.g. Monitoring, Education and Outreach, and LUP, RLU, Incentives and Stewardship) resulting in a significantly shortened policy table.
Consistency	Uxbridge- All efforts should be made, where possible, to have similar processes and policies within the SWP plan between each SWP region. This is particularly relevant for a local municipality that has multiple SWP regions in their jurisdiction to ensure consistent implementation within that municipality.		Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies.
Enforcability	Uxbridge- The SPC should have their legal counsel review the proposed policies to ensure that they are enforceable. This is particularly true in instances where an activity not a use is being prohibited. As it is difficult for Official Plans and Zoning By-laws to prohibit activities rather than uses, the wording of the policies in the SWP plan that refer to activities should be reviewed by legal counsel to ensure the policy can be enforced.		Noted-the MOE review of the policies will determine if the policies are written in such a way that they can be enforced.
Implementation	Uxbridge- The SPC should encourage MMAH to develop guidelines for the use of development planning or zoning within WHPAs.		Noted
Conformity	Uxbridge- While it is recognized that Planning decisions must conform to the SWP Plan after their approval, the actual updating of municipal Ops should be at the municipalities discretion but not later than the next 5 year review.		The province will specify a timeline for municipalities to conform to the SWP plan when the plan is approved.
Enforcability	Uxbridge- The SPC should petition MMA to ensure that the implementation of SWP policies in municipal Ops and Zoning by-laws (or development permit by-laws) should not be appeable by the public. The potential costs of defending this Provincial Policy Regulation should not be borne by the local municipalities.		The SPC is drafting a letter to Minister Bradley requesting funding for implmentation of the SPP.
Existing vs. Future	Uxbridge- Clear direction should be provided in the SWP policies that speak to applications in process. Applications in process should be considered under the existing use policies.		Each policy now states whether it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to esisting or future threats.
Monitoring Policies			It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.

General Comments

Ch, Pg, Topic	Comment	Suggested Improvement	SPC Response
Future	Uxbridge- The SPC should petition MMA to allow municipalities to identify future municipal well head sites in their Ops and protect incompatible uses from being permitted in these areas. This would potentially reduce the cost of siting new wells required for growth.		Noted
Implementation	Uxbridge- As part of the implementation of WHPA policies, provincial grant funding for implementation of the policies, education, outreach or incentives should be provided. If funding is not provided, the water authority should be able to fund implementation of the policies, education, outreach, or incentives through water rates and the local municipality should be able to access these funds to finance their requirements under the SPP.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
Heather and Neil	All monitoring policies should say which policy it tracking.		All monitoring policies have been consolidated in the revised plan. There is now one monitoring policy per implementing body. The policy tables clearly references the monitoring policy that will apply.
Heather and Neil	Strategic Action is not a tool. Please delete throughout the document and change to other. Other type policies must be clearly tied to a threat and area or the policies will be out of scope.		This has corrected throughout the document.
Impacts	A/E-It is imperative that any draft policies minimize the impact on the agricultural community. It is noted that many prohibitions are contained in the draft policies relating to agricultural activities such as application and storage of agricultural source material, handling and storage of fuel and livestock grazing and pasturing. The agricultural industry is of critical importance to the Townships of East Garafraxa and Amaranth and the respective municipalities would prefer to work directly with the agricultural community and "manage" these issues rather than developing top-down prohibition policies that only discourage the farming community.		Noted- the policies that affect the agricultural community were drafted by the SPC with many suggestions from the agricultural representatives.
LUP	King- The use of Land Use Planning tools to address agricultural uses is not likely to have much effect given that the municipality does not receive planning applications to permit "new agriculture". Much of the threats from agriculture come in the form of storage and handling of materials, none of which requires planning approvals and rarely requires a building permit.	Discourage the use of Land Use Planning tools and focus on outreach and education focused in the agricultural communities to provide the best opportunity to reduce the risk in the threatened areas.	Noted.

Threat #1(a): The establishment, operation or maintenance of a waste disposal site within the meaning of Part V of the Environmental Protection Act (hauled sewage).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvement	SPC Response							
1 a - 1	PI	MC	MOE	E	C	The MOE shall amend all existing Certificates of Approval to prohibit the spreading of hauled sewage anywhere it would be a significant threat (except Issue Contributing Areas, which have a specific suite of policies).	Penetanguishene-Hauled sewage from private systems violates sewer use by-laws and Penetanguishene wastewater treatment plants are not designed or approved to receive septage. In the event that a new plant is constructed or an existing plan such as the provincial plan at Waypoint is updated to accept septage, there should be a requirement for testing before entering into the sanitary system or disposal at the plant.	Penetanguishene-Require septic sampling before entering any sanitary systems	The policies contained within the revised Source Protection Plan will impose a ban of the spreading of hauled sewage everywhere it would be Significant. As such the committee is not putting any recommendation forward on conditions that should be included within future C of As. The committee will keep this point in mind should future policy direction change.							
							Haliburton-What is the specific suite of policies in the Issue Contributing Areas? Are they more or less restrictive than this policy where the issue is not currently impacting the municipal water source?	Haliburton-Consider policies comparable to those of the Trent Conservation Coalition Source Protection Region which permit management as well as prohibition.	In the revised plan the same suite of policies also applies to the Issues Contributing Areas.							
							Peel- Staff supports the policy approach		Noted							
							York-For consistency, should agree on an implementation timeline timing for implementation varies, CTC suggests a 2 year to do reviews, 5 year phase out		The MOE is currently discussing the need for transitional policies within the Source Protection Plan, and whether or not the approach to writing transitional policies should be consistent across the province. The SPC will fully consider the need for transitional policies at a later date when the MOE releases the transitional policies guidance document.							
1 a - 2	Mon (PI)	MC	MOE	E	F	The MOE shall document the number of Certificates of Approval that have been reviewed and amended, the compliance monitoring undertaken, and how	Peel- Staff supports the policy approach		Noted							
							1 a - 3	PI	MC	MOE	F	C	The MOE shall not approve Certificates of Approval where the application of hauled sewage would be a significant drinking water threat (except Issue	Peel- Staff supports the policy approach		Noted
							1 a - 4	PI	HR	MOE	F	F	The MOE should not approve Certificates of Approval where the application of hauled sewage to land would be a moderate or low drinking water threat.	Haliburton-While this policy is "should" not "shall" and therefore, discretionary, it would, if implemented, effectively result in the prohibition of the application of hauled sewage throughout most of the SPR. Is this practical? Is there relative scientific support for a policy which effectively prohibits an activity for which the province already provides licensing and oversight? Are there alternatives in place, with capacity available, to replace this practice? If the technology is in place to support this action then why is policy 1a-7 included?	Remove this policy until additional research to justify such a strong stance has been provided. As it is for a moderate or low drinking water threat, not for a significant threat, and may be premature, this policy should not be included in this round.	This is one of the few circumstances where the SPC included a low and moderate threat policy to further protect the municipal water supply. Since this policy is targeted at low and moderate threats, the legal effect is have regard and therefore, the MOE may choose not to enact the policy.
														Peel- Staff supports the policy approach		Noted
						York-this policy would cover all of SGRA and HVA which may be onerous and may impact sewage haulers but protects private well owners it forces the haulers for raw sewage to use controlled municipal sewage sites needs to be added to CTC		Noted								
						CKL-Please clarify; the rational stated 'Significant' drinking water threats however, the policy focuses on Moderate and Low?		This is one of the few circumstances where the SPC included a low and moderate threat policy to further protect the municipal water supply. Since this policy is targeted at low and moderate threats, the legal effect is have regard and therefore, the MOE may choose not to enact the policy.								
1 a - 5	Mon (PI)	HR	MOE	F	F	The MOE shall document the number of Certificates of Approval that have been reviewed, amended and denied, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE shall prepare and submit to the SPA, a report summarizing the actions taken and the results achieved for the previous year.	Peel- Staff supports the policy approach		Noted							
							EG-Request clarification as to where waste disposal sites would be prohibited? How determine where it would be a significant drinking water threat? Does it rely on a Risk Assessment? Is this policy suggesting that waste disposal sites be prohibited within WHPAs?	Be more specific	This policy is the monitoring requirements for policy 1a-4 above. Policy 1a-4 is encouraging the MOE not to approve the spreading of hauled sewage within WHPA-A and IPZs where the vulnerability score is high enough to create a Significant, Moderate and Low Drinking Water Threat. Please refer to chapters 5 and 13 of the Lake Simcoe Assessment Report for additional details on where the policy would apply within East Gwillimbury.							
1 a - 6	Other	NLB	Mun	E?	E?	Municipalities are encouraged to develop Master Servicing Plans that include the capacity necessary to accept hauled sewage from private systems in the municipality.	Peel- Staff supports the policy approach. The SGBLS and CTC SPCs should consider whether the policy direction should be consistent among the source protection plans.	(ie. amend documents to prohibit waste disposal sites within WHPAs)	Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted each others policies.							
							Shelburne- What is the relationship between this policy and the Provincial Policy Statement which states that "The determination of sufficient reserve sewage system capacity shall include treatment capacity for hauled sewage from private communal sewage services and individual on-site sewage services" (s. 1.6.4.1 e). Is this a conflict with the PPS and if there is a conflict, which policy prevails (SWP vs PPS?). Note that the PPS does not specify "within the municipality" in reference to private systems.	Re-visit this policy in light of PPS wording and current MOE rules for sewage haulers.	This policy has been removed from the Source Protection Plan as it was deemed out of scope by the MOE since it was not tied to a specific vulnerable area.							

Threat #1(a): The establishment, operation or maintenance of a waste disposal site within the meaning of Part V of the Environmental Protection Act (hauled sewage).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvement	SPC Response
							CKL-Please clarify; What does NLP stand for, it is not shown in the list of acronyms? Durham-1a-6 Municipalities are "encouraged to develop Master Servicing Plans that include the capacity necessary to accept hauled sewage from private systems...". Financing these systems will be a challenge. These private systems belong to existing residents who are not on municipal services. The capital cost to a municipality to create the additional capacity at a sewage treatment facility to accept hauled sewage may be quite significant for the municipality. Development Charge revenue could not be used toward the capital cost of plant expansion because properties not connected to the sanitary sewer system do not pay sewer DCs. In Durham, stations to accept hauled sewage already exist at some sewage treatment plants. The Region has sufficient capacity somewhere in Durham to treat the amount of hauled sewage that we would likely receive. However, this may not be the case in some smaller rural communities, particularly those with a large cottage population. If processing of hauled sewage from private septic systems uses up all spare capacity of an existing treatment plant, it could limit new development that was planned for a community based on the existence of excess capacity. Additional operating costs to process the sewage would be another expense for the municipality. Hauled sewage is more concentrated and therefore may require modifications to processing operations. All of these costs should be recovered on full cost recovery basis through disposal service user fees. In some places, fees may be unaffordable for the users, especially if long distance haulage costs or substantial capital costs have to be recouped through the user fee.	Possibly a typo.	The legal effect should have read NLB. This policy has been removed from the Source Protection Plan. This policy has been removed from the Source Protection Plan as it was deemed out of scope by the MOE since it was not tied to a specific vulnerable area.
1 a - 7	Re	NLB	MOE		?	MOE should undertake research around hauled sewage treatment options and the opportunity to create environmentally friendly usable by-products (e.g. compost).	Peel- Staff supports the policy approach Durham-1a-7 MOE proposed to ban spreading of hauled sewage in 2002. If the MOE hasn't done research on how to implement the ban yet, it seems uncertain when this will occur.		Noted The SPC has drafted the policy to encourage MOE to undertake this research to help negate the need for the spreading of hauled sewage within vulnerable areas where Significant, Moderate and Low threats are possible. No specific time frame has been stated as the MOE only has to consider undertracking this research.
1 a - 8	Ch- (Should be E/O)	NLB	MOE		?	MOE should develop a manifest for the haulage of untreated sewage (similar to that required for wastes regulated under O Reg. 347) to ensure appropriate documentation of the waste throughout its life cycle.	Peel-staff has no comment on the policy. York-check rationale document to ensure it indicates that this is an education opportunity to the homeowner to ensure they know that proper disposal of their septage	(ie. amend documents to prohibit transfer stations within WHPAs)	Noted This policy has been removed from the Source Protection Plan as it was deemed out of scope by the MOE since it was not tied to a specific vulnerable area.

Threat #1(b): The establishment, operation or maintenance of a waste disposal site within the meaning of Part V of the Environmental Protection Act (waste disposal sites).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
1 b - 1	PI	MC	MOE	E	C	The MOE shall amend existing Certificates of Approval for sites that are significant drinking water threats to ensure that these sites cannot receive hazardous waste, and add additional conditions so that these sites cease to be significant drinking water threats. Such conditions may include: mandatory inspections at least every 5 years, regular monitoring of leachate quality and movement as well as regular reviews to ensure that impacts to drinking water quality are identified early.	Peel-Staff supports the policy approach. It should be clarified that the fulfillment of the added conditions should be the owners responsibility and not the municipality.		Specific C of A conditions have been removed from the policy, as the SPC felt the MOE would already include appropriate conditions. The conditions specified within the first policy drafts have been included in the rationale document.
							Barrie-Suggest the description be amended to allow Waste Disposal Sites to operate special hazardous waste depots and subsequently receive hazardous waste, to ensure that these materials are handled properly. Greater detail for the description of disposal versus received is recommended.	Allow waste receiving and prohibit waste disposal. Provide description of disposal versus received.H7	A detailed description of waste disposal sites has been included within the revised Source Protection Plan. The revised policy direction still does not allow for hazardous waste to be disposed of or stored at transfer stations within vulnerable areas where the threat would be Significant. There are only a few hazardous waste transfer stations within vulnerable areas where the activity would be Significant, and therefore the committee felt these transfer stations could be relocated outside the vulnerable area.
							York-prohibition of existing activity which opposite of overall direction to allow existing with rmp "Direct the MOE to review existing CofAs for any waste disposal site as defined in Part V of the EPA and ensure or add as necessary clauses that lead to the reduction of risks to drinking sites CTC policy directs the MOE to do this in consultation with the RMO (prefer SGBLS approach)		Noted
							Tiny-Agree - Requesting MOE inspections on Waste Disposal Sites being mandatory. Inspection period should be 1-2 years.		Specific C of A conditions have been removed from the policy, as the SPC felt the MOE would already include appropriate conditions. The conditions specified within the first policy drafts have been included in the rationale document.
							Durham-1b -1 While this policy is necessary, there could be very significant financial implications for affected municipalities. Owners, including municipalities, may need provincial assistance to deal with old or orphaned sites.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
1 b - 2	Mon (PI)	MC	MOE	E	F	The MOE shall document the number of Certificates of Approval that have been reviewed and amended, the compliance monitoring undertaken, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	Peel- Staff has no comment on the policy		Noted
							Durham-1b-2, 4 Could these policies be combined?		All monitoring policies have been combined by implementing body.
1 b - 3	PI	MC	MOE	F	C	The MOE shall not approve Certificates of Approval for new or expanded systems in vulnerable areas that would be a significant drinking water threat.	Peel- Staff supports the policy approach.		Noted
							York-remove 'expanded' as it should be treated as 'an existing' to allow for new risk mitigation measures to be implemented to an existing site remove 'vulnerable areas' as its covered by the SDWT remove 'systems' and change to 'waste disposal sites as defined in Part V of the EPA' CTC policy directs the MOE to do this in consultation with the RMO and is directly only at expansions AND pairs it with a manage via RMP approved by RMO (error p&m). Prefer SGBLS approach		The revised policy wording identified waste disposal as defined under Part IV of the EPA. The SPC approach for this threat was to consider expansions as new and; therefore, expansions to existing facilities will not be allowed within vulnerable areas where the activity would pose a Significant Drinking Water Threat.
1 b - 4	Mon (PI)	MC	MOE	F	F	The MOE shall document the number of Certificates of Approval that have been reviewed, amended and denied, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE shall prepare and submit to the SPA, a report summarizing the actions taken and the results achieved for the previous year.	Peel-Staff supports the policy approach.		Noted
1 b - 5	LUP	MC	Mun	F	E	The municipality shall amend its planning documents to prohibit waste disposal sites that would be a significant drinking water threat. If the expansion of an existing site is coupled with risk reduction (through infrastructure improvements, for example) so that the threat is no longer significant, expansion would be allowed.	Peel- Staff supports the policy approach. Policy wording should be reviewed and revised for clarity. The phrase "is coupled with risk reduction" is not clear.		This policy has been revised to mirror the approach taken in policy 1b-3. As a result expansions to existing facilities will not be permitted in vulnerable areas where the activity would be a Significant Drinking Water Threat.
							Shelburne- If waste disposal sites are prohibited under 1b-5 what is the purpose/content of the Disclosure Report to be required as part of complete application requirements under 1b-6? Who will review the Disclosure Report to determine if it is acceptable for a complete application? What qualifications do they require?	Explanation/definition of Disclosure Report required along with prescribed tools for measuring sufficiently of the document.	
							York- Prohibit and manage policy. Delete second sentence to be consistent 1b-3 add the expansion portion of this policy to the existing threat policy such that the objective (prohibit v manage) for any one policy isn't both. "delete second sentence to be consistent 1b-3; need to be clear that it's a waste disposal site as defined in Part V of the EPA" CTC outlines RA component requirements. CTC splits the policy in two Wst-4 prohibits new while Wst-2 prohibits unless RPM (error - p&m). Prefer SGBLS approach		
							Newmarket-Waste disposal sites include by definition (under the Environmental Protection Act) any land, building, structure in connection with the depositing, disposal, handling, storage, transfer, treatment or processing of waste which includes, ashes, garbage refuse, domestic waste, industrial waste, municipal refuse, etc. 74 waste disposal sites have been identified within Newmarket within Wellhead Protection Areas as defined by the Source Protection Plan (within 100 m of a municipal well through to the 25 year capture Zone). Policy 1b-5 requires municipalities to amend its Official Plan to prohibit waste disposal sites, including transfer stations that pose a "significant" threat. Guidance is not provided to assess which uses pose a significant threat. For example, transfer stations are becoming part of commercial activities where waste and potentially hazardous products are returned to retailers for recycling, e.g., paint, batteries, cell phones, etc. Also, many manufacturing businesses include a component of reuse or recycling of waste products as part of their manufacturing process, which is encouraged by the province and municipalities. Therefore, clarification is required to provide guidance around the particular	Clarification is required to provide guidance around the particular types of waste, transfer stations and processing activities that pose a significant threat, and therefore should be prohibited by municipalities within the Wellhead Protection Areas; and to define the waste disposal activities and processes that would be subject to Risk Assessments.	The provincial tables of circumstance state the specific conditions that need to be triggered in order to be considered Significant. The revised Source Protection Plan provides a summary of what is considered to be a waste disposal threat.
						Durham-1b – 5 Re: allowing expansion of existing with "risk reduction" measures...would these not be a requirement in the C of A? How would they be enforced through land use planning?			This policy has been revised to mirror the approach taken in policy 1b-3. As a result expansions to existing facilities will not be permitted in vulnerable areas where the activity would be a Significant Drinking Water Threat.

Threat #1(b): The establishment, operation or maintenance of a waste disposal site within the meaning of Part V of the Environmental Protection Act (waste disposal sites).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
1 b - 6	LUP	MC	Mun	F	E	The municipality shall amend its Official Plan to include a Disclosure report as part of the complete application requirements within a vulnerable area where there would be a significant drinking water threat.	Peel- define disclosure report York-this policy is not required because 1b-3 prohibits any future waste disposal sites Durham-1b – 6 What is a Disclosure report? This needs to be explained.		This policy, and the term disclosure report has been removed from the Source Protection Plan..
1 b - 7	LUP	MC	Mun	F	B	The municipality shall amend its planning documents to prohibit transfer stations where they would be a significant threat.	Peel- staff supports the policy approach to prohibit waste transfer stations within vulnerable areas where waste transfer stations are a significant threat. Shelburne- If waste disposal sites are prohibited under 1b-5 what is the purpose/content of the Disclosure Report to be required as part of complete application requirements under 1b-6? Who will review the Disclosure Report to determine if it is acceptable for a complete application? What qualifications do they require? York-Delete this policy as transfer stations are included in Part V of the EPA and would be covered by policy 1-b3 with appropriate amendments Newmarket-Waste disposal sites include by definition (under the Environmental Protection Act) any land, building, structure in connection with the depositing, disposal, handling, storage, transfer, treatment or processing of waste which includes, ashes, garbage refuse, domestic waste, industrial waste, municipal refuse, etc. 74 waste disposal sites have been identified within Newmarket within Wellhead Protection Areas as defined by the Source Protection Plan (within 100 m of a municipal well through to the 25 year capture Zone). Policy 1b-5 requires municipalities to amend its Official Plan to prohibit waste disposal sites, including transfer stations that pose a "significant" threat. Guidance is not provided to assess which uses pose a significant threat. For example, transfer stations are becoming part of commercial activities where waste and potentially hazardous products are returned to retailers for recycling, e.g., paint, batteries, cell phones, etc. Also, many manufacturing businesses include a component of reuse or recycling of waste products as part of their manufacturing process, which is encouraged by the province and municipalities. Therefore, clarification is required to provide guidance around the particular Durham-1b – 7 Does this apply to existing or future transfer stations?	Explanation/definition of Disclosure Report required along with prescribed tools for measuring sufficiency of the document.	Noted This policy, and the term disclosure report has been removed from the Source Protection Plan.. The policy has been removed. This policy has been removed from the Source Protection Plan. The provincial tables of circumstance state the specific conditions that need to be triggered in order to be considered Significant. The revised Source Protection Plan provides a summary of what is considered to be a waste disposal threat. Each policy now states whether it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats.
1 b - 8	Mon (LUP)	MC	Mun	F	F	The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to prohibit waste disposal sites and transfer stations that would be a significant drinking water threat.	Shelburne- The Town's planning documents already prohibit waste disposal sites within a WHPA, noxious uses involving waste storage prohibited more generally throughout the Town. Who will determine if existing municipal policies/zoning are sufficient as is, or if an amendment is required? York-In two tier municipalities, implementation roles to be clarified. Clarify planning documents. delete as above	Shelburne- Clarify requirements to amend planning documents.	This policy has been removed from the Source Protection Plan. This policy has been removed from the Source Protection Plan.
1 b - 9	EO	MC	Mun	E	E	The municipality responsible for water systems, in collaboration with the SPA shall (continue to) undertake an outreach and awareness program targeted at residential, industrial and commercial landowners that addresses the importance of proper disposal of hazardous waste and promotes the continuation / enhancement of waste diversion.	Shelburne- Why does this policy (and others) specifically apply to "The municipality responsible for water systems"? In Shelburne, the local municipality is responsible for water systems but the County is responsible for waste collection/management disposal. Should the municipality responsible for waste management appropriately be the lead for outreach/awareness program pertaining to proper disposal of hazardous waste? York-In two tier municipalities, implementation roles to be clarified.For consistency, should base materials for EO be prepared by the MOE and distributed to the municipalities to ensure consistent base messaging? Newmarket-Outreach and awareness program should also include education on proper <u>storage and handling</u> of hazardous waste, in addition to "proper disposal". Orillia- In an effort to be comprehensive, the plan has dipped into areas that are addressed by other Acts or municipal programs. While it is great to be comprehensive, there is a risk of creating competing programs with slightly different mandates and overlapping reporting requirements. Some of the requirements with respect to household hazardous waste are a good example of this. They can be deleted from the Plan. This will allow those working on implementation to focus on items not already being completed and that are more likely to protect source water. Durham-1b-9, 1b-11 The "municipality with responsibility for water systems" may not be responsible for, or in control of, local waste management programs. In addition, municipal waste responsibilities are limited to the residential sector. Industrial and commercial wastes are handled by the private sector and the ICI sector disposal of hazardous waste is regulated by the MOE.	Clarify division/sharing of responsibilities among local municipality (responsible for water system) and upper-tier (responsible for waste management/disposal). Expand the outreach program to include education on storage and handling of hazardous waste.	Local SPAs have now been identified as the lead agency with some collaboration with municipalities Local SPAs have now been identified as the lead agency with some collaboration with municipalities Since storage and handling of hazardous waste is not identified as a SDWT in the provincial table of threat it was not added to the policy. This information has been flagged for an implementation guide of what could be included in the education/outreach program. Local SPAs have now been identified as the lead agency with some collaboration with municipalities. This will allow for a watershed approach to help address Significant Drinking Water Threats. Local SPAs have now been identified as the lead agency with some collaboration with municipalities
1 b - 10	Mon (EO)	MC	Mun	E	F	The municipality shall document its outreach and awareness efforts. By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing the outreach.	Shelburne- Why does this policy (and others) specifically apply to "The municipality responsible for water systems"? In Shelburne, the local municipality is responsible for water systems but the County is responsible for waste collection/management disposal. Should the municipality responsible for waste management appropriately be the lead for outreach/awareness program pertaining to proper disposal of hazardous waste? York-In two tier municipalities, implementation roles to be clarified.	Clarify division/sharing of responsibilities among local municipality (responsible for water system) and upper-tier (responsible for waste management/disposal).	Local SPAs have now been identified as the lead agency with some collaboration with municipalities Local SPAs have now been identified as the lead agency with some collaboration with municipalities
1 b - 11	In	MC	Mun	E	E	Municipalities are required to consider ways in which additional conveniences for hazardous waste disposal can be created (e.g. through additional hazardous waste drop off / pick up arrangements, creation of 'toxic taxi's', etc.).	Penetanguishene-Will there be incentives for remediation to brown field sites from old landfill sites or other identified contaminated sites (such as industrial or commercial lands) that may be contaminating our wellheads? Peel- Staff supports the policy approach	Penetang-Deal with previous and existing threats and provide financial incentives	A project like this may be eligible under the ODWSP. Please contact your local stewardship coordinator to obtain additional information. Noted

Threat #1(b): The establishment, operation or maintenance of a waste disposal site within the meaning of Part V of the Environmental Protection Act (waste disposal sites).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
							<p>Shelburne- Why does this policy (and others) specifically apply to "The municipality responsible for water systems"? In Shelburne, the local municipality is responsible for water systems but the County is responsible for waste collection/management disposal. Should the municipality responsible for waste management appropriately be the lead for outreach/awareness program pertaining to proper disposal of hazardous waste?</p> <p>York-In two tier municipalities, implementation roles to be clarified. Change the wording to "... Required to consider and implement..."</p> <p>CKL-Researching and implementing additional conveniences for hazardous waste disposal, such as additional drop off points and pick up arrangements may not control illegal dumping, may be costly for the Municipality and does not offer the hauler any tangible incentive. Perhaps a cost incentive initiative stewardship program lead by the MOE or SPA should be considered ie after a given volume is discharged; discharge rates would be reduced giving the hauler a tangible incentive to use the controlled drop off points outside of vulnerable areas. Change legal effect from MC to HR.</p>	<p>Clarify division/sharing of responsibilities among local municipality (responsible for water system) and upper-tier (responsible for waste management/disposal).</p>	<p>Local SPAs have now been identified as the lead agency with some collaboration with municipalities</p> <p>The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.</p> <p>The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.</p>
1 b - 12	In	HR NLB	MOE	E	?	MOE should maintain the stewardship programs targeting significant threat activities to incent risk reduction projects.	Peel- Clarify intended policy direction. Is the intent "to encourage the MOE to provide financial incentives through Ontario Drinking Water Stewardship Program to reduce risks to drinking water"? If so, the policy should be revised to be clear.		The policy has been revised to clearly state that the intent is to encourage MOE to continue funding relevant stewardship programs.
1 b - 13	In	MC NLB	SPA	E	?	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	Peel- The Ontario Drinking Water Stewardship program should identify the implementing bodies not the Source Protection Plan. Why are SPAs named as the implementing body?		The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
1 b - 14	Mon (In)	MC NLB	Mun	E	F	The municipality shall document the action taken to consider additional hazardous waste conveniences. By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	<p>Shelburne- Why does this policy (and others) specifically apply to "The municipality responsible for water systems"? In Shelburne, the local municipality is responsible for water systems but the County is responsible for waste collection/management disposal. Should the municipality responsible for waste management appropriately be the lead for outreach/awareness program pertaining to proper disposal of hazardous waste?</p> <p>York-This policy as it pertains to 1b-11 should follow that policy and be renumbered 1b-12.</p> <p>Durham-1b-9, 1b-14 Adding and new waste collection events reporting on them has budgetary impacts for the municipality that collects waste. It may not be the same as the water-providing municipality so this may need to be a partnership effort with suitable funding arrangements.</p>	<p>Clarify division/sharing of responsibilities among local municipality (responsible for water system) and upper-tier (responsible for waste management/disposal).</p>	<p>Local SPAs have now been identified as the lead agency with some collaboration with municipalities</p> <p>All monitoring policies have been combined by implementing body. The new formatting of the plan addresses this concern.</p> <p>The intent of this monitoring policy was not to be onerous to the municipalities. The intent is for municipalities to provide adequate information to allow the SPA to track the policy implementation. How monitoring policies need to be addressed will be included in an Implementation Guide.</p>
1 b - 15	Mon (In)	MC NLB	SPA	E	F	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.	<p>Peel- this policy requires the monitoring body (SPA) to report to itself on stewardship actions. Staff questions the need for this policy.</p> <p>CKL-Please clarify, its reads as though the SPA is required to report to the SPA? Should this not be the MOE to report to the SPA is the Stewardship is extended as 1b-12? Not clear on this.</p>		<p>The monitoring policy has been revised so the SPA is no longer reporting to itself. The SPA has been directed to include documentation in their annual report on the risk reduction efforts they administered throughout the year.</p> <p>The monitoring policy has been revised to require the SPA to include documentation in the annual report to the ministry on the taks they completed throughout the year.</p>
1 b - 16	SA	NLB	MOE		?	MOE should investigate closed landfills where they would be a significant threat (e.g. monitoring, reporting, data sharing at all levels, communication.)	York-should share all related information on the closed landfill with RMO		This policy has been removed from the Source Protection Plan as it was deemed out of scope by the MOEs pre-consultation review of the policies.
1 b - 17	Re	NLB	Mun	E	?	Municipalities should research historical landfills in their jurisdiction to ensure that these historical sites are appropriately identified and managed.	<p>Penetanguishene-Will there be incentives for remediation to brown field sites from old landfill sites or other identified contaminated sites (such as industrial or commercial lands) that may be contaminating our wellheads?</p> <p>Barrie-Funding should be made available for the environmental investigation and subsequent monitoring of historical waste sites.</p> <p>Barrie-What is meant by "historical landfills ... appropriately identified and managed"?</p> <p>York-Define or explain 'appropriately...managed' and to what degree. In two tier municipalities, implementation roles to be clarified. limitations if the site is on privately owned lands</p> <p>Durham-1b-17 Asking municipalities to "research historical landfills in their jurisdiction" is a non-starter. It goes beyond the significant threat area and could have significant economic and liability consequences, particularly if they have to pay to clean them up and/or provide perpetual care.</p>	<p>Penetang-Deal with previous and existing threats and provide financial incentives</p> <p>Expand existing funding program to include the monitoring of historical landfills.</p> <p>Include a definition of 'managed'.</p>	This policy has been removed from the Source Protection Plan as it was deemed out of scope by the MOEs pre-consultation review of the policies.

Threat #1(c): The establishment, operation or maintenance of a waste disposal site within the meaning of Part V of the Environmental Protection Act (mine tailings).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
1 c - 1	PI	MC	MOE	E	C	The MOE shall amend all existing Certificates of Approval for the storage of mine tailings to ensure that the storage ceases to be a significant drinking water threat.	York-Is this policy necessary - could it be simplified by using the words 'waste under Part V of EPA'...to roll up?		The SPC chose to write different policies for each of the threat 1 subthreats to allow for subtle differences in the policy direction.
1 c - 2	Mon (PI)	MC	MOE	E	F	The MOE shall document the number of Certificates of Approval that have been reviewed and amended, the compliance monitoring undertaken, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	York-Is this policy necessary - could it be simplified by using the words 'waste under Part V of EPA'...to roll up?		All monitoring policies have been revised based on implementing body.
1 c - 3	PI	MC	MOE	F	C	MOE shall not approve new Certificates of Approval for the storage of mine tailings where the activity would be a significant drinking water threat.	York-Is this policy necessary - could it be simplified by using the words 'waste under Part V of EPA'...to roll up? includes a broader scope of waste, including refined waste disposal, well injection, pcb, etc - prefer SGBLS approach		The SPC chose to write different policies for each of the threat 1 subthreats to allow for subtle differences in the policy direction.
1 c - 4	Mon (PI)	MC	MOE	F	F	The MOE shall document the number of Certificates of Approval that have been reviewed, amended and denied, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE shall prepare and submit to the SPA, a report summarizing the actions taken and the results achieved for the previous year.	York-Is this policy necessary - could it be simplified by using the words 'waste under Part V of EPA'...to roll up? includes a broader scope of waste, including refined waste disposal, well injection, pcb, etc - prefer SGBLS approach		All monitoring policies have been revised based on implementing body.

