

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
ASM-1 Option 1 No change	Application of Agricultural Source Material (ASM) to Land	OMAFRA	C	<p>Prescribed Instrument</p> <p>1) The application of ASM to land shall be prohibited where the activity is, or would be, a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (future); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (future). 	See Maps 1.1 - 1.21	Future: Immediately (T-3)	N/A	MON-4
				<p>2) Where the application of ASM to land is in an area where the activity is, or would be, a significant drinking water threat, the Nutrient Management Plan or Strategy that governs the activity shall be reviewed or established to ensure appropriate terms and conditions are included so that the activity ceases to be, or does not become, a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 		Existing: Upon expiry or within 5 years (T-2)	See Explanatory Notes	
				<p>3) Where the application of ASM to land is in an area where the activity is, or would be, a significant drinking water threat, the Nutrient Management Plan or Strategy that governs the activity shall be reviewed or established to ensure appropriate terms and conditions are included so that the activity ceases to be, or does not become, a significant drinking water threat. In addition to any other risk management measures required through the Prescribed Instrument, the Prescribed Instrument shall as a minimum ensure:</p> <p>a) the application of ASM is not applied during restricted periods, or any other time when the soil is snow covered or frozen consistent with the limitations of subsection 52.2 – 52.4 of Ontario Regulation 267/03 under the <i>Nutrient Management Act, 2002</i> to avoid runoff; and</p> <p>b) soil testing is required for plant available nitrogen each year prior to application of ASM to determine appropriate application rates, in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates (existing, future); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates (existing); or • the remainder of an Issue Contributing Area for Nitrates (existing, future). 		Future: Immediately (T-3)	GEN-5 ASM-5	MON-4

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 Highlighted text = revisions made after public consultation

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
ASM-1 Option 2	Application of Agricultural Source Material (ASM) to Land	OMAFRA	C	<p>Prescribed Instrument</p> <p>1) The application of ASM to land shall be prohibited where the activity is, or would be, a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Pathogens (future); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (future). 	See Maps 1.1 - 1.21	<p>Future: Immediately (T-3)</p> <p>Existing: Upon expiry or within 5 years (T-2)</p>	N/A	MON-4
				<p>2) Where the application of ASM to land is in an area where the activity is, or would be, a significant drinking water threat, the Nutrient Management Plan or Strategy that governs the activity shall be reviewed or established to ensure appropriate terms and conditions are included so that the activity ceases to be, or does not become, a significant drinking water threat. In addition to any other risk management measures required through the Prescribed Instrument, the Prescribed Instrument shall as a minimum ensure:</p> <p>a) the application of ASM is not applied during restricted periods, or any other time when the soil is snow covered or frozen consistent with the limitations of subsection 52.2 – 52.4 of Ontario Regulation 267/03 under the <i>Nutrient Management Act, 2002</i> to avoid runoff; and</p> <p>b) soil testing is required for plant available nitrogen each year prior to application of ASM to determine appropriate application rates, in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates (existing, future); • WHPA-B (VS=10) in an Issue Contributing Area for Pathogens (existing); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 		<p>Future: Immediately (T-3)</p> <p>Existing: 3 years (T-1)</p>	GEN-5 ASM-5	MON-4

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COMMENTS POLICY ASM-1		
	Comments	Response
Halton Region and lower tier municipalities	<p>20. ASM-1, ASM -2, ASM-3, ASM-4 – Halton Region and OMAFRA maintain that the actual risk posed to our municipal drinking water quality does not warrant widespread prohibition in Davidson’s WHPA-B and WHPA-E (368 acres) for the future storage of Agricultural Source Material (ASM) and future application of ASM in Davidson’s WHPA-E (225 acres).</p> <p>It is understood that the application and storage of ASM occur within the vulnerable areas. Staff cannot support the need to prohibit this threat activity. This is consistent with OMAFRA’s position which supports management of agricultural activities outside of WHPA-A’s using prescribed instruments (nutrient management plans) or Part IV tools (risk management plans). Halton Region and its local municipalities support normal farm practices and is not in support of any policy that limits agricultural use to continue into the future.</p>	<p>This information regarding acres affected in Halton’s comments is not consistent with the detailed information provided in Table 2 of the Halton Region Inter-Office Memorandum from Chitra Gowda and John McIntosh to David Simpson dated May 23, 2014. The actual number of acres from Halton’s own analysis is 181 acres of agricultural land consisting of parts of 11 agricultural properties.</p> <p>The CTC SPC have extensively considered Halton’s concerns regarding this policy at both the April 23 and June 24, 2014 SPC meetings and made the decision to manage in a WHPA-B (VS=10) in an Issue Contributing Area for future Nitrates in favour of Halton’s preferred approach.</p> <p>The definition of existing is a generous definition which allows activities occurring 10 years prior to plan approval to be considered as existing.</p>
York Region	<p>It is not clear why part 3 of these policies is separated and specific to a subset of threat activity. Would the requirements in Part 3 not be reasonable for all RMP/NMP?</p> <p><u>Suggested revision:</u> Include the specified requirements in Part 2 of each policy and eliminate Part 3.</p>	<p>SPC to consider Option 2 as per York Region suggestion.</p>
CVC	<p>Part 3a) OMAFRA has historically utilized MOE to carry-out the on-farm auditing of the Nutrient Management legislation. CVC Staff recommend that the MOE should be added to the Implementing Body if they would be carrying out the inspections for time of ASM application. The feasibility behind this inspection is questioned. It would require consistent year-round monitoring</p>	<p>Policy ASM-5 deals with MOECC as the implementer of the ASM inspections and is cross referenced in the “Related Policies” column.</p>
CVC	<p>Part 3b) Consider including a minimum sampling standard in this policy. In addition, if the intended nitrogen source is manure, an annual manure analysis should be performed so that the correct application rate can be matched.</p>	<p>Will include in Explanatory Document.</p>