Threat #2(a): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (stormwater management).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
2 a - 1	PI	MC	MOE	E	C	<p>The MOE shall amend all existing Certificates of Approval for systems where the discharge of stormwater from a stormwater retention pond is a significant drinking water threat to incorporate conditions to ensure that these systems cease to be significant drinking water threats.</p> <p>Such conditions may include: criteria for the operation and performance of stormwater management facilities, requirements for regular and ongoing maintenance with periodic removal of accumulated sediment, lining of the pond where warranted and the possible need for an oil/water separator, mandatory inspections at least every 5 years, upgrading of these systems to current standards as necessary, regular monitoring and recording of specific indicators (e.g. pathogens and chemicals (particularly in the case of wells with known issues (i.e. salt), reporting on incidents and the provision of contingencies to address contamination or other requirements that address site conditions.</p>	<p>Peel- Staff supports the policy approach but recommends that the SGBLS and CTC region SPCs coordinate policy development to ensure policy consistency to the greatest extent possible. Staff supports the policy approach to use provincial instruments (Certificates of Approvals) issued under the EPA to address this threat.</p>		<p>Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies.</p>
							<p>York-although a good practice, most will not be able to implement due to financial implications. Very costly to pump out and removal of seds (particularly if contaminated with immobile inorganics e.g. Lead). Links to Lake Simcoe Protection Plan - may want to influence the Storm Water Master Plans Add in words regarding Storm Water Master Plans may want to encourage Provincial funding through Ministry of Infrastructure</p>		<p>The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP.</p>
							<p>Uxbridge- If there are changes to C of A for SWM facilities as a result of the MOE review, there should be a fund set up by the MOE that would pay for the cost of upgrading maintenance requirements or SWM Pond infrastructure.</p>		<p>The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP.</p>
							<p>Durham-2a-1 Amending the C of As for existing stormwater ponds could have major cost implications for municipalities. It may not be advisable to include this much detail about potential "conditions" in the policy itself. The conditions will be determined based on the local conditions, type of facility, etc. and standards may change over time.</p>		<p>The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP.</p>
2 a - 2	Mon (PI)	MC	MOE	E	F	<p>The MOE shall document the number of Certificates of Approval that have been reviewed and amended, the compliance monitoring undertaken, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained including a copy of each Certificate of Approval.</p>	<p>Peel- Staff supports the policy approach</p> <p>York- CTCincluded new CofAs to be reported - should remove reference to new CofA since this policy is for existing systems (i.e.new = future)</p>		<p>Noted</p> <p>This comment seems out of place as the policy as drafted does not contain the word new. All monitoring policies have been simplified and revised based on implementing body.</p>
2 a - 3	PI	MC	MOE	F	C	<p>The MOE shall not approve Certificates of Approval for new systems where the discharge of stormwater from a stormwater retention pond would be a significant drinking water threat. If the expansion of an existing site is coupled with risk reduction (through infrastructure improvements, for example) so that the threat is no longer significant, expansion would be allowed.</p>	<p>Peel- Staff supports the policy approach, but is concerned that the proposed policy wording is unclear. Staff requests that the SGBLS and CTC region SPCs coordinate policy development to ensure that policy approaches for stormwater management are consistent within the Region of Peel. Please clarify if the policy is prohibiting all discharges or only stormwater management facilities that infiltrate stormwater into the ground? It may not be feasible or necessary to prohibit all stormwater discharges in vulnerable areas (e.g. managed discharges to surface water).</p>		<p>The revised policy clearly states the stormwater management facility and discharge features would be prohibited in the future where the activity would be a Significant Drinking Water Threat. Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies. The policy is prohibiting</p>
							<p>York-add the expansion portion of this policy to the existing threat policy such that the objective (prohibit v manage) for any one policy isn't both. definition of existing activities needs to allow for applications that are substantively underway Links to Lake Simcoe Protection Plan - storm water master plans Add the words ...Where lands have not received prior Planning approvals... "CTC does not allow for any expansions; CTC includes WHPA E in their policy - should remove WHPA E reference as it should only say 'where significant"</p>		<p>The policy has been revised and the expansions component has been moved to the existing policy.</p>
							<p>Durham-2a-3 Expansion (of stormwater ponds) where they are threats should not be allowed regardless of risk reduction actions.</p>		<p>Please see the explanatory document for the SPCs rationale for allowing expansions to existing facilities.</p>
2 a - 4	Mon (PI)	MC	MOE	F	F	<p>The MOE shall document the number of Certificates of Approval that have been reviewed, amended and denied, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE shall prepare and submit to the SPA, a report summarizing the actions taken and the results achieved for the previous year.</p>	<p>Peel- staff supports the policy approach.</p> <p>York-remove policy Seems redundant to report on 'inaction'</p>		<p>Noted</p> <p>It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.</p>

Threat #2(a): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (stormwater management).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
2 a - 5	LUP	MC	Mun	F	B	The municipality shall, wherever possible and in consideration of planning decisions, locate stormwater management ponds outside of the vulnerable area where there would be a significant drinking water threat.	Peel- Staff requests that the SGBLS and CTC Region SPCs coordinate policy development to ensure that land use planning policy approaches for stormwater management are consistent within the Region of Peel. With respect to Policy 2a-5, clarify the meaning of "and in consideration of planning decisions". The phrase is not clear and may unnecessarily capture all planning applications and decisions, including applications for minor development (e.g. minor variances). If a land use policy is considered necessary for this threat, staff recommends the SPP include generic policy direction such as directing municipalities to "prohibit stormwater management facilities in vulnerable areas where stormwater management facilities would be a significant threat unless it can be demonstrated to the satisfaction of the RMO that the activity will not be a significant threat to drinking water.		Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies. This policy has been removed from the revised Source Protection Plan.
							Barrie-This policy may restrict a new development from utilizing a storm pond for stormwater management. In reviewing the list of threats activities, the risk associated with stormwater is minimal in comparison. If the system is coupled with risk reduction so that the threat is no longer significant, than stormwater ponds would be allowed.	Use infrastructure improvements that demonstrated risk reduction and remove LUP locating stormwater management ponds outside of the vulnerable areas.	This policy has been removed from the revised Source Protection Plan.
							York-'wherever possible' may lead to inconsistent intent of the policy direction e.g. Prohibition Location of SWMP may not be determined until secondary plan or subdivision plan approval "intent is unclear - 'wherever possible' does not align with a prohibition as in policy 2a-3 however, agree with 'where possible' allows for flexibility that may be warranted for planning approvals already granted" "CTC does not allow for 'where possible' CTC reference WHPA E - more appropriate to specify 'where significant' CTC includes reference to infiltration systems"		This policy has been removed from the revised Source Protection Plan.
							CKL-Please clarify the rationale behind this policy: to locate storm water ponds 'outside' of vulnerable areas where there would be a significant drinking water threat.		This policy has been removed from the revised Source Protection Plan.
							Durham-2a-5 This should be a general provision in the PPS for all WHPAs and IPZs province-wide.		This policy has been removed from the revised Source Protection Plan.
2 a - 6	Mon (LUP)	MC	Mun	F	F	The municipality shall report on the number of planning applications reviewed that were: • denied • approved with the stormwater management facility located outside of the vulnerable area where there would be a significant drinking water threat. • approved with the stormwater management facility located within the vulnerable area where there would be a significant drinking water threat. By February 1st of each year, the municipality shall prepare and submit to the SPA, a report summarizing the action taken including the rationale behind the decisions for the previous year.	Peel- this policy is unnecessary and should be deleted. Staff recommends monitoring the notices of adoption of the policy and not individual planning applications.		This policy has been removed from the revised Source Protection Plan.
							Shelburne- Wordy/unclear What are the details of the reporting requirement? A copy of the application file? Could this annual documentation be streamlined/combined with responsibilities of the RMO to pre-screen certain applications?	Shelburne- Could just say all planning applications involving stormwater management facilities. Provide guidance on specific documentation requirements.	This policy has been removed from the revised Source Protection Plan.
							Barrie-If applications for new systems are prohibited by the MOE, is this not a duplication of effort? What is the purpose of tracking the number of 'denied' planning applications? What does a 'stormwater management facility' include?	Remove the tracking of applications under LUP. If included, remove the tracking for denied applications. Define 'facility'.	This policy has been removed from the revised Source Protection Plan.
							York-difficult to deny planning applications; Need to find out how LAMs track LUP applications replaced 'denied' with 'issued conditons that prohibit the location of SWMP within significant threat areas' CTC specifies Planning Act and Condominum Act		This policy has been removed from the revised Source Protection Plan.
							Tiny-Agee – Requesting MOE inspections of Waste Water Treatment Plants/Sewer Systems being Mandatory. Inspection period should be every year.		This policy has been removed from the revised Source Protection Plan.
							Please clarify the rationale behind this policy		This policy has been removed from the revised Source Protection Plan.

Threat #2(a): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (stormwater management).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
							Newmarket-This policy, along with many other policies within the Source Protection Plan requires that municipalities report to the Source Protection Agency on planning applications that have been considered, including those denied and those permitted that may pose a risk within, and in the case of stormwater management, outside the Vulnerable Areas. The tracking and reporting on applications that pose threats is an important component, however it is a process that requires municipal resources. In order to reduce staff resource time, ensure reporting standards are implemented consistently, reporting templates should be developed and provided to all municipalities. Clarification is required regarding whether additional funding will be made available to municipalities to address the required reporting mechanism.	In order to reduce staff resource time, ensure reporting standards are implemented consistently; reporting templates should be developed and provided to all municipalities. Clarification is required regarding whether additional funding will be made available to municipalities to address the required reporting mechanism.	This policy has been removed from the revised Source Protection Plan.
							Durham-2a-6 Why would the municipality report the number of stormwater management ponds approved <i>outside</i> the vulnerable areas? How is it relevant to the CWA requirements?		This policy has been removed from the revised Source Protection Plan.
2 a - 7	EO	MC	Mun	E	E	The municipality responsible for water systems, in collaboration with the SPA, shall undertake an outreach and awareness program targeted at residential, industrial and commercial landowners as well as the development industry that explains the importance of source water protection and: 1. provides information about contaminants found in stormwater 2. promotes the yellow fish program 3. includes signage at stormwater management facilities 4. promotes water efficiency and water conservation This outreach and awareness program should include specific targets and deliverables as well as a timeframe so that success can be measured.	Peel- staff supports the policy approach Where should this E&O program be implemented? Sheburne- What are the staff commitments/resource and cost implications? What is the required content/format of the annual reporting? Staff training/qualifications required to undertake this work? What are "sub-standard stormwater managemetn facilities? Barrie-To ensure that the specific targets and deliverables that are to be measured are consistent across the watershed, it is recommended that the SPA develop the specific targets that are to be measured. York-ensure ref to LID signage at all SWMP may be overly costly - might be better to be strategic with outreach at specific high traffic locations water for tomorrow program for water efficiency is already underway include the words 'may include' CTC has no policy Durham-2a-7 What is the "yellow fish" program? Many people may not know.		Noted- The revised education/outreach policies specify that the programs should be implemented within vulnerable areas where the activity would be a Significant Drinking Water Threat. It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide. Local SPAs have now been identified as the lead agency with some collaboration with municipalities. This will result in a consistent approach across the watershed. Local SPAs have now been identified as the lead agency with some collaboration with municipalities. The policy revised policy no longer references installing sinage at stormwater management facilities. The yellow fish program is an awareness program aimed at identifying storm drains that drain directly into a water body without treatment for contamination.
2 a - 8	Mon (EO)	MC	Mun	E	F	The municipality shall document its awareness program efforts. By February 1st of each year, the municipality shall prepare and submit to the SPA, a report summarizing the awareness program, what targets were obtained and the outcomes achieved.	Peel- Staff requests the SPC to review the draft monitoring policies and consider if a general policy on monitoring rather than detailed policy direction for each threat is a preferred approach. Sheburne- What are the staff commitments/resource and cost implications? What is the required content/format of the annual reporting? Staff training/qualifications required to undertake this work? What are "sub-standard stormwater managemetn facilities?		All monitoring policies have been simplified and revised based on implementing body. How monitoring policies need to be addressed will be included in an implementation guide. It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.

Threat #2(a): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (stormwater management).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
							York-difficult to measure if we've made people more aware of SWP thorough efforts outcomes may be difficult to specify.CA stewardship links		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
							Durham-2a-8 Documenting results from a broad public awareness campaign may be difficult and expensive. Water quality may not <i>improve</i> as a result of the campaign (but it may not get worse despite population growth, etc.).		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
2 a - 9	SA	MC	Mun	E	E	Municipalities are required to consider the ways in which sub-standard stormwater management facilities within vulnerable areas can be regularly maintained and upgraded.	Peel- Please clarify the implementing body (upper or lower tier)?		The committee has not specified whether the policy is to be implemented by the upper tier or lower tier- as the committee was unsure of who is responsible for mainting stormwater management facilities in many cases.
							Sheburne- What are the staff commitments/resource and cost implications? What is the required content/format of the annual reporting? Staff training/qualifications required to undertake this work? What are "sub-standard stormwater managemetrn facilities?"	Provide templates, examples of targets, deliverables and evaluation measures. Standardized material and reporting requirements for all municipalities would help to foster a uniform approach and may reduce the guess-work of meeting annual reporting requirement. Consistent report format may also streamline SPA review. Define criterial for identifying sub-standard facilities, provide guidelines for review of SWM facilities and annual reporting.	It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
							Barrie-This policy requires the municipality to upgrade sub-standard stormwater management facilities within vulnerable areas. In a presentation prepared by the LSRCA, the total for 276 retrofit opportunities in the watershed at an estimated cost \$117 million dollars. The municipality, in establishing an Implementation Plan, will prioritize projects recognizing the most effective manner to implement the required works and taking into account the capital resources available. It will take some time to investigate alternative funding mechanisms that can be employed.	Ministry needs to recognize that projects will be considered under the capital planning process of the municipality with a long range implementation period. Time is needed to establish the retrofit opportunities and alternative funding mechanisms.	This policy is asking municipalities to consider upgrading substandard facilities. There is no legal requirement to upgrade these facilities.
							Barrie-Definition of 'stormwater management facilities' should not include storm sewers.	Amend the definition of Stormwater management to exclude storm sewers.	Storm sewers are not included in the definition of this threat. The revised source protection plan provides a clearer explanation of what is captured under the threat definition.
							York-links to the Lake Simcoe Protection Plan - Master Plans for Storm Water		Noted
							Newmarket-There will be costs associated with the review by municipalities of existing stormwater management facilities within the vulnerable areas and the annual documentation of the actions taken to maintain or upgrade the systems. Will there be additional funding provided to municipalities to undertake this review and subsequent implementation to address identified threats?	Will there be additional funding provided to municipalities to undertake the review and subsequent implementation to address identified threats in accordance with policy 2a -9 &12?	The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
							Durham-2a-9 This would be covered in the C of A conditions in 2a-1. 2a-9, 2a-12, 2a-14 all involve or could involve significant capital and ongoing operating costs for Region and lower tier municipalities in Durham.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
2 a - 10	In	HR	MOE	E	?	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.	Peel- clarify intended policy direction. Is the intent to "encourage the MOE to provide financial incentives through the Ontario Drinking Water Stewardship Program to reduce risks to drinking water"? If so, the policy should be revised to be clear.		The policy has been revised to clearly state that the intent is to encourage MOE to continue funding relevant stewardship programs.

Threat #2(a): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (stormwater management).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
2 a - 11	In	MC	SPA	E	E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	Peel- The Ontario Drinking Water Stewardship Program should identify the implementing bodies not the source protection plan. Why are the SPAs named as the implementing body?		The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
2 a - 12	Mon (In)	MC	Mun	E	F	The municipality shall document the action taken to maintain and/or upgrade existing systems in vulnerable areas. By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	Sheburne- What are the staff commitments/resource and cost implications? What is the required content/format of the annual reporting? Staff training/qualifications required to undertake this work? What are "sub-standard stormwater management facilities?"	Provide templates, examples of targets, deliverables and evaluation measures. Standardized material and reporting requirements for all municipalities would help to foster a uniform approach and may reduce the guess-work of meeting annual reporting requirement. Consistent report format may also streamline SPA review. Define criteria for identifying sub-standard facilities, provide guidelines for review of SWM facilities and annual reporting.	It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
							Barrie-This policy requires the municipality to document action taken to maintain and/or upgrade existing systems in vulnerable areas. Reporting is also required under the Comprehensive Stormwater Management Master Plan in accordance with Section 4.5-SA of the Lake Simcoe Protection Plan. LSRCA will prepare a progress report to the Province on the preparation and implementation of these master plans.	Avoid duplication of reporting mechanisms.	It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring
2 a - 13	Mon (In)	MC	SPA	E	E	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.	Peel- this policy requires the monitoring body (SPA) to report to itself on stewardship actions. Staff questions the need for this policy and requests confirmation of the SPAs roles with respect to stewardship actions in relation to this threat.		The monitoring policy has been revised so the SPA is no longer reporting to itself. The SPA has been directed to include documentation in their annual report on the risk reduction efforts they administered throughout the year.
2 a - 14	LUP	NLB	Mun		E	Municipalities are encouraged to include policies in their Official Plans that require the preparation of Master Environmental Servicing Plans for new developments.	Peel- suggest deleting this policy or defining "Master Environmental Servicing Plans" and clarifying how they would contribute to the elimination or management of this significant drinking water threat.		Please see the explanatory document for the SPCs rationale for including this policy.
2 a - 15	Re	HR	MOE	E	?	The MOE should research alternative methods for stormwater management. MOE may wish to consider the approach currently in place through the Lake Simcoe Protection Plan. Research should focus on how to mitigate significant threats in stormwater including the reduction of stormwater runoff.			
2 a - 16	PI	MC	MOE		?	The MOE should not permit new stormwater management ponds for roads where they would be a significant drinking water threat when making decisions under the Environmental Assessment Act.	York-prohibit may be too restrictive for practical H&S reasons may need to control discharge for health and safety reasons e.g. Control driving hazards Roads unclear if intent was ponds only - what about sand and grit chambers, etc. Reference to the EAA is not clear what the intent might be. Amend the MEA Municipal Class EA, on IEAs only? - AH		This policy has been removed from the revised Source Protection Plan.

Threat #2(b): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (wastewater treatment plants/sewer systems).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
2 b - 1	PI	MC	MOE	E	C	The MOE shall amend Certificates of Approval for systems that are a significant drinking water threat to ensure that these sites cease to be significant drinking water threats by incorporating conditions that may include the following: - mandatory inspections at least every 5 years - upgrading of these systems to current standards as necessary - regular reviews to ensure that impacts to drinking water quality are identified early - a requirement that by-pass emergency management plans address by-passes and that this is communicated to water operators/RMO/health unit as well as neighbouring municipalities.	Peel- Staff supports the policy approach		Noted
							York-mandatory inspection of WWTP every five years, with an intent to inspect critical sewage infrastructure e.g pipes on a cycle that is cost effective cost of inspection every five years for sewage pipes are high and may need longer than 5years to inspect all kms of pipe "OMM Inspection program for YDSS already underway &I program considers monitoring includes some inspections" emergency management plans should be tested annually "CTC specifies additional groundwater monitoring and contingency if g/w shows adverse conditions CTC requires upgrading facility to current standards"		All of the detailed requirements of what an amended approval have been removed from the policy. The SPC felt that the ministry would include appropriate terms and conditions to ensure the threat ceases to be a significant Drinking Water Threat.
							Tiny-Agee – Requesting MOE inspections of Waste Water Treatment Plants/Sewer Systems being Mandatory. Inspection period should be every year.		Noted-All of the detailed requirements of what an amended approval have been removed from the policy. The SPC felt that the ministry would include appropriate terms and conditions to ensure the threat ceases to be a significant Drinking Water Threat.
						Durham-2b-1 C of A amendment cost comment also applies to amendments affecting wastewater treatment plants and sewer systems. What defines "current standards"? See comment about not including "conditions" in 2a-1.			All of the detailed requirements of what an amended approval have been removed from the policy. The SPC felt that the ministry would include appropriate terms and conditions to ensure the threat ceases to be a significant Drinking Water Threat.
2 b - 2	Mon (PI)	MC	MOE	E	F	The MOE shall document the number of Certificates of Approval that have been reviewed and amended, the compliance monitoring undertaken, and how protection of municipal drinking water sources has been addressed. By February 1 of each year, MOE shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	Peel- Staff supports the policy approach		Noted
2 b - 3	PI	MC	MOE	F	C	The MOE shall not approve Certificates of Approval for new sewage treatment plants where they would be a significant drinking water threat.	Peel- Staff supports the policy approach		Noted
							Durham-2b-3 Suggest rewording as "The MOE shall deny Certificates...."		The policy has been revised to clearly state the intent of the policy in standard policy text suggested by the MOE.
2 b - 4	Mon (PI)	MC	MOE	F	F	The MOE shall document the number of Certificates of Approval that have been reviewed and denied, and how protection of municipal drinking water sources has been addressed. By February 1 of each year, MOE shall prepare and submit to the SPA, a report summarizing the actions taken and the results achieved for the previous year.	Peel- Staff supports the policy approach		Noted
							Durham-2b-4 Amend the wording to say "The MOE shall document the number of C of A applications that have been reviewed and denied. By Feb. 1..." Denying the Cof A is how they addressed the threat. Could 2b-2 and 2b-4 be combined?		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
2 b - 5	LUP	MC	Mun	F	B	The municipality shall amend their planning documents to prohibit new sewage treatment plants and any associated outlets where they would be a significant drinking water threat.	Peel- Staff supports the policy approach		Noted
							Shelburne- 2b-5 says amend "planning documents", 2b-6 says "notice of adoption of official plan amendment". Could be a combination of official plan and/or zoning amendments to implement this policy. Town policies and zoning already require full municipal servicing for new development, no amendments likely needed. Septic inspection services are provided by the Country of Dufferin Building Department- the Town does not have the staff resources/training familiar with proper care and inspection of septic tanks. Conservation Authority has existing programs in place re septic systems. Staff commitments/resources and cost implications? Required content/format of the annual reporting? Staff training/qualification required to undertake this work? Industries that would produce these effluent discharges are generally not permitted by existing policies and zoning. How does the Town determine if existing OP and zoning are sufficient to address this policy, or if amendments are required? Staff commitments/resource and cost implications? Required content/format of the annual reporting? Staff training/qualification required to undertake this work?	Use generic language "amend planning documents" Clarify division/sharing responsibilities among local municipality (responsible for water sytem), upper tier (responsibel for septic approvals, inspection etc.) and the CA has existing related programs. Provide templates, examples, evaluation measures, criteria, etc for programs, incentives annual reporting. Examples of policies and zoning that would be acceptable. Provide templates, examples, evaluation measures, targets, criteria, etc for programs and annual reporting.	The province will determine if existing O.P. policies are adequate to be in conformity with the Source Protection Plan.
							Barrie-This policy outlines prohibiting new sewage treatments and associated outlets however there is no mention of expansions. It would be helpful if the terms 'new' excluded expansions. Policies 1b-5 and 2a-3 specifically references exclusion of expansion but this policy does not.	Include "expansion would be allowed".	The revised policy states that expansions to existing facilities will only be permitted where such expansions do not pose a Significant Drinking Water Threat.
							York-does this include pipes? CTC includes related pipes		The policy captures the circumstances outlined in the provincial tables of circumstances
							Tiny-Disagree – with amending planning documents regarding prohibiting new onsite sewage systems. Option for the RMO to pre screen and approve on large properties where only a portion of property is in WHPA. Also advanced treatment systems		This comment seems out of place. This set of policies is for waste water treatment plants.
							EG-How determine where it would be a significant drinking water threat? Does it rely on a Risk Assessment?	Be more specific about implementation	The revised introductory material to the Source Protection Plan policies now contains a section that summarizes how to determine where the Source Protection Plan policies apply.
2 b - 6	Mon (LUP)	MC	Mun	F	F	The planning approval authority shall provide to the SPA a copy of the notice of adoption of the official plan amendment to prohibit sewage treatment plants in vulnerable areas that are or	Peel- Staff supports the policy approach		Noted

Threat #2(b): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (wastewater treatment plants/sewer systems).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
						Official plan amendment to prohibit sewage treatment plants in vulnerable areas that are or would be a significant drinking water threat.	<p>Shelburne- 2b-5 says amend "planning documents", 2b-6 says "notice of adoption of official plan amendment". Could be a combination of official plan and/or zoning amendments to implement this policy.</p> <p>Town policies and zoning already require full municipal servicing for new development, no amendments likely needed. Septic inspection services are provided by the County of Dufferin Building Department- the Town does not have the staff resources/training familiar with proper care and inspection of septic tanks. Conservation Authority has existing programs in place re septic systems. Staff commitments/resources and cost implications? Required content/format of the annual reporting? Staff training/qualification required to undertake this work?</p> <p>Industries that would produce these effluent discharges are generally not permitted by existing policies and zoning. How does the Town determine if existing OP and zoning are sufficient to address this policy, or if amendments are required?</p>	<p>Use generic language "amend planning documents"</p> <p>Clarify division/sharing responsibilities among local municipality (responsible for water system), upper tier (responsible for septic approvals, inspection etc.) and the CA has existing related programs. Provide templates, examples, evaluation measures, criteria, etc for programs, incentives annual reporting.</p> <p>Examples of policies and zoning that would be acceptable. Provide templates, examples, evaluation measures, targets, criteria, etc for programs and annual reporting.</p>	<p>The province will determine if existing O.P. policies are adequate to be in conformity with the Source Protection Plan.</p>
							Durham-2b-6 See 2b-5. If this policy is kept, wording should be changed to reflect only future circumstances "in areas where the activity would be a significant"		The wording of the Land Use Planning Policy has been revised to reflect that the policy is for future Significant Drinking Water Threats.

Threat #2(b): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (wastewater treatment plants/sewer systems).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
2 b - 7	EO	MC	Mun		E	The municipality responsible for water systems in collaboration with the SPA shall undertake an awareness program targeted at residential, industrial and commercial and institutional landowners that addresses the importance of source water protection and appropriate sewer use. This awareness program should include set specific targets and deliverables so that its success can be qualitatively defined in its reporting requirements.	Peel- Staff supports the policy approach. The target area should be clarified.		Local SPAs have now been identified as the lead agency with some collaboration with municipalities
							Shelburne- Staff commitments/resource and cost implications? Required content/format of the annual reporting? Staff training/qualifications required to undertake this work/ Town policies and zoning already require full municipal servicing for new development, no amendments likely needed. Septic inspection services are provided by the Country of Dufferin Building Department- the Town does not have the staff resources/training familiar with proper care and inspection of septic tanks. Conservation Authority has existing programs in place re septic systems. Staff commitments/resources and cost implications? Required content/format of the annual reporting? Staff training/qualification required to undertake this work? Industries that would produce these effluent discharges are generally not permitted by existing policies and zoning. How does the Town determine if existing OP and zoning are sufficient to address this policy, or if amendments are required?	Templants, examples, evaluation measures, criteria, etc for programs, annual reporting. Clarify division/sharing responsibilities among local municipality (responsible for water sytem), upper tier (responsibel for septic approvals, inspection etc.) and the CA has existing related programs. Provide templates, examples, evaluation measures, criteria, etc for programs, incentives annual reporting. Examples of policies and zoning that would be acceptable. Provide templates, examples, evaluation measures, targets, criteria, etc for programs and annual reporting.	Local SPAs have now been identified as the lead agency with some collaboration with municipalities
							Barrie-To ensure that the specific targets and deliverables that are to be measured are consistent across the watershed it is recommended that the SPA develop the specific targets that are to be measured.	SPA develop specific targets and deliverables to be measured.	Local SPAs have now been identified as the lead agency with some collaboration with municipalities
							York-municipality with responsibility for water systems ** check Municipal Act, does this wording make sense? - AH replace 'municipality responsible for water systems' with the appropriate wording as defined under the Municipal act 'responsible for the water production, treatment and storage..'		Local SPAs have now been identified as the lead agency with some collaboration with municipalities
							Durham-2b-7 This policy could have major cost implications depending on specific requirements and monitoring obligations. Also see comment in general section on education and awareness campaign.		Local SPAs have now been identified as the lead agency with some collaboration with municipalities. The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
2 b - 8	Mon (EO)	MC	Mun		F	By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing its outreach and awareness program, what targets were obtained and the outcomes achieved.	Peel- Staff requests the SPC to review the draft monitoring policies and consider if a general policy on monitoring rather than detailed policy direction for each threat is a preferred approach.		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
							Shelburne- Staff commitments/resource and cost implications? Required content/format of the annual reporting? Staff training/qualifications required to undertake this work/ Industries that would produce these effluent discharges are generally not permitted by existing policies and zoning. How does the Town determine if existing OP and zoning are sufficient to address this policy, or if amendments are required?	Templants, examples, evaluation measures, criteria, etc for programs, annual reporting. Clarify division/sharing responsibilities among local municipality (responsible for water sytem), upper tier (responsibel for septic approvals, inspection etc.) and the CA has existing related programs. Provide templates, examples, evaluation measures, criteria, etc for programs, incentives annual reporting. Examples of policies and zoning that would be acceptable. Provide templates, examples, evaluation measures, targets, criteria, etc for programs and annual reporting.	It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide. The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
2 b - 9	In	HR	Mun		?	Municipalities shall consider the ways in which additional conveniences can be created to implement in-flow/infiltration reduction programs to reduce the likelihood of by-pass.	Town policies and zoning already require full municipal servicing for new development, no amendments likely needed. Septic inspection services are provided by the Country of Dufferin Building Department- the Town does not have the staff resources/training familiar with proper care and inspection of septic tanks. Conservation Authority has existing programs in place re septic systems. Staff commitments/resources and cost implications? Required content/format of the annual reporting? Staff training/qualification required to undertake this work?		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
							Shelburne- Staff commitments/resource and cost implications? Required content/format of the annual reporting? Staff training/qualifications required to undertake this work/	Templants, examples, evaluation measures, criteria, etc for programs, annual reporting.	The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
							York-links to I&I program		Noted
							Durham-2b-9, 10, 13 and 15 to 17 all have financial implications for municipalities where such a bylaw, maintenance program or infrastructure standards are not already in place. A maintenance program could be dictated in the amended C of A per 2b-1. We support making these strategic action policies, as it gives the municipality the flexibility to choose the best option for their circumstances.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
2 b - 10	In	HR	Mun		?	Municipalities shall consider the implementation of programs to remove connections of stormwater sources to sanitary sewers to reduce surges in volumes during wet weather and the establishment of upgrade priorities that focus on the most vulnerable areas.	York-links to I&I program		Noted
							Newmarket-This recommendation suggests that municipalities shall consider the implementation of programs to remove connections of stormwater sources to sanitary sewers. This policy could be strengthened by providing funding or other incentives to municipalities to identify and implement changes to the stormwater system where significant threats have been identified within vulnerable areas.	This policy could be strengthened by providing funding or other incentives to municipalities to identify and implement changes to the stormwater system where significant threats have been identified within vulnerable areas.	The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
2 b - 11	In	HR	MOE		?	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.	Peel- clarify intended policy direction. Is the intent to "encourage the MOE to provide financial incentives through the Ontario Drinking Water Stewardship Program to reduce risks to drinking water"? If so, the policy should be revised to be clear.		The policy has been revised to clearly state that the intent is to encourage MOE to continue funding relevant stewardship programs.
2 b - 12	In	MC	SPA		E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	Peel- The Ontario Drinking Water stewardship program should identify the implementing bodies not the source protection plan. Why are the SPAs named as the implementing body?		The Ontario Drinking Water Stewardship Program is currently implmented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs

Threat #2(b): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (wastewater treatment plants/sewer systems).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
							Shelburne-Town policies and zoning already require full municipal servicing for new development, no amendments likely needed. Septic inspection services are provided by the Country of Dufferin Building Department- the Town does not have the staff resources/training familiar with proper care and inspection of septic tanks. Conservation Authority has existing programs in place re septic systems. Staff commitments/resources and cost implications? Required content/format of the annual reporting? Staff training/qualification required to undertake this work?	Clarify division/sharing responsibilities among local municipality (responsible for water system), upper tier (responsible for septic approvals, inspection etc.) and the CA has existing related programs. Provide templates, examples, evaluation measures, criteria, etc for programs, incentives annual reporting.	The province will determine if existing O.P. policies are adequate to be in conformity with the Source Protection Plan.
							Durham-2b-12 Why is this a "must conform" policy?		The policy is must conform because it is addressing a Significant Drinking Water Threat and the implementing body is a public body listed under the Clean Water Act. Please see the legal effect explanation in the revised Source Protection Plan for additional information.
2 b - 13	Mon (In)	MC	Mun		?	The municipality shall document the action taken to consider upgrade priorities. By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	Peel- Staff requests the SPC to review the draft monitoring policies and consider if a general policy on monitoring rather than detailed policy direction for each threat is a preferred approach.		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
							Shelburne- Staff commitments/resource and cost implications? Required content/format of the annual reporting? Staff training/qualifications required to undertake this work/ Town policies and zoning already require full municipal servicing for new development, no amendments likely needed. Septic inspection services are provided by the Country of Dufferin Building Department- the Town does not have the staff resources/training familiar with proper care and inspection of septic tanks. Conservation Authority has existing programs in place re septic systems. Staff commitments/resources and cost implications? Required content/format of the annual reporting? Staff training/qualification required to undertake this work?	Templates, examples, evaluation measures, criteria, etc for programs, annual reporting. Clarify division/sharing responsibilities among local municipality (responsible for water system), upper tier (responsible for septic approvals, inspection etc.) and the CA has existing related programs. Provide templates, examples, evaluation measures, criteria, etc for programs, incentives annual reporting.	It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide. The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
							York-This policy should follow 2b-10 as the monitoring requirement is confusing when not in context with the 'action' policy links to Asset Management programs add words - upgrades to existing sewage works, including collection and treatment systems/ CTC states will upgrade to current standards		This has been corrected in the revised Source Protection Plan.
2 b - 14	Mon (In)	MC	SPA		E	By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.	Peel- This policy requires the monitoring body (SPA) to report to itself on stewardship actions. Staff questions the need for this policy and requests confirmation of the SPA's role with respect to stewardship actions in relation to this threat.		The monitoring policy has been revised so the SPA is no longer reporting to itself. The SPA has been directed to include documentation in their annual report on the risk reduction efforts they administered throughout the year.
							Shelburne-Town policies and zoning already require full municipal servicing for new development, no amendments likely needed. Septic inspection services are provided by the Country of Dufferin Building Department- the Town does not have the staff resources/training familiar with proper care and inspection of septic tanks. Conservation Authority has existing programs in place re septic systems. Staff commitments/resources and cost implications? Required content/format of the annual reporting? Staff training/qualification required to undertake this work?	Clarify division/sharing responsibilities among local municipality (responsible for water system), upper tier (responsible for septic approvals, inspection etc.) and the CA has existing related programs. Provide templates, examples, evaluation measures, criteria, etc for programs, incentives annual reporting.	The province will determine if existing O.P. policies are adequate to be in conformity with the Source Protection Plan.
2 b - 15	SA	NLB	Mun		E	Municipalities should consider the adoption of sewer use by-laws in highly vulnerable areas.	Peel- Define "highly vulnerable areas"? Do you mean in "highly vulnerable aquifers (HVAs)" or "vulnerable area"?		This policy has been removed from the revised Source Protection Plan.
							Shelburne- Town already has municipal-wide sewer use by-law. Why limit to vulnerable areas? Sewer flows through highly vulnerable areas could be coming from outside the highly vulnerable areas, and likely do in most cases. Town policies and zoning already require full municipal servicing for new development, no amendments likely needed. Septic inspection services are provided by the Country of Dufferin Building Department- the Town does not have the staff resources/training familiar with proper care and inspection of septic tanks. Conservation Authority has existing programs in place re septic systems. Staff commitments/resources and cost implications? Required content/format of the annual reporting? Staff training/qualification required to undertake this work?	Consider removing "in highly vulnerable areas", should sewer use by-laws cover users in the entire sanitary service area? Clarify division/sharing responsibilities among local municipality (responsible for water system), upper tier (responsible for septic approvals, inspection etc.) and the CA has existing related programs. Provide templates, examples, evaluation measures, criteria, etc for programs, incentives annual reporting.	This policy has been removed from the revised Source Protection Plan.
							York-add words - where collection systems reside within the significant threat area		This policy has been removed from the revised Source Protection Plan.
							Newmarket-This policy recommends that municipalities consider the adoption of sewer use by-laws and consider higher standards for sewage infrastructure. It is recommended that municipalities be provided with best practices or a model Sewer Use By-laws and examples of the 'higher' standards for sewage infrastructure recommended?	Newmarket-Municipalities should be provided with best practices and a model Sewer Use By-laws and examples of recommended 'higher' standards for sewage infrastructure for implementation in vulnerable areas.	This policy has been removed from the revised Source Protection Plan.
							Durham-2b-15 A sewer use bylaw would normally apply to the entire sanitary sewer system. Because of the connectivity within a system it doesn't really make sense to apply it only in the WHPA or IPZ.		This policy has been removed from the revised Source Protection Plan.
2 b - 16	SA	NLB	Mun		E	Municipalities should consider higher standards for sewage infrastructure in vulnerable areas.	Barrie-There are a number of circumstances that make a sanitary sewer a significant threat. If the sewer is failing, it may take time to identify and correct the problem. It is uncertain what measures would be required to reduce the likelihood of this risk for existing sanitary sewers that are a significant threat.	Define higher standards for sewage infrastructure by including best practices in Background Document.	This policy has been removed from the revised Source Protection Plan.
							add words - significant threat areas		This policy has been removed from the revised Source Protection Plan.
							Barrie-This Strategic Action would benefit many municipalities. Perhaps MOE or the Conservation could produce a guidance document to define the higher standards for sewage infrastructure. Perhaps include some best practices of other municipalities in the Background Document.	Define higher standards for sewage infrastructure by including best practices in Background Document.	This policy has been removed from the revised Source Protection Plan.
							Newmarket-This policy recommends that municipalities consider the adoption of sewer use by-laws and consider higher standards for sewage infrastructure. It is recommended that municipalities be provided with best practices or a model Sewer Use By-laws and examples of the 'higher' standards for sewage infrastructure recommended?	Newmarket-Municipalities should be provided with best practices and a model Sewer Use By-laws and examples of recommended 'higher' standards for sewage infrastructure for implementation in vulnerable areas.	This policy has been removed from the revised Source Protection Plan.

Threat #2(b): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (wastewater treatment plants/sewer systems).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
2 b - 17	SA	NLB	Mun		E	Municipalities should ensure ongoing and regular maintenance of the storm sewer network to prevent road flooding and the inflow of water to the sanitary sewer systems.	Peel- municipalities who has the responsibility for delivering stormwater management should be indicated as the implementing bodies for this policy.		This policy has been removed from the revised Source Protection Plan.
							add words - with particular focus during the fall and spring.		This policy has been removed from the revised Source Protection Plan.

ICA: Nitrate for Georgian Sands and Lafontaine ICA
Policies for the establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes
of sewage
(Threat #2b: waste water treatment plants / sewer systems)

Policy #	Tool	Legal Effect	Implementer	Original Policy	Comments	Suggested Improvements	SPC Response
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No change in policy approach. The policies in the body of the report apply to ICA.

Threat #2(c): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (onsite sewage systems).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
In addition to the policy approaches outlined below, it was also recognized that the mandatory inspection program, as required under the Building Code, addresses many of the Source Protection objectives associated with private septic systems.									
2 c - 1	PI	MC	MOE	E	C	The MOE shall amend all existing Certificates of Approval for large (more than 10,000 litres) septic systems to prevent expansion where the system is a significant threat. If the expansion of an existing site is coupled with risk reduction (through infrastructure improvements, for example) so that the threat is no longer significant, expansion would be allowed.	Peel- staff requests that the SGBLS and CTC region SPCs coordinate policy development to ensure that policy approaches for large onsite sewage systems are consistent within the Region of Peel. Staff supports the policy approach to use Provincial Instruments (C of As) issued under the EPA to address this threat. Clarify what is meant by "if the expansion of an existing site is coupled with risk reduction". The phrase "is coupled with risk reduction" is not clear. York-large systems may need to upgrade to meet new treatment standards would be better to tag a requirement with Class EA because its earlier in the process need to find out if private system would need to do an EA re-word - expansions of existing systems must include a risk reduction conditions as part of the EA prefer CTC wording except need to allow expansions lacks any reference to expansions Durham-2c-1 and 2c-3 both contain clauses referring to expansion of an existing system. Is this an error? 2c-3 should read "The MOE shall deny applications for C of As for new..."		Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted each others policies. The phrase coupled with risk reduction has been removed from the revised plan. The revised policy direction no longer permits the expansion of existing large on-site sewage systems within vulnerable areas where the system would be a Significant Drinking Water Threat.
2 c - 2	Mon (PI)	MC	MOE	E	F	The MOE shall document the number of Certificates of Approval that have been reviewed and amended. By February 1 of each year, MOE shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	Durham-2c-2 and 4 Could these policies be combined? All C of A applications should be reviewed if they are a threat, not just applications submitted because of an expansion.		The revised policy requires that all C of As be reviewed if they are located in a vulnerable area where they would be a Significant Drinking Water Threat.
2 c - 3	PI	MC	MOE	F	C	The MOE shall not approve Certificates of Approval for new or expanded large systems that would be a significant drinking water threat. If that expansion is coupled with a risk reduction (through infrastructure improvements, for example) so that the threat is no longer significant, expansion would be allowed.	Peel- Policy 2c-1 and 2c-3 duplicates policy for expansion of large systems. York-duplicates policy on expansions (2c-1) - remove expansion reference here (leave in 2c-1) For municipal systems, a class EA would address locating within significant threat area remove reference to expansions prefer CTC wording for expansions A/E-We would appreciate clarification as to the extent to which larger septic systems are prohibited and whether this will have any implication on the future employment growth of Amaranth and East Garafraxa. There should be flexibility in the policies to permit enhanced treatment systems to allow for replacement and upgrade of these systems if demonstrated that is necessary.		The policy has been revised and no longer references expansions to existing large on-site sewage systems. The policy has been revised and no longer references expansions to existing large on-site sewage systems. The revised introductory material to the Source Protection Plan policies now contains a section that summarizes how to determine where the Source Protection Plan policies apply. Please see the explanatory document for the SPCs rationale of prohibit future large on-site sewage systems within vulnerable areas where they would be Significant Drinking Water Threats.
2 c - 4	Mon (PI)	MC	MOE	F	F	The MOE shall document the number of Certificates of Approval that have been reviewed and denied, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE shall prepare and submit to the SPA, a report summarizing the actions taken and the results achieved for the previous year.	York-is possible to combine this monitoring policy to link to several others Durham-2c-4 If a C of A application is denied, MOE has protected the water source. What else is there to report?		The monitoring policies have combined in the revised source protection plan to remove unnecessary duplication. There is now monitoring policy per implementing body. It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
2 c - 5	LUP	MC	Mun	F	B	The municipality shall amend its planning documents to prohibit new domestic on-site sewage systems that would be a significant threat. Lots of record of the approval of the Source Protection Plan would be exempted.	Haliburton-This policy is not clear on how replacement systems are to be addressed i.e. is a replacement system a "new system"? If a replacement system is considered a "new system" then the policy is inconsistent i.e. a new system is allowed on a vacant lot of record but a replacement system on an already developed lot is not. The policy also appears to miss opportunities to: • Require improved standards such as a tertiary system for both new systems on vacant lots and replacement systems; • to connect to a municipal system where feasible. This policy, as drafted, conflicts with the direction of the Provincial Policy Statement on intensification and redevelopment in the Settlement Areas for those municipalities with approved Official Plan documents that include Settlement Areas on partial services. Although on-site sewage systems are not subject to Part IV powers, this policy is using land use planning to prohibit smaller on-site septic systems, while policies for systems larger than 10,000 litres cannot only be enlarged but new systems also established. It is not appropriate to treat small systems more harshly when tools such as 2c-12 provide a mechanism to monitor the maintenance and operation of these systems. This policy could represent undue hardship for property owners who do not have the option of a municipal sewer system as it offers no solution. This policy is also inconsistent with the options provided for landowners in areas already impacted by the threat., where systems are only prohibited within the WHPA-A, but within the ICA, advanced treatment systems are required for new systems.	Haliburton- Include replacement systems that are built to an advanced standard. If the intent is that they are included then specifically say so. Check Planner FAQ Draft policies that compatible with those for larger systems (See 2c-1 and 2c-3). Consider policies comparable to those of the Trent Conservation Coalition SPR which require connection to a municipal system where feasible and, where not feasible, new lots and construction on existing lots (both vacant and replacement systems) are built to a higher standard. The policies of Section 7.2.3.1 particularly 2c-ICA-5 uses this approach.	The policy has been revised to allow small on-site sewage systems within vulnerable areas where they would be a Significant Drinking Water Threat as long as they can demonstrate through the submission of a hydrological study that the new system is sized appropriately for the lot.
							Peel- staff requests that SGBLS and CTC region SPCs coordinate policy development to ensure that land use planning policy approaches for small onsite sewage systems are consistent within the region of peel. Staff questions the need for a policy to prohibit all new lot creations and suggests that a land use planning policy that requires a risk assessment would be effective and appropriate for this threat. Staff recommends that the SPC consider a land use policy that directs municipalities to prohibit small septic systems on new lots in vulnerable areas where they would be a significant drinking water threat unless a risk assessment is undertaken and the risk assessment demonstrates to the satisfaction of the RMO that the septic systems would not be a significant drinking water threat. Staff supports permitting small onsite sewage disposal systems on existing lots of record subject to mandatory septic system inspection program.		Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted each others policies.
						Barrie-The municipality is to prohibit new domestic on-site sewage systems that would be a significant threat. Does "new" include replacement of existing systems or the expansion of existing systems? What about areas that do not have municipal servicing?	Provide definition of "new" for domestic systems. Consider that it may take time for municipality to provide servicing.		The policy has been revised to allow small on-site sewage systems within vulnerable areas where they would be a Significant Drinking Water Threat as long as they can demonstrate through the submission of a hydrological study that the new system is sized appropriately for the lot.

Threat #2(c): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (onsite sewage systems).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
							York-'lots of record' and development applications that have 'commenced' should be exempt from this prohibition		The policy has been revised to allow small on-site sewage systems within vulnerable areas where they would be a Significant Drinking Water Threat as long as they can demonstrate through the submission of a hydrological study that the new system is sized appropriately for the lot. The MOE is currently discussing the need for transitional policies within the Source Protection Plans and whether or not the approach should be consistent across the province. The SPC will fully consider the need for transitional policies at a later date when the MOE releases its guidance document.
							A/E-The policies regarding new lot creation and the restriction/prohibition of individual septic systems require further discussion. There are several existing lots of record and currently designated Estate Residential developments (approved and pending) that rely on individual septic systems. Any prohibition that would prevent the realization of these subdivisions is once again a "non-starter". It is noted that development is minimal in comparison to other activities/uses within the various Source Protection Regions.		The policy has been revised to allow small on-site sewage systems within vulnerable areas where they would be a Significant Drinking Water Threat as long as they can demonstrate through the submission of a hydrological study that the new system is sized appropriately for the lot.
							Newmarket-The wording of the policy needs to be clarified to ensure that it does not inadvertently recognize that all existing lots of record are exempt from the prohibition for on-site sewage systems. For example, in most urban areas the intent is that all existing lots of record shall be required to connect to the municipal sanitary sewer unless the lot is identified within an area specifically designated in the official Plan where services are not intended to be extended. The policy should be tied back to municipal OP's.	The policy should be refined to ensure that not all existing lots of record are exempt from the prohibition for on-site sewage systems. Only existing lots of record that are specifically identified in municipal OP's that municipal services are not intended to be extended, may only be exempted from the prohibition of on-site septic systems.	The policy has been revised to allow small on-site sewage systems within vulnerable areas where they would be a Significant Drinking Water Threat as long as they can demonstrate through the submission of a hydrological study that the new system is sized appropriately for the lot. The SPC has also included a policy to encourage municipalities to enact by-laws to promote mandatory connection to municipal waste water system in vulnerable areas where the on-site sewage system would be a Significant Drinking Water Threat.
							EG_How determine where it would be a significant drinking water threat? Are they to be prohibited within WHPAs?	Be more specific about implementation	The revised introductory material to the Source Protection Plan policies now contains a section that summarizes how to determine where the Source Protection Plan policies apply.
2c-6	Mon (LUP)	MC	MC	F	F				
TBD	LUP	MC	Mun	F	B				
2 c - 6	Mon (LUP)	MC	Mun	F	F	The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to prohibit new on-site sewage systems where they would be a significant threat.			

Threat #2(c): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (onsite sewage systems).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
2 c - 7	EO	HR	Mun		E	The municipality responsible for water systems in collaboration with the SPA shall undertake an awareness program targeted at landowners within vulnerable areas about proper care and maintenance of septic systems.	King-Industrial Effluent is not a use and as such is difficult to control using Land Use Planning controls.	This activity needs to be identified through outreach and education.	This comment seems out of place- this set of policies are to address Significant On-site sewage system threats.
							York-septic systems fall under lower tier role (not municipality responsible for water in Regional setting) reword - municipality with the authority for septic inspections under building code are responsible for education and outreach perfer CTC wording to assign appropriate duties state municipality or building code authority		Local SPAs have now been identified as the lead agency with some collaboration with municipalities.
							Durham-2c-7 See general comment about awareness programs. In this case, the scope is the wellhead protection area residents and businesses. Presumably, you would do an integrated info package/visit per affected property with all the advice on all their threats provided at once, perhaps annually.		Local SPAs have now been identified as the lead agency with some collaboration with municipalities.
2 c - 8	Mon (EO)	HR	Mun		F	The municipality shall document its outreach efforts. By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	York-Need to specify outreach efforts to address septic system threats		Local SPAs have now been identified as the lead agency with some collaboration with municipalities.
2 c - 9	In	HR	MOE		?	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.	Peel- clarify intended policy direction. Is the intent to "encourage the MOE to provide financial incentives through the Ontario Drinking Water Stewardship Program to reduce risks to drinking water"? If so, the policy should be revised to be clear.		The policy has been revised to clearly state that the intent is to encourage MOE to continue funding relevant stewardship programs.
							Durham-2c-9 "MOE should maintain the stewardship program..." If so, the application process needs to be simple enough for municipalities, homeowners and small businesses to manage and there needs to be sufficient cash available from MOE to actually motivate and support change. If applications exceed the funds available in one year, they should be on a waiting list for the next opportunity...not have to reapply.		Noted
2 c - 10	In	MC	SPA/CA		E?	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	Peel- The Ontario Drinking Water Stewardship Program should identify the implementing bodies not the source protection plan. Why are the SPA's named as the implementing body?		The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
2 c - 11	Mon (In)	MC	SPA/CA		F	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.	Peel- This policy requires the monitoring body (SPA) to report to itself on stewardship actions. Staff questions the need for this policy and request confirmation of the SPA's role with respect to stewardship actions in relation to this threat.		The monitoring policy has been revised so the SPA is no longer reporting to itself. The SPA has been directed to include documentation in their annual report on the risk reduction efforts they administered throughout the year.
2 c - 12	Oth	MC	Mun		E	The municipality should implement and prioritize a maintenance / inspection program for septic systems that are a significant threat.	Clearview-the municipality can establish an inspection program, but cannot establish a maintenance program other than requiring individual land owners to repair systems that are deficient in accordance with regulatory standards and requirements – the municipality will not be undertaking maintenance other than on municipally owned property		The municipality is required to establish an inspection program in accordance with the recent building code amendments.
							Barrie-Duplication of effort – Building code requires inspection program.	Check on duplication and coordinate with the Building Code.	Noted- this policy was included to highlight the recent changes in the building code to those who may not be aware of them.
							CKL-What Septic inspection methodologies/tests are to be used? To what extent should the Septic tanks be inspected, maintenance & construction records, external and internal checks? What date should all the Septic Tanks be inspected by, within 1yr or 3yrs after policy is implemented? The costs of implementing a Septic inspection program will be an additional financial challenge for the municipality therefore, the costs would need to be recovered either from Provincial support ie MOE Stewardship Program or recovery charges against the resident. If the latter, the recoverable costs may not be affordable to the residents as well as cover the municipal costs.	Spelling Typo: 'prioritize' Should read; Where it is believed that a Septic Tank is faulty, inspection is to be carried out and repairs made so that it is no longer a SDWT	The requirements of the septic inspection program are outlined in the recent building code amendments. Suggestions on how this program could be implemented will be included in the implementation guide. The recent building code amendments state that the municipality needs to have completed the first round of inspections within 5 years of the Assessment Reports being approved. The SGBLS assessment reports were approved in early 2012.
							EG-Who is going to cover the costs associated with septic system re-inspection program? Province needs to provide funding.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
							Durham-2c-12 The implementer should be the MOE.		The recent building code amendments stipulate the the municipality must undertake a septic inspection program in vulnerable areas where the systems would be Significant Drinking Water Threats.

Threat #2(c): The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (onsite sewage systems).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
2 c - 13	Mon (Oth)	MC	Mun		F	By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained on its inspection program.	CKL-As above – to inspect Septic tanks, draining would be required and possibly a confined space entry. The only real means of understanding a Septic Tank condition without draining the tank at considerable costs to the owner would be to review the construction and maintenance records as well as look for visible leaks. The municipal would need some form of evidence that the Tank is failing before they can inspect the Septic tank at cost to the owner.		The requirements of the septic inspection program are outlined in the recent building code amendments. Suggestions on how this program could be implemented will be included in the implementation guide.
2 c - 14	In	MC	Mun	E	E	Municipalities are required to consider incentives that can be offered to landowners to improve the use and care of septic systems that are a significant drinking water threat.	Clearview-Policy 2c-14 – “municipalities <u>are required</u> to consider incentives that can be offered to landowners...” should be altered to “municipalities <u>may</u> consider incentives...” – the municipality should not be obligated to incur additional costs with respect to the provision of incentives.		This policy only requires the municipality to consider providing incentives. Please see the explanatory document for the SPCs rationale for including this policy. The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
							Barrie-Municipalities are <u>required</u> to consider incentives that can be offered causing a potential financial burden – Must Conform. Would it not be more effective to spend the capital funds to provide servicing of unserved areas?	Remove MC and make it NLB.	Noted- please see the explanatory document for the SPCs rationale for including this policy.
							York-this policy creates an unreasonable expectation that municipal funding will be forthcoming - please remove this policy creates an unreasonable expectation that municipal funding will be forthcoming - please remove		This policy only requires the municipality to consider providing incentives. Please see the explanatory document for the SPCs rationale for including this policy. The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to
							EG-Broaden the implementer section to include incentives from conservation authorities, Province, SPA, etc (not just municipalities). Municipalities do not necessarily have any money to provide financial incentives.	Add CA/SPA/Province to the implementer and description columns	This policy only requires the municipality to consider providing incentives. Please see the explanatory document for the SPCs rationale for including this policy. Additional Incentives policies have been included to address this Significant Drinking Water Threat. The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
							Durham-2c-14 - "requires" municipalities to consider incentives for improvements to use and care of septic systems. Funded how? Those on private septic systems likely are not on Regional water and sanitary sewer systems and therefore not paying user rates.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
2 c - 15	Mon (In)	MC	Mun	E	F	By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained on its actions to maintain and/or upgrade existing septic systems.	Clearview-Policy 2c-15 – the municipality can report on the results of inspection programs and any actions taken by individual owners in response to regulatory violations and orders. The municipality can also track any alterations made which are subject to permit requirements. The wording should be altered to ensure that there is no misunderstanding that the municipality would undertake any maintenance or alteration actions other than on systems it owns or operates.		The wording of the monitoring policy has been revised and simplified.
2 c - 16	SA	NLB	MOE		?	MOE, with municipal input, should conduct a regional review of Sewage Treatment Plant capacity to receive the hauled sewage being collected locally to ensure there is sufficient capacity to accommodate private servicing and prevent illegal dumping.	Haliburton-While this policy is not legally binding, it appears to recognize municipal sewage treatment plants as the only available/acceptable disposal treatment option. What about lagoons, trenches and future technological innovations?	Haliburton- amend policy to include wording that is -more consistent with 1a-6; -recognizes that there are other acceptable treatment options; and - allows for taking advantage of future technological innovations. Eg. MOE, with MUNICIPAL input, should conduct a regional review of licensed treatment facility capacity to receive the hauled sewage being collected locally to ensure there is sufficient capacity to accommodate private servicing and prevent illegal dumping.	This policy has been removed from the revised Source Protection Plan as it was deemed out of scope by the MOE during their pre-consultation review.
							Peel- Staff supports the policy approach.		Noted- this policy has been removed from the revised Source Protection Plan as it was deemed out of scope by the MOE during their pre-consultation review.
							Clearview-Policy 2c-16 – there needs to be a coordinated review of hauled sewage capacity as both the collection treatment of hauled sewage and the disposal of treatment biosolids are not confined within a single municipal boundary – Provincial funding will also be required to fund required improvements and expansions to treatment plants as rural land owners do not contribute development charges or operating charges to municipal treatment plants.		This policy has been removed from the revised Source Protection Plan as it was deemed out of scope by the MOE during their pre-consultation review.
							CKL-This policy will not prevent illegal dumping. A cost incentive program may do but not guaranteed. I agree that Municipality should ensure it has the capacities to handle hauled sewage and report this to the MOE as mitigation.	Remove: 'and prevent illegal dumping'	This policy has been removed from the revised Source Protection Plan as it was deemed out of scope by the MOE during their pre-consultation review.
						Durham-2c-16 – “MOE <i>with municipal input</i> , should conduct a regional review of sewage treatment plant capacity to receive the hauled sewage being collected locally to ensure there is sufficient capacity to accommodate private servicing and prevent illegal dumping.” Who is going to “ensure there is sufficient capacity”? This could be a very expensive proposition, especially given the existing limits on phosphorus (P) contributions to Lake Simcoe by sewage treatment plants and the future goal of the Lake Simcoe Protection Plan to further reduce P contributions. Small rural municipalities will not have the tax or user rate base to accomplish this.		This policy has been removed from the revised Source Protection Plan as it was deemed out of scope by the MOE during their pre-consultation review.	

ICA: Nitrate for Georgian Sands and Lafontaine ICA
Policies for the establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage
(Threat #2c: on-site sewage systems)

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	SPC Response
2c - ICA - 1	PI	MC	MOE	E	C	The MOE shall amend all existing Certificates of Approval for large (more than 10,000 litres) septic systems to prevent expansion within WHPA-A. If the expansion of an existing site is coupled with risk reduction (through infrastructure improvements, for example) so that the threat is no longer significant, expansion would be allowed.		
2c - ICA - 2	Mon (PI)	MC	MOE	E	F	The MOE shall document the number of Certificates of Approval that have been reviewed and amended. By February 1 of each year, MOE shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.		
2c - ICA - 3	PI	MC	MOE	F	C	The MOE shall not approve Certificates of Approval for new or expanded large systems within WHPA-A, unless the expansion is coupled with risk reduction so that the threat is no longer significant. Outside of the WHPA-A, but within the ICA, advanced treatment systems are required for Certificates of Approval for new systems.	Durham-2c-ICA-3 – Expansions are covered in 2c-ICA-1	The policy has been revised and no longer references expansions.
2c - ICA - 4	Mon (PI)	MC	MOE	F	F	The MOE shall document the number of Certificates of Approval that have been reviewed and denied, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE shall prepare and submit to the SPA, a report summarizing the actions taken and the results achieved for the previous year.		
2c - ICA - 5	LUP	MC	Mun	F	B	The municipality shall amend its planning documents to prohibit new domestic on-site sewage systems within WHPA-A. Lots of record of the approval of the Source Protection Plan would be expemted. Outside of the WHPA-A, but within the ICA, advanced treatment systems are required for new systems.	York-Consider defining or providing some context to "advanced treatment systems". Exempted is mistyped.	The policy has been revised and no longer references advanced treatment systems. Please see the explanatory document for the SPCs rationale for removing the reference.
							York-Disagree – with amending planning documents regarding prohibiting new onsite sewage systems. Properties within WHPA-A should also require advanced treatment systems.	The policy has been revised and no longer references advanced treatment systems. Please see the explanatory document for the SPCs rationale for removing the reference.
							CKL-What about existing systems within the WHPA-A that are replaced, do they need to be advanced treatment systems?	The policy has been revised and no longer references advanced treatment systems. Please see the explanatory document for the SPCs rationale for removing the reference.
							Durham-2c-ICA-5 Revise to say "Lots of record <u>as</u> of the date of approval of the SPP..."	Noted
2c - ICA - 6	Mon (LUP)	MC	Mun	F	F	The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to prohibit new on-site sewage systems within WHPA-A, and require advanced treatment systems within the remainder of the ICA.		
TBD	LUP	MC	Mun	F	B			
TBD	Mon (lup)	MC	Mun					
TBD	LUP	MC	Mun	F	B			
TBD	Mon (LUP)	MC	Mun	F	F			
TBD	EO	HR	Mun		E			
TBD	Mon (EO)	HR	Mun		F			
TBD	In	HR	MOE					
TBD	In	MC	SPA					
TBD	Mon (In)	MC	SPA					

ICA: Nitrate for Georgian Sands and Lafontaine ICA
Policies for the establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage
(Threat #2c: on-site sewage systems)

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	SPC Response
2c - ICA - 7	Oth	MC	Mun	F	E	The municipality should implement and prioritize a maintenance / inspection program for septic systems that are a significant threat.		
2c - ICA - 8	Mon (Oth)	MC	Mun	F	F	By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained on its inspection program.		

Threat #2d: The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (industrial effluent).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
2 d - 1	PI	MC	MOE	E	C	The MOE shall amend existing Certificates of Approval for Industrial effluent discharges that are a significant drinking water threat to incorporate conditions such that the activity ceases to be a significant threat. Such conditions may include: regular and ongoing monitoring particularly in areas where issues/concerns exist; mandatory inspections at least every 5 years as well as regular and ongoing maintenance.	Peel- Staff supports the policy approach to use provincial instruments (Certificates of Approval) issued under the EPA to address this threat.		Noted
2 d - 2	Mon (PI)	MC	MOE	E	F	The MOE shall document the number of Certificates of Approval that have been reviewed and amended. By February 1 of each year, MOE shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	Peel- Staff supports the policy approach to use provincial instruments (Certificates of Approval) issued under the EPA to address this threat.		Noted
2 d - 3	PI	MC	MOE	F	C	MOE shall not approve Certificates of Approval for new industrial effluent discharges that would be a significant threat.	Peel- Staff supports the policy approach to use provincial instruments (Certificates of Approval) issued under the EPA to address this threat. York-does this include expansions		Noted The policy is referring to the discharge of industrial effluent only.
2 d - 4	Mon (PI)	MC	MOE	F	F	The MOE shall document the number of Certificates of Approval for industrial effluent that have been reviewed and denied, and how protection of municipal drinking water sources has been addressed. By February 1 of each year, MOE shall prepare and submit to the SPA, a report summarizing the actions taken and the results achieved for the previous year.	Peel- Staff supports the policy approach to use provincial instruments (Certificates of Approval) issued under the EPA to address this threat.		Noted
2 d - 5	LUP	MC	Mun	F	B	The municipality shall amend their planning documents to prohibit new industrial effluent discharges in areas where they would be a significant threat.	Haliburton- This policy reflects an activity NOT a land use. Certain land uses result in industrial effluent discharges. MOE issues a Certificate of Approval for the activity. Therefore this is not an activity for which land use planning is an appropriate tool. The municipality has no control over the activity and is not the licensing body for it.	Haliburton- Remove this policy-cannot be implemented or enforced. If the policy is not removed, it should be amended to read "indicate that it does not support industrial effluent discharge in areas where".	This policy has been removed from the revised Source Protection Plan.
							The "discharge of industrial effluent" is not a use of land that can be regulated using land use planning tools under the Planning Act. This policy should be deleted or revised. Staff does not prefer the use of land use planning tools to address industrial effluent discharges and suggests that provincial instruments be selected as the preferred policy approach unless these threats can be tied to an effective, appropriate and implementable land use planning approach.		This policy has been removed from the revised Source Protection Plan.
							Barrie-Where is WHPA-E? This policy prohibits new industrial effluent discharges in area where they would be a significant threat. This threat is currently managed through the existing Sewer Use By-law.	Include exemption where a Sewer Use By-law is in place.	This policy has been removed from the revised Source Protection Plan.
							York-not sure zoning can address discharge of effluent? (land use vs activities) confirm with appropriate use of the Planning Act with municipal planners		This policy has been removed from the revised Source Protection Plan.
							EG-How determine where it would be a significant drinking water threat?	Be more specific about implementation	The revised introductory material to the Source Protection Plan policies now contains a section that summarizes how to determine where the Source Protection Plan policies apply.
							Durham-2d-5 How can a municipal planning document prevent new effluent discharges if there is no change in land use, zoning or building permit required? There is no Planning Act trigger. A sewage use bylaw affecting the industry might be applicable.		This policy has been removed from the revised Source Protection Plan.
2 d - 6	Mon (LUP)	MC	Mun	F	F	The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to prohibit industrial effluent discharges where they would be a significant threat	Haliburton- See comment for above policy.	Haliburton- not required if above policy is removed.	This policy has been removed from the revised Source Protection Plan.

Threat #2d: The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage (industrial effluent).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
2 d - 7	EO	MC	Mun	E	E	The municipality responsible for water systems, in collaboration with the SPA, shall undertake an outreach and awareness program targeted at landowners that addresses the importance of pollution prevention by explaining the need for proper industrial effluent management. This outreach and awareness program should include specific targets and deliverables as well as a timeframe so that success can be measured.	Durham-2d-7 The municipality should not be responsible for education and outreach to the ICI sector. This should be dealt with by the MOE within the C of A approval process.		Local SPAs have now been identified as the lead agency with some collaboration with municipalities
2 d - 8	Mon (EO)	MC	Mun	E	F	By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing its outreach and awareness program, what targets were obtained and the outcomes achieved.			
2 d - 9	EO	HR	MOE	E	?	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.	York-repeated policy - can we just have one?		Policies have been combined where possible (e.g. Monitoring, Education and Outreach, and LUP, RLU, Incentives and Stewardship) resulting in a significantly shortened policy table.
2 d - 10	In	MC	SPA	E	E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	York-repeated policy - can we just have one?		Policies have been combined where possible (e.g. Monitoring, Education and Outreach, and LUP, RLU, Incentives and Stewardship) resulting in a significantly shortened policy table.
2 d - 11	Mon (In)	MC	SPA	E	F	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.	York-repeated policy - can we just have one?		Policies have been combined where possible (e.g. Monitoring, Education and Outreach, and LUP, RLU, Incentives and Stewardship) resulting in a significantly shortened policy table.