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
ASM-2 Option 1 No change	Application of Agricultural Source Material (ASM) to Land	RMO	G	Part IV, s.57, s.58 For farms that do not require a Nutrient Management Plan or Strategy, where the application of ASM is, or would be, a significant drinking water threat, the following actions shall be taken: 1) The application of ASM is designated for the purpose of s.57 under the <i>Clean Water Act</i> , and is therefore prohibited where the threat is, or would be, significant in any of the following areas: <ul style="list-style-type: none"> • WHPA-A (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (future); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (future). 	See Maps 1.1 - 1.21	Future: Immediately (T-5) Existing: 180 days (T-4)	GEN-1 See Explanatory Notes	MON-2
				2) The application of ASM is designated for the purpose of s.58 under the <i>Clean Water Act</i> , requiring risk management plans, where the threat is, or would be, significant in any of the following areas: <ul style="list-style-type: none"> • WHPA-B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 		Future: Immediately (T-7) Existing: 1 year/5 years (T-6)	GEN-1 ASM-6 See Explanatory Notes	MON-2
			H	3) The application of ASM is designated for the purpose of s.58 under the <i>Clean Water Act</i>, requiring risk management plans, where the threat is, or would be, significant. In addition to any other risk management measures required through the risk management plan, the risk management plan shall as a minimum ensure: a) the application of ASM is not applied during restricted periods, or any other time when the soil is snow covered or frozen consistent with the limitations of subsection 52.2 – 52.4 of Ontario Regulation 267/03 under the <i>Nutrient Management Act, 2002</i> to avoid runoff; and b) soil testing is required for plant available nitrogen each year prior to application of ASM to determine appropriate application rates, in any of the following areas: <ul style="list-style-type: none"> • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates (existing, future); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates (existing); or • the remainder of an Issue Contributing Area for Nitrates (existing, future). 				

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
ASM-2 Option 2	Application of Agricultural Source Material (ASM) to Land	RMO	G	<p>Part IV, s.57, s.58</p> <p>For farms that do not require a Nutrient Management Plan or Strategy, where the application of ASM is, or would be, a significant drinking water threat, the following actions shall be taken:</p> <p>1) The application of ASM is designated for the purpose of s.57 under the <i>Clean Water Act</i>, and is therefore prohibited where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Pathogens (future); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (future). 	See Maps 1.1 - 1.21	<p>Future: Immediately (T-5)</p> <p>Existing: 180 days (T-4)</p>	GEN-1	MON-2
			H	<p>2) The application of ASM is designated for the purpose of s.58 under the <i>Clean Water Act</i>, requiring risk management plans, where the threat is, or would be, significant. In addition to any other risk management measures required through the risk management plan, the risk management plan shall as a minimum ensure:</p> <p>a) the application of ASM is not applied during restricted periods, or any other time when the soil is snow covered or frozen consistent with the limitations of subsection 52.2 – 52.4 of Ontario Regulation 267/03 under the <i>Nutrient Management Act, 2002</i> to avoid runoff; and</p> <p>b) soil testing is required for plant available nitrogen each year prior to application of ASM to determine appropriate application rates, in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Pathogens (existing); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 		<p>Future: Immediately (T-7)</p> <p>Existing: 1 year/5 years (T-6)</p>	GEN-1 ASM-6	MON-2

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COMMENTS POLICY ASM-2		
	Comments	Response
Halton Region and lower tier municipalities	20. ASM-1, ASM -2, ASM-3, ASM-4 – Halton Region and OMAFRA maintain that the actual risk posed to our municipal drinking water quality does not warrant widespread prohibition in Davidson’s WHPA-B and WHPA-E (368 acres) for the future storage of Agricultural Source Material (ASM) and future application of ASM in Davidson’s WHPA-E (225 acres).	This information regarding acres affected in Halton’s comments is not consistent with the detailed information provided in Table 2 of the Halton Region Inter-Office Memorandum from Chitra Gowda and John McIntosh to David Simpson dated May 23, 2014. The actual number of acres from Halton’s own analysis is 181 acres of agricultural land consisting of parts of 11 agricultural properties.
	It is understood that the application and storage of ASM occur within the vulnerable areas. Staff cannot support the need to prohibit this threat activity. This is consistent with OMAFRA’s position which supports management of agricultural activities outside of WHPA–A’s using prescribed instruments (nutrient management plans) or Part IV tools (risk management plans). Halton Region and its local municipalities support normal farm practices and is not in support of any policy that limits agricultural use to continue into the future.	The CTC SPC have extensively considered Halton’s concerns regarding this policy at both the April 23 and June 24, 2014 SPC meetings and made the decision to manage in a WHPA-B (VS=10) in an Issue Contributing Area for future Nitrates in favour of Halton’s preferred approach. The definition of existing is a generous definition which allows activities occurring 10 years prior to plan approval to be considered as existing.
York Region	It is not clear why part 3 of these policies is separated and specific to a subset of threat activity. Would the requirements in Part 3 not be reasonable for all RMP/NMP? <u>Suggested revision</u> : Include the specified requirements in Part 2 of each policy and eliminate Part 3.	SPC to consider Option 2 as per York Region suggestion.

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
ASM-3 No change	Storage of Agricultural Source Material (ASM)	OMAFRA	C	<p>Prescribed Instrument</p> <p>1) The storage of ASM shall be prohibited where the activity would be a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (future); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (future). 	See Maps 1.1 - 1.21	Future: Immediately (T-3)	N/A See Explanatory Notes	MON-4
				<p>2) Where the storage of ASM is in an area where the activity is, or would be, a significant drinking water threat, the Nutrient Management Plan or Strategy that governs the activity shall be reviewed or established to ensure appropriate terms and conditions are included so that the activity ceases to be, or does not become, a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing); or • WHPA-B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 		Future: Immediately (T-3) Existing: 3 years (T-1)	GEN-5 ASM-5 See Explanatory Notes	MON-4

COMMENTS POLICY ASM-3		
	Comments	Response
Halton Region and lower tier municipalities	<p>20. ASM-1, ASM -2, ASM-3, ASM-4 – Halton Region and OMAFRA maintain that the actual risk posed to our municipal drinking water quality does not warrant widespread prohibition in Davidson’s WHPA-B and WHPA-E (368 acres) for the future storage of Agricultural Source Material (ASM) and future application of ASM in Davidson’s WHPA-E (225 acres).</p> <p>It is understood that the application and storage of ASM occur within the vulnerable areas. Staff cannot support the need to prohibit this threat activity. This is consistent with OMAFRA’s position which supports management of agricultural activities outside of WHPA–A’s using prescribed instruments (nutrient management plans) or Part IV tools (risk management plans). Halton Region and its local municipalities support normal farm practices and is not in support of any policy that limits agricultural use to continue into the future.</p>	<p>This information regarding acres affected in Halton’s comments is not consistent with the detailed information provided in Table 2 of the Halton Region Inter-Office Memorandum from Chitra Gowda and John McIntosh to David Simpson dated May 23, 2014. The actual number of acres from Halton’s own analysis is 181 acres of agricultural land consisting of parts of 11 agricultural properties.</p> <p>The CTC SPC have extensively considered Halton’s concerns regarding this policy at both the April 23 and June 24, 2014 SPC meetings and made the decision to maintain the policy as is.</p> <p>The definition of existing is a generous definition which allows activities occurring 10 years prior to plan approval to be considered as existing.</p>

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
ASM-4 No change	Storage of Agricultural Source Material (ASM)	RMO	G	<p>Part IV, s.57, s.58</p> <p>For farms that do not require a Nutrient Management Plan or Strategy, where the storage of ASM would be a significant drinking water threat, the following actions shall be taken:</p> <p>1) The storage of ASM is designated for the purpose of s.57 under the <i>Clean Water Act</i>, and is therefore prohibited where the threat would be significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (future); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (future). 	See Maps 1.1 - 1.21	Future: Immediately (T-5)	GEN-1 See Explanatory Notes	MON-2
			H	<p>2) The storage of ASM is designated for the purpose of s.58 under the <i>Clean Water Act</i>, requiring risk management plans, where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing); or • WHPA-B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 		Future: Immediately (T-7) Existing: 1 year/5 years (T-6)	GEN-1 ASM-6 See Explanatory Notes	MON-2

COMMENTS POLICY ASM-4		
	Comments	Response
Halton Region and lower tier municipalities	<p>20. ASM-1, ASM -2, ASM-3, ASM-4 – Halton Region and OMAFRA maintain that the actual risk posed to our municipal drinking water quality does not warrant widespread prohibition in Davidson’s WHPA-B and WHPA-E (368 acres) for the future storage of Agricultural Source Material (ASM) and future application of ASM in Davidson’s WHPA-E (225 acres).</p> <p>It is understood that the application and storage of ASM occur within the vulnerable areas. Staff cannot support the need to prohibit this threat activity. This is consistent with OMAFRA’s position which supports management of agricultural activities outside of WHPA–A’s using prescribed instruments (nutrient management plans) or Part IV tools (risk management plans). Halton Region and its local municipalities support normal farm practices and is not in support of any policy that limits agricultural use to continue into the future.</p>	<p>This information regarding acres affected in Halton’s comments is not consistent with the detailed information provided in Table 2 of the Halton Region Inter-Office Memorandum from Chitra Gowda and John McIntosh to David Simpson dated May 23, 2014. The actual number of acres from Halton’s own analysis is 181 acres of agricultural land consisting of parts of 11 agricultural properties.</p> <p>The CTC SPC have extensively considered Halton’s concerns regarding this policy at both the April 23 and June 24, 2014 SPC meetings and made the decision to maintain the policy as is.</p> <p>The definition of existing is a generous definition which allows activities occurring 10 years prior to plan approval to be considered as existing.</p>

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
ASM-5 No change	Application of Agricultural Source Material (ASM) to Land Storage of Agricultural Source Material (ASM)	MOECC	K	<p>Specify Action</p> <p>For farms that require a Nutrient Management Plan or Strategy, the Ministry of Environment and Climate Change shall prioritize and conduct regular inspections of these farms where the application and storage of ASM is, or would be, a significant drinking water threat. for:</p> <p>a) the application of ASM to land in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • WHPA E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). <p>b) The storage of ASM in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA A (existing); or • WHPA B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • WHPA E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 	See Maps 1.1 - 1.21	Existing & Future: 3 years/ 5 years (GEN-5)	ASM-1 ASM-3 See Explanatory Notes	MON-4

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
ASM-6 SPC to discuss with NEW GEN-8	Application of Agricultural Source Material (ASM) to Land Storage of Agricultural Source Material (ASM)	Municipality	E	<p>Specify Action</p> <p>For farms and other lands that do not require a Nutrient Management Plan or Strategy, the municipality shall ensure through their authority that the Risk Management Inspector responsible for enforcement will prioritize and conduct regular inspections of these lands where the application and storage of ASM is, or would be, a significant drinking water threat. in any of the following areas:</p> <p>a) the application of ASM to land in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • WHPA E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). <p>b) The storage of ASM in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA A (existing); or • WHPA B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • WHPA E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 	See Maps 1.1 - 1.21	After RMP is approved per policy ASM-2 and ASM-4	ASM-2 ASM-4 See Explanatory Notes	MON-1

COMMENTS POLICY ASM-6		
	Comments	Response
Halton Region and lower tier municipalities	21. This inspection policy is redundant to the requirements by municipalities to conduct inspections as part of a Risk Management Plan (ASM-2 and ASM-4).	CTC staff have confirmed with MOECC staff that while the intent is there, there is no requirement to carry out regular inspections of Risk Management Plans in the <i>Clean Water Act, 2006</i> or the associated Ontario Regulation 287/07.
Wellington County municipalities	9. This policy is an example of prioritization policies for RMP inspections. There are a number of similar policies for other threats in the Amended Proposed Plan and this comment is applicable to all of the similar policies regarding prioritization of RMP inspections. The prioritization of inspection policies such as Liv-5 and ASM-6 have the legal effect of must comply (List E). This reduces the operational flexibility of the RMOs/municipalities in organizing and conducting their inspection workload. By placing a priority on these types of inspections within the CTC area, it reduces the RMO/municipalities' ability to balance the, potentially, conflicting workloads and timelines of inspections where the RMO/municipality is implementing multiple source protection plans. This type of prioritization is better left as an operational matter for the RMO/municipalities that considers the workload from all Source Protection Plans within their jurisdiction. If the legal effect of these policies could be changed to have regard for, this would assist those RMOs/municipalities attempting to balance multiple Source Protection Plans' implementation.	CTC staff have confirmed with MOECC staff that while the intent is there, there is no requirement to carry out regular inspections of Risk Management Plans in the <i>Clean Water Act, 2006</i> or the associated Ontario Regulation 287/07.