Threat #3: The application of agricultural source material to land.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Change	SPC Response
3 - 1	Pro	MC	Mun	E/F	G		Peel- Staff supports the policy approach but recommends that SGBLS and CTC Region SPCs coordinate policy development to ensure that policies are consistent within the Region of Peel and recommends that the SPCs consider the following policy approaches: 1.continue prohibition of future ASM application and storage within WHPA-A; 2. manage existing and future ASM application and storage in vulnerable areas outside WHPA-A where ASM application and storage is a significant drinking water threat; and 3. prohibit future ASM application within ICAs where a water quality issue related to ASM application is identified.		Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies.
							York-Add wording to indicate that this applies to both existing and future activities preference to use SGBLS approach CTC prohibits for farms under NMA in all areas where significant threat		The revised policy text now clearly states whether the policy is for an existing or future potential Significant Drinking Water Threat.
							EG-Clarify where this prohibition is to be outlined (ie. Official Plans?) Who will enforce this? The RMO? Local municipalities can't track the application of ASM.	Implementer should be the Province (OMAFRA?)	Municipalities are always the implementing body of Section 57 policies. These can be enforced by the RMO.
3 - 2	Mon (Pro)	MC	Mun	E/F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.			
3 - 3	RMP	MC	Mun	E/F	H	The Risk Management Official (RMO) shall negotiate a Risk Management Plan (RMP) with those applying ASM on farms not phased-in under the Nutrient Management Act where the application is a significant drinking water threat outside of WHPA-A. These RMP will be based upon the same principles as the requirements of a nutrient management plan or strategy, and scoped to address these specific threats with conditions such as: • No ASM spreading within the WHPA-A • Soil tests to determine fertilizer requirements every 3 years at minimum	The ministry supports the use of RMPs for farms that are not phased in under the NMA. We support the negotiation of an RMP between the RMO and those storing or applying ASM on farms where the activity is a significant drinking water threat outside of WHPA-A. We also support similar policies where an RMP would be used to manage the risks of application and storage of commercial fertilizer where it is a significant drinking water threat. The policies state that these RMPs will be based on the same principles as the requirements of a NMP or NMS. The NMA does not have standards for managing the storage of commercial fertilizer. However, OMAFRA recommends the use of RMPs based on appropriate nutrient management practices to manage threats in this case.		Noted- The policy has been revised to require the Risk Management Plans to reflect appropriate nutrient management practices.
							We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.		Noted- The policy has been revised to require the Risk Management Plans to reflect appropriate nutrient management practices.
							Peel- Staff supports the policy approach to manage this activity outside of WHPA-A and requests that SGBLS and CTC region SPCs coordinate policy development to ensure policy approaches are consistent within the Region of Peel. Policies for managing this threat should be coordinated so that there is no duplication between the regulation of farms under the NMA and s.58 Risk Management under the CWA.		Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies.
							York-Add wording to reflect IPZ-1 (to say policy applies in IPZ-1 but outside 30 m as per policy 3-1). Remove wording about no ASM spreading in WHPA-A since it is covered in 3-1. remove suggestions for inclusions in RMP from policy and add to rationale document		The reference to 30 m has been removed from both policies and both policies have been revised so that the prohibition within WHPA-A/IPZ-1 is not being repeated.
3 - 4	Mon (RMP)	MC	Mun	E	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.		Noted- The policies has been revised to require the Risk Management Plans to reflect appropriate nutrient management practices.
3 - 5	RLU	MC	Mun	F	H	This SWP plan designates all Agricultural land uses within the areas where the application of ASM could be a significant drinking water threat, as a restricted land use under Section 59 of the Clean Water Act. All agricultural building permit and planning act applications within those areas requires pre-screening by the RMO.	Shelburne- "All agricultural building permit and planning act-applications within those areas requires pre-screening by the RMO" - at what stage in the application process does the pre-screening occur? (e.g. is this part of the normal agency circulation and comment? Prior to deeming application complete? Prior to public notice? Prior to public meeting? Prior to decision? -What are RMOs powers/duties in the pre-screening role? Is the RMO to direct municipalities not to process, approve, circulate or consider the application? -what are the potential outcomes of the pre-screening? (e.g. require more information? changes/alteration to the plan/proposal? -how much time must be allotted to the RMO to complete the pre-screening and how does this relate to the legislated procedures and timeframes that a municipality must follow upon receipt of an application under the Building Code Act and the Planning Act?	Define purpose, scope, powers/duties, potential outcomes and timing of RMO pre-screening of applications and relation to legislated procedures.	The revised Source Protection Plan Introduction section and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.
							EG-Typically most agricultural lands are already zoned and designated for agricultural uses – therefore, planning applications for such uses aren't required. Building permit applications only required for new buildings – what about the use of existing structures? How enforce policies? Local municipalities can't track the application of ASM.	Focus on education vs land use policy	The revised Source Protection Plan Introduction section and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.
3 - 6	Mon (RLU)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.			
3 - 7	EO	MC	SPA	E	E	The Ontario Soil and Crop Improvement Association (OSCIA), in collaboration with the SPA, shall undertake an education and outreach program targeted at agricultural landowners within vulnerable areas that promote Best Management Practices to safeguard water supplies.	OMAFRA Supports		Noted
							Peel- Confirm whether a source protection plan can require the Ontario Soil and Crop Improvement Association to be an implementing body under the CWA.		The SPC can identify OSCIA as an implementing body. However, doing so reduces the legal effect of the policy from 'must conform' to 'non-legally binding'. The policy has been revised to identify the Local SPA as the implementing body with some collaboration with OSCIA
3 - 8	Mon (EO)	MC	SPA	E	F	The OSCIA and SPA shall document communication and outreach efforts. By February 1st of each year, the OSCIA and SPA shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	OMAFRA Supports		Noted
3 - 9	In	NLB	MOE	E	J	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.	Peel- Clarify intended policy direction. Is the intent to "encourage the MOE to provide financial incentives through the Ontario Drinking Water Stewardship Program to reduce risks to drinking water"? If so, the policy should be revised to be clear.		The policy has been revised to clearly state that the intent is to encourage MOE to continue funding relevant stewardship programs.

Threat #3: The application of agricultural source material to land.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Change	SPC Response
3 - 10	In	MC	SPA	E	E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	Peel- The Ontario Drinking Water Stewardship program should identify the implementing bodies not the source protection plan. Why are the SPAs named as the implementing body?		The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
3 - 11	Mon (In)	MC	SPA	E	F	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA/CA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.			
3 - 12	SA	NLB	Mun		E	Municipalities are encouraged to avoid future water supply sites that would cause existing land use activities to be classified as significant threats through the purchase of the lands within the WHPA-A most vulnerable to water quality threats for purposes of wellhead protection.	<p>Peel- Staff does not support this policy. New municipal water supply infrastructure is subject to environmental assessment requirements under the Municipal Class EA and Ontario Environmental Assessment Act. Impacts to land uses are required to be addressed through this process, including the requirement to consider how impacts can be avoided or minimized. Staff questions the need for this policy as EA requirements are already a legislated requirement under the EA act.</p> <p>Clearview-Policy 3-12 – Unfortunately the location of settlement areas within an agricultural landscape is a historic fact. It is not reasonable, in this landscape, to expect that avoidance has a high probability of success. The purchasing of those lands may also be cost prohibitive and interfere with farming operations and the maintenance of agricultural production on prime agricultural lands. It may be more appropriate to ensure that any planning for new or expanded wells include identification of the source area and the establishment of appropriate management agreements with impacted landowners which would allow continued private ownership and appropriate land use practices compatible with continued agricultural protection and protection of the water supply.</p> <p>Shelburne- Will there be funding program available to assist municipalities with the purchase/acquisition of land? Are there alternatives to land purchase that would achieve the same objective more cost effectively? (e.g. registered easements, agreements, mandatory land dedication, land exchange, expropriation?)</p> <p>EG-Not clear what the direction is here, but seems to suggest municipalities purchase lands in WHPA-A areas for protection. What is meant by "future" water supply sites and how determine? Municipalities do not have financial resources to purchase lands.</p> <p>Durham-3-12 "municipalities are encouraged to avoid future water supply sites that would cause existing uses to be classified as significant drinking water threats through purchase of lands in the WHPA – A." Awkward wording...municipality will have little choice about where to put the well...you have to put it where the water is. Re-word the policy to say "Where feasible, when developing new wells, purchase of the WHPA – A is recommended as a way of reducing existing or preventing future threats to the municipal</p> <p>Municipalities are not financially able to participate in any required actions or provide incentives or compensation in relation to altered operations or land uses.</p>	<p>Consider inclusion of other mechanisms as alternatives to land purchase and alternative means of acquiring the land.</p> <p>clarify the direction/intent</p>	This policy has been removed from the Draft Source Protection Plan as the MOEs preliminary review of the plan has deemed the policy of scope.

Threat #4: The storage of agricultural source material.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
4 - 1	Pro	MC	Mun	F	G	The storage of Agricultural Source Material (ASM) where it is or would be a significant drinking water threats is prohibited under Section 57 of the Clean Water Act.	We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.		Noted- The policy has been revised to require the Risk Management Plans to reflect appropriate nutrient management practices.
							Peel- Staff supports the policy approach but recommends that the SGBLS and CTC Region SPCs coordinate policy development to ensure that policies are consistent within the Region of Peel and recommends that the SPCs consider the following policy approaches: 1. continue with prohibition of future ASM application and storage within WHPA-A; 2. manage existing and future ASM application and storage in vulnerable areas outside of WHPA-A where ASM application and storage is a significant drinking water threat; and 3. prohibit future ASM application within ICAs where a water quality issue related to ASM application is identified.		Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted each others policies.
							York-Make it clear whether or not the policy is for existing or future (assumed) threats Wouldn't a policy allowing a s.58 RMP (similar to 3-3) be useful for storage as well as application? -AH		Each policy now states whether it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats.
							EG-Who will enforce this? The RMO? Local municipalities can't track the storage of ASM.	Focus on education	The RMO with the aid of Risk Management Inspectors will work with local municipalities to enforce the policy.
							Durham-4-1 The policy prohibits current and future storage of ASMs, so what will the RMO report?		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
4 - 2	Mon (Pro)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	Penetang-It states that this is a 'Must conform to' policy and requires a risk management plan although our 3 threats are listed as not requiring a risk management plan?	Penetang-'Must conform' should only be applicable for municipalities with that particular threat	Municipalities are required to update their planning documents to contain all Source Protection Policies regardless of whether or not existing potential Significant Drinking Water Threats have been identified for a specific threat. The Implementation Guide will provide additional details on how to implement policies that are not applicable to a municipality at this time.
							We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.		Noted- The policy has been revised to require the Risk Management Plans to reflect appropriate nutrient management practices.
4 - 3	LUP RLU	MC	Mun	F	I	This SWP plan designates all Agricultural land uses within the areas where the storage of ASM could be a significant drinking water threat, as a restricted land use under Section 59 of the Clean Water Act. All agricultural building permit and planning act applications within those areas requires pre-screening by the RMO.	Shelburne- "All agricultural building permit and planning act-applications within those areas requires pre-screening by the RMO" - at what stage in the application process does the pre-screening occur? (e.g. is this part of the normal agency circulation and comment? Prior to deeming application complete? Prior to public notice? Prior to public meeting? Prior to decision? -What are RMOs powers/duties in the pre-screening role? Is the RMO to direct municipalities not to process, approve, circulate or consider the application? -what are the potential outcomes of the pre-screening? (e.g. require more information? changes/alteration to the plan/proposal? -how much time must be allotted to the RMO to complete the pre-screening and how does this relate to the legislated procedures and timeframes that a municipality must follow upon receipt of an application under the Building Code Act and the Planning Act?	Define purpose, scope, powers/duties, potential outcomes and timing of RMO pre-screening of applications and relation to legislated procedures.	The revised Source Protection Plan Introduction section and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.
							York-Should this be a RLU policy?		Yes, this has been corrected in the revised policy consolidation.
							EG-Typically most agricultural lands are already zoned and designated for agricultural uses – therefore, planning applications for such uses aren't required. Building permit applications only required for new buildings – what about the use of existing structures? How enforce policies? Local municipalities can't track the storage of ASM.	Focus on education vs land use policy	The revised Source Protection Plan Introduction section and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.
4 - 4	Mon (LUP) RLU	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.			

Threat #4: The storage of agricultural source material.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
4 - 5	EO	MC	SPA	E	E	The Ontario Soil and Crop Improvement Association (OSCIA), in collaboration with the SPA, shall undertake an education and outreach program targeted at agricultural landowners within vulnerable areas that promote Best Management Practices to safeguard water supplies.	OMAFRA supports Peel- confirm whether a source protection plan can require the OSCIA to be an implementing body under the CWA.		The SPC can identify OSCIA as an implementing body. However, doing so reduces the legal effect of the policy from 'must conform' to 'non-legally binding'. The policy has been revised to identify the Local SPA as the implementing body with some collaboration with OSCIA
4 - 6	Mon (EO)	MC	SPA	E	F	The OSCIA and SPA shall document communication and outreach efforts. By February 1st of each year, the OSCIA and SPA shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	OMAFRA supports		Noted
4 - 7	In	NLB	MOE	E	?	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.	Peel-clarify intended policy direction. Is the intent to "encourage the MOE to provide financial incentives through the Ontario Drinking Water Stewardship Program to reduce risks to drinking water"? If so,the policy should be revised to be clear.		The policy has been revised to clearly state that the intent is to encourage MOE to continue funding relevant stewardship programs.
4 - 8	In	MC	SPA	E	E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	Peel- The Ontario Drinking Water Stewardship Program should identify the implementing bodies not the source protection plan. ,Hwy are the SPAs named as the implementing body?		The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
4 - 9	Mon (In)	MC	SPA	E	F	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.			

**ICA: ASM storage and application for Georgian Sands and Lafontaine ICA
Policies for the application and storage of agricultural source material (Threat #3 and 4)**

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
3/4 - ICA - 1	Pro	MC	Mun	F	G	The storage and application of ASM within the WHPA-A is prohibited under Section 57 of the Clean Water Act.	We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.		Noted
							CKL-Outright prohibition of storage may severely impact people's livelihood.	Allow PI and/or RMP and S.57 for future storage.	Within the Issues Contributing Area the existing and future prohibition is limited to WHPA-A. Existing storage facilities if present will need to be located outside of the 100 m circle.
							Durham-3/4 –ICA-1 This policy is more restrictive than the non-ICA policy. The MOE should not be the implementer if section 57 prohibition is the tool. The RMO is responsible for Part IV tools.		This policy is more restrictive than the non-ICA policy as it recognizes that these systems have an existing nitrate issue. The implementing body has been corrected to state that municipalities are responsible for implementing the policy.
3/4 - ICA - 2	Mon (Pro)	MC		F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.		Noted

**ICA: ASM storage and application for Georgian Sands and Lafontaine ICA
Policies for the application and storage of agricultural source material (Threat #3 and 4)**

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
3/4 - ICA - 3	RMP	MC		E / F	H	The Risk Management Official (RMO) shall negotiate a Risk Management Plan (RMP) with those storing or applying ASM on farms not phased-in under the Nutrient Management Act where the activity is a significant drinking water threat outside of WHPA-A. These RMP will be based upon the same principles as the requirements of a nutrient management plan or strategy, and scoped to address these specific threats with conditions such as: <ul style="list-style-type: none"> • No ASM spreading within the WHPA-A • Soil tests to determine fertilizer requirements every 3 years at minimum 	The ministry supports the use of RMPs for farms that are not phased in under the NMA. We support the negotiation of an RMP between the RMO and those storing or applying ASM on farms where the activity is a significant drinking water threat outside of WHPA-A. We also support similar policies where an RMP would be used to manage the risks of application and storage of commercial fertilizer where it is a significant drinking water threat. The policies state that these RMPs will be based on the same principles as the requirements of a NMP or NMS. The NMA does not have standards for managing the storage of commercial fertilizer. However, OMAFRA recommends the use of RMPs based on appropriate nutrient management practices to manage threats in this case.		Noted- The policy has been revised to require the Risk Management Plans to reflect appropriate nutrient management practices.
3/4 - ICA - 4	Mon (RMP)	MC		E / F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	The ministry supports the use of RMPs for farms that are not phased in under the NMA. We support the negotiation of an RMP between the RMO and those storing or applying ASM on farms where the activity is a significant drinking water threat outside of WHPA-A. We also support similar policies where an RMP would be used to manage the risks of application and storage of commercial fertilizer where it is a significant drinking water threat. The policies state that these RMPs will be based on the same principles as the requirements of a NMP or NMS. The NMA does not have standards for managing the storage of commercial fertilizer. However, OMAFRA recommends the use of RMPs based on appropriate nutrient management practices to manage threats in this case.		Noted- The policy has been revised to require the Risk Management Plans to reflect appropriate nutrient management practices.
TBD	PI								
3/4 - ICA - 5	RLU	MC		F	I	This SWP plan designates all Agricultural land uses within the areas where the application of ASM could be a significant drinking water threat, as a restricted land use under Section 59 of the Clean Water Act. All agricultural building permit and planning act applications within those areas requires pre-screening by the RMO.			
3/4 - ICA - 6	Mon (RLU)	MC		F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.			
3/4 - ICA - 7	LUP	MC		F	B	Municipalities shall amend their planning documents to: <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include provisions to prohibit the storage and application of ASM within the WHPA-A.include official plan policies and/or zoning, and • include provisions to manage through RMP the handling and storage of ASM outside the WHPA-A but within the ICA. 	MOE- Managing activities cannot be achieved through LUP. The comments on this policy also apply to 3/4-ICA-8. If you are asking the RMO to consider performance standards listed in the OP- this is out of scope.		The Land Use Planning policy has been simplified to mirror the Section 57 prohibition.
3/4 - ICA - 8	Mon (LUP)	MC		F	F	The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to: <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include provisions to prohibit the storage and application of ASM within the WHPA-A.include official plan policies and/or zoning, and • include provisions to manage through RMP the handling and storage of ASM outside the WHPA-A but within the ICA. 			

Threat #5: The management of agricultural source material (aquaculture).

Policy #	Tool	Legal Effect	Implementer	Original Policy	Comments	Suggsted Improvements	SPC Response
There are no existing threats in our region, nor is there a possibility for a future significant threat, therefore no policies have been developed							

Threat #6: The application of non-agricultural source material to land.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
							Agricultural Repts- A new special policy should be developed for Category 1 NASM (Vegetable Peels) to be treated as ASMs, and be allowed to be spread outside of WHPA-A.		New policies have been added to the SPP that treat category 1 NASMs like ASMs.
6 - 1	PI	MC	MOE, OMAFRA	E	C	The MOE and/or OMAFRA shall amend existing Certificates of Approval / NASM plans for the application of NASM that are a significant drinking water threat to incorporate conditions such that the activity ceases to be a significant threat. Such conditions may include: baseline testing of soils to determine soil limiting factors, and on-going testing to ensure concentrations are not building in the soil.	<p>OMAFRA-Regulations as set out in the Nutrient Management Act address the application, handling and storage of non-agricultural source material (NASM) for farms that are required to have NASM Plans. The issuance of Certificates of Approval is under the authority of the Ontario Water Resources Act. This legislation is implemented by the Ministry of the Environment.</p> <p>Peel-staff supports the policy but recommends that the SGBLS and CTC region SPCs coordinate policy development to ensure that policies are consistent within the Region of Peel and recommends that the SPCs consider the following policy approaches:</p> <ol style="list-style-type: none"> 1. continue with prohibition of NASM application and storage within WHPA-A 2. Manage and/or encourage phase out of existing NASM application and storage in vulnerable areas outside WHPA-A where NASM application and storage is a significant drinking water threat; and 3. prohibit future (new) NASM application and storage in vulnerable areas outside WHPA-A where NASM application and storage is a significant drinking water threat. <p>Durham-6-1 Why are there no parallel restrictions on spreading in WHPA-A and shoreline similar to those restrictions outlined in Policy 3-1?</p>	The MOE and/or OMAFRA shall amend existing Certificates of Approval / NASM plans for the application of NASM that are a significant drinking water threat to incorporate conditions such that the activity ceases to be a significant threat. Such conditions may include: baseline testing (P, N, K and heavy metals) of soils to determine soil limiting factors, and on-going testing to ensure concentrations are not building in the soil.	To recognize that the application, handling and storage of NASM is regulated under different legislation (EPA, OWRA and the NMA) both the MOE and OMAFRA were identified as implementing bodies. The policy has been revised to clearly indicate that the policy relates to non-agricultural properties as well., Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted each others policies.
6 - 2	Mon (PI)	MC	MOE, OMAFRA	E	F	The MOE and/or OMAFRA shall document the number of Certificates of Approval and / or NASM plans that have been reviewed and amended, the compliance monitoring undertaken, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE and / or OMAFRA shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	<p>OMAFRA-Regulations as set out in the Nutrient Management Act address the application, handling and storage of non-agricultural source material (NASM) for farms that are required to have NASM Plans. The issuance of Certificates of Approval is under the authority of the Ontario Water Resources Act. This legislation is implemented by the Ministry of the Environment.</p> <p>Peel-staff supports the policy but recommends that the SGBLS and CTC region SPCs coordinate policy development to ensure that policies are consistent within the Region of Peel and recommends that the SPCs consider the following policy approaches:</p> <ol style="list-style-type: none"> 1. continue with prohibition of NASM application and storage within WHPA-A 2. Manage and/or encourage phase out of existing NASM application and storage in vulnerable areas outside WHPA-A where NASM application and storage is a significant drinking water threat; and 3. prohibit future (new) NASM application and storage in vulnerable areas outside WHPA-A where NASM application and storage is a significant drinking water threat. 		To recognize that the application, handling and storage of NASM is regulated under different legislation (EPA, OWRA and the NMA) both the MOE and OMAFRA were identified as implementing bodies. The policy has been revised to clearly indicate that the policy relates to non-agricultural properties as well., Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted each others policies.
6 - 3	PI	MC	MOE, OMAFRA	F	C	When the SWP plan comes into effect, MOE and OMAFRA shall not approve Certificates of Approval for the application of NASM that would be a significant drinking water threat.	<p>Regulations as set out in the Nutrient Management Act address the application, handling and storage of non-agricultural source material (NASM) for farms that are required to have NASM Plans. The issuance of Certificates of Approval is under the authority of the Ontario Water Resources Act. This legislation is implemented by the Ministry of the Environment.</p> <p>York-should these policies reference NASM plans in addition to Csofa?</p> <p>Durham-6-3 The statement "When the SWP plan comes into effect" does not appear in any other policy. Why does it appear here?</p>		To recognize that the application, handling and storage of NASM is regulated under different legislation (EPA, OWRA and the NMA) both the MOE and OMAFRA were identified as implementing bodies. The policy has been revised to clearly indicate that the policy relates to non-agricultural properties as well., The policy has been revised to include all of different legislations that NASMs require approval under. This statement has been removed from the plan. All of the revised policies have been put into standard wording by tool.
6 - 4	Mon (PI)	MC	MOE, OMAFRA	F	F	The MOE and OMAFRA shall document the number of certificates of approval for NASM and NASM plans that have been reviewed and denied, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE and OMAFRA shall prepare and submit to the SPA, a report summarizing the actions taken and the results achieved for the previous year.	OMAFRA-Regulations as set out in the Nutrient Management Act address the application, handling and storage of non-agricultural source material (NASM) for farms that are required to have NASM Plans. The issuance of Certificates of Approval is under the authority of the Ontario Water Resources Act. This legislation is implemented by the Ministry of the Environment.		To recognize that the application, handling and storage of NASM is regulated under different legislation (EPA, OWRA and the NMA) both the MOE and OMAFRA were identified as implementing bodies. The policy has been revised to clearly indicate that the policy relates to non-agricultural properties as well.,
6 - 5	EO	NLB	OSCIA, SPA	E	E	The Ontario Soil and Crop Improvement Association (OSCIA), in collaboration with the SPA, shall undertake an education and outreach program targeted at agricultural landowners within vulnerable areas and NASM haulers/appliers to promote Best Management Practices to safeguard water supplies.	<p>OMAFRA supports</p> <p>Peel- confirm whether a source protection plan can require the Ontario Soil and Crop Improvement Association to be an implementing body under the CWA.</p> <p>Durham-6-5, 6-6, 7-7, 7-8 If C of As/NASM plans for NASM storage and spreading in WHPAs and IPZ s will not be approved, is an education and outreach program really necessary? Suggest that instead, all of the best practices about keeping contamination away from water supplies be incorporated into a general education package for farmers and businesses operating in the community around the well or intake. This would also benefit those on private wells.</p>		Noted The SPC can identify OSCIA as an implementing body. However, doing so reduces the legal effect of the policy from 'must conform' to 'non-legally binding'. The policy has been revised to identify the Local SPA as the implementing body with some collaboration with OSCIA NASMs have been incorporated a component of the new combined agricultural Education and Outreach program. The SPC has include NASMs in the policy as it provides an opportunity to educate receivers of NASMs.
6 - 6	Mon (EO)	NLB	OSCIA, SPA	E	F	The OSCIA and SPA shall document communication and outreach efforts. By February 1st of each year, the OSCIA and SPA shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	OMAFRA supports		Noted
6 - 7	In	HR	MOE	E	?	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.	<p>OMAFRA supports</p> <p>Peel- clarify intended policy direction. Is the intent to "encourage the MOE to provide financial incentives through the Ontario Drinking Water Stewardship Program to reduce risks to drinking water"? If so, the policy should be revised to be clear.</p>		Noted The policy has been revised to clearly state that the intent is to encourage MOE to continue funding relevant stewardship programs.
6 - 8	In	MC	SPA	E	E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	Peel- The Ontario Drinking Water Stewardship Program should identify the implementing bodies not the source protection plan. Why are the SPAs named as the implementing body?		The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
6 - 9	Mon (In)	MC	SPA	E	F	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.	Peel- This policy requires the monitoring body (SPA) to report to itself on stewardship actions. Staff questions the need for this policy and requests confirmation of the SPAs role with respect to the stewardship actions in relation to this threat.		The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs

Threat #6: The application of non-agricultural source material to land.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
6 - 10	Oth	NLB	MOE		?	MOE is encouraged to develop a manifest for NASM (similar to that required for wastes regulated under O Reg. 347) to ensure appropriate documentation of the waste throughout its life cycle.			
6 - 11	Res	NLB	MOE/OMAFRA		?	MOE and OMAFRA are encouraged to continue research regarding soil limiting factors relevant to NASM, and to reflect that research in the management of NASM sites.	OMAFRA will continue to conduct research concerning the management of NASM. The ministry will also continue to review the pesticide management training course and revise as appropriate.		Noted

Threat #7: The handling and storage of non-agricultural source material.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvement	SPC Response
7 - 1	PI	MC	MOE, OMAFRA	E	C	The MOE and/or OMAFRA shall amend existing Certificates of Approval / NASM plans for the storage and handling of NASM that are a significant drinking water threat to incorporate conditions such that the activity ceases to be a significant threat.	Regulations as set out in the Nutrient Management Act address the application, handling and storage of non-agricultural source material (NASM) for farms that are required to have NASM Plans. The issuance of Certificates of Approval is under the authority of the Ontario Water Resources Act. This legislation is implemented by the Ministry of the Environment. Newmarket-The wording suggests that the "incorporation" of conditions into a certificate of approval would remove the threat. It would appear that more appropriate wording would be "the implementation of conditions such that the activity ceases to be a threat..." would be more appropriate wording.	Refine the wording to ensure that the "implementation of" conditions rather than the conditions, removes the threats.	To recognize that the application, handling and storage of NASM is regulated under different legislation (EPA, OWRA and the NMA) both the MOE and OMAFRA were identified as implementing bodies. The policy has been revised to clearly indicate that the policy relates to non-agricultural properties as well., The revised policy now directs the implementing body to include terms and conditions that would result in the threat ceasing to be Significant.
7 - 2	Mon (PI)	MC	MOE, OMAFRA	E	F	The MOE and/or OMAFRA shall document the number of Certificates of Approval and / or NASM plans that have been reviewed and amended, the compliance monitoring undertaken, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE and / or OMAFRA shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	Regulations as set out in the Nutrient Management Act address the application, handling and storage of non-agricultural source material (NASM) for farms that are required to have NASM Plans. The issuance of Certificates of Approval is under the authority of the Ontario Water Resources Act. This legislation is implemented by the Ministry of the Environment.		To recognize that the application, handling and storage of NASM is regulated under different legislation (EPA, OWRA and the NMA) both the MOE and OMAFRA were identified as implementing bodies. The policy has been revised to clearly indicate that the policy relates to non-agricultural properties as well.,
7 - 3	PI	MC	MOE/OMAFRA	F	C	When the SWP plan comes into effect, MOE and OMAFRA shall not approve Certificates of Approval for the handling and storage of NASM that would be a significant drinking water threat.	Regulations as set out in the Nutrient Management Act address the application, handling and storage of non-agricultural source material (NASM) for farms that are required to have NASM Plans. The issuance of Certificates of Approval is under the authority of the Ontario Water Resources Act. This legislation is implemented by the Ministry of the Environment. York-should these policies reference NASM plans in addition to CsofA? Durham-7-3 and 7-5 are duplicative – Having the MOE refuse the C of A (6-3, 7-3) is the most effective and enforceable mechanism to prevent NASM storage in the WHPA. Having a LUP policy (7-5) in addition is unnecessary and likely ineffective and is just another official plan policy that could be appealed at great expense to the municipality.		To recognize that the application, handling and storage of NASM is regulated under different legislation (EPA, OWRA and the NMA) both the MOE and OMAFRA were identified as implementing bodies. The policy has been revised to clearly indicate that the policy relates to non-agricultural properties as well., The policy has been revised to include all of different legislations that NASMs require approval under. Noted- A Land Use Planning policy has been included for the storage of NASM that mirror the policy direction of the PI. This was done as the municipality planning office is often the first stop a person makes when working through the planning process.
7 - 4	Mon (PI)	MC	MOE/OMAFRA	F	F	The MOE and OMAFRA shall document the number of certificates of approval for NASM and NASM plans that have been reviewed and denied, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE and OMAFRA shall prepare and submit to the SPA, a report summarizing the actions taken and the results achieved for the previous year.	Regulations as set out in the Nutrient Management Act address the application, handling and storage of non-agricultural source material (NASM) for farms that are required to have NASM Plans. The issuance of Certificates of Approval is under the authority of the Ontario Water Resources Act. This legislation is implemented by the Ministry of the Environment.		To recognize that the application, handling and storage of NASM is regulated under different legislation (EPA, OWRA and the NMA) both the MOE and OMAFRA were identified as implementing bodies. The policy has been revised to clearly indicate that the policy relates to non-agricultural properties as well.,
7 - 5	LUP	MC	Mun	F	B	The municipality shall amend their planning documents to: • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and • include provisions that prohibit the storage of NASM that would be a significant drinking water threat.	Haliburton- This policy speaks of using planning documents to prohibit storage. While land use planning can prohibit the outside storage of certain products and bulk storage facilities through site plan control, it cannot prohibit the inside storage or handling of these substances within a building or facility. Therefore, although motherhood Official Plan policies to support the intent of this proposed policy could be considered, the proposed policy cannot be implemented as drafted. NOTE: Bulk storage facilities are a land use that can be prohibited. Are these only for future occurrences? How will it impact existing uses? Shelburne- What is the purpose/content of the Disclosure report to be required as part of complete application requirements? Who will review the Disclosure Report to determine if it is acceptable for a complete application? What qualifications do they require? Concern re staff/resource/cost/training requirements. Re: Prohibition policies-how does the Town determine if existing OP and zoning are sufficient to address this policy, or if amendments are required? York-It is unclear how this policy would be implemented. Proponents are not required to apply to munic. for a permit so how would this practice be captured? Why do you need a LUP policy if you are prohibiting via PI? Include a report to show conformity to CWA/SPP as part of complete application requirements within the areas a significant threat could occur (similar to ORMCP conformity requirements) Staff continue to struggle with the use of LUP policies to address activities. Where those LUP policies are only supporting a Part IV or PI prohibition, consider removing them in lieu of a conformity report requirement. Newmarket-The details for the disclosure reports, required as part of the complete application provisions of an OP requires clarification. Guidelines for such reports would be helpful to ensure consistency. EG-Clarify where NASM storage would be prohibited? In WHPAs or only within vulnerable areas? Typically, municipal planning/building permit applications are not required for storage of NASM – unless a new building is to be constructed. Policies should focus on OMAFRA's approvals process. Local municipalities can't track the application/storage of NASM.	Haliburton- Revise the policy to: -remove the requirement to prohibit storage; or -revise to include policies that support the intent to prohibit -revise the policy to prohibit the outdoor storage. Explanatn/ definition of Disclosure Report required along with prescribed tools for measuring sufficiency of the document. Example of policies and zoning would be acceptable re prohibition. A Land Use Planning policy has been included for the storage of NASM that mirror the policy direction of the PI (<i>prohibit new and expansions to existing</i>). This was done as the municipality planning office is often the first stop a person makes when working through the planning process. The term disclosure report has been removed from the Source Protection Plan. The storage of NASMs would be prohibited within WHPAs and IPZs where the vulnerability score was ten when a circumstance in the Provincial Tables of Drinking Water Threats was triggered.	A Land Use Planning policy has been included for the storage of NASM that mirror the policy direction of the PI (<i>prohibit new and expansions to existing</i>). This was done as the municipality planning office is often the first stop a person makes when working through the planning process. The Province will determine if existing O.P policies are adequate to be in conformity with the Source Protection Plan. A Land Use Planning policy has been included for the storage of NASM that mirror the policy direction of the PI (<i>prohibit new and expansions to existing</i>). This was done as the municipality planning office is often the first stop a person makes when working through the planning process. The term disclosure report has been removed from the Source Protection Plan.
7 - 6	Mon (LUP)	MC	Mun	F	F	The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to: • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and • prohibit land uses that involve the handling and storage of NASM that would be a significant drinking water threat.	Haliburton- See comments for 7-5 Shelburne- What is the purpose/content of the Disclosure report to be required as part of complete application requirements? Who will review the Disclosure Report to determine if it is acceptable for a complete application? What qualifications do they require? Concern re staff/resource/cost/training requirements. Re: Prohibition policies-how does the Town determine if existing OP and zoning are sufficient to address this policy, or if amendments are required?	Haliburton- see comments for 7-5 Shelburne- What is the purpose/content of the Disclosure report to be required as part of complete application requirements? Who will review the Disclosure Report to determine if it is acceptable for a complete application? What qualifications do they require? Concern re staff/resource/cost/training requirements. Re: Prohibition policies-how does the Town determine if existing OP and zoning are sufficient to address this policy, or if amendments are required?	See response to comments for 7-5. The term disclosure report has been removed from the Source Protection Plan. The province will determine if existing O.P. policies are adequate to be in conformity with the Source Protection Plan.
7 - 7	EO	MC	OSCIA, SPA	E	E	The Ontario Soil and Crop Improvement Association (OSCIA), in collaboration with the SPA, shall undertake an education and outreach program targeted at agricultural landowners within vulnerable areas and NASM haulers/appliers to promote Best Management Practices to safeguard water supplies.	Peel- confirm whether a source protection plan can require the Ontario Soil and Crop Improvement Association to be an implementing body under the CWA.		The SPC can identify OSCIA as an implementing body. However, doing so reduces the legal effect of the policy from 'must conform' to 'non-legally binding'. The policy has been revised to identify the Local SPA as the implementing body with some collaboration with OSCIA
7 - 8	Mon (EO)	MC	OSCIA, SPA	E	F	The OSCIA and SPA shall document communication and outreach efforts. By February 1st of each year, the OSCIA and SPA shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	Omafra supports		Noted
7 - 9	In	HR	MOE	E	?	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.	Peel- clarify intended policy direction. Is the intent to "encourage the MOE to provide financial incentives through the Ontario Drinking Water Stewardship Program to reduce risks to drinking water"? If so, the policy should be revised to be clear.		The policy has been revised to clearly state that the intent is to encourage MOE to continue funding relevant stewardship programs.