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ASM-7 No change	Management of Agricultural Source Material (ASM) (Aquaculture)	MOECC	C	<p>Prescribed Instrument</p> <p>The management of ASM (Aquaculture) shall be prohibited where the activity is, or would be, a significant drinking water threat in the following areas:</p> <ul style="list-style-type: none"> An Issue Contributing Area for Pathogens (existing, future). 	See Map 1.9	<p>Future: Immediately (T-3)</p> <p>Existing: Upon expiry or within 5 years (T-2)</p>	N/A See Explanatory Notes	MON-4

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
NASM-1 No change	Application of Non-Agricultural Source Material (NASM) to Land (Category 1)	RMO OMAFRA MOE	G	<p>Part IV, s.57, s.58 Prescribed Instrument</p> <p>Where the application of NASM (Category 1) to land is, or would be, a significant drinking water threat, the following actions shall be taken:</p> <p>1) The application of NASM (Category 1) is designated for the purpose of s.57 under the Clean Water Act, and is therefore prohibited where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> WHPA-A (existing, future). WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Pathogens (future). 	See Maps 1.1 - 1.21	<p>Future: Immediately (T-5)</p> <p>Existing: 180 days (T-4)</p>	GEN-1 See Explanatory Notes	MON-2
			H	<p>2) The application of NASM (Category 1) to land is designated for the purpose of s.58 under the Clean Water Act, requiring risk management plans, where the threat is significant in any of the following areas:</p> <ul style="list-style-type: none"> WHPA-B(VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or WHPA-E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Pathogens (existing). the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 		<p>Future: Immediately (T-7)</p> <p>Existing: 1 year/5 years (T-6)</p>	GEN-1 NASM-5 See Explanatory Notes	MON-2

COMMENTS POLICY NASM-1		
	Comments	Response
Durham Region	The application and storage of Category 1 NASMs should be addressed by the <i>Nutrient Management Act, 2002</i> .	Category 1 NASM does not fall under the <i>Nutrient Management Act, 2002</i> and as such the SPC cannot use the Prescribed Instrument as the tool.

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
NASM-2 Edited (no change to intent)	Handling and Storage of Non-Agricultural Source Material (NASM) (Category 1)	RMO OMAFRA MOE	G	<p>Part IV, s.57, s.58 Prescribed Instrument</p> <p>Where the handling and storage of NASM (Category 1) to land is, or would be, a significant drinking water threat, the following actions shall be taken:</p> <p>1) The handling and storage of NASM (Category 1) is designated for the purpose of s.57 under the Clean Water Act, as is therefore prohibited where the threat would be significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (future). 	See Maps 1.1 - 1.21	Future: Immediately (T-5)	GEN-1 See Explanatory Notes	MON-2
			H	<p>2) The handling and storage of NASM (Category 1) is designated for the purpose of s.58 under the Clean Water Act, requiring risk management plans, where the threat is significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing); or • WHPA-B (VS=10) (existing, future); or • WHPA-E (VS ≥ 9) (existing, future); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 		Future: Immediately (T-7) Existing: 1 year/5 years (T-6)	GEN-1 NASM-5 See Explanatory Notes	MON-2

COMMENTS POLICY NASM-2		
	Comments	Response
Town of Orangeville	The Town requests that the CTC SPC consider revising the wording of the proposed NASM-2 policy from "Where the handling and storage of NASM (Category 1) to land is, ..." to "Where the handling and storage of NASM (Category 1) is, ..."	Staff have made the suggested revision.

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
NASM-3 No change	Application of Non-Agricultural Source Material (NASM) to Land (Category 2 and 3) including Treated Septage	OMAFRA MOECC	C	<p>Prescribed Instrument</p> <p>1) The application of NASM (Category 2 and 3) to land shall be prohibited where the activity would be a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (future); or • WHPA-B (VS=10) (future); or • WHPA-E (VS ≥ 8) (future); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (future). 	See Maps 1.1 - 1.21	Future: Immediately (T-3)	N/A See Explanatory Notes	MON-4
				2) The application of NASM to land (existing) may continue only until the expiry of the current approval, after which time it would be considered as a future activity.		Existing: Upon expiry or within 5 years (T-2)	N/A See Explanatory Notes	MON-4

COMMENTS POLICY NASM-3		
	Comments	Response
Halton Region and lower tier municipalities	<p>22. Similar to OMAFRA’s position, Halton Region and its local municipalities are unclear why future NASM application cannot be managed (i.e. NASM plans or risk management plans) outside WHPA-A in the same way existing activities are managed, especially given that the actual risk posed to our municipal drinking water quality is extremely low.</p> <p>The safe application of NASM to farmland has been well studied and effectively practiced for over 30 years under strict criteria which minimizes risk to human health, crops, environment, and Ontario water supplies. Staff also reminded the SPC that OMAFRA approved NASM plans match application rates with agronomic demands to ensure maximal utilization of nutrients with little potential for nutrients to impact groundwater quality. Furthermore, the biological treatment of biosolids prior to land application breaks down nutrients into more stable components (i.e. nitrogen is conserved) which are far less likely to experience run-off compared to the free release of nutrients associated with fertilizer application.</p> <p>NASM application activities are not major contributors to the total nitrate mass loadings in the ICA for Davidson Well System.</p>	<p>The CTC SPC have extensively considered Halton’s concerns regarding this policy at both the April 23 and June 24, 2014 SPC meetings and made the decision to maintain the policy as is.</p>

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
NASM-4 No change	Handling and Storage of Non-Agricultural Source Material (NASM) (Category 2 and 3) including Treated Septage	OMAFRA MOECC	C	<p>Prescribed Instrument</p> <p>The handling and storage of NASM (Category 2 and 3) shall be prohibited where the activity is, or would be, a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing, future); or • WHPA-B (VS=10) (existing, future); or • WHPA-E (VS ≥ 9) (existing, future); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 	See Maps 1.1 - 1.21	<p>Future: Immediately (T-3)</p> <p>Existing: Upon expiry or within 5 years (T-2)</p>	N/A See Explanatory Notes	MON-4
NASM-5 Edited	Application of NASM to Land Handling and Storage of NASM	OMAFRA MOECC	K	<p>Education and Outreach</p> <p>The Ministry of Environment and Climate Change and OMAFRA are requested to provide to landowners and haulers that have a NASM Plan or Environmental Compliance Approval to haul, store or apply NASM (Category 1), information on the importance of protecting source water and the location of the nearby municipal wells where the application, handling and storage of NASM is, or would be, a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing, future); or • WHPA-B (VS=10) (existing, future); or • WHPA-E (VS ≥ 8 for application; VS ≥ 9 for handling and storage) (existing, future); or • the remainder of an Issue Contributing Area for Nitrates (existing, future). 	See Maps 1.1 - 1.21	Existing & Future: Consider within 2 years (T-15)	GEN-6 NASM-1 NASM-2 See Explanatory Notes	MON-4

COMMENTS POLICY NASM-5		
	Comments	Response
MOECC	5. NASM-5 is an education and outreach policy directed towards MOECC and OMAFRA that specifically addresses Category 1 NASM. The policy as currently written includes a reference to environmental compliance approvals (ECA), which are not issued for Category 1 NASM. For clarity, please remove the reference to ECAs in the policy.	The reference to Category 1 NASM has been removed so that this policy applies to all categories of NASM.