Threat #7: The handling and storage of non-agricultural source material.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvement	SPC Response
7 - 10	In	MC	SPA	E	E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	Peel- The Ontario Drinking Water Stewardship program should identify the implementing bodies not the source protection plan. Why are the SPA's named as the implementing body?		The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
7 - 11	Mon (In)	MC	SPA	E	F	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.	Peel- This policy requires the monitoring body (SPA) to report to itself on stewardship actions. Staff questions the need for this policy and requests confirmation of the SPAs role with respect to stewardship actions in relation to this threat.		The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs

**ICA: Nitrate for Georgian Sands and Lafontaine ICA
Policies for the application and storage of non-agricultural source material (Threat #6 and 7)**

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
6/7 - ICA - 1	PI	MC	MOE/OMAFRA	F	C	The MOE and OMAFRA shall not approve Certificates of Approval for the handling and storage of NASM that would be a significant drinking water threat.	Regulations as set out in the Nutrient Management Act address the application, handling and storage of non-agricultural source material (NASM) for farms that are required to have NASM Plans. The issuance of Certificates of Approval is under the authority of the Ontario Water Resources Act. This legislation is implemented by the Ministry of the Environment.		To recognize that the application, handling and storage of NASM is regulated under different legislation (EPA, OWRA and the NMA) both the MOE and OMAFRA were identified as implementing bodies. The policy has been revised to clearly indicate that the policy relates to non-agricultural properties as well.,
6/7 - ICA - 2	Mon (PI)	MC	MOE/OMAFRA	F	F	The MOE and OMAFRA shall document the number of certificates of approval for NASM and NASM plans that have been reviewed and denied, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE and OMAFRA shall prepare and submit to the SPA, a report summarizing the actions taken and the results achieved for the previous year.	Regulations as set out in the Nutrient Management Act address the application, handling and storage of non-agricultural source material (NASM) for farms that are required to have NASM Plans. The issuance of Certificates of Approval is under the authority of the Ontario Water Resources Act. This legislation is implemented by the Ministry of the Environment.		To recognize that the application, handling and storage of NASM is regulated under different legislation (EPA, OWRA and the NMA) both the MOE and OMAFRA were identified as implementing bodies. The policy has been revised to clearly indicate that the policy relates to non-agricultural properties as well.,
6/7 - ICA - 3	PI	MC	MOE, OMAFRA	E	C	The MOE and/or OMAFRA shall amend existing Certificates of Approval / NASM plans for the storage, handling or application of NASM that are a significant drinking water threat to incorporate conditions such that the activity ceases to be a significant threat.	Regulations as set out in the Nutrient Management Act address the application, handling and storage of non-agricultural source material (NASM) for farms that are required to have NASM Plans. The issuance of Certificates of Approval is under the authority of the Ontario Water Resources Act. This legislation is implemented by the Ministry of the Environment.		To recognize that the application, handling and storage of NASM is regulated under different legislation (EPA, OWRA and the NMA) both the MOE and OMAFRA were identified as implementing bodies. The policy has been revised to clearly indicate that the policy relates to non-agricultural properties as well.,
6/7 - ICA - 4	Mon (PI)	MC	MOE, OMAFRA	E	F	The MOE and/or OMAFRA shall document the number of Certificates of Approval and / or NASM plans that have been reviewed and amended, the compliance monitoring undertaken, and how protection of municipal drinking water sources has been addressed. By February 1st of each year, MOE and / or OMAFRA shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	Regulations as set out in the Nutrient Management Act address the application, handling and storage of non-agricultural source material (NASM) for farms that are required to have NASM Plans. The issuance of Certificates of Approval is under the authority of the Ontario Water Resources Act. This legislation is implemented by the Ministry of the Environment.		To recognize that the application, handling and storage of NASM is regulated under different legislation (EPA, OWRA and the NMA) both the MOE and OMAFRA were identified as implementing bodies. The policy has been revised to clearly indicate that the policy relates to non-agricultural properties as well.,
6/7 - ICA - 5	LUP	MC	Mun	F	B	The municipality shall amend their planning documents to: <ul style="list-style-type: none"> include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and include provisions that prohibit the storage of NASM that would be a significant drinking water threat. 			
6/7 - ICA - 6	Mon (LUP)	MC	Mun	F	F	The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to: <ul style="list-style-type: none"> include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and prohibit the handling and storage of NASM that would be a significant drinking water threat. 			

Threat #8: The application of commercial fertilizer to land.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
8 - 1	RMP	MC	Mun	E / F	H	<p>The RMO shall negotiate a Risk Management Plan (RMP) with those applying commercial fertilizer that there is or would be a significant drinking water threat. These RMP will be based upon the same principles as the requirements of a nutrient management plan or strategy, and scoped to address these specific threats with conditions such as:</p> <ul style="list-style-type: none"> • Soil tests to determine fertilizer requirements every 3 years at minimum • 2-3 Crop rotation • Fertilizer use at prescribed rates and applied by a certified professional only • No mixing or loading of fertilizer / pesticide in WHPA-A 	<p>Peel- Staff supports the policy approach but recommends that the SGBLS and CTC region SPCs coordinate policy development to ensure that policies are consistent within the Region of Peel and recommends that the SPCs consider the following policy approaches:</p> <ol style="list-style-type: none"> 1. manage existing and future application of commercial fertilizer in vulnerable areas where application of commercial fertilizer is a significant drinking water threat; 2. Prohibit future (new or expanded) large quantity commercial fertilizer storage within WHPA-A; and 3. manage existing and future commercial fertilizer storage (except large quantity storage within WHPA-A) in vulnerable areas where storage of commercial fertilizer is a significant drinking water threat. 		<p>Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies.</p>
							<p>Newmarket-It is unclear when a Risk Management Plan is required for the application of commercial fertilizer. Is there minimum lot size and or application quantity to trigger the requirement for a Risk Management Plan? Would a Risk Management Plan be required for the application of commercial fertilizer to municipally/school board operated playing fields and similar public properties?</p>	<p>Clarify if there is minimum lot size and or application quantity that triggers a Risk Management Plan, and whether Risk Management Plan are intended to be required for the application of commercial fertilizer to municipally/school board operated playing fields and similar public properties.</p>	<p>The revised introduction to the application of commercial fertilizer threat policies provides a summary of circumstances needed to be considered a Significant Drinking Water Threat.</p>
							<p>Durham-8-1 Why not make a standalone policy to prohibit "mixing and loading" of fertilizer where it is a significant threat? Shouldn't mixing and loading actually fall under "handling" in the next set of policies (9)? Why is pesticide included here rather than in section 11?</p>		<p>The condition that states no mixing and loading should occur within WHAP-A has been removed from the policy.</p>
8 - 2	Mon (RMP)	MC	Mun	E	F	<p>The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.</p>			

Threat #8: The application of commercial fertilizer to land.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
8 - 3	RLU	MC	Mun	F	I	This SWP plan designates all land uses within the areas where the application of commercial fertilizer would be a significant drinking water threat, as a restricted land use under Section 59 of the Clean Water Act that requires a pre-screening by a RMO of all building permit and planning act applications within those areas.	Shelburne- How will the municipality know in all cases if a landuse will involve the application of commercial fertilizer> Is it within the scope of a municipality's powers under the Planning Act to require this information as part of the complete application requirements, or does the CWA confer this power on municipalities>	Identify land uses where application of commercial fertilizer would typically be a concern. See comment suggestions policy 3-5 (template etc)	The revised Source Protection Plan introduction section and the explanatory document provides an explanation of how RLU policies work. Yes, the CWA allows municipalities to require this information as part of a complete planning application. How to implement these policies will be included in an implementation guide.
							York-Include in the rationale document that there is a link to Lake Simcoe Protection Plan - Policy 6.18 SA - Province will develop a regulation for use of fertilizers for non agricultural lands		Policy was revised and therefore the comment does not apply.
							EG-Typically, municipal planning/building permit applications are not required for application of fertilizer – unless a new building is to be constructed. Who will enforce this? The RMO? Local municipalities can't track the application of fertilizer.	Focus on education vs land use policy	The revised Source Protection Plan introduction section and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.
8 - 4	Mon (RLU)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.			

Threat #8: The application of commercial fertilizer to land.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
8 - 5	EO	MC	OSCIA, SPA		E	The Ontario Soil and Crop Improvement Association (OSCIA), in collaboration with the SPA, shall undertake an education and outreach program targeted at agricultural landowners within vulnerable areas and NASM haulers/appliers to promote Best Management Practices to safeguard water supplies.	OMAFRA supports		Noted
							Peel- confirm whether a source protection plan can require the OSCIA to be an implementing body under the CWA.		The SPC can identify OSCIA as an implimenting body. However, doing so reduces the legal effect of the policy from 'must conform' to 'non-legally binding'. The policy has been revised to identify the Local SPA as the implimenting body with some collaboration with OSCIA
8 - 6	Mon (EO)	MC	OSCIA, SPA		F	The OSCIA and SPA shall document communication and outreach efforts. By February 1st of each year the OSCIA and SPA shall report to the SPA on the progress of the education	OMAFRA supports		Noted

Threat #8: The application of commercial fertilizer to land.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
						year, the OSCIA and OFA shall prepare and submit to the OFA, a report summarizing the education and outreach program, the action taken and the results obtained.	Peel- confirm whether a source protection plan can require the OSCIA to be an implementing body under the CWA.		The SPC can identify OSCIA as an implementing body. However, doing so reduces the legal effect of the policy from 'must conform' to 'non-legally binding'. The policy has been revised to identify the Local SPA as the implementing body with some collaboration with OSCIA
						Clearview-Policies 8-1 to 8-4 – same comments as policies 3-1 to 3-6 and 3-12. Municipalities are not financially able to participate in any required actions or provide incentives or compensation in relation to altered operations or land uses.			The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.

Threat #9: The handling and storage of commercial fertilizer.

It was recognized that Nutrient Management Plans, under the Nutrient Management Act, are prescribed instruments that could be amended to address Source Protection objectives. No suggestions were made to modify Nutrient Management Plans, however, as they were considered to be protective of drinking water.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
9 - 1	Pro	MC	Mun	F	G	The storage of commercial fertilizer where it would be a significant drinking water threats is prohibited under Section 57 of the Clean Water Act	We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.		Noted
							Peel- the policies are not consistent- policy 9-1 prohibits storage while policy 9-3 proposes that storage of commercial fertilizer is to be managed. Staff requests that the proposed policy direction be clarified. Please also see comments to Policy 8-1.		This policy is for future storage sites and the direction is to prohibit. Policy 9-3 is for existing storage sites and direction is to manage. Each of the revised policies now states whether it related to an existing or future threat, and an additional column has been included into the table that also states whether it related to existing or future threats.
							York-Make it clear whether or not the policy is for existing or future (assumed) threats		Each policy now states whether it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats.
							EG-Who will enforce this? The RMO? Local municipalities can't track the storage of fertilizer.	Focus on education vs land use policy	The RMO will be responsible for implementing the policy with aid from the local municipality.
							Durham-9-1 through 9-10 - These policies deal almost exclusively with storage and don't cover "handling" at all. As suggested above, "mixing and loading" may belong here. As previously noted, why duplicate the Section 59 policy (9-5) with a Planning Act land use policy(9-7)? There will rarely be a Planning Act trigger for this activity so this policy has very limited effectiveness.		The policy has been revised to include "handling" within the policy text. A Land Use Planning policy has been included for the storage of fertilizer that mirror the policy direction of the Section 57 and 58 policies. This was done as the municipality planning office is often the first stop a person makes when working through the planning process.
9 - 2	Mon (Pro)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.		Noted
9 - 3	RMP	MC	Mun	E	H	The RMO shall negotiate a Risk Management Plan (RMP) with those storing commercial fertilizer where that is a significant drinking water threat. These RMP will be based upon the same principles as the requirements of a nutrient management plan or strategy, and scoped to address these specific threats with conditions such as: • Double walled tanks or secondary containment is required for liquid fertilizer • Collision protection (bollards) are required around the storage • Removal from the WHPA-A at earliest opportunity	Penetang-There should be incentives to the landowner for upgrades to double walled tanks or secondary containment, and not the financial burden on the municipality.		The policy wording does not require the municipality to fund the upgrade of storage tanks to double walled. The landowner may qualify for the ODWS program.
							The ministry supports the use of RMPs for farms that are not phased in under the NMA. We support the negotiation of an RMP between the RMO and those storing or applying ASM on farms where the activity is a significant drinking water threat outside of WHPA-A. We also support similar policies where an RMP would be used to manage the risks of application and storage of commercial fertilizer where it is a significant drinking water threat. The policies state that these RMPs will be based on the same principles as the requirements of a NMP or NMS. The NMA does not have standards for managing the storage of commercial fertilizer. However, OMAFRA recommends the use of RMPs based on appropriate nutrient management practices to manage threats in this case.		Noted
9 - 4	Mon (RMP)	MC	Mun	E	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	The ministry supports the use of RMPs for farms that are not phased in under the NMA. We support the negotiation of an RMP between the RMO and those storing or applying ASM on farms where the activity is a significant drinking water threat outside of WHPA-A. We also support similar policies where an RMP would be used to manage the risks of application and storage of commercial fertilizer where it is a significant drinking water threat. The policies state that these RMPs will be based on the same principles as the requirements of a NMP or NMS. The NMA does not have standards for managing the storage of commercial fertilizer. However, OMAFRA recommends the use of RMPs based on appropriate nutrient management practices to manage threats in this case.		Noted

Threat #9: The handling and storage of commercial fertilizer.

It was recognized that Nutrient Management Plans, under the Nutrient Management Act, are prescribed instruments that could be amended to address Source Protection objectives. No suggestions were made to modify Nutrient Management Plans, however, as they were considered to be protective of drinking water.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
9 - 5	RLU	MC	Mun	F	I	This SWP plan designates all land uses within the areas where the handling and storage of commercial fertilizer would be a significant drinking water threat, as a restricted land use under Section 59 of the Clean Water Act that requires a pre-screening by a RMO of all building permit and planning act applications within those areas.	<p>Shelburne- "All agricultural building permit and planning act-applications within those areas requires pre-screening by the RMO" - at what stage in the application process does the pre-screening occur? (e.g. is this part of the normal agency circulation and comment? Prior to deeming application complete? Prior to public notice? Prior to public meeting? Prior to decision? -What are RMOs powers/duties in the pre-screening role? Is the RMO to direct municipalities not to process, approve, circulate or consider the application? -what are the potential outcomes of the pre-screening? (e.g. require more information? changes/alteration to the plan/proposal? -how much time must be allotted to the RMO to complete the pre-screening and how does this relate to the legislated procedures and timeframes that a municipality must follow upon receipt of an application under the Building Code Act and the Planning Act?</p> <p>Shelburne- How will the municipality know in all cases if a landuse will involve the application of commercial fertilizer> Is it within the scope of a municipality's powers under the Planning Act to require this information as part of the complete application requirements, or does the CWA confer this power on municipalities></p> <p>EG-Typically, municipal planning/building permit applications are not required for the handling/storage of fertilizer – unless a new building is to be constructed. Who will enforce this? The RMO? Local municipalities can't track the handling/storage of fertilizer.</p>	<p>Define purpose, scope, powers/duties, potential outcomes and timing of RMO pre-screening of applications and relation to legislated procedures.</p> <p>Focus on education vs land use policy</p>	<p>The roles and responsibilities will be explained within an Implementation Guide.</p> <p>The revised Source Protection Plan introduction section and the explanatory document provides an explanation of how RLU policies work. Yes, the CWA allows municipalities to require this information as part of a complete planning application. How to implement these policies will be included in an implementation guide.</p> <p>Yes, the RMO will be responsible for implementing this policy with the aid of the municipality.</p>
9 - 6	Mon (RLU)	MC	Mun	F		The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.			
9 - 7	LUP	MC	Mun	F	B	<p>The municipalities shall amend their planning documents to:</p> <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and • include provisions that prohibit the storage of commercial fertilizer that would be a significant drinking water threat. 	<p>Haliburton-This policy speaks of using planning documents to prohibit the storage. While land use planning can prohibit the outside storage of certain products and bulk storage facilities through site plan control, it cannot prohibit the inside storage or handling of these substances within a building or facility. Therefore, although motherhood Official Plan policies to support the intent of this proposed policy could be considered, the proposed policy cannot be implemented as drafted. NOTE: Bulk storage facilities are a land use that can be prohibited. Are these only for future occurrences? How will it impact existing uses?</p> <p>Peel- define "disclosure report". Revise land use planning policy direction to prohibit future large scale/bulk storage of commercial fertilizer in quantities >2500 kg within WHPA A.</p> <p>York-rather than DR include a conformity report to show conformity to CWA/SPP as part of complete application requirements</p> <p>Newmarket-The policy should include the minimum amount of commercial fertilizer being stored that would potentially pose a significant threat and therefore would trigger a prohibition, e.g., fertilizers for commercial retail.</p> <p>EG-Who will enforce this? The RMO? Municipalities can't track</p>	<p>Haliburton- revise the policy to: -remove the requirements to prohibit storage; or -revise to include policies that support the intent to prohibit -revise the policy to prohibit the outdoor storage.</p> <p>The policy should include the minimum amount of commercial fertilizer being stored that would potentially pose a significant threat and therefore would trigger a prohibition.</p> <p>Focus on education vs land use policy</p>	<p>A Land Use Planning policy has been included for the storage of commercial fertilizer that mirrors the policy direction of the Section 57 and 58 policies. This was done as the municipality planning office is often the first stop a person makes when working through the planning process.</p> <p>The term disclosure report has been removed from the Source Protection Plan</p> <p>The RLU policy has been combined and simplified, and no longer references a conformity report.</p> <p>The revised introduction to the Handling and Storage of Commercial Fertilizer policies contains a table summarizing the amount of fertilizer needed to be a Significant Drinking Water Threat.</p> <p>Yes, the RMO will be responsible for implementing this policy with the aid of the municipality.</p>
9 - 8	Mon (LUP)	MC	Mun	F	F	<p>The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to:</p> <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and • prohibit land storage of commercial fertilizer that would be a significant drinking water threat. 	<p>Haliburton- See comments for 9-7</p>	<p>Haliburton- see comments for 9-7</p>	<p>See response to 9-7</p>

Threat #9: The handling and storage of commercial fertilizer.

It was recognized that Nutrient Management Plans, under the Nutrient Management Act, are prescribed instruments that could be amended to address Source Protection objectives. No suggestions were made to modify Nutrient Management Plans, however, as they were considered to be protective of drinking water.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
9 - 9	EO	MC	OSCIA, SPA	E	E	The Ontario Soil and Crop Improvement Association (OSCIA), in collaboration with the SPA, shall undertake an education and outreach program targeted at agricultural landowners within vulnerable areas that promote Best Management Practices to safeguard water supplies.	OMAFRA supports Peel- Confirm whether a source protection plan can require the Ontario Soil and Crop Improvement Association to be an implementing body under the CWA.		Noted
9 - 10	Mon (EO)	MC	OSCIA, SPA	E	F	The OSCIA and SPA shall document communication and outreach efforts. By February 1st of each year, the OSCIA and SPA shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	OMAFRA supports		Noted

**ICA: Nitrate for Georgian Sands and Lafontaine ICA
Policies for the storage and application of commercial fertilizer (Threat #8 and 9)**

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	SPC Response
8/9 - ICA - 1	Pro	MC		F	G	The storage of bulk commercial fertilizer is prohibited under Part IV of the Clean Water Act within WHPA-A.	We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.	Noted
							Durham-8/9-ICA -1 through 8/9-ICA-9 –commercial fertilizers – Why duplicate the Section 59 policy (8-5) with a Planning Act land use policy(8-7)? There will rarely be a Planning Act trigger for this activity so this policy has very limited effectiveness.	A Land Use Planning policy has been included for the storage of fertilizer that mirror the policy direction of the Section 57 and 58
8/9 - ICA - 2	Mon (Pro)	MC		F	F	By February 1st of each year, the RMO shall prepare and submit to the SPA, a report documenting the number of planning applications received and the number that have not been permitted to locate in WHPA-A.	We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.	Noted
8/9 - ICA - 3	RMP	MC	Mun	E / F	H	The RMO shall negotiate a Risk Management Plan (RMP) with those applying commercial fertilizer that there is or would be a significant drinking water threat. These RMP will be based upon the same principles as the requirements of a nutrient management plan or strategy, and scoped to address these specific threats with conditions such as: <ul style="list-style-type: none"> • Soil tests to determine fertilizer requirements every 3 years at minimum • 2-3 Crop rotation • Fertilizer use at prescribed rates and applied by a certified professional only • No mixing or loading of fertilizer / pesticide in WHPA-A 	The ministry supports the use of RMPs for farms that are not phased in under the NMA. We support the negotiation of an RMP between the RMO and those storing or applying ASM on farms where the activity is a significant drinking water threat outside of WHPA-A. We also support similar policies where an RMP would be used to manage the risks of application and storage of commercial fertilizer where it is a significant drinking water threat. The policies state that these RMPs will be based on the same principles as the requirements of a NMP or NMS. The NMA does not have standards for managing the storage of commercial fertilizer. However, OMAFRA recommends the use of RMPs based on appropriate nutrient management practices to manage threats in this case.	Noted- As the NMA does not specify requirements minimum storage requirements for commercial fertilizer, the SPC has developed some minimum storage requirements to safeguard water supplies, based on industry input.
							York-include dyking for liquid nitrogen as a suggestion	The revised policy specifies minimum requirements for the storage of liquid fertilizer (under cover, on an impervious floor with no drainage outlet).
8/9 - ICA - 4	Mon (RMP)	MC	Mun	E	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	The ministry supports the use of RMPs for farms that are not phased in under the NMA. We support the negotiation of an RMP between the RMO and those storing or applying ASM on farms where the activity is a significant drinking water threat outside of WHPA-A. We also support similar policies where an RMP would be used to manage the risks of application and storage of commercial fertilizer where it is a significant drinking water threat. The policies state that these RMPs will be based on the same principles as the requirements of a NMP or NMS. The NMA does not have standards for managing the storage of commercial fertilizer. However, OMAFRA recommends the use of RMPs based on appropriate nutrient management practices to manage threats in this case.	Noted- As the NMA does not specify requirements minimum storage requirements for commercial fertilizer, the SPC has developed some minimum storage requirements to safeguard water supplies, based on industry input.
8/9 - ICA - 5	RLU	MC	Mun	F	I	This SWP plan designates all land uses within the areas where the application of commercial fertilizer would be a significant drinking water threat, as a restricted land use under Section 59 of the Clean Water Act that requires a pre-screening by a RMO of all building permit and planning act applications within those areas.	Tiny-The policy would designate the application of commercial fertilizer as a restricted land use that requires prescreening by a RMO of all building permit and Planning Act applications within those areas.It is unclear how the application of fertilizer could be prescreened through building permit and Planning Act applications.	The revised SPP introduction and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.
8/9 - ICA - 6	Mon (RLU)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.		
8/9 - ICA - 7	LUP	MC		F	B	Municipalities shall amend their planning documents to: <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, and • include provisions that to prohibit the storage of commercial fertilizer within the WHPA-A. 		

**ICA: Nitrate for Georgian Sands and Lafontaine ICA
Policies for the storage and application of commercial fertilizer (Threat #8 and 9)**

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	SPC Response
8/9 - ICA - 8	Mon (LUP)	MC		F	F	The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to: <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, and • prohibit the storage of commercial fertilizer within the WHPA-A. 		

Threat #10: The application of pesticides to land.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvement	SPC Response
10 - 1	RMP	MC	Mun	E/F	H	<p>The RMO shall negotiate a Risk Management Plan (RMP) with those applying pesticides that is (or would be) a significant drinking water threat. These RMP will be scoped to address these specific threats and include provisions such as:</p> <ul style="list-style-type: none"> • Pesticide use at prescribed rates and applied by a certified professional only • No mixing or loading of pesticide in WHPA-A • Soil tests to confirm pesticides are not accumulating in the soil 	<p>OMAFRA also supports the use of RMPs for addressing the application and storage of pesticides and the storage of fuel. For policies concerning the application of pesticides, we would like to note that if pesticides are applied properly and at the recommended rates, they will not usually accumulate in the soil. Also, we suggest that a "certified professional" be defined as a person who has taken the Grower Pesticide Safety Course.</p>		<p>Noted- the SPC will include a definition with the glossary to capture what course a certified professional would need for the different industries.</p>
							<p>Peel- staff supports the policy approach.</p>		<p>Noted</p>
							<p>Newmarket-It is unclear when a Risk Management Plan is required for the application of pesticides. Is there minimum lot size and or application quantity to trigger the requirement for a Risk Management Plan. Would a Risk Management Plan be required for the application of pesticides municipally/school board operated playing fields and road allowances?</p>	<p>Clarify if there is minimum lot size and or application quantity that triggers a Risk Management Plan.</p>	<p>The revised introduction to the Application of Pesticides policies provides a summary of the circumstances that would cause the activity to be a Significant Drinking Water Threat.</p>
10 - 2	Mon (RMP)	MC	Mun		F	<p>The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.</p>	<p>OMAFRA also supports the use of RMPs for addressing the application and storage of pesticides and the storage of fuel. For policies concerning the application of pesticides, we would like to note that if pesticides are applied properly and at the recommended rates, they will not usually accumulate in the soil. Also, we suggest that a "certified professional" be defined as a person who has taken the Grower Pesticide Safety Course.</p>		<p>Noted- the SPC will include a definition with the glossary to capture what course a certified professional would need for the different industries.</p>

Threat #10: The application of pesticides to land.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvement	SPC Response	
10 - 3	RLU	MC	Mun	F	I	This SWP plan designates all land uses within the areas where the application of pesticide is or would be a significant drinking water threat, as a restricted land use under section 59 of the Clean Water Act that requires a pre-screening by a RMO of all building permit and planning act applications within those areas.	Peel- this policy is not applicable to this threat. The application of pesticides to land does not require a building permit or an application under the planning act.	This SWP plan designates all land uses within the areas where the application of pesticide is or would be a significant drinking water threat, as a restricted land use under section 59 of the Clean Water Act that requires a pre-screening by a RMO of all building permit and planning act applications within those areas.	The revised SPP introduction and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.	
							Shelburne- "All agricultural building permit and planning act-applications within those areas requires pre-screening by the RMO" - at what stage in the application process does the pre-screening occur? (e.g. is this part of the normal agency circulation and comment? Prior to deeming application complete? Prior to public notice? Prior to public meeting? Prior to decision? -What are RMOs powers/duties in the pre-screening role? Is the RMO to direct municipalities not to process, approve, circulate or consider the application? -what are the potential outcomes of the pre-screening? (e.g. require more information? changes/alteration to the plan/proposal? -how much time must be allotted to the RMO to complete the pre-screening and how does this relate to the legislated procedures and timeframes that a municipality must follow upon receipt of an application under the Building Code Act and the Planning Act?		The revised SPP introduction and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.	
							Tiny-The policy would designate the application of pesticide as a restricted land use that requires prescreening by a RMO of all building permit and Planning Act applications within these areas. It is unclear how the application of fertilizer could be prescreened through building permit and Planning Act applications.		The revised SPP introduction and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.	
							EG-Typically, municipal planning/building permit applications are not required for application of pesticides – unless a new building is to be constructed. Who will enforce this? Municipalities can't track the application of pesticides		Focus on education vs land use policy	The RMO will enforce the policy with some aid from the local municipality.
							Durham-10-3 application of pesticides to land – Rarely will there be a Planning Act application trigger for this activity so the policy has very limited effectiveness.			The revised SPP introduction and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.
10 - 4	Mon (RLU)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.				

Threat #10: The application of pesticides to land.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvement	SPC Response
10 - 5	EO	MC	OSCIA, SPA	E	E	The Ontario Soil and Crop Improvement Association (OSCIA), in collaboration with the SPA, shall undertake an education and outreach program targeted at agricultural landowners within vulnerable areas that promote Best Management Practices to safeguard water supplies.	OMAFRA supports		Noted
							Newmarket-The education and outreach program should include a significant component on alternatives to pesticides as part of the best practices component.	The education and outreach program should include a significant component on alternatives to pesticides as part of the best practices component.	This suggestion will be added to the explanatory document/ Implementation guide describing what should be include in the Education and Outreach Program
10 - 6	Mon (EO)	MC	OSCIA, SPA	E	F	The OSCIA and SPA shall document communication and outreach efforts. By February 1st of each year, the OSCIA and SPA shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	OMAFRA supports		Noted
10 - 7	EO	HR	OMAFRA, MOE	E	?	When SWP plan comes into effect, OMAFRA and the MOE are encouraged to review the pest management training course, and revise as appropriate to reflect additional precautions and exclusions within SWP vulnerable areas that applicators should be aware of.	OMAFRA will continue to conduct research concerning the management of NASM. The ministry will also continue to review the pesticide management training course and revise as appropriate.		Noted
							Penetang-Does not include residential use of banned pesticides that are being phased out.	Penetang-Education and Outreach for residents. Possible special hazardous waste collection at County facilities encourage proper disposal.	Noted
							Policies 10-1 to 10-4 – same comments as policies 3-1 to 3-6 and 3-12.		See Response to above comments
						Municipalities are not financially able to participate in any required actions or provide incentives or compensation in relation to altered operations or land uses.			Local SPAs have now been identified as the lead agency with some collaboration with municipalities The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.

Threat #11: The handling and storage of pesticides.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
11 - 1	Pro	MC	Mun	F	G	The storage of pesticides where it would be a significant drinking water threat is prohibited under Section 57 of the Clean Water Act	Peel- Staff requests that the SGBLS and CTC Region SPCs coordinate policy development to ensure that policy approaches are consistent within the Region of Peel. Staff questions why the SGBLS is proposing to prohibit the storage of pesticides while the CTC Region is proposing to regulate the activity. Staff requests that SGBLS and CTC SPCs to consider the following policy approaches: 1. existing storage of pesticides where storage would be a significant threat-manage through regulation under s.58 of the CWA. 2. future small scale storage where the activity would be a significant threat- manage through regulation under s.58 of the CWA. 3. future large scale/bulk storage of pesticides in vulnerable areas where large scale/bulk storage is a significant drinking water threat- s.57 prohibition;and 4. future large scale/bulk storage is a significant drinking water threat- prohibit through land use planning policy under Planning Act.		Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies.
							York-Make it clear whether or not the policy is for existing or future (assumed) threats		Each policy now states whether it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats.
							Newmarket-The policy should include the minimum amount of pesticide being stored that would potentially pose a significant threat and therefore would trigger a prohibition, e.g., for commercial retail.	The policy should include the minimum amount of pesticide being stored that would potentially pose a significant threat and therefore would trigger a prohibition.	The revised introduction to the handling and storage of pesticides threat policies now contains a table summarizing the circumstances that need to be triggered to be a Significant Drinking Water Threat.
11 - 2	Mon (Pro)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.			
11 - 3	RMP	MC	Mun	E	H	The RMO shall negotiate a Risk Management Plan (RMP) with those storing pesticide that is a significant drinking water threat. These RMP will be scoped to address these specific threats and include provisions such as: • Double walled tanks or secondary containment is required • Collision protection (bollards) are required around the storage • Removal from the WHPA-A at earliest opportunity	OMAFRA also supports the use of RMPs for addressing the application and storage of pesticides and the storage of fuel. For policies concerning the application of pesticides, we would like to note that if pesticides are applied properly and at the recommended rates, they will not usually accumulate in the soil. Also, we suggest that a "certified professional" be defined as a person who has taken the Grower Pesticide Safety Course.		The definition suggestion will be included in the glossary.
							Peel- Policy 11-1 and 11-3 appear to conflict with each other. Policy 11-1 prohibits storage of pesticides while policy 11-3 proposes to regulate the activity. Please clarify intended policy direction.		Policy 11-1 is for future activities, and policy 11-3 is for existing activities. All of the revised policies now state whether the policies relates to an existing or future threat, and an additional column has been included in the table that also states whether it relates to existing or future threats.
11 - 4	Mon (RMP)	MC	Mun	E	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	OMAFRA also supports the use of RMPs for addressing the application and storage of pesticides and the storage of fuel. For policies concerning the application of pesticides, we would like to note that if pesticides are applied properly and at the recommended rates, they will not usually accumulate in the soil. Also, we suggest that a "certified professional" be defined as a person who has taken the Grower Pesticide Safety Course.		The definition suggestion will be included in the glossary.