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
LIV-1 No change	The use of Land as Livestock Grazing or Pasturing Land (O. Reg. 385/08, s.3)	RMO	G	<p>Part IV, s. 57, s.58</p> <p>Where the use of land as livestock grazing or pasturing land is, or would be, a significant drinking water threat, the following actions shall be taken:</p> <p>1) The use of land as livestock grazing or pasturing land (with an animal density >1 Nutrient Unit per acre) is designated for the purpose of s.57 under the <i>Clean Water Act</i>, and is therefore prohibited where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A in an Issue Contributing Area for Nitrates or Pathogens (existing, future). 	See Maps 1.1 - 1.21	<p>Future: Immediately (T-5)</p> <p>Existing: 180 days (T-4)</p>	<p>GEN-1</p> <p>See Explanatory Notes</p>	MON-2
			H	<p>2) The use of land as livestock grazing or pasturing land is designated for the purpose of s.58 under the <i>Clean Water Act</i>, requiring risk management plans, where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-A in an Issue Contributing Area for Nitrates or Pathogens with an animal density <1 Nutrient Unit per acre (existing, future); or • WHPA-B (VS=10) (existing, future); or • WHPA-E (VS ≥ 8) (existing, future); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 		<p>Future: Immediately (T-7)</p> <p>Existing: 1 year/5 years (T-6)</p>	<p>GEN-1 LIV-5</p> <p>See Explanatory Notes</p>	MON-2

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
LIV-2 No change	The use of Land as an Outdoor Confinement Area or a Farm-Animal Yard (O. Reg. 385/08, s.3)	OMAFRA	C	Prescribed Instrument 1) The use of land as an outdoor confinement area or farm-animal yard shall be prohibited where the activity would be a significant drinking water threat in any of the following areas: <ul style="list-style-type: none"> • WHPA-A (future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (future); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (future). 	See Maps 1.1 - 1.21	Future: Immediately (T-3)	N/A See Explanatory Notes	MON-4
				2) Where the use of land as an outdoor confinement area or farm-animal yard is in an area where the activity is, or would be, a significant drinking water threat, the Nutrient Management Plan or Strategy that governs the activity shall be reviewed or established to ensure appropriate terms and conditions are included so that the activity ceases to be, or does not become, a significant drinking water threat in any of the following areas: <ul style="list-style-type: none"> • WHPA-A (existing); or • WHPA-B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 		Future: Immediately (T-3) Existing: 3 years (T-1)	GEN-5 LIV-4 See Explanatory Notes	MON-4

COMMENTS POLICY LIV-2		
	Comments	Response
Halton Region and lower tier municipalities	<p>23. LIV-2, LIV-3 – Halton Region and OMAFRA maintain that the actual risk posed to our municipal drinking water quality does not warrant widespread prohibition of future outdoor confinement areas or farm animal yards in WHPA-B and WHPA-E within the Davidson Well nitrate ICA. Such activities can be adequately managed through the use of existing prescribed instruments (nutrient management plans) or Part IV tools (risk management plans).</p> <p>There are few outdoor confinement areas or farm animal yards in the nitrate ICA for Davidson well system. These activities are not major contributors to the total nitrate mass loadings in the ICA for Davidson Well System.</p> <p>Halton Region and its local municipalities support normal farm practices which align with well established <i>Nutrient Management Act, 2002</i> principles but do not support any policy that limits agricultural use to continue into the future.</p>	<p>The CTC SPC have extensively considered Halton’s concerns regarding this policy at both the April 23 and June 24, 2014 SPC meetings and made the decision to maintain the policy as is.</p> <p>The definition of existing is a generous definition which allows activities occurring 10 years prior to plan approval to be considered as existing.</p>

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
LIV-3 No change	The use of Land as an Outdoor Confinement Area or a Farm-Animal Yard (O. Reg. 385/08, s.3)	RMO	G	<p>Part IV, s.57, s.58</p> <p>For lands that do not require a Nutrient Management Plan or Strategy, where the use of land as an outdoor confinement area or farm-animal yard is, or would be, a significant drinking water threat, the following actions shall be taken:</p> <p>1) The use of land for an outdoor confinement area or farm-animal yard is designated for the purpose of s.57 under the <i>Clean Water Act</i>, and is therefore prohibited where it would be significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (future); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (future). 	See Maps 1.1 - 1.21	Future: Immediately (T-5)	GEN-1 See Explanatory Notes	MON-2
			H	<p>2) The use of land as an outdoor confinement area or farm animal yard is designated for the purpose of s.58 under the <i>Clean Water Act</i>, requiring risk management plans, where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing); or • WHPA-B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 		Future: Immediately (T-7) Existing: 1 year/5 years (T-6)	GEN-1 LIV-5 See Explanatory Notes	MON-2

COMMENTS POLICY LIV-3		
	Comments	Response
Halton Region and lower tier municipalities	<p>23. LIV-2, LIV-3 – Halton Region and OMAFRA maintain that the actual risk posed to our municipal drinking water quality does not warrant widespread prohibition of future outdoor confinement areas or farm animal yards in WHPA-B and WHPA-E within the Davidson Well nitrate ICA. Such activities can be adequately managed through the use of existing prescribed instruments (nutrient management plans) or Part IV tools (risk management plans).</p> <p>There are few outdoor confinement areas or farm animal yards in the nitrate ICA for Davidson well system. These activities are not major contributors to the total nitrate mass loadings in the ICA for Davidson Well System.</p> <p>Halton Region and its local municipalities support normal farm practices which align with well-established <i>Nutrient Management Act, 2002</i> principles but do not support any policy that limits agricultural use to continue into the future.</p>	<p>The CTC SPC have extensively considered Halton’s concerns regarding this policy at both the April 23 and June 24, 2014 SPC meetings and made the decision to maintain the policy as is.</p> <p>The definition of existing is a generous definition which allows activities occurring 10 years prior to plan approval to be considered as existing.</p>

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
LIV-4 No change	The use of Land as an Outdoor Confinement Area or a Farm-Animal Yard (O. Reg. 385/08, s.3)	MOECC	K	<p>Specify Action</p> <p>For farms that require a Nutrient Management Plan or Strategy, the Ministry of Environment and Climate Change shall prioritize and conduct regular inspections of these farms where the use of land as an outdoor confinement area or a farm-animal yard is, or would be, a significant drinking water threat. in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing); or • WHPA-B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 	See Maps 1.1 - 1.21	Existing & Future: 3 years/ 5 years (GEN-5)	LIV-2 See Explanatory Notes	MON-4

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
LIV-5 SPC to discuss with NEW GEN-8	The use of Land as Livestock Grazing or Pasturing Land (O. Reg. 385/08, s.3) The use of Land as an Outdoor Confinement Area or a Farm-Animal Yard (O. Reg. 385/08, s.3)	Municipality	E	<p>Specify Action</p> <p>For farms and other lands that do not require a Nutrient Management Plan or Strategy, the municipality shall ensure through their authority that the Risk Management Inspector responsible for enforcement will prioritize and conduct regular inspections of these farms where the use of land for livestock grazing or pasturing and/or an outdoor confinement area or a farm-animal yard is, or would be, a significant drinking water threat. for:</p> <p>a) the use of land as livestock grazing or pasturing land in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-A in an Issue Contributing Area for Nitrates or Pathogens with an animal density <1 Nutrient Unit per acre (existing, future); or • WHPA-B (VS=10) (existing, future); or • WHPA-E (VS ≥ 8) (existing, future); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). <p>b) the use of land as an outdoor confinement area or a farm-animal yard in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing); or • WHPA-B (VS=10) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-E (VS ≥ 8) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-B (VS=10) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • WHPA-E (VS ≥ 4.2) in an Issue Contributing Area for Nitrates or Pathogens (existing); or • the remainder of an Issue Contributing Area for Nitrates or Pathogens (existing, future). 	See Maps 1.1 - 1.21	After RMP is approved per policy LIV-1 and LIV-3	LIV-1 LIV-3 See Explanatory Notes	MON-1

COMMENTS POLICY LIV-5		
	Comments	Response
Halton Region and lower tier municipalities	24. This inspection policy is redundant to the requirements by municipalities to conduct inspections as part of a Risk Management Plan (LIV-1 and LIV-3).	CTC staff have confirmed with MOECC staff that while the intent is there, there is no requirement to carry out regular inspections of Risk Management Plans in the <i>Clean Water Act, 2006</i> or the associated Ontario Regulation 287/07.
Wellington County municipalities	9. This policy is an example of prioritization policies for RMP inspections. There are a number of similar policies (ie ASM-6) for other threats in the Amended Proposed Plan and this comment is applicable to all of the similar policies regarding prioritization of RMP inspections. The prioritization of inspection policies such as Liv-5 and ASM-6 have the legal effect of must comply (List E). This reduces the operational flexibility of the RMOs/municipalities in organizing and conducting their inspection workload. By placing a priority on these types of inspections within the CTC area, it reduces the RMO/municipalities' ability to balance the, potentially, conflicting workloads and timelines of inspections where the RMO/municipality is implementing multiple source protection plans. This type of prioritization is better left as an operational matter for the RMO/municipalities that considers the workload from all Source Protection Plans within their jurisdiction. If the legal effect of these policies could be changed to have regard for, this would assist those RMOs / municipalities attempting to balance multiple Source Protection Plans' implementation.	CTC staff have confirmed with MOECC staff that while the intent is there, there is no requirement to carry out regular inspections of Risk Management Plans in the <i>Clean Water Act, 2006</i> or the associated Ontario Regulation 287/07.

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
FER-1 No change	Application of Commercial Fertilizer to Land	OMAFRA	C	<p>Prescribed Instrument</p> <p>1) The application of commercial fertilizer (containing nitrogen) to land shall be prohibited where the activity is, or would be, a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing, future); or • WHPA-E (VS ≥ 4.5) in an Issue Contributing Area for Nitrates (future). 	See Maps 1.1 - 1.21	<p>Future: Immediately (T-3)</p> <p>Existing: Upon expiry or within 5 years (T-2)</p>	N/A See Explanatory Notes	MON-4
				<p>2) Where the application of commercial fertilizer (containing nitrogen or phosphorus) to land is in an area where the activity is, or would be, a significant drinking water threat, the Nutrient Management Plan or Strategy that governs the activity shall be reviewed or established to ensure appropriate terms and conditions are included so that the activity ceases to be, or does not become, a significant drinking water threat in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-B (VS=10) (existing, future); or • WHPA-E (VS ≥ 9) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-E (VS ≥ 4.5) in an Issue Contributing Area for Nitrates (existing); or • the remainder of an Issue Contributing Area for Nitrates (existing, future). 		<p>Future: Immediately (T-3)</p> <p>Existing: 3 years (T-1)</p>	GEN-5 FER-4 See Explanatory Notes	MON-4
FER-2 No change	Application of Commercial Fertilizer to Land	RMO	G	<p>Part IV, s.57, s.58</p> <p>For lands that do not require a Nutrient Management Plan or Strategy, where the application of commercial fertilizer to land is, or would be, a significant drinking water threat (excluding incidental quantities for personal use), the following actions shall be taken:</p> <p>1) The application of commercial fertilizer with (containing nitrogen) is designated for the purpose of s.57 under the <i>Clean Water Act</i>, and is therefore prohibited where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing, future); or • WHPA-E (VS ≥ 4.5) in an Issue Contributing Area for Nitrates (future). 	See Maps 1.1 - 1.21	<p>Future: Immediately (T-5)</p> <p>Existing: 180 days (T-4)</p>	GEN-1 See Explanatory Notes	MON-2
				<p>2) The application of commercial fertilizer (containing nitrogen or phosphorus) to land is designated for the purpose of s.58 under the <i>Clean Water Act</i>, requiring risk management plans, where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA A (existing or future use of fertilizer without Nitrogen); or • WHPA-B (VS=10) (existing, or future use of any fertilizer); or • WHPA-E (VS ≥ 9) which is not in an Issue Contributing Area for Nitrates (existing, or future use of any fertilizer); or • WHPA-E (VS ≥ 4.5) in an Issue Contributing Area for Nitrates (existing use of any fertilizer); or • the remainder of an Issue Contributing Area for Nitrates (existing, or future use of any fertilizer). 		<p>Future: Immediately (T-7)</p> <p>Existing: 1 year/5 years (T-6)</p>	GEN-1 FER-5 See Explanatory Notes	MON-2