Threat #11: The handling and storage of pesticides.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
11 - 5	RLU	MC	Mun	F	I	This SWP plan designates all land uses within the areas where the storage of pesticide is or would be a significant drinking water threat, as a restricted land use under section 59 of the Clean Water Act that requires a pre-screening by a RMO of all building permit and planning act applications within those areas.	Shelburne- "All agricultural building permit and planning act-applications within those areas requires pre-screening by the RMO" - at what stage in the application process does the pre-screening occur? (e.g. is this part of the normal agency circulation and comment? Prior to deeming application complete? Prior to public notice? Prior to public meeting? Prior to decision? -What are RMOs powers/duties in the pre-screening role? Is the RMO to direct municipalities not to process, approve, circulate or consider the application? -what are the potential outcomes of the pre-screening? (e.g. require more information? changes/alteration to the plan/proposal? -how much time must be allotted to the RMO to complete the pre-screening and how does this relate to the legislated procedures and timeframes that a municipality must follow upon receipt of an application under the Building Code Act and the Planning Act?	Define purpose, scope, powers/duties, potential outcomes and timing of RMO pre-screening of applications and relation to legislated procedures.	The Implementation Guide will contain a section explaining the roles and duties of the RMO.
							EG-Typically, municipal planning/building permit applications are not required for handling/storage of pesticides – unless a new building is to be constructed. Who will enforce this? Municipalities can't track the storage of pesticides	Focus on education vs land use policy	The revised Source Protection Plan introduction section and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.
							Durham-11-5 applies a Sec. 59 restricted land use policy to pesticide storage and 11-7 applies a land use planning policy for pesticide storage. This is an example of unnecessary and (probably ineffective) duplication. There will not necessarily be a land use planning trigger for creation of new pesticide storage facilities in an existing facility.		The revised Source Protection Plan introduction section and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.
11 - 6	Mon (RLU)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	Durham-11-1, 11-2 - Even though the storage of pesticides is prohibited in future (11-1), there is a corresponding policy requirement (11-2) for the RMO to report "action taken and results obtained". It is not clear what they would be reporting or what change they would be looking for as a "result".		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an implementation guide.
11 - 7	LUP	MC	Mun	F	B	The municipalities shall amend their planning documents to; • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and • include provisions that prohibit the storage of pesticide that would be a significant drinking water threat.	Haliburton-This policy speaks of using planning documents to prohibit the storage. While land use planning can prohibit the outside storage of certain products and bulk storage facilities through site plan control, it cannot prohibit the inside storage or handling of these substances within a building or facility. Therefore, although motherhood Official Plan policies to support the intent of this proposed policy could be considered, the proposed policy cannot be implemented as drafted. NOTE: bulk storage facilities are a land use that can be prohibited. Are these only for future occurrence? How will it impact existing uses?	Haliburton- revise the policy to: -remove the requirement to prohibit storage; or -revise to include policies that support the intent to prohibit -revise the policy to prohibit the outdoor storage.	The revised LUP policies have been simplified to mirror the requirements of the Part IV power policies.
							Peel- please provide the rationale and justification for the policy to prohibit future storage of pesticides wherever storage is a significant threat and why a risk management policy tool, such as the one proposed by the CTC region, in not an acceptable alternative. Staff requests that the SGBLS and CTC Region SPCs coordinate policy development to ensure that policy approaches are consistent within the Region of Peel to the greatest extent possible.		Please see the explanatory document for the committee rationale for include a future prohibition. Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted each others policies.
							Shelburne-The Town's planning documents already prohibit pesticides within a WHPA. Who will determine if existing municipal policies/zoning are sufficient as is, or if an amendment is required?	Clarify requirements to amend planning documents.	The Province will determine if existing O.P. policies are adequate to be in conformity with the Source Protection Plan.
11 - 8	Mon (LUP)	MC	Mun	F	F	The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to; • identify those lands subject to restricted land use provisions under	Haliburton- see comments for 11-7	Haliburton- see comments for 11-7	See response for 11-7
							Shelburne-The Town's planning documents already prohibit pesticides within a WHPA. Who will determine if existing municipal policies/zoning are sufficient as is, or if an amendment is required?	Clarify requirements to amend planning documents.	The Province will determine if existing O.P. policies are adequate to be in conformity with the Source Protection Plan.

Threat #11: The handling and storage of pesticides.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
11 - 9	EO	MC	OSCIA, SPA	E	?	The Ontario Soil and Crop Improvement Association (OSCIA), in collaboration with the SPA, shall undertake an education and outreach program targeted at agricultural landowners within vulnerable areas that promote Best Management Practices to safeguard water supplies.	OMAFRA supports Peel- Confirm whether a source protection plan can require the Ontario Soil and Crop Improvement Association to be an implementing body under the CWA.		Noted The SPC can identify OSCIA as an implementing body. However, doing so reduces the legal effect of the policy from 'must conform' to 'non-legally binding'. The policy has been revised to identify the Local SPA as the implementing body with some collaboration with OSCIA
11 - 10	Mon (EO)	MC	OSCIA, SPA	E	F	The OSCIA and SPA shall document communication and outreach efforts. By February 1st of each year, the OSCIA and SPA shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	OMAFRA supports		Noted
11 - 11	In	MC	Mun	E	E	Municipalities are required to consider ways in which additional conveniences can be created either through additional hazardous waste drop off and/or pick up arrangements (increasing frequency, location, creation of 'toxic taxis', etc.)	OMAFRA supports these policies- Municipalities must consider ways in which additional conveniences can be created either through additional hazardous waste drop off and/or pick up arrangements (increasing frequency, location, creation of 'toxic taxis' etc)		Noted
							Shelburne- Country is responsible for waste collection/management disposal. Should the municipality responsible for water management appropriately be the lead for addressing this policy re hazardous waste conveniences?	Clarify division.sharing of responsibility among upper and lower tier.	The policy has been to say "the municipalities responsible for waste....."
							Tiny-Requires municipalities to consider ways in which additional conveniences can be created (under handling and storage of pesticides). Provide examples of how this would be implemented?		Examples of how this policy could be implemented will be provided in an implementation guide.
11 - 12	Mon (In)	MC	Mun	E	F	The municipality shall document the action taken to consider additional hazardous waste conveniences. By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	OMAFRA supports these policies- Municipalities must consider ways in which additional conveniences can be created either through additional hazardous waste drop off and/or pick up arrangements (increasing frequency, location, creation of 'toxic taxis' etc)		Noted
							Shelburne- Country is responsible for waste collection/management disposal. Should the municipality responsible for water management appropriately be the lead for addressing this policy re hazardous waste conveniences?	Clarify division.sharing of responsibility among upper and lower tier.	The policy has been to say "the municipalities responsible for waste....."

Threat #12: The application of road salt.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
12 - 1	RMP	MC	Mun	F	H	The RMO shall negotiate a Risk Management Plan (RMP) with those who are applying road salt where there is (or would be) a significant drinking water threat. These RMPs would be based on the same principles as a Salt Management Plan. Residential properties are exempt from this requirement.	Shelburne- multi-unit residential parking lots could be significant users of road salt?	Clarify exemption	The revised introduction to the application of road salt policies better explains when the application of salt is considered to be a Significant Drinking Water Threat.
						Newmarket-This policy requires a Risk Management Plan to be prepared based on the same principles as the Salt Management Plan filed with Environment Canada. In order to reduce work load and ensure consistent reporting, the reporting required under the Source Protection Plan should be the same as that required for the Salt Management Plans if the municipality has developed a Salt Management Plan as recommended by Environment Canada's Code of Practice for the Environmental Management of Road Salts.	Newmarket-In order to reduce work load and ensure consistent reporting, the reporting required under the Source Protection Plan should be the same as that required for the Salt Management Plans if the municipality has developed a Salt Management Plan as recommended by Environment Canada's Code of Practice for the Environmental management of Road Salts	The reporting requirements for the Clean Water Act differ slightly than those for the Environment Canada's Code of Practice. The reporting requirements for the Source Protection Plan are not intended to be onerous.	
12 - 2	Mon (RMP)	MC	Mun	F	F	By February 1 st of each year, the RMO shall prepare and submit to the SPA, a report documenting the action taken and the results obtained.	Barrie-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season in Barrie typically extends from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the SPA and would not allow correlation between the two reports.	Align the SPA reporting date with the June 30 th ECP reporting requirement.	Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
12 - 3	RLU	MC	Mun	E	I	This SWP plan designates all land uses within the areas where the application of road salt would be a significant drinking water threat, as a restricted land use under Section 59 of the Clean Water Act. All planning applications for activities related to the application of road salt where the activity would be a significant drinking water threat are required to be pre-screened by the RMO.	Shelburne- "All building permit and planning act-applications within those areas requires pre-screening by the RMO" - at what stage in the application process does the pre-screening occur? (e.g. is this part of the normal agency circulation and comment? Prior to deeming application complete? Prior to public notice? Prior to public meeting? Prior to decision? -What are RMOs powers/duties in the pre-screening role? Is the RMO to direct municipalities not to process, approve, circulate or consider the application? -what are the potential outcomes of the pre-screening? (e.g. require more information? changes/alteration to the plan/proposal? -how much time must be allotted to the RMO to complete the pre-screening and how does this relate to the legislated procedures and timeframes that a municipality must follow upon receipt of an application under the Building Code Act and the Planning Act?	Define purpose, scope, powers/duties, potential outcomes and timing of RMO pre-screening of applications and relation to legislated procedures.	The Implementation Guide will contain a section explaining the roles and duties of the RMO.
						OGRA-Section 5.4.2. identifies the Planning Act as one of the regulatory measures. In reviewing the document "All planning applications . . ." refers to Planning Act applications. Municipalities undertake a number of planning activities (strategic planning, capital planning, maintenance planning, etc) and for clarity we recommend that the phrase be reworded to "All Planning Act applications"		The wording of the revised RLU policy has been simplified, and is worded to be in compliance with the Clean Water Act.	
12 - 4	Mon (RLU)	MC	Mun	F	F	By February 1 st of each year, the RMO shall prepare and submit to the SPA, a report documenting the action taken and the results obtained.	Barrie-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season in Barrie typically extends from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the SPA and would not allow correlation between the two reports.	Align the SPA reporting date with the June 30 th ECP reporting requirement.	Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
						OGRA Response -The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season is defined by each municipality and would typically extend from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the RMO with no correlation between reports.		Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.	
12 - 5	EO	MC	Mun, SPA	E	E	Municipalities in collaboration with the SPA, shall undertake an awareness program targeted at landowners and private contractors within vulnerable areas that address the importance of source protection planning and the impacts of road salt on drinking water sources, with the key message being the efficient use of road salt and the use of alternatives.	York-list Province as implementer and not municipality, Province is already responsible for stewardship		Local SPAs have now been identified as the lead agency with some collaboration with municipalities
						Durham-12-5 – The policy may have large cost implications for the municipality.		Local SPAs have now been identified as the lead agency with some collaboration with municipalities	

Threat #12: The application of road salt.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
12 - 6	Mon (EO)	MC	Mun	E	F	The municipality shall document its education and outreach efforts. By February 1 st of each year, the municipality shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	Barrie-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season in Barrie typically extends from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the SPA and would not allow correlation between the two reports.	Align the SPA reporting date with the June 30 th ECP reporting requirement.	Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
						York-list Province as implementer and not municipality		Local SPAs have now been identified as the lead agency with some collaboration with municipalities	
						OGRA Response -The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season is defined by each municipality and would typically extend from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the RMO with no correlation between reports.		Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.	
12 - 7	In	HR	MOE	E	?	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.			
12 - 8	In	MC	SPA	E	E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.			
12 - 9	Mon (In)	MC	SPA	E	F	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.			
12 - 10	In	MC	Mun	E	E	Municipalities are required to consider incentives that can be offered to promote safe salt management including the implementation and use of advanced salting equipment.	York-Please remove this policy as it establishes an unreasonable expectation and should be covered by MOE		This policy has been removed from the Source Protection Plan.
							EG-Municipalities do not necessarily have any money to provide financial incentives.		This policy has been removed from the Source Protection Plan.
							Durham-12-10 is a "must conform" policy requiring the municipality to "consider incentives that can be offered to promote safe salt management including the implementation and use of advanced salting equipment". In the current fiscal environment, the municipality will be fortunate if it can afford to do this for their own operations. Providing "incentives" for others to do so, beyond something like public recognition for best practices, is extremely unlikely. 12-10, 12-11, 12-14 Environment Canada currently has a program that encourages municipalities spreading more than 500 tons of salt annually to have a plan and report results each June. They also are funding research at the University of Waterloo on the environmental impacts of sodium chloride and alternatives and on more effective spreading practices and application rates. Environment Canada is just beginning efforts to also look at private sector operations such as large parking facilities, landscape companies, etc..		This policy has been removed from the Source Protection Plan.
12 - 11	SA	NLB	OGRA, AMO, SPA		E?	The Ontario Good Roads Association (OGRA) and the Association of Municipalities of Ontario (AMO), in collaboration with the SPA shall undertake an awareness program targeted at municipalities that addresses the importance of source protection planning and the impacts of road salt on drinking water sources, with the key message being the efficient use of road salt or the use of alternatives.	Newmarket-This recommendation encourages the Ontario Good Roads Association and the Association of Municipalities of Ontario to continue to undertake awareness programs related to efficient use of road salt "or" the use of alternatives. In view of the impact of road salt on water quality and the environment, this recommendation could be strengthened by using the term "and" instead of "or", in order to encourage the use of alternatives to salt, in addition to efficient use of salt. This approach would also support Policy 12-14 which encourages research into alternatives to road salt. For example, other jurisdictions have been applying an alcohol based product in sensitive areas both alone and in combination with a salt brine.	In view of the impact of road salt on water quality and the environment, this recommendation could be strengthened by using the term "and" instead of "or" as a means of encouraging use of alternatives to salt and in support of Policy 12-14 which encourages research into alternatives to road salt.	The policy has been revised to merge all of the salt and snow education and outreach policies into one.
12 - 12	SA	NLB	Mun		?	All municipalities are encouraged to have in place Road Salt Management Plans.	Durham-12-12 Further to the comments on 12-10, encouraging municipalities to have road salt management plans for vulnerable areas is a good idea. However, creating salt management plans for a municipal road operation costs money and so does implementing them (may need to build new salt infrastructure or retrofit spreading equipment). Durham Region has a voluntary salt management plan for Regional Roads and is actively implementing it, but many of our area municipalities do not have such plans. In areas where chloride is a serious issue, the Province may need to assist with funding.		This policy has been removed from the Source Protection Plan.
12 - 13	SA	NLB	Mun		?	All municipalities with Road Salt Management Plans are encouraged to amend their salt management plans to identify the location of wellhead protection areas and intake protection zones to address the threats due to the application, handling and storage of road salt.			
12 - 14	Re	HR	MTO, OGRA, AMO		?	When the SWP plan comes into effect, the Province together with the OGRA and AMO is encouraged to undertake research into cost effective alternatives to salt.	Barrie-Joint effort of the Province, OGRA and AMO to undertake research into cost effective alternatives to road salt should not result in recommendations that would compromise road safety.	Include clarification in the policy to confirm that road safety will not be compromised by the recommendation of salt alternatives.	Noted
							MTO- MTO, supports working collaboratively with groups such as OGRA and AMO to find cost effective solutions to impacts associated with winter maintenance material and practices. Please consider broadening the wording of the policy statement to read as follows: MTO, OGRA and AMO are encourage to continue to use the Ontario Salt Management Group (OSMG) to develop best practices through the use of current technology for conducting winter maintenance, in a way that minimizes the impacts on drinking water sources. Inherent in this wording/approach is finding cost effective alternatives to salt.		Noted

ICA: Barrie: Policies for the application and storage of road salt (Threat # 12 and 13).

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
12/13 - ICA - 1	Pro	MC	Mun	F	G	The bulk storage of road salt where it would be a significant threat is prohibited under Section 57 of the Clean Water Act.			
12/13 - ICA - 2	RMP	MC	Mun	E / F	H	The RMO shall negotiate a Risk Management Plan (RMP) with those who are storing bulk quantities where there is a significant drinking water threat, or applying road salt within the WHPA-A. These RMPs would be based on the same principles as a Salt Management Plan.			
12/13 - ICA - 3	RLU	MC	Mun	E / F	I	This SWP plan designates all land uses within the areas where the application and handling or storage of road salt would be a significant drinking water threat, as a restricted land use. All planning applications for activities related to the application or handling or storage of road salt where the activity would be a significant drinking water threat are required to be pre-screened by the RMO.	OGRA-Section 5.4.2. identifies the Planning Act as one of the regulatory measures. In reviewing the document "All planning applications . . ." refers to Planning Act applications. Municipalities undertake a number of planning activities (strategic planning, capital planning, maintenance planning, etc) and for clarity we recommend that the phrase be reworded to "All Planning Act applications"		The wording of the revised RLU policy has been simplified, and is worded to be in compliance with the Clean Water Act.
12/13 - ICA - 4	Mon (RMP)	MC	Mun	E / F	F	By February 1st of each year, the Risk Management Official (RMO) shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	OGRA-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season is defined by each municipality and would typically extend from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the RMO with no correlation between reports.		Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
12/13 - ICA - 5	LUP	MC	Mun	F	B	Municipalities shall amend their planning documents to prohibit bulk salt storage where it would be a significant threat.			
12/13 - ICA - 6	Mon (LUP)	MC	Mun	F	F	The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to: <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act; and • prohibit the storage of bulk road salt in the ICA 			
12/13 - ICA - 7	EO	MC	Mun	E / F	F	The municipality, in collaboration with the SPA, shall undertake a program to raise the awareness of property owners, property managers, and snow removal contractors within the Issue Contributing Area. The program should reflect best practices for salt storage and application, and the vulnerability of the Issue Contributing Area.			

Threat #13: The handling and storage of road salt.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
13 - 1	Pro	MC	Mun	F	G	The storage of bulk road salt where it would be a significant drinking water threat is prohibited under Section 57 of the Clean Water Act	Peel- Staff does not support a broad prohibition on road salt storage facilities as currently drafted and requests the SGBLS SPC to consider the draft policies that have been developed for the CTC region which provide an exemption for covered facilities.		Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies.
							Durham-13-1 and 13-2 Even though the activity is prohibited in future, there is a corresponding policy requirement for the risk management official to report "action taken and results obtained". It is not clear what they would be reporting or what change they would be looking for as a "result". (Same comment for 14-1 and 14-2, 15-1 and 15-2, etc.)		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
13 - 2	Mon (Pro)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	Barrie-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season in Barrie typically extends from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the SPA and would not allow correlation between the two reports.	Align the SPA reporting date with the June 30 th ECP reporting requirement.	Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
							OGRA-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season is defined by each municipality and would typically extend from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the RMO with no correlation between reports.		Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
13 - 3	RMP	MC	Mun	E	H	The RMO shall negotiate a Risk Management Plan (RMP) with those who are storing bulk road salt where there is a significant drinking water threat. These RMPs would be based on the same principles as a Salt Management Plan.			
13 - 4	Mon (RMP)	MC	Mun	E	F	By February 1st of each year, the Risk Management Official (RMO) shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	Barrie-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season in Barrie typically extends from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the SPA and would not allow correlation between the two reports.	Align the SPA reporting date with the June 30 th ECP reporting requirement.	Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
							OGRA-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season is defined by each municipality and would typically extend from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the RMO with no correlation between reports.		Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
13 - 5	RLU	MC	Mun	E	I	This SWP plan designates all land uses within the areas where the storage of road salt would be a significant drinking water threat, as a restricted land use under Section 59 of the Clean Water Act. All planning applications related to the storage of bulk road salt are required to be pre-screened by the RMO.	York-missing accompanying monitoring policy (13-6 Mon (RLU) - By February 1st of each year, the RMO shall prepare and submit to the SPA , a report documenting the action taken and the results obtained.)		A reference to the monitoring policy has been added to the revised plan.
13 - 6	LUP	MC	Mun	F	B	Municipalities shall amend their planning documents to prohibit salt storage within where it would be a significant drinking water threat.	Shelburne-For clarity should stoarge be defined or noted in the policy to mean uncovered storage of 500 tonnes or greater? Policy 13-6 is missing words after within? The Town's planning documents already prohibit salt storage within WHPA. Who will determine if existing municipal policies/zoning are sufficient as is, or an amendement is required?	Clarify requirements to amend planning documents	The revised introduction the handling and storage of road salt policies includes a table summarizing the amount of salt needed to be considered a Significant Drinking Water Threat.
							Newmarket-Editorial: Add "vulnerable areas" after "within."	Add "vulnerable areas" after "within."	Added
13 - 7	Mon (LUP)	MC	Mun	F	F	Municipalities shall provide to the SPA a copy of the notice of adoption of the planning document amendments to: 1. identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act; 2. include a disclosure report as part of the complete application requirements where there is or would be a significant drinking water threat; 3. prohibit the storage of bulk road salt where it would be a significant drinking water threat.	Shelburne-For clarity should stoarge be defined or noted in the policy to mean uncovered storage of 500 tonnes or greater? Policy 13-6 is missing words after within? The Town's planning documents already prohibit salt storage within WHPA. Who will determine if existing municipal policies/zoning are sufficient as is, or an amendement is required?	Clarify requirements to amend planning documents	The revised introduction the handling and storage of road salt policies includes a table summarizing the amount of salt needed to be considered a Significant Drinking Water Threat.
13 - 8	In	HR	MOE	E	E	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.			
13 - 9	In	MC	SPA	E	E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.			
13 - 10	Mon (In)	MC	SPA	E	F	The SPA/CA shall document its stewardship efforts. By February 1 of each year, the SPA/CA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.			

Threat #14: The storage of snow.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
14 - 1	Pro	MC	Mun	F	G	The storage of snow where it would be a significant drinking water threat is prohibited under Section 57 of the Clean Water Act	Durham-The policy could have large cost implications for the municipality. See general comments above regarding the feasibility of municipalities offering incentive programs. The education and outreach program and requirements for best practices should also extend to private property owners and snow removal companies.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
14 - 2	Mon (Pro)	MC	Mun	F	F	By February 1 st of each year, the RMO shall prepare and submit to the SPA, a report documenting the action taken and the results obtained.	Barrie-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season in Barrie typically extends from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the SPA and would not allow correlation between the two reports.	Align the SPA reporting date with the June 30 th ECP reporting requirement.	Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
							OGR-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season is defined by each municipality and would typically extend from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the RMO with no correlation between reports.		Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
							Durham-14-2 See 13-2 above. If the activity is prohibited in future there should be nothing for the RMO monitor and report.		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
14 - 3	RMP	MC	Mun	E	H	The RMO shall negotiate a Risk Management Plan (RMP) with those who are storing snow where there is a significant drinking water threat.	Peel- Policy needs to define the types of snow storage facilities/areas that are subject to the policy (all snow storage designated sites)?		The revised introduction to the snow storage policies provides a table summarizing the storage area and location needed to be considered a Significant Drinking Water Threat.
							Newmarket-Since several of Newmarket's municipal wells and their respective vulnerable areas are adjacent to or within large parking lots where snow from the parking lot is stored. Stronger policy direction should be included to guide the Risk Management Plans proposed to be required e.g., to incorporate best management practices that are designed to reduce infiltration and direct runoff to appropriately designed storm water management ponds and/or require off-site storage.	Stronger policy direction should be included to guide the Risk Management Plans e.g., to incorporate best management practices that reduces infiltration and runoff to storm water management ponds that may impact source water and/or require off-site storage.	The RMP wording has been revised to say that the plan must be based on contemporary standards and ensure the threat ceases to be Significant. Contemporary standards may include the suggestions provided.
14 - 4	Mon (RMP)	MC	Mun	E	F	By February 1 st of each year, the RMO shall prepare and submit to the SPA, a report documenting the action taken and the results obtained.	Barrie-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season in Barrie typically extends from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the SPA and would not allow correlation between the two reports.	Align the SPA reporting date with the June 30 th ECP reporting requirement.	Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
							Newmarket-These two policies 14-4 and 14-6 could be combined to reduce duplication.		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
							OGR-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season is defined by each municipality and would typically extend from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the RMO with no correlation between reports.		Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
14 - 5	RLU	MC	Mun	F	I	This SWP plan designates all land uses within the areas where the storage of road salt would be a significant drinking water threat, as a restricted land use under Section 59 of the Clean Water Act. All planning applications related to the storage of bulk road salt are required to be pre-screened by the RMO.	Peel- Staff supports the policy approach		Noted
							Shelburne- same questions/comments noted for policy 8-3 and 3-5 re pre-screening, information required for complete application. This policy appears to be identical to 13-5. Should say snow storage?		The restricted land use policies have been merged into one. How this policy is to be implemented will be explained in an implementation guide.
							Newmarket-Editorial: Policy 14 deals with storage of snow and policy 14-5 inadvertently refers to "salt storage" instead of "snow storage".	Policy 14 deals with storage of snow and policy 14-5 inadvertently refers to "salt storage" instead of "snow storage".	The restricted land use policies have been merged into one. The editorial mistake has been corrected.
14 - 6	Mon (RLU)	MC	Mun	E	F	By February 1 st of each year, the RMO shall prepare and submit to the SPA, a report documenting the action taken and the results obtained.	Barrie-The Environmental Code of Practice (ECP) for the Environmental Management of Road Salts requires municipalities to report on road salt usage by June 30th of each year. The winter season in Barrie typically extends from November of each year until the following April. Reporting in February would require one report for the ECP and a second report for the SPA and would not allow correlation between the two reports.	Align the SPA reporting date with the June 30 th ECP reporting requirement.	Unfortunately, the February 1st deadline is not set by the SPC, but by Ontario Regulation 287/07, Section 65.8 (8), which specifies that the Risk Management Official shall submit an annual report to the SPA by February 1st in the year following the year to which the report applies.
							Newmarket-These two policies 14-4 and 14-6 could be combined to reduce duplication.		It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
14 - 7	LUP	MC	Mun	F	B	Municipalities shall amend their planning documents to prohibit snow storage within where it would be a significant drinking water threat.	Same questions/comments noted for policies 7-5 and 7-6 re disclosure report and prohibition. The Town's planning documents already prohibit snow storage within a WHPA. Who will determine if existing municipal policies/zoning are sufficient, or if an amendment is required?	Clarify requirement to amend planning documents.	The Province will determine if existing O.P policies are adequate to be in conformity with the Source Protection Plan.
							York-References storage of salt rather than snow - AH		This has been corrected in the revised policy.

Threat #14: The storage of snow.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
							Newmarket-This policy recommends that planning documents be amended to prohibit snow storage that pose a significant threat to drinking water. The policy requires clarification regarding the volume and/or other parameters to define first what constitutes snow storage and second when snow storage poses a significant threat.	The policy requires clarification regarding what constitutes snow storage and the volume of snow and/or other parameters to assist in defining when snow storage poses a significant threat.	The revised introduction to the snow storage policies provides a table summarizing the storage area and location needed to be considered a Significant Drinking Water Threat.
							OGRA-Reword to read: Municipalities shall amend their Planning Act documents to prohibit snow storage where there is a significant drinking water threat.		All Land Use Planning policies has been revised to say <i>"municipalities shall amend their planning documents to..... In vulnerable areas where the activity is or would be a Significant Drinking Water Threat."</i>
14 - 8	Mon (LUP)	MC	Mun	F	F	Municipalities shall provide to the SPA a copy of the notice of adoption of the planning document amendments to: 1. identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act; 2. include a disclosure report as part of the complete application requirements where there is or would be a significant drinking water threat; 3. prohibit the storage of snow where it would be a significant drinking water threat.	Municipalities shall amend their Planning Act documents to prohibit snow storage where there is a significant drinking water threat.	Clarify requirement to amend planning documents.	The direction of the revised Land Use Planning policy is to prohibit new or the expansion of existing snow storage facilities in vulnerable areas where the activity is or would be a Significant Drinking Water Threat.

Threat #14: The storage of snow.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
14 - 9	EO	MC	Mun, SPA	E	E	Municipalities in collaboration with the SPA, shall undertake an education and outreach program targeted at landowners and private contractors within vulnerable areas that address the importance of source protection planning and the impacts of road salt on drinking water sources, with the key message being the proper storage of snow and the efficient use of road salts or the use of alternatives.	Shelburne- staff commitments/resource and cost implications? Required content/format of the annual reporting? Staff training qualifications required to undertake this work? York-list Province as implementer and not municipality, Province is already responsible for stewardship	Provide templates, examples, evaluation measures, targets, criteria etc for programs.	Local SPAs have now been identified as the lead agency with some collaboration with municipalities Local SPAs have now been identified as the lead agency with some collaboration with municipalities
14 - 10	Mon (EO)	MC	Mun	E	F	The municipality shall document its education and outreach efforts. By February 1 st of each year, the municipality shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	Shelburne- staff commitments/resource and cost implications? Required content/format of the annual reporting? Staff training qualifications required to undertake this work? York-list Province as implementer and not municipality,	Provide templates, examples, evaluation measures, targets, criteria etc for programs.	Local SPAs have now been identified as the lead agency with some collaboration with municipalities It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide. Local SPAs have now been identified as the lead agency with some collaboration with municipalities
14 - 11	In	HR	MOE	E	?	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.			
14 - 12	In	MC	SPA	E	E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.			
TBD	Mon (In)	MC	SPA	E	F				
14 - 13	In	MC	Mun	E	E	Municipalities are required to consider incentives that can be offered to promote the effective storage of snow as well as the importance of safe salt management including the implementation and use of advanced salting equipment.	Peel- Staff does not support the policy as proposed Shelburne- staff commitments/resource and cost implications? Required content/format of the annual reporting? Staff training qualifications required to undertake this work?	Provide templates, examples, evaluation measures, targets, criteria etc for programs.	Although, this policy has a Must Conform legal effect, the policy only requires the municipality to consider providing opportunities to promote the effective storage of snow. The policy does not require that the municipalities provide financial incentives to those storing snow. The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
14 - 14	Mon (In)	MC	SPA	E	F	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.			

Threat #14: The storage of snow.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
14 - 15	SA	NLB	OGRA, AMO, SPA		?	The Ontario Good Roads Association (OGRA) and the Association of Municipalities of Ontario (AMO), in collaboration with the SPA shall undertake an education and outreach program targeted at municipalities that addresses the importance of source protection planning and the impacts of proper snow storage on drinking water sources, with the key message being the efficient storage of snow.			
14 - 16	SA	NLB	Mun		E	All municipalities are encouraged to have in place Road Salt Management Plans for their parking lots and snow storage facilities.	<p>York-clarify whether local or regional municipality or both?</p> <p>Newmarket-This policy recommends that municipalities are encouraged to have in place Road Salt Management Plans for their parking lots, and snow storage facilities.</p>	The policy should recognize that Road Salt Management Plan could be an expansion of the Salt Management Plan filed by municipalities with Environment Canada and addressed in Threat 12 above (12-1 and 12-2). In this way two plans would not need to be prepared. Is there a time limit intended to be proposed for the preparation of the Plan?	<p>This policy has been removed from the revised Source Protection Plan.</p> <p>This policy has been removed from the revised Source Protection Plan.</p>
14 - 17	SA	NLB	Mun		E	Municipalities are encouraged to include best practices for the snow storage and the associated melt water as part of the approval process for site-plan applications for developments with large parking lots.	<p>York-where would this policy apply - only areas where threat could be significant? Would best practices be conditional or merely recommendations? Policy wording is unclear</p> <p>Newmarket-This policy encourages municipalities to establish best practices for snow storage and associated melt water practices as part of the site plan approval process. Best practices and guidelines should be provided to municipalities to assist in the consistent implementation of snow storage policies and associated melt water practices.</p>	Best practices and guidelines should be provided to municipalities to assist in the consistent implementation of snow storage policies. Effort should be made to coordinate any proposed requirements with those of Environment Canada where appropriate.	<p>This policy has been removed from the revised Source Protection Plan.</p> <p>This policy has been removed from the revised Source Protection Plan.</p>

ICA: Barrie - Policies for the storage of snow (Threat # 14)

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
14 - ICA - 1	Pro	MC	Mun	F	G	The storage of snow, with the exception of emergencies, is prohibited under Section 57 of the Clean Water Act within WHPA-A.			
14 - ICA - 2	Mon (Pro)	Mon	Mun	F	F	By February 1st of each year, the municipality shall prepare and submit to the SPA, a report documenting the number of planning applications received and the number that have not been permitted to locate in WHPA-A.	Barrie-The requirement to report the number of planning applications received and the number that have not been permitted to locate in WHPA-A. It is not clear what you hope to show/understand with this information.	Remove the tracking of applications.	It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
14 - ICA - 3	LUP	MC	Mun	F	B	Municipalities shall amend their planning documents to prohibit snow storage and melting facilities within the WHPA-A.	OGRA-Reword to read: Municipalities shall amend their Planning Act documents to prohibit snow storage where there is a significant drinking water threat.		All Land Use Planning policies has been revised to say " <i>municipalities shall amend their planning documents to..... In vulnerable areas where the activity is or would be a Significant Drinking Water Threat.</i>
14 - ICA - 4	Mon (LUP)	MC	Mun	F	F	Municipalities shall provide to the SPA a copy of the notice of adoption of the planning document amendments to prohibit the storage or melting of snow in WHPA-A			
14 - ICA - 5	EO	MC	Mun	E / F	E	The municipality, in collaboration with the SPA, shall undertake a program to raise the awareness of property owners, property managers, and snow removal contractors within the Issue Contributing Area. The program should reflect best practices for snow storage and the vulnerability of the Issue Contributing Area.			

Threat #15: The handling and storage of fuel.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
15 - 1	Pro	MC	Mun	F	G	The storage of fuel where it would be a significant drinking water threat is prohibited under Section 57 of the Clean Water Act	We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.		Noted
						Policy 15-1 and 15-3 appear to conflict with each other. Policy 15-1 prohibits storage of fuel while policy 15-3 proposes to regulate the activity. Please clarify the intended policy direction. Staff requests that the SGBLS and CTC Region SPCs coordinate policy development to ensure that policy approaches are consistent within the Region of Peel and requests the SPCs to consider the following policy approaches: 1. existing large scale storage of fuel in quantities >2500 L and all underground fuel storage in any quantity in vulnerable areas where storage of fuel is a significant threat- manage through regulation under Aggregate Resources Act and s.58 of the CWA. 2. future large scale storage in any quantity in vulnerable areas where storage of fuel is a significant threat- s.57 prohibition except where above ground fuel storage is an accessory activity at an aggregate extraction site or at a municipal drinking water system; and 3. future large scale storage of fuel in quantities >2500 litres and all underground fuel storage in any quantity in vulnerable areas where storage of fuel is a significant threat- prohibit through land use planning policy under the Planning Act except where above ground fuel storage is an accessory activity at an aggregate extraction site or at a municipal drinking water system.		Policy 15-1 is addressing future Significant Drinking Water Threats and Policy 15-3 is to address existing Significant Drinking Water Threats. Each policy within the revised plan now states whether or not it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats.	
						York- policy should exclude single residential homes		Noted- please see the explanatory document for the rationale explaining why single residential homes have been included in the policy.	
15 - 2	Mon (Pro)	MC		F	F	By February 1 st of each year, the RMO shall prepare and submit to the SPA, a report documenting the action taken and the results obtained.	We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.		Noted
						Clearview-it is unclear as to what actions the RMO is to report on. Presumably it is the immediately preceding policy however even in such situations additional explanation regarding anticipated actions is required.		How the monitoring policies are to be implemented will be explained in an implementation guide.	
15 - 3	RMP	MC	Mun	E	H	The RMO shall negotiate a Risk Management Plan (RMP) with those who are handling or storing fuel where there is a significant drinking water threat. The Risk Management Plans may include conditions such as: 1) Secondary containment. 2) Spill/leak detection (monitoring processes). 3) Collision protection (bollards).	Penetang-What are the penalties for not complying with the risk management plan? and who will be responsible for costs: property owner or municipality When negotiating a risk management plan, will the landowner have to absorb the costs of compliance? Are there any programs to assist? OMAFRA also supports the use of RMPs for addressing the application and storage of pesticides and the storage of fuel. For policies concerning the application of pesticides, we would like to note that if pesticides are applied properly and at the recommended rates, they will not usually accumulate in the soil. Also, we suggest that a "certified professional" be defined as a person who has taken the Grower Pesticide Safety Course.	Penetang- Clarify Consider incentive programs or alternatively mechanisms for landowners to assist through program or municipality.	How the Risk Management Plans are to be implemented and the penalties for not complying the policy will be explained in an implementation guide.
						Policy 15-1 and 15-3 appear to conflict with each other. Policy 15-1 prohibits storage of fuel while policy 15-3 proposes to regulate the activity. Please clarify the intended policy direction. Staff requests that the SGBLS and CTC Region SPCs coordinate policy development to ensure that policy approaches are consistent within the Region of Peel and requests the SPCs to consider the following policy approaches: 1. existing large scale storage of fuel in quantities >2500 L and all underground fuel storage in any quantity in vulnerable areas where storage of fuel is a significant threat- manage through regulation under Aggregate Resources Act and s.58 of the CWA. 2. future large scale storage in any quantity in vulnerable areas where storage of fuel is a significant threat- s.57 prohibition except where above ground fuel storage is an accessory activity at an aggregate extraction site or at a municipal drinking water system; and 3. future large scale storage of fuel in quantities >2500 litres and all underground fuel storage in any quantity in vulnerable areas where storage of fuel is a significant threat- prohibit through land use planning policy under the Planning Act except where above ground fuel storage is an accessory activity at an aggregate extraction site or at a municipal drinking water system.		Policy 15-1 is addressing future Significant Drinking Water Threats and Policy 15-3 is to address existing Significant Drinking Water Threats. Each policy within the revised plan now states whether or not it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats.	
						York- policy should exclude single residential homes		Noted- please see the explanatory document for the rationale explaining why single residential homes have been included in the policy.	
						Newmarket-The suggested conditions do not include above ground storage. Above ground storage of fuel has been implemented in other jurisdictions as a means of ensuring early detection of leaks and containment. Consideration should be given to prohibit underground storage in all vulnerable areas and require above ground storage to be designed with a secondary containment to ensure that any leaks can be effectively detected and contained.	Prohibit underground storage of fuel in all vulnerable areas and add above ground storage with secondary containment as another example of a condition for storage of fuel which may be implemented in the vulnerable areas.	A Risk Management Plan would be required for those storing fuel, above, below or partially below ground depending on the quantity stored. Please see the revised introduction to the fuel policies for a table summarizing requirements to be classified as a Significant Drinking Water Threat.	
15 - 4	Mon (RMP)	MC	Mun	E	F	By February 1 st of each year, the RMO shall prepare and submit to the SPA, a report documenting the action taken and the results obtained.	OMAFRA also supports the use of RMPs for addressing the application and storage of pesticides and the storage of fuel. For policies concerning the application of pesticides, we would like to note that if pesticides are applied properly and at the recommended rates, they will not usually accumulate in the soil. Also, we suggest that a "certified professional" be defined as a person who has taken the Grower Pesticide Safety Course.		Noted
						Clearview-it is unclear as to what actions the RMO is to report on. Presumably it is the immediately preceding policy however even in such situations additional explanation regarding anticipated actions is required.		How the monitoring policies are to be implemented will be explained in an implementation guide.	
						Barrie-How will the pre-screening process work given that a complete application triggers timelines under the Planning Act?	Clarify this requirement.	The revised Source Protection Plan introduction section and the explanatory document provides an explanation of how RLU policies work.How to implement these policies will be explained in an implementation guide.	
15 - 5	RLU	MC	Mun	E / F	I	This SWP plan designates all land uses within the areas where the handling and storage of fuel would be a significant drinking water threat, as a restricted land use under Section 59 of the Clean Water Act. All planning applications related to fuel handling and storage requires pre-screening by a RMO.	Shelburne- same questions/comments noted for policy 8-3 and 3-5 re pre-screening, information required for complete application.		The revised Source Protection Plan introduction section and the explanatory document provides an explanation of how RLU policies work.How to implement these policies will be explained in an implementation guide.

Threat #15: The handling and storage of fuel.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
							York- policy should exclude single residential homes		Noted- please see the explanatory document for the rationale explaining why single residential homes have been included in the policy.
15 - 6	Mon (RLU)	MC	Mun	F	F	By February 1 st of each year, the RMO shall prepare and submit to the SPA, a report documenting the action taken and the results obtained.	Clarview-it is unclear as to what actions the RMO is to report on. Presumably it is the immediately preceding policy however even in such situations additional explanation regarding anticipated actions is required.		How the monitoring policies are to be implemented will be explained in an implementation guide.
15 - 7	LUP	MC	Mun	F	B	Municipalities shall amend their Planning documents to: • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and • include provisions that prohibit the handling and storage of fuel that would be a significant drinking water threat.	Clearview-need additional information on the nature and content of a "disclosure report"		The term disclosure report has been removed from the revised Source Protection Plan.
							Shelburne- same questions/comments noted for policies 7-5 and 7-6 re disclosure report and prohibition. The Town's planning documents already prohibit bulk fuel storage within a WHPA. Who will determine if existing municipal policies/zoning are sufficient as is, or if an amendment is required?	Clarify requirement to amend planning documents.	The Province will determine if existing O.P. policies are adequate to be in conformity with the Source Protection Plan.
							York- policy should exclude single residential homes		Noted- please see the explanatory document for the rationale explaining why single residential homes have been included in the policy.
							Newmarket-Further policy guidance is required to identify within which vulnerable areas the handling and storage of fuel should be prohibited in Official Plans. All vulnerable zones have a vulnerability score of 10 and it would appear that due to the significant threat to drinking water, the storage and handling of fuel should be prohibited in all the areas unless Risk Management Plans satisfactorily eliminates the risk.	Clarify which vulnerable areas pose the greatest threat and provide guidance to municipalities regarding within which zones the handling and storage of fuel should be prohibited. If permitted, fuel handling and storage should be subject to a Risk Management Plan and clear policy provisions should be required that ensures that leaks can be easily detected and contained (e.g., above ground storage and containment).	The revised introductory material to the Source Protection Plan policies now contains a section that summarizes how to determine where the Source Protection Plan policies apply.
15 - 8	Mon (LUP)	MC	Mun	F	F	Municipalities shall provide to the SPA a copy of the notice of adoption of the planning document amendments to: • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and • prohibit the handling and storage of fuel that would be a significant drinking water threat.	Clearview-need additional information on the nature and content of a "disclosure report"		The term disclosure report has been removed from the revised Source Protection Plan.
							Shelburne- same questions/comments noted for policies 7-5 and 7-6 re disclosure report and prohibition. The Town's planning documents already prohibit bulk fuel storage within a WHPA. Who will determine if existing municipal policies/zoning are sufficient as is, or if an amendment is required?	Clarify requirement to amend planning documents.	The Province will determine if existing O.P. policies are adequate to be in conformity with the Source Protection Plan.
							Newmarket-Amendments to the Planning documents and notice of adoption provisions in this section and other sections with comparable wording should be combined as one policy in order to simplify the wording. In addition, municipalities should only provide their amended official plan amendments that address the source protection policies to the Source Protection Agency following approval rather than "adoption" of the official plan, as the adopted amendment may be subsequently modified by the approval authority.	Amendments to the Planning documents and notice of adoption provisions in this section and other sections with comparable wording should be combined as one policy in order to simplify the wording. In addition, municipalities should only provide their amended official plan amendments that address the source protection policies to the Source Protection Agency following approval rather than "adoption" of the official plan, as the adopted amendment may be subsequently modified by the approval authority.	The wording of all monitoring policies have been simplified. The revised Source Protection Plan now contains one monitoring policy per implementing body.
15 - 9	In	HR	MOE	E	?	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.	Peel- clarify intended policy direction. Is the intent to "encourage the MOE to provide financial incentives through the Ontario Drinking Water Stewardship Program to reduce risks to drinking water"? If so, the policy should be revised to be clear.		The policy has been revised to clearly state that the intent is to encourage MOE to continue funding relevant stewardship programs.
15 - 10	In	MC	SPA	E	E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	Peel- The Ontario drinking water stewardship program should identify the implementing bodies not the source protection plan. Why are the SPAs named as the implementing body?		The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
15 - 11	Mon (In)	MC	SPA	E	F	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.	Peel- this policy requires the monitoring body (SPA) to report to itself on stewardship actions. Staff questions the need for this policy and requests confirmation of the SPAs role with respect to stewardship actions in relation to this threat.		The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
15 - 12	Oth	NLB	TSSA		?	The TSSA should disclose to the SPA the number / location / and any reporting information for fuels storage in vulnerable areas	Clarview-this information should also be provided to RMOs to assist in undertaking their responsibilities. Municipalities are not financially able to participate in any required actions or provide incentives or compensation in relation to altered operations or land uses.		This policy has been revised to require the SPA to obtain the information from TSSA and forward it to the RMOs.
							York-The TSSA information should also be forwarded to RMOs		
							Durham-15-12 The TSSA also should disclose this information to the Risk Management Official.		
5-13	Oth	NLB			?		Tiny- Clarify these policies do not apply to residential / domestic fuel oil tanks.		These policies will apply to residential fuel tanks if the meet the threshold criteria. The revised introduction to the fuel threat policies contains a table summarizing the storage location and volume of fuel needed to be a Significant Drinking Water Threat.

Threat #16: The handling and storage of a dense non-aqueous phase liquid.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
16 - 1	Pro	MC	Mun	F	G	The storage of DNAPL where it would be a significant drinking water threat is prohibited under Section 57 of the Clean Water Act.	Peel- Policy 16-1 and 16-3 appear to conflict with each other. Policy 16-1 prohibits storage of DNAPLs while Policy 16-3 proposes to regulate the activity. Please clarify the intended policy direction. Staff requests that the SGBLS and CTC Region SPCs coordinate policy development to ensure that policy approaches are consistent within the Region of Peel and requests the SGBLS and CTC SPCs to consider the following policy approaches: 1. existing large scale storage of DNAPLs (excluding small quantity container storage in individual containers <5 litres in vulnerable areas where storage would be a significant threat- manage through s.58 of the CWA to ensure DNAPL storage is not a significant threat and encourage phase out over time; 2. future large scale storage of DNAPLs (excludes small quantity container storage in individual containers <5 litres) in vulnerable areas where storage would be a significant threat- s.57 prohibition; and 3. future large scale storage of DNAPLs (excludes small quantity container storage in individual containers <5 litres) in vulnerable areas where storage would be a significant threat- s.57 prohibit through land use planning policy under Planning Act.		Policy 16-1 is to address to future Significant Drinking Water Threats and Policy 16-3 is to address existing Significant Drinking Water Threats. Each policy within the revised plan now states whether it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats. Considerable effort has gone towards ensuring consistency within neighbouring regions. Improved coordination between regions has resulted in increased consistency to the extent that regions have adopted each others policies
						Barrie-The province should prohibit the Handling and Storage of DNAPLs. It is an enormous workload for a municipality to manage the threat of DNAPs when an outright ban of its usage would be more efficient use of resources and effective tool for public education.	Province should ban on the Handling and Storage of DNAPLs.	As the handling and storage of DNAPLs is not regulated under a Prescribed Instrument the SPC is allowed to modify, the SPC felt a Section 57 prohibition enforced by the municipalities would be the most effective means of prohibiting the future handling and storage of DNAPLs. The SPC has included a policy that encourages the MOE to phase out DNAPL products and their use in Ontario.	
						York-< 5 L - manage using education and outreach for existing and future activities >5L - manage existing activities using RMP and prohibit Sec 57 future activities - CTC only applies to DNAPL quantities >5L and ICI Sector for existing and future whereas SGBLS applies to all quantities in all sectors		The policy has been revised to include an exemption for personal or family use.	
16 - 2	Mon (Pro)	MC	Mun	F	F	By February 1 st of each year, the RMO shall prepare and submit to the SPA, a report documenting the action taken and the results obtained.	Clearview-it is unclear as to what actions the RMO is to report on. Presumably it is the immediately preceding policy however even in such situations additional explanation regarding anticipated actions is required.		How the monitoring policies are to be implemented will be explained in an implementation guide.
						York-tool should be Mon (Pro)		This has been corrected	
16 - 3	RMP	MC	Mun	E	H	The RMO shall negotiate a Risk Management Plan (RMP) with those who are handling or storing DNAPL where there is a significant drinking water threat. The Risk Management Plans should reflect industry best practices and may include conditions such as: 1) Secondary containment. 2) Spill/leak detection (monitoring processes). 3) Collision protection (bollards).	Peel- Policy 16-1 and 16-3 appear to conflict with each other. Policy 16-1 prohibits storage of DNAPLs while Policy 16-3 proposes to regulate the activity. Please clarify the intended policy direction. Staff requests that the SGBLS and CTC Region SPCs coordinate policy development to ensure that policy approaches are consistent within the Region of Peel and requests the SGBLS and CTC SPCs to consider the following policy approaches: 1. existing large scale storage of DNAPLs (excluding small quantity container storage in individual containers <5 litres in vulnerable areas where storage would be a significant threat- manage through s.58 of the CWA to ensure DNAPL storage is not a significant threat and encourage phase out over time; 2. future large scale storage of DNAPLs (excludes small quantity container storage in individual containers <5 litres) in vulnerable areas where storage would be a significant threat- s.57 prohibition; and 3. future large scale storage of DNAPLs (excludes small quantity container storage in individual containers <5 litres) in vulnerable areas where storage would be a significant threat- s.57 prohibit through land use planning policy under Planning Act.		Policy 16-1 is to address to future Significant Drinking Water Threats and Policy 16-3 is to address existing Significant Drinking Water Threats. Each policy within the revised plan now states whether it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats. Considerable effort has gone towards ensuring consistency within neighbouring regions. Improved coordination between regions has resulted in increased consistency to the extent that regions have adopted each others policies
						Barrie-It is not realistic to have a Risk Management Plan negotiated with those storing and handling DNAPLs without a stated volume. With the current policy a RMP would be needed for any quantity.	State the quantity of DNAPL for which a RMP will be negotiated.	The policy has been revised to include an exemption for personal or family use.	
						York-< 5 L - manage using education and outreach for existing and future activities >5L - manage existing activities using RMP and prohibit Sec 57 future activities - CTC only applies to DNAPL quantities >1-5L and ICI Sector for existing and future whereas SGBLS applies to all quantities in all sectors		The policy has been revised to include an exemption for personal or family use.	
16 - 4	Mon (RMP)	MC	Mun	E	F	By February 1 st of each year, the RMO shall prepare and submit to the SPA, a report documenting the action taken and the results obtained.	Clearview-it is unclear as to what actions the RMO is to report on. Presumably it is the immediately preceding policy however even in such situations additional explanation regarding anticipated actions is required.		How the monitoring policies are to be implemented will be explained in an implementation guide.
						York-tool should be Mon (RMP)		This has been corrected	
16 - 5	RLU	MC	Mun	F	I	This SWP plan designates all land uses within the areas where the handling and storage of DNAPL would be a significant drinking water threat, as a restricted land use under Section 59 of the Clean Water Act. All building permit and planning act applications within those areas require pre-screening by the RMO.	Shelburne- same comments noted for policies 8-3 and 3-5re pre screening information required for complete package..		The revised Source Protection Plan introduction section and the explanatory document provides an explanation of how RLU policies work.How to implement these policies will be explained in an implementation guide.
16 - 6	Mon (RLU)	MC	Mun	F	F	By February 1 st of each year, the RMO shall prepare and submit to the SPA, a report documenting the action taken and the results obtained.	Clearview-it is unclear as to what actions the RMO is to report on. Presumably it is the immediately preceding policy however even in such situations additional explanation regarding anticipated actions is required.		How the monitoring policies are to be implemented will be explained in an implementation guide.
						York-tool should be Mon (RLU)		This has been corrected	
						Newmarket-Prohibit underground storage of non-aqueous liquid and require above ground storage to be designed with a secondary containment to ensure that any leaks can be effectively detected and contained.	Prohibit underground storage of non-aqueous liquid and require above ground storage to be designed with a secondary containment to ensure that any leaks can be effectively detected and contained.	The revised policy promotes above ground storage of DNAPLs.	

Threat #16: The handling and storage of a dense non-aqueous phase liquid.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
16 - 7	LUP	MC	Mun	F	B	<p>Municipalities shall amend their planning documents to;</p> <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and • include provisions that prohibit the handling and storage of DNAPL that would be a significant drinking water threat. 	<p>Haliburton-This policy speaks of using planning documents to prohibit the storage and handling. While land use planning can prohibit the outside handling and/o rstorage of certain products and bulk storage facilities through site plan control, it cannot prohibit the inside storage or handling of these substances within a building or facility. Therefore, although motherhood Official Plan policies to support the intent of this proposed policy could be considered, the proposed policy cannot be implemented as drafted.</p> <p>NOTE: bulk storage facilities are a landuse that can be prohibited.</p> <p>Are these only for future occurrences? How</p>	<p>Haliburton- revise the policy to:</p> <ul style="list-style-type: none"> -remove the requirement to prohibit storage and/or handling;or -revise to include policies that support the intent to prohibit -revise the policy to prohibit the outdoor storage and handling. 	<p>The revised Source Protection Plan introduction section and the explanatory document provides an explanation of how RLU policies work.How to implemet these policies will be explained in an implemetation guide.</p>
							<p>Clearview-need additional information on the nature and content of a "disclosure report"</p>		<p>The term disclosure report has been removed from the Source Protection Plan.</p>
							<p>Shelburne- same comments noted for policies 7-5 and 7-6 re disclosure report and prohibition.</p>		<p>See response to policies 7-5 and 7-6</p>
16 - 8	Mon (LUP)	MC	Mun	F	F	<p>Municipalities shall provide to the SPA a copy of the notice of adoption of the planning document amendments to;</p> <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and • prohibit the handling and storage of DNAPL that would be a significant drinking water threat. 	<p>Haliburton- see comments for 16-7</p>	<p>Haliburton- see comments for 16-7</p>	<p>See response to 16-7.</p>
							<p>Peel- the draft SGBLS source protection plan proposes a land use policy to prohibit future land uses that include the handling and storage of DNAPLs; however, there is no similar land use policy in the source protection plans for the CTC region. Staff requests that the SGBLS and CTC SPCs coordinate policy development to ensure that policy approaches are consistent within the Region of Peel. Staff supports the policy requiring municipalities to provide notices of adoption of policy.</p> <p>Define "disclosure report."</p>		<p>Considerable effort has gone towards ensuring consistency within neighbouring regions. Improved coordination between regions has resulted in increased consistency to the exten that regions have adopted each others policies. The term disclosure report has been removed from the SPP.</p>
							<p>Clearview-need additional information on the nature and content of a "disclosure report"</p>		<p>The term disclosure report has been removed from the Source Protection Plan.</p>
							<p>York-tool should be Mon (LUP)</p>		<p>This has been corrected</p>
						<p>Newmarket-Further policy guidance is required to identify within which vulnerable areas the handling and storage of non-aqueous liquid should be prohibited through Official Plan policies.</p>	<p>The recommended awareness program should include the following: "...explaining the importance of proper <u>storage, handling</u> and disposal of hazardous waste..."</p>	<p>The revised introductory material to the Source Protection Plan policies now contains a section that summarizes how to determine where the Source Protectin Plan policies apply.</p>	

Threat #16: The handling and storage of a dense non-aqueous phase liquid.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
16 - 9	EO	MC	Mun	E	E	The municipality responsible for water systems, in collaboration with the SPA, shall undertake an awareness program that addresses the importance of pollution prevention by: (i) explaining the importance of proper disposal of hazardous waste; and (ii) promoting the use of alternatives to DNAPL products.	Shelburne-Same comments noted for policeis 1b-9 to 1b-14 re upper tier vs lower tier roles and responsibilities and concerns re resources to undertake this work.		Local SPAs have now been identified as the lead agency with some collaboration with municipalities
						York-remove municipality as implementer and use Province as sole implementer to ensure efficiency and consistency throught province - TKM		Local SPAs have now been identified as the lead agency with some collaboration with municipalities	
						Newmarket-The recommended awareness program should include the following: "...explaining the importance of proper storage, handling, disposal and recycling of hazardous waste..."		The suggestions have been added to the revised policy.	
						Durham-16-9 It's not clear how the municipality or the SPA will know which industries and businesses in the vulnerable areas will have DNAPLs onsite at a given time. The situation can change over time without the knowledge or permission of the municipality or SPA. The MOE may be in a better position to police this through toxics reduction and other regulations.		Noted	
16 - 10	Mon (EO)	MC	Mun/SPA	E	F	The municipality and SPA shall document communication and outreach efforts. By February 1 st of each year, the municipality shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	Shelburne-Same comments noted for policeis 1b-9 to 1b-14 re upper tier vs lower tier roles and responsibilities and concerns re resources to undertake this work.		Local SPAs have now been identified as the lead agency with some collaboration with municipalities
16 - 11	In	MC	Mun	E	E	Municipalities are required to consider the ways in which additional conveniences can be created either through additional hazardous waste drop off and/or pick up arrangements (increasing frequency, location, creation of 'toxic taxi's', etc.)	Penetang-Are there any incentives for remediation of areas contaminated by DNAPLS?	Penetang-Expand to include DNAPLS in incentive programs	Remediating sites contaminated with DNAPLS may qualify as an eligible project for funding through ODWSP. Please contact your local stewardship representative for more information.
						clearview-in Simcoe County it should be clearly identified that this is a County responsibility, not a local municipal responsibility. Municipalities are not financially able to participate in any required actions or provide incentives or compensation in relation to altered operations or landuses.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.	
						Shelburne-Same comments noted for policeis 1b-9 to 1b-14 re upper tier vs lower tier roles and responsibilities and concerns re resources to undertake this work.		The policy has been revised to say the municipality responsible for waste.	
						York-remove municipality as implementer and use Province as sole implementer to ensure efficiency and consistency throught province		The policy has been revised to say the municipality responsible for waste.	
						Durham-16-11, 17-11 The policies should state that arrangements are for residential properties only. Businesses and industries that purchase hazardous chemicals in quantity are regulated by the MOE Environmental Protection Act. Regulation 347 dictates transport, storage and disposal of such chemicals including accounting for disposal of wastes which must be removed by licensed operators. Municipalities would not involve themselves in this process so would not be offering hazardous waste conveniences or "toxic taxis" for industry.		The policy has been revised to say for household hazardous waste disposal.	
16 - 12	Mon (In)	MC	Mun	E	F	The municipality shall document the action taken to consider additional hazardous waste conveniences. By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	clearview-in Simcoe County it should be clearly identified that this is a County responsibility, not a local municipal responsibility. Municipalities are not financially able to participate in any required actions or provide incentives or compensation in relation to altered operations or landuses.		The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
							Shelburne-Same comments noted for policeis 1b-9 to 1b-14 re upper tier vs lower tier roles and responsibilities and concerns re resources to undertake this work.		The policy this monitoring policy is referencing is has been revised to say the municipality responsible for waste.
16 - 13	In	HR	MOE	E	E	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.	Peel- clarify intended policy direction. Is the intent to "encourage the MOE to provide financial incentives through the oNtario Drinking Water Stewardship Program to reduce risks to drinking water"? If so, the policy should be revised to be clear.		The policy has been revised to clearly state that the intent is to encourage MOE to continue funding relevant stewardship programs.
16 - 14	In	MC	SPA	E	E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	Peel- The Ontario Drinking Water Stewardship Program should identify the implementing bodies not the source protection plan. Why are the SPAs named as the implementing body?		The Ontario Drinking Water Stewardship Program is currently implmented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
16 - 15	Mon (In)	MC	SPA	E	F	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.	Peel- This policy requires the monitoring body (SPA) to report to itself on stewardship actions. Staff questions the need for this policy and requests confirmation of the SPAs role with respect to the stewardships actions in relation to this threat.		The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
16 - 16	Re	NLB	MOE		?	The MOE should establish a research program to ensure that Liquid Fuels Handling Act requirements for bulk storage and handling of liquid fuels are also adequate for solvent products and waste material currently in use in the province. The proposed research should evaluate whether a risk-based system would meet the requirements stipulated in the O'Connor inquiry regarding an "imperceptible level or risk". The Provincial government, based on the findings should develop the appropriate provincial legislative policies to ensure acceptable handling and storage practices for liquid chemicals and liquid industrial wastes.			
16 - 17	Oth	NLB	MOE		?	The MOE should require products containing DNAPL to be clearly labeled as such to inform consumers of the product dangers.			

Threat #16: The handling and storage of a dense non-aqueous phase liquid.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
16 - 18	Oth	NLB	MOE		?	MOE should research alternatives to DNAPL products and phase out their use in Ontario.			
Additional Other Comments						King	Household domestic use of DNAPL required to be clarified.	Approach used by Oak Ridges Moraine Plan permits use of products for personal use. Public needs to understand what quantities are considered domestic versus commercial. Education and outreach is the key by persons qualified in the field.	The policies have been revised to include an exemption for household hazardous waste.
						Mono	The policies prepared to date propose to address groundwater point source locations within a WHPA. More attention should be directed to restrictions placed on the production, distribution and disposal of contaminants, especially prohibited contaminants such as DNAPLs. This must be completed at the Federal Level.	A Provincial or Federal register requiring documentation and delivery/disposal amounts should be considered for all potential contaminants of municipal water systems, which can and have been moved or transported beyond municipal boundaries.	The SPC has included a policy encouraging the MOE to phase out the use of DNAPLs within the province.
						Orillia	The plan does not appear to provide any guidance with respect to DNAPL quantities (i.e. is a single household's supply of consumer-sized glue a DNAPL or only commercial quantities?)		The policies have been revised to include an exemption for household hazardous waste.

ICA: TCE for Orillia, Coldwater, Robert St in Penetanguishene and Cannington

Policy #	Tool	Legal Effect	Implementer	Description	Comments	Suggested Improvements	SPC Response
No change in policy approach. The policies in the body of the report apply to ICA							

Item #17: The handling and storage of an organic solvent.

Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	SPC Response
Pro	MC	Mun	F	G	The storage of organic solvent where it would be a significant drinking water threat is prohibited under Section 57 of the Clean Water Act.	Peel- Staff requests that the SGBLS and CTC region SPCs coordinate policy development to ensure that policy approaches are consistent within the Region of Peel and that policies for organic solvents are consistent with the policy approach for DNAPLs. Policy 17-1 and policy 17-3 appear to conflict with each other. Policy 17-1 prohibits handling and storage of organic solvent while Policy 17-3 proposes to regulate the activity. Please clarify the intended policy direction.	Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted each others policies.
						Shelburne- if organic solvents are prohibited what is the RMO reporting on and why have BMP for those storing organic solvents if they're not permitted to do so?	It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
						Barrie-It is possible that railway cars carrying toluene would be covered under this policy if the contents are being filled or emptied then this would be considered handling and storage activity and therefore a significant threat is possible. This would require prohibiting the activity or negotiating a RMP for potentially several locations. It is the intention to capture such an activity under this threat?	Transportation corridors were not included in the technical assessment for this round of Source Protection Planning and as such the policy would not apply to railway cars.
Mon (Pro)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	Shelburne- if organic solvents are prohibited what is the RMO reporting on and why have BMP for those storing organic solvents if they're not permitted to do so?	It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide. BMP has been proposed for existing threats, this policy is for existing.
						York-"The RMO shall, in accordance with section 58 of the Clean Water Act, agree to or establish a Risk Management Plan that reflects, at a minimum, industry best management practices..." - AH	The terms contemporary standards has been included in the revised RMP policy wording.
RMP	MC	Mun	E	H	The RMO shall negotiate a Risk Management Plan that reflects industry BMP [such as Responsible Care]) with those storing organic solvents where there is a significant drinking water threat.	Shelburne- if organic solvents are prohibited what is the RMO reporting on and why have BMP for those storing organic solvents if they're not permitted to do so?	It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
						Barrie-There are a few circumstances that a volume > 25 litres are a significant threat. A threshold quantity should be stated for the handling and storage of Organic Solvents.	The revised introduction the organic solvent policies contains a table summarizing the volume of Organic solvent that needs to be stored to be considered a Significant Drinking Water Threat.
Mon (RMP)	MC	Mun	E	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	Shelburne- if organic solvents are prohibited what is the RMO reporting on and why have BMP for those storing organic solvents if they're not permitted to do so?	It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
RLU	MC	Mun	F	I	This SWP plan designates all land uses within the areas where the storage of organic solvent would be a significant drinking water threat, as a restricted land use under Section 59 of the Clean Water Act. All building permit and planning act applications within those areas require pre-screening by the RMO.	Shelburne- <u>All</u> building permit and planning act applications require pre-screening in this case? Or only those potentially involving organic solvents? Same questions.comments noted for policy 8-3 and 3-5.	The revised Source Protection Plan introduction and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.

Item #17: The handling and storage of an organic solvent.

Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	SPC Response
Mon (RLU)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	York-tool should be "Mon (RLU)"	This has been corrected.
LUP	MC	Mun	F	B	Municipalities shall amend their planning documents to: <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and • include provisions that prohibit the storage of organic solvent that would be a significant drinking water threat. 	Haliburton-This policy speaks of using planning documents to prohibit the storage. While land use planning can prohibit the outside storage of certain products and bulk storage facilities through site plan control, it cannot prohibit the inside storage or handling of these substances within a building or facility. Therefore, although motherhood Official Plan policies to support the intent of this proposed policy could be considered, the proposed policy cannot be implemented as drafted. NOTE: bulk storage facilities are a land use that can be prohibited. Are these only for future occurrences? How will it impact existing uses?	The revised Source Protection Plan introduction and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be included in an implementation guide.
						Peel- The draft SGBLS source protection plan proposes a landuse planning policy to prohibit future land uses that include the handling and storage of organic solvent; however, there is not similar land use policy in the source protection plans for the CTC region. Staff requests that the SGBLS and CTC region SPCs coordinate policy development to ensure that policy approaches are consistent within the Region of Peel. Staff supports the policy requiring municipalities to provide notices of adoption of policy. define "disclosure report".	Considerable effort has gone towards ensuring consistency with neighbouring Regions. Improved coordination between Regions has resulted in increased consistency to the extent that Regions have adopted eachothers policies.
						Shelburne- Same questions/comments noted for policies 7-5 and 7-6 re disclosure report and prohibition. The Towns planning documents already prohibit solvents within a WHPA. Who will determine if existing municipal policies.zoning are sufficient as is, or if an amendment is required?	The province will determine if existing O.P policies are adequate to be in conformity with the Source Protection Plan.
Mon (LUP)	MC	Mun	F	F	The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to: <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, and • prohibit the storage of organic solvent that would be a significant drinking water threat. 	Haliburton- see comments for 17-7	See response to 17-7
						Shelburne- Same questions/comments noted for policies 7-5 and 7-6 re disclosure report and prohibition. The Towns planning documents already prohibit solvents within a WHPA. Who will determine if existing municipal policies.zoning are sufficient as is, or if an amendment is required?	The term disclosure report has been removed from the revised Source Protection Plan. The Province will determine if existing O.P. policies are adequate to be in conformity with the Source Protection Plan.

Item #17: The handling and storage of an organic solvent.

Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	SPC Response
EO	MC	Mun	E	E	The municipality responsible for water systems, in collaboration with the SPA, shall undertake an awareness program that addresses the importance of pollution prevention by explaining the importance of proper disposal of hazardous waste	Shelburne- same comments noted for policies 1b-1b-14 re upper tier vs lower tier roles and responsibilities and concerns re resources to undertake this work. York-remove municipality as implementer and use Province as sole implementer to ensure efficiency and consistency through province - TKM	The policy has been revised to say the municipality responsible for waste. Local SPAs have now been identified as the lead agency with some collaboration with municipalities
Mon (EO)	MC	Mun	E	F	The municipality and SPA shall document communication and outreach efforts. By February 1 st of each year, the municipality shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	Shelburne- same comments noted for policies 1b-1b-14 re upper tier vs lower tier roles and responsibilities and concerns re resources to undertake this work.	Local SPAs have now been identified as the lead agency with some collaboration with municipalities
In	MC	Mun	E	E	Municipalities are required to consider the ways in which additional conveniences can be created either through additional hazardous waste drop off and/or pick up arrangements (increasing frequency, location, creation of 'toxic taxi's', etc.)	Shelburne- same comments noted for policies 1b-1b-14 re upper tier vs lower tier roles and responsibilities and concerns re resources to undertake this work. York-remove municipality as implementer and use Province as sole implementer to ensure efficiency and consistency through province	The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives. Noted
Mon (In)	MC	Mun	E	F	The municipality shall document the action taken to consider additional hazardous waste conveniences. By February 1 of each year, the municipality shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	Shelburne- same comments noted for policies 1b-1b-14 re upper tier vs lower tier roles and responsibilities and concerns re resources to undertake this work.	The SPC is drafting a letter to Minister Bradley requesting funding for implementation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives.
In	HR	MOE	E	?	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.	Peel- clarify intended policy direction. Is the intent to "encourage the MOE to provide financial incentives through the Ontario Drinking Water Stewardship Program to reduce risks to drinking water"? If so, the policy should be revised to be clear.	The policy has been revised to clearly state that the intent is to encourage MOE to continue funding relevant stewardship programs.
In	MC	SPA	E	E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	Peel- The ontario drinking water stewardship program should identify the implementing bodies not the source protection plan. Why are the SPAs named as the implementing body?	The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
Mon (In)	MC	SPA	E	F	The SPA shall document its stewardship efforts. By February 1 of each year, the SPA shall prepare and submit to the SPA a report summarizing the stewardship action taken and the results obtained.	Peel- this policy requires the monitoring body (SPA) to report to itself on stewardship actions. Staff questions the need for this policy and requests confirmation of the SPAs role with respect to stewardship actions in relation to this threat.	The Ontario Drinking Water Stewardship Program is currently implemented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
Re	NLB	MOE		?	The Ministry of the Environment is encouraged to establish a research program to ensure that Liquid Fuels Handling Act requirements for bulk storage and handling of liquid fuels are also	York-reference to Liquid Fuels Handling Act is incorrect. Maybe "Liquid Fuels Handling Code" or the Fuels regulations? - AH	This policy has been removed from the revised Source Protection Plan.

Threat #18: The management of run-off that contains chemicals used in the de-icing of aircraft.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	Suggested Improvements	SPC Response
18 - 1	Oth	NLB	Transport Canada	F	?	In support of the existing planning process for new airport facilities and to protect drinking water sources from runoff containing de-icing chemicals, Transport Canada, in their consideration of any new airport facilities, are encouraged to include appropriate design standards and management practices to prevent the runoff from airport de-icing facilities from becoming a significant drinking water threat	Uxbridge- The requirements in the draft SWP associated with airports are unenforceable, as airports and related infrastructure are a federal responsibility. The plan may provide a recommendation that could be passed along to Federal Department of Transport for their information but it is not appropriate		The implementing body for this policy is the Federal Government. The municipality has no responsibility to implement this policy.
18 - 2	Mon (Oth)	NLB	Mun		F	The municipality shall report to the Source Protection Authority on the number of environmental assessments initiated for new airport facilities within vulnerable areas.	Peel- Staff does not support this policy. York-municipalities do not see EAs for new airports - this is done by the federal government		Noted The implementing body for this policy is the Federal Government. The municipality has no responsibility to implement this policy.

Threat #19: An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body.

Policy #	Tool	Legal Effect	Implementer	Original Policy	Comment	SPC Response
19 - 1	Oth	NLB	Mun	Dufferin County municipalities that share a water source (i.e. aquifer) should implement a joint municipal water management system or authority to plan and operate potable water systems to ensure that water quality and quantity is maintained or improved and cost efficiencies are realized.	Peel- Staff requests that the SPC include direction to require appropriate participation and/or consultation with the Region of Peel and Town of Caledon as there are a number of Orangeville and Mono Township Wells that affect the Region of Peel.	The policy has been revised to say municipalities located within a local area with Significant Threat... This wording will capture everyone that is affected by the policy.
					A/E-There was considerable interest and discussion regarding the possibility of a Joint Water Management System Authority (Authority). As you can appreciate, there is much confusion and speculation surrounding the role and function of such an Authority, the responsibility of each Township, the Board make-up, and the costs to the ratepayers of the respective municipalities. Further, any policy recommendations must ensure that such as Authority is not mandated. We don't believe a recommendation for such an Authority is within the mandate of the Committees. These questions need to be answered and it is imperative that further discussions take place on this subject at both a political and technical level before any policy commitment is made.	SGBLS has revised this policy say that the affected municipalities should consider collaborating to find mutually beneficial solutions to water servicing constraints.
					Mono-The proposed quantity threat policy requires the implementation of a joint municipal water management system authority to plan and operate potable water systems. It is unclear what this policy means. We would request that the Source Protection Committee reconsider its evaluation of this issue as a threat, and provide significantly more rationale for the solution to this threat (if any), prior to placing this policy within the Source Protection Plan.	The SPC has revised the policy to say that the affected municipalities should consider collaborating to find mutually beneficial solutions to water servicing constraints.
19 - 2	Oth	NLB	MOE	MOE should facilitate and support implementation of a joint municipal water management system or authority for Dufferin County municipalities that share a water source (i.e. aquifer).	Peel- Staff requests that the SPC include direction to require appropriate participation and/or consultation with the Region of Peel and Town of Caledon as there are a number of Orangeville and Mono Township Wells that affect the Region of Peel.	The SPC has revised the policy to say that the affected municipalities should consider collaborating to find mutually beneficial solutions to water servicing constraints.
					A/E-As you are aware, the Tier 3 study recommended a Regional Water Strategy for Orangeville, Mono, and Amaranth which all have functioning wells in the affected area. In assessing such a strategy, it must be understood that many existing municipal wells have been approved at certain rated levels and re-rating may be necessary to accommodate future development. We do not support and question the validity of adding East Garafraxa to the mix (presumably for geographical reasons) but excluding the Region of Peel and Town of Caledon. It is noted that East Garafraxa has no municipal wells in the stressed area.	The SPC has revised the policy to say that the MOE should support affected municipal efforts that focus on finding collaborative and mutually beneficial solutions to water servicing constraints.
					Mono-The concept of physically linking the systems as suggested by members of the SPC should be abandoned. This part of the SPC discussion is operational in nature and was not suggested as a solution to the problem by the Tier 3 study. This solution creates water takings from two separate aquifers in Mono, and two separate watersheds being operated as one system. This solution is unnecessary or at the minimum premature based on the above discussion, and is not a recommendation of the Tier 3 report. The Tier 3 report recommends a management study to deal with permitting and monitoring, and does not include recommendations on operations and/or physical connections of systems.	The SPC has revised the policy to say that the MOE should support affected municipal efforts that focus on finding collaborative and mutually beneficial solutions to water servicing constraints.
19 - 3	Oth	NLB	MOE	The MOE should adopt and use the Tier 3 water budget model for each Local Area as the primary model to evaluate future PTTW, and for municipalities and others to evaluate development.	Mono-Municipal wells are subject to C of A.... if there is a threat to the quantity of water within the aquifer, the problem lies with the approval authority. Municipalities have been requesting the MOE include a cumulative water taking report in their approvals for commercial water takings, aggregate water takings, and other land uses, prior to approving C of As.	This policy has been removed from the revised Source Protection Plan.
CTC Policies						
Dem-1 PI (MC)				Direct the MOE to conduct a one-time baseline review of all existing Permits To Take Water (PTTW) within a Tier 3 water budget Local Area identified as having significant water quantity threats to amend or strengthen the permits and/or reduce permitted quantity takings as technically necessary, to ensure that municipal water supply requirements for the current and planned service capacity (per the population numbers used in the Tier 3 water budget) will be met on a sustainable basis. The Ministry of Natural Resources should also be consulted to ensure that the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained, improved or restored.		

Threat #19: An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body.

Policy #	Tool	Legal Effect	Implementer	Original Policy	Comment	SPC Response
DEM-1	Mon (PI)			Direct the MOE to report to the Source Protection Authority by February 1 of each year: 1) the number of PTTWs that have been reviewed, amended, approved or denied for existing, expanding or proposed new water-taking land uses within significant threat areas; and 2) to provide details on how the protection of municipal drinking water sources was addressed for the previous year.		
DEM-2	PI (MC)			Direct the MOE to not issue PTTWs for new or increased taking within a Tier 3 water budget Local Area identified as having significant water quantity threats unless the proponent can demonstrate using the Tier 3 water budget model that: a) the taking will not affect the ability to meet the municipal water supply requirements for the current and planned service capacity; b) it will not negatively affect the takings of other existing holders of PTTW; c) the new use can be serviced on a sustainable basis; and d) the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained, improved or restored.		
DEM-3	LUP			Direct the Planning Approval Authority to prohibit new or expanded uses that require new or additional water supply beyond the planned future service capacity within a Tier 3 water budget Local Area identified as having significant water quantity threats unless it can be demonstrated using the Tier 3 water budget model that: a) the taking will not affect the ability to meet the municipal water supply requirements for the current and planned service capacity; b) it will not negatively affect the takings of other existing holders of PTTW; c) the new use can be serviced on a sustainable basis; and d) the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained, improved or restored.		
DEM-4	LUP			Direct Planning Approval Authority to only approve settlement area expansions based on: 1) the proven capacity, using the Tier 3 water budget model, to sustainably provide municipal water services; and 2) an analysis of the implications of future potential growth on water sources, wastewater receiving water bodies, and ecological, hydrological and aquatic systems.		
DEM-5	SA (NLB)			Direct the municipality to provide notice to property owners of identified lands (as shown in the Tier 3 Water Budget maps) that due to potential water quantity issues it may be necessary to impose conditions on existing land use designations.		
DEM-6	SA (NLB)			Where Tier 3 water budgets have demonstrated water quantity supply constraints to the servicing of projected future growth, direct the Provincial Growth Management/Planning Ministries (such as MOE, MMAH, MOI (Growth Secretariat)) to reconsider and adjust population and employment targets to levels that are sustainable on locally based water systems, pursuant to section 39(4) of the CWA.		
DEM-7	SA (NLB)			Direct the municipality to maintain and enhance existing or develop and implement a new Water Conservation Plan.		

Threat #20: An activity that reduces the recharge of an aquifer.

Policy #	Tool	Legal Effect	Implementer	Original Policy	Comments	SPC Response
20 - 1	LUP	MC	Mun	The municipality shall prohibit designating new land uses that result in recharge reduction that would be a significant threat unless the proponent can demonstrate that post-development recharge will match pre-development recharge and that groundwater quality will not be impaired	Peel- Staff supports the policy approach in principal but has concerns with the current wording of the policy. Does pre to post development recharge have to be met at the site level in everycase under all circumstances? Should clarification be provided in the policy such as "to the greatest extent possible" or "to the satisfaction of the municipality"? Staff requests that the SGBLS and CTC Region SPCs coordinate policy development to ensure that policy approaches are consistent within the Region of Peel.	The revised policy states that new development and site alteration shall only be permitted where the water balance will be maintained (i.e. no net reduction in recharge). Considerable effort has gone towards ensuring consistency with neighbouring regions. Improved coordination between regions has resulted in increased consistency to the extent that regions have adopted each others policies
					Shelburne- confusing use of word "designating" - "prohibit designating new land uses"? Should be "shall not approve?" Does this policy apply only to significant recharge areas?	The revised policy wording no longer uses the term designating. This policy only applies within the local area identified in the completion of the Orangeville Tier 3.
					Barrie-The policy prohibits designating land uses that result in recharge reduction. This is in contradiction with the Places to Grow Act, 2005 and the intensification required under the plan.	This policy only applies within the local area identified in the completion of the Orangeville Tier 3.
					York-"The municipality shall prohibit designating new land uses that result in recharge reduction that would be a significant threat unless the proponent can demonstrate, to the satisfaction of the municipality, that post-development recharge will match..."	The wording of this policy has been revised to clearly state the intent of the SPC.
20 - 2	LUP	MC	Mun	Municipalities shall amend their planning documents to include provisions that prohibit impervious cover in the WHPA-Q1 and WHPA-Q2 unless it can be demonstrated pre-development recharge can be maintained.	Peel- Staff supports the policy approach in principal but has concerns with the current wording of the policy. Does pre to post development recharge have to be met at the site level in everycase under all circumstances? Should clarification be provided in the policy such as "to the greatest extent possible" or "to the satisfaction of the municipality"? Staff requests that the SGBLS and CTC Region SPCs coordinate policy development to ensure that policy approaches are consistent within the Region of Peel.	This policy has been removed from the revised Source Protection Plan. The intent of this policy has been captured in the revised Land Use Planning Policy.
					Barrie-This policy is impractical in an urban area without restricting growth.	This policy only applies within the local area identified in the completion of the Orangeville Tier 3.
					A/E-Concerned with many of the policy directives to direct land uses with impervious areas outside of a Local Area and prohibit land uses that would reduce recharge is unrealistic when you are dealing with existing approved land use designations. Development by its very nature will reduce recharge and you simply cannot move an approved land use designation elsewhere without serious ramifications in doing so. With respect to recharge, we believe effort should be made to maintain as close as reasonable possible existing recharge levels. However, to prohibit reduction in recharge is untenable. The prohibition on any reduction on recharge as a result of development is impractical. What land use relating to development would not result in the reduction of recharge? We are also unclear as to how the draft policies relate to overland flow captured in stormwater management ponds and discharged to an outlet. In this case, it would not appear that water is being returned to the ground. In addition, we are concerned with the potential implications of policies which are aimed at prohibiting an activity that takes water from an aquifer or surface water body without returning it to the same aquifer or surface water body.	This policy has been removed from the revised Source Protection Plan. The intent of this policy has been captured in the revised Land Use Planning Policy.
20 - 3	Mon (LUP)	MC	Mun	Municipalities shall provide to the SPA a copy of the notice of adoption of the planning document amendments to prohibit impervious cover in the WHPA-Q1 and WHPA-Q2 unless it can be demonstrated pre-development recharge can be maintained.		
20 - 4	LUP	HR	Mun	Municipalities should adopt Low Impact Development approaches to maintain or enhance recharge	A/E-The Townships do not support mandating LID initiatives. We believe that these must be considered on a site specific basis within the identified affected areas. It is noted that the Townships do not support certain LID techniques (e.g. infiltration trenches) due to concerns of maintenance which rests with the local municipalities.	This policy has been removed from the revised Source Protection Plan.

Threat #20: An activity that reduces the recharge of an aquifer.

Policy #	Tool	Legal Effect	Implementer	Original Policy	Comments	SPC Response
					Municipalities are also moving towards implementation of LID standards which should also increase infiltration to the groundwater resource. This combined with the water conservation policies will provide an opportunity for the Source Protection Authorities to re-evaluate the quantity threat in this area under more realistic circumstances. The infiltration or water balance component of the quantity threat should be evaluated by the water system Local Area, not across the identified threat area. What is the water balance for Cardinal Woods local Area, having a reduced pumping rate, with the current development standard (i.e. large lots, septic)? And would this local area remain part of the significant threat area?	This policy has been removed from the revised Source Protection Plan.
					Durham-20-4 – Does the policy require Low Impact Development approaches everywhere in the municipality or just in the affected area?	This policy only applies within the local area identified in the completion of the Orangeville Tier 3.
20 - 5	Oth	NLB	MOE	The Ministry of Environment should refresh tools and guidelines to reflect Low Impact Development practices	Newmarket-We encourage and support the recommendation that the MOE refresh tools and guidelines to reflect best practices for Low Impact Development.	This policy has been removed from the revised Source Protection Plan.
					Durham-20 – These policies prohibit or restrict an “activity that reduces the recharge of an aquifer” and may have the effect of further limiting development in Durham’s northern communities. Some municipalities may find it challenging to accommodate growth and intensification required under the Growth Plan given the restrictions outlined in these policies.	This policy only applies within the local area identified in the completion of the Orangeville Tier 3.

Threat #21: The use of land as livestock grazing or pasturing land, an outdoor confinement area or a farm-animal yard.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	SPC Response
21 - 1	Pro	MC	Mun	F	G	Livestock grazing, pasturing or outdoor confinement within WHPA-A is prohibited under Section 57 of the Clean Water Act.	We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.	Noted- The policy has been revised to require the Risk Management Plans to reflect appropriate nutrient management practices.
							The ministry supports the use of RMPs for livestock grazing and pasturing operations where the activity is a significant drinking water threat outside of WHPA-A and does not support the blanket prohibition of grazing and pasturing in WHPA-A and IPZ-1 zones. Grazing and pasturing can be managed in these zones using appropriate nutrient management practices where the soil depth is greater than 30cm and where the livestock density is <1 NU/acre. However, OMAFRA does support the prohibition of grazing and pasturing where the soil depth is less than 30cm and the livestock density is > 1 NU/acre.	Noted- the revised policy direction would still enforce an existing future prohibition within WHPA-A. Please see the explanatory document for the SPCs rationale for doing so.
							Peel- Staff does not support the policy to prohibit existing livestock grazing, pasturing, outdoor confinement areas or farm animal yards within WHPA A zones where this activity is a significant drinking water threat and prefers that existing activities be managed under the NMA for farms that are phased in under the NMA or through s.58 of the CWA for farms that are not phased in under the NMA.	Noted- the RMP will only be required for those not phased in under the NMA.
							York-For existing and future? what about a farm animal yard? There may be some circumstances that have not been included in this policy as it is currently written	Each policy now states whether it relates to an existing or future threat, and an additional column has been included into the table that also states whether it relates to existing or future threats. The wording of the policy has been revised to state all of the threat circumstances.
21 - 2	Mon (Pro)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.	We OMAFRA support the prohibition of the storage and application of ASM, the storage of commercial fertilizers and fuel, and the use of land for outdoor confinement of livestock in WHPA-A, as this is consistent with current requirements under the NMA (NMA). The NMA does not define or include such requirements for IPZ-1 zones. However, the IPZ concept was not available when the NMA was developed, and prohibition in IPZ-1 is consistent with the spirit of the NMA. We also support prohibition in the WHPA-A equivalent portion of WHPA-E zones. Where prohibition has been proposed outside of these zones, OMAFRA recommends the use of nutrient management standards and appropriate management practices to address these threats.	Noted- the revised Risk Management Plan policy requires that the plan reflect appropriate nutrient management practices.
							The ministry supports the use of RMPs for livestock grazing and pasturing operations where the activity is a significant drinking water threat outside of WHPA-A and does not support the blanket prohibition of grazing and pasturing in WHPA-A and IPZ-1 zones. Grazing and pasturing can be managed in these zones using appropriate nutrient management practices where the soil depth is greater than 30cm and where the livestock density is <1 NU/acre. However, OMAFRA does support the prohibition of grazing and pasturing where the soil depth is less than 30cm and the livestock density is > 1 NU/acre.	Noted- please see the explanatory document for the SPCs rationale for proposing an existing and future prohibition within WHPA-A and IPZ-1.
							Peel- Staff does not support the policy to prohibit existing livestock grazing, pasturing, outdoor confinement areas or farm animal yards within WHPA A zones where this activity is a significant drinking water threat and prefers that existing activities be managed under the NMA for farms that are phased in under the NMA or through s.58 of the CWA for farms that are not phased in under the NMA.	Noted- the RMP will only be required for those not phased in under the NMA.
21 - 3	RMP	MC	Mun	E / F	H	The RMO shall negotiate a Risk Management Plan with those involved in livestock grazing and pasturing operations that are not phased in under the Nutrient Management Act where this is or would be a significant drinking water threat. These RMPs will be based on the same principles as the requirements of a Nutrient Management Plan or Strategy, and scoped to address specific threats.	The ministry supports the use of RMPs for livestock grazing and pasturing operations where the activity is a significant drinking water threat outside of WHPA-A and does not support the blanket prohibition of grazing and pasturing in WHPA-A and IPZ-1 zones. Grazing and pasturing can be managed in these zones using appropriate nutrient management practices where the soil depth is greater than 30cm and where the livestock density is <1 NU/acre. However, OMAFRA does support the prohibition of grazing and pasturing where the soil depth is less than 30cm and the livestock density is > 1 NU/acre.	Noted- please see the explanatory document for the SPCs rationale for proposing an existing and future prohibition within WHPA-A and IPZ-1.
							Peel- Staff supports the draft policy to manage existing livestock grazing pasturing, outdoor confinement areas and farm animal yards through s.58 of the CWA that are not phased in under the NMA.	Noted
							York-outdoor confinement and FAY?	The policy has been revised to include outdoor confinement and FAYs.

Threat #21: The use of land as livestock grazing or pasturing land, an outdoor confinement area or a farm-animal yard.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	SPC Response
21 - 4	Mon (RMP)	MC	Mun	E / F	F	By February 1st of each year, the Risk Management Official (RMO) shall prepare and submit to the SPA, a report summarizing the action taken and the results obtained.	The ministry supports the use of RMPs for livestock grazing and pasturing operations where the activity is a significant drinking water threat outside of WHPA-A and does not support the blanket prohibition of grazing and pasturing in WHPA-A and IPZ-1 zones. Grazing and pasturing can be managed in these zones using appropriate nutrient management practices where the soil depth is greater than 30cm and where the livestock density is <1 NU/acre. However, OMAFRA does support the prohibition of grazing and pasturing where the soil depth is less than 30cm and the livestock density is > 1 NU/acre.	Noted- please see the explanatory document for the SPCs rationale for proposing an existing and future prohibition within WHPA-A and IPZ-1.
21 - 5	RLU	MC	Mun	F	I	This SWP plan designates all land uses within the areas where the grazing and pasturing of livestock would be a significant drinking water threat as a restricted land use under Section 59 of the Clean Water Act. All building permits and planning applications submitted within those areas require pre-screening by the RMO.	Shelburne- same questions.comments noted for policies 17-5, 8-3, and 3-5 re pre-screening information required for complete application and scope. (All building permit and planning act applications?)	The revised Source Protection Plan introduction section and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be explained in an implementation guide.
							Tiny-Policy would designate the grazing and pasturing of livestock as a restricted land use requiring prescreening by the RMO of building permit and planning applications. It is questioned how livestock grazing and pasturing can be prescreened through building permit and Planning Act applications.	The revised Source Protection Plan introduction section and the explanatory document provides an explanation of how RLU policies work. How to implement these policies will be explained in an implementation guide.
21 - 6	Mon (RLU)	MC	Mun	F	F	The RMO shall document action taken in their annual risk management report, and submit to the SPA by February 1 of each year.		
21 - 7	LUP	MC	Mun	F	B	Municipalities shall amend their planning documents to: <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, • include provisions that prohibit the grazing and pasturing of livestock in WHPA-A, and • include provisions that require RMP for the grazing and pasturing of livestock where the activity would be a significant threat outside WHPA-A. 	Peel- the draft SBLS SPP proposes a land use policy to prohibit future grazing and pasturing of livestock within WHPA-A; however, there is no similar land use policy in the source protection plans for the CTC region. Staff does not support the use of land use planning tools for this activity if other tools are considered effective for this threat. Most rural areas that are used for agriculture are already zoned to permit the use. Unless, the direction is to re-designate and re-zone lands, a land use policy to prohibit will have little effect. Staff supports the policy approaches being proposed in the CTC region for this threat.	Please see the explanatory document for the SPCs rationale of including an a LUP policy to mirror the Part IV power policies. Considerable effort has gone towards ensuring consistency with neighbouring regions. Improved coordination between regions has resulted in increased consistency to the extent that regions have adopted each others policies.
							Shelburne- same disclosure report question. Does OMAFRA support these policies? In the past, restrictions on livestock (other than MDS) has been deemed to be in conflict with the PPS policies for prime agricultural areas where "all types and intensities of agriculture" are to be permitted, and beyond the scope of municipal regulatory powers in an Official Plan or Zoning By-law under the Planning Act even within WHPA's. Does the CWA confer new powers on municipalities to regulate livestock in an Official Plan and/ or Zoning by-law in WHPAs in prime agricultural areas? How does this affect existing agricultural land uses?	The term disclosure report has been removed from the revised source protection plan. Please see OMAFRAs comments throughout this document as they pertain to the policies. Yes, the CWA confers new powers on municipalities to implement the Source Protection Plan. The revised Source Protection Plan introduction and the explanatory document provides an explanation of how RLU policies work. How to implement RLU policies will be included in an implementation guide.
							York-To be consistent with 21-1 should outdoor confinement and farm animal yard also be prohibited in WHPA-A?	Yes, the policy has been revised to include outdoor confinement.
21 - 8	Mon (LUP)	MC	Mun	F	F	The municipality shall provide to the SPA a copy of the notice of adoption of the planning document amendments to: <ul style="list-style-type: none"> • identify those lands subject to restricted land use provisions under Section 59 of the Clean Water Act, • include a disclosure report as part of the complete application requirements within a vulnerable area where there is or would be a significant drinking water threat, • include provisions that prohibit the grazing and pasturing of livestock in WHPA-A, and • include provisions that require RMP for the grazing and pasturing of livestock where the activity would be a significant threat outside WHPA-A. 	Shelburne- same disclosure report question. Does OMAFRA support these policies? In the past, restrictions on livestock (other than MDS) has been deemed to be in conflict with the PPS policies for prime agricultural areas where "all types and intensities of agriculture" are to be permitted, and beyond the scope of municipal regulatory powers in an Official Plan or Zoning By-law under the Planning Act even within WHPA's. Does the CWA confer new powers on municipalities to regulate livestock in an Official Plan and/ or Zoning by-law in WHPAs in prime agricultural areas? How does this affect existing agricultural land uses?	Yes, the CWA confers new powers on municipalities to implement the Source Protection Plan. The revised Source Protection Plan introduction and the explanatory document provides an explanation of how RLU policies work. How to implement RLU policies will be included in an implementation guide.
21 - 9	EO	MC	Mun/SPA	E	E	The municipality responsible for water systems in collaboration with the SPA	OMAFRA supports, Peel supports	Noted

Threat #21: The use of land as livestock grazing or pasturing land, an outdoor confinement area or a farm-animal yard.

Policy #	Tool	Legal Effect	Implementer	Existing / Future	List	Original Policy	Comments	SPC Response
						SPA shall undertake an awareness program targeted at livestock grazing and pasturing operators within vulnerable areas that promote the development of Environmental Farm Plans and Best Management Practices to safeguard water supplies.	Shelburne- Staff commitments/resource and cost implications? Required content/format of the annual reporting? Staff training/ qualifications required to undertake this work? York-Should be OMAFRA? Durham-21-9 Grazing – Environmental Farm Plans are confidential and voluntary. The MOE/OMAFRA may be better equipped to handle this education and outreach activity.	Local SPAs have now been identified as the lead agency with some collaboration with municipalities Local SPAs have now been identified as the lead agency with some collaboration with municipalities Local SPAs have now been identified as the lead agency with some collaboration with municipalities
21 - 10	Mon (EO)	MC	Mun	E	F	The municipality shall document its communication and outreach efforts. By February 1st of each year, the municipality shall prepare and submit to the SPA, a report summarizing the education and outreach program, the action taken and the results obtained.	OMAFRA supports Shelburne- Staff commitments/resource and cost implications? Required content/format of the annual reporting? Staff training/ qualifications required to undertake this work?	Noted The SPC is drafting a letter to Minister Bradley requesting funding for implmentation of the SPP. Policies requiring municipalities to provide incentives have been revised so that municipalities are only required to consider incentives. It is a requirement of the legislation that each policy has a corresponding monitoring policy. It is the intent of the SPC to ensure the reporting requirements are not onerous, but do provide adequate information to track implementation of the policy. How monitoring policies need to be addressed will be included in an Implementation Guide.
21 - 11	In	NLB	OMAFRA		?	OMAFRA is encouraged to maintain and where possible enhance funding for the preparation of Environmental Farm Plans.	Peel supports	Noted
21 - 12	In	HR	MOE		?	MOE should maintain the stewardship program targeting significant threat activities to incent risk reduction projects.	Peel-clarify intended policy direction. Is the intent to "encourage the MOE to provide financial incentives through the Ontario Drinking Water Stewardship Program to reduce risks to drinking water:? If so, the policy should be revised to be clear.	The policy has been revised to clearly state that the intent is to encourage MOE to continue funding relevant stewardship programs.
21 - 13	In	MC	SPA		E	If the stewardship program is extended, SPAs shall implement risk reduction projects through the stewardship program targeting significant drinking water threats as appropriate.	Peel- The ontario drinkking water stewardship program should identify implementing bodies not the source protection plan. Why are the SPAs named as the implementing body?	The Ontario Drinking Water Stewardship Program is currently implmented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs
21 - 14	Mon (In)	MC	SPA		F	The SPA shall document its stewardship efforts and shall prepare a report summarizing the stewardship action taken and the results obtained by February 1st of each year.	Peel- This policy requires the monitoring body (SPA to report to itself on stewardship actions. Staff questions the need for this policy and requests confirmation of the SPAs role with respect to stewardship actions in relation to this threat.	The Ontario Drinking Water Stewardship Program is currently implmented by the SPA's. Identifying them as implementing bodies within the SPP mirrors the current program operating structure. The SPAs were identified as implementing bodies to provide a measure of consistency across the watershed when implementing education and outreach programs

ICA: Nitrate for Georgian Sands and Lafontaine ICA
Policies for the use of land as livestock grazing or pasturing land, an outdoor confinement area of a farm-animal yard (Threat #21)

Policy #	Tool	Legal Effect	Implementer	Original Policy	Comments	Suggested Improvement	SPC Response
No change in policy approach. The policies in the body of the report apply to ICA.							

City of Barrie/Penetanguishene Conditions Policies

Original Policy	Comments	SPC Response
<p>1. That the MOE be directed to provide each year to the SPA a report of actions taken, if any, in relation to the contaminated site that has been identified as a Significant Threat, by MOE or other persons or bodies over the previous calendar year.</p>	<p>Barrie- In 2002 the City implemented a Groundwater Monitoring Program to determine potential impacts to the municipal groundwater water supply. The Program includes the groundwater quality monitoring of the deep municipal aquifer and the shallow upper aquifer. Groundwater samples are collected from 55 monitoring points by City staff on a monthly, semi-annual and annual basis. Golder Associates has been retained to provide advice related to the potential impacts to the City groundwater supply aquifer and provide annual reports that are distributed to the Ministry of the Environment. This Program supports the City's Drinking Water Quality Management System (DWQMS) Program.</p>	<p>Noted-this type of information could be included in the annual report to the SPA.</p>
<p>2. That the local planning authority be directed to give notice to the SPA of any applications under the Planning Act to redevelop a site identified as a Significant Threat condition in the assessment report. (Note that Policy 3.2.2 of the Provincial Policy Statement directs that contaminated sites shall be remediated as necessary prior to any activities related to the redevelopment proposal proceeding). This redevelopment proposal my ultimately resolve the condition and therefore no more monitoring of this condition is necessary.</p>	<p>Barrie- It is recommended that the South Georgian Bay Lake Simcoe Source Protection Committee (SPC) consider the potential of a monitoring policy related to the existing conditions as noted in Table 1: Summary of Existing Conditions that are solely specific to the City of Barrie.</p> <p>Barrie Environmental Operations recommends that the SPC adopt Option 1 and 3 as described in the aforementioned Staff Report by way of the reasons outlined above.</p>	<p>Noted</p> <p>Noted- please see the explanatory document for the SPCs rational for including this policy.</p>