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COMMENTS POLICY FER-2									
		Comments				Response			
CVC	CVC staff recommends a definition for "incidental quantities for personal use" be included in the policies.				Will add definition to Glossary of Terms.				
Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy	
FER-3 No change	Handling and Storage of Commercial Fertilizer	RMO	G	<p>Part IV, s.57, s.58</p> <p>For farms and other lands, where the handling and storage of commercial fertilizer to land is, or would be, a significant drinking water threat (excluding incidental quantities for personal use), the following actions shall be taken:</p> <p>1) The handling and storage of commercial fertilizer is designated for the purpose of s.57 under the <i>Clean Water Act</i>, and is therefore prohibited where the threat would be significant in the following area:</p> <ul style="list-style-type: none"> • WHPA-A (future). 	See Maps 1.1 - 1.21	Future: Immediately (T-5)	GEN-1 See Explanatory Notes	MON-2	
			H	<p>2) The handling and storage of commercial fertilizer to land is designated for the purpose of s.58 under the <i>Clean Water Act</i>, requiring risk management plans, where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing); or • WHPA-B (VS=10) (existing, future); or • WHPA-E (VS=10) (existing, future); or • the remainder of an Issue Contributing Area for Nitrates (existing, future). <p>Without limiting other requirements, risk management plans shall include conditions to require storage of quantities over 2,500 kg to be within a covered structure.</p>		Future: Immediately (T-7) Existing: 1 year/5 years (T-6)	GEN-1 FER-5 See Explanatory Notes	MON-2	
FER-4 No change	Application of Commercial Fertilizer	MOECC	K	<p>Specify Action</p> <p>For farms that require a Nutrient Management Plan or Strategy, the Ministry of Environment and Climate Change shall prioritize and conduct regular inspections of these farms where the application of commercial fertilizer to land is, or would be, a significant drinking water threat. in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-B (VS=10) (existing, future); or • WHPA-E (VS ≥ 9) which is not in an Issue Contributing Area for Nitrates or Pathogens (existing, future); or • WHPA-E (VS ≥ 4.5) in an Issue Contributing Area for Nitrates (existing); or • the remainder of an Issue Contributing Area for Nitrates (existing, future). 	See Maps 1.1 - 1.21	Existing & Future: 3 years/ 5 years (GEN-5)	FER-1 See Explanatory Notes	MON-4	

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
FER-5 SPC to discuss with NEW GEN-8	Application of Commercial Fertilizer Handling and Storage of Commercial Fertilizer	Municipality	E	<p>Specify Action</p> <p>For farms and other lands (excluding incidental quantities for personal use) that do not require a Nutrient Management Plan or Strategy, the municipality shall ensure through their authority that the Risk Management Inspector responsible for enforcement will prioritize and conduct regular inspections of these lands where the application, handling and storage of commercial fertilizer is, or would be, a significant drinking water threat.,for:</p> <p>a) application of commercial fertilizer to land in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA A (existing or future use of fertilizer without Nitrogen); or • WHPA B (VS=10) (existing or future use of any fertilizer); or • WHPA E (VS ≥ 9) which is not in an Issue Contributing Area for Nitrates (existing or future use of any fertilizer); or • WHPA E (VS ≥ 4.5) in an Issue Contributing Area for Nitrates (existing use of any fertilizer); or • the remainder of an Issue Contributing Area for Nitrates (existing or future use of any fertilizer). <p>b) handling and storage of commercial fertilizer in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA A (existing); or • WHPA B (VS=10) (existing, future); or • WHPA E (VS=10) (existing, future); or • the remainder of an Issue Contributing Area for Nitrates (existing, future). 	See Maps 1.1 - 1.21	After RMP is approved per policy FER-2 and FER-3	FER-2 FER-3 See Explanatory Notes	MON-1

COMMENTS POLICY FER-5		
	Comments	Response
Halton Region and lower tier municipalities	25. This inspection policy is redundant to the requirements by municipalities to conduct inspections as part of a Risk Management Plan (FER-2 and FER-3).	CTC staff have confirmed with MOECC staff that while the intent is there, there is no requirement to carry out regular inspections of Risk Management Plans in the <i>Clean Water Act, 2006</i> or the associated Ontario Regulation 287/07.
Wellington County municipalities	9. This policy is an example of prioritization policies for RMP inspections. There are a number of similar policies (ie ASM-6) for other threats in the Amended Proposed Plan and this comment is applicable to all of the similar policies regarding prioritization of RMP inspections. The prioritization of inspection policies such as Liv-5 and ASM-6 have the legal effect of must comply (List E). This reduces the operational flexibility of the RMOs/municipalities in organizing and conducting their inspection workload. By placing a priority on these types of inspections within the CTC area, it reduces the RMO/municipalities' ability to balance the, potentially, conflicting workloads and timelines of inspections where the RMO/municipality is implementing multiple source protection plans. This type of prioritization is better left as an operational matter for the RMO/municipalities that considers the workload from all Source Protection Plans within their jurisdiction. If the legal effect of these policies could be changed to have regard for, this would assist those RMOs/municipalities attempting to balance multiple Source Protection Plans' implementation.	CTC staff have confirmed with MOECC staff that while the intent is there, there is no requirement to carry out regular inspections of Risk Management Plans in the <i>Clean Water Act, 2006</i> or the associated Ontario Regulation 287/07.

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
FER-6 Edited (no change to intent)	Application of Commercial Fertilizer to Land	Municipality	E	<p>Education and Outreach</p> <p>The municipality shall deliver education and outreach materials and programs where the application, handling and storage of commercial fertilizer is, or would be, a significant drinking water threat, targeted towards:</p> <p>a) an individual for personal use to promote timely fertilizer application and best management practices in urban settings; and</p> <p>b) non-agricultural lands to promote best management practices to safeguard water supplies from drinking water threats;</p> <p>in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing, future); or • WHPA-B (VS=10) (existing, future); or • WHPA-E (VS ≥ 9 for application; VS=10 for handling and storage) (existing, future); or • the remainder of an Issue Contributing Area for Nitrates (existing, future). <p>Where appropriate education and outreach materials prepared by the Ministry of Environment and Climate Change are available, the municipality shall deliver those materials.</p>	See Maps 1.1 - 1.21	Existing & Future: 2 years (T-10)	GEN-6 See Explanatory Notes	MON-1
	Handling and Storage of Commercial Fertilizer	MOECC	K					MON-4

COMMENTS POLICY FER-6		
	Comments	Response
Town of Orangeville	The Town is requesting that the CTC SPC provide further clarification on the requirement for the Municipality to "deliver" education and outreach materials and programs in areas where the application, handling and storage of commercial fertilizers is, or would be, a significant drinking water threat. Does the proposed FER-6 policy require the Municipality to also develop the education and outreach materials and programs? If so, the Town is requesting that staffing and funding limitations at smaller municipalities be considered before finalizing this policy.	Where information is already made available by another agency, the Town of Orangeville should use those materials. In this instance, the MOECC is encouraged to produce the materials. Where information is not available, the Town of Orangeville would be required to develop any education and outreach materials and MOECC is in the process of rolling out an Education and Outreach catalogue to help municipalities comply with education and outreach policies. Also, SPMIF funding has been provided to the Town of Orangeville by the Province that could be used towards policies such as this.

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
PES-1 No change	Application of Pesticide to Land	RMO	H	<p>Part IV, s.58</p> <p>The application of pesticide to land is designated for the purpose of s.58 under the <i>Clean Water Act</i>, requiring risk management plans, where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing, future); or • WHPA-B (VS=10) (existing, future); or • WHPA-E (VS ≥ 8.1) (existing, future). <p>Without limiting other requirements, risk management plans shall incorporate appropriate agri-environmental best management practices and standards to ensure the activity ceases to be, or does not become, a significant drinking water threat.</p>	See Maps 1.1 - 1.21	<p>Future: Immediately (T-7)</p> <p>Existing: 1 year/5 years (T-6)</p>	GEN-1	MON-2

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
PES-2 Option 1 No change	Handling and Storage of Pesticide	RMO	G	Part IV, s.57, s.58 Where the handling and storage of pesticide is, or would be, a significant drinking water threat, the following actions shall be taken: 1) The handling and storage of pesticide is designated for the purpose of s.57 under the <i>Clean Water Act</i> , and is therefore prohibited where the threat would be significant in any of the following areas: <ul style="list-style-type: none"> • WHPA-A (future); or • WHPA-B (VS=10) (future); or • WHPA-E (VS ≥ 9) (future). 	See Maps 1.1 - 1.21	Future: Immediately (T-5)	GEN-1 See Explanatory Notes	MON-2
			H	2) The handling and storage of pesticide is designated for the purpose of s.58 under the <i>Clean Water Act</i> , requiring risk management plans, where the threat is significant in any of the following areas: <ul style="list-style-type: none"> • WHPA-A (existing); or • WHPA-B (VS=10) (existing); or • WHPA-E (VS ≥ 9) (existing). Without limiting other requirements, risk management plans shall incorporate appropriate agri-environmental best management practices and standards to ensure the activity ceases to be a significant drinking water threat.		Existing: 1 year/5 years (T-6)	N/A See Explanatory Notes	MON-2
PES-2 Option 2	Handling and Storage of Pesticide	RMO	G	Part IV, s.57, s.58 Where the handling and storage of pesticide is, or would be, a significant drinking water threat, the following actions shall be taken: 1) The handling and storage of pesticide is designated for the purpose of s.57 under the <i>Clean Water Act</i> , and is therefore prohibited where the threat would be significant in any of the following areas: <ul style="list-style-type: none"> • WHPA-A (future); or • WHPA-B (VS=10) (future); or • WHPA-E (VS ≥ 9) (future). 	See Maps 1.1 - 1.21	Future: Immediately (T-5)	GEN-1	MON-2
			H	2) The handling and storage of pesticide is designated for the purpose of s.58 under the <i>Clean Water Act</i> , requiring risk management plans, where the threat is significant in any of the following areas: <ul style="list-style-type: none"> • WHPA-A (existing); or • WHPA-B (VS=10) (existing, future); or • WHPA-E (VS ≥ 9) (existing, future). Without limiting other requirements, risk management plans shall incorporate appropriate agri-environmental best management practices and standards to ensure the activity ceases to be a significant drinking water threat.		Future: Immediately (T-7) Existing: 1 year/5 years (T-6)	N/A	MON-2

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COMMENTS POLICY PES-2	
	Comments
Halton Region and lower tier municipalities	<p>26. Staff does not support the future prohibition of the handling and storage of pesticides in WHPA-B and WHPA-E. Rather, the RMO could effectively work with landowners in developing a Risk Management Plan based on existing regulations and best management practices such as the Environmental Farm Plan within WHPA-B and WHPA-E.</p> <p>Numerous extensive regulations are already in place to manage this threat such as: Pest Controls Products Act, Fisheries Act, Pesticide Act, Ontario Regulation 347, Ontario Regulation 63, and the Cosmetic Pesticides Ban Act.</p>

Response
SPC to review Option 2 to address consistency issue regarding the handling and storage of pesticide.

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
PES-3 No change	<p>Application of Pesticide to Land</p> <p>Handling and Storage of Pesticide</p>	MOECC	K	<p>Education and Outreach</p> <p>Where the application, handling and storage of pesticide is, or would be, a significant drinking water threat, the Ministry of Environment and Climate Change should develop education, training and outreach programs promoting integrated pest management and alternative pest control best management practices, particularly for farms, golf courses and sports fields where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing, future); or • WHPA-B (VS=10) (existing, future); or • WHPA-E (VS ≥ 8.1 for application; VS ≥ 9 for handling and storage) (existing, future). 	See Maps 1.1 - 1.21	Existing & Future: Consider within 2 years (T-15)	GEN-6 See Explanatory Notes	MON-4
PES-4 SPC to discuss with NEW GEN-7	<p>Application of Pesticide to Land</p> <p>Handling and Storage of Pesticide</p>	Municipality	E	<p>Incentive</p> <p>Where the application, handling and storage of pesticide is, or would be, a significant drinking water threat, the municipality shall consider providing incentive programs to encourage best management practices for agricultural/rural landowners to reduce the risks to groundwater where the threat is, or would be, significant in any of the following areas:</p> <ul style="list-style-type: none"> • WHPA-A (existing); or • WHPA-B (VS=10) (existing); or • WHPA-E (VS ≥ 8.1 for application; VS ≥ 9 for handling and storage) (existing). 	See Maps 1.1 - 1.21	Existing: Consider within 2 years (T-11)	N/A	MON-1

COMMENTS POLICY PES-4	
	Comments
Halton Region and lower tier munic.	27. MOE should be responsible for incentives and not the municipality.
CVC	CVC Staff encourages the SPC to include an incentive policy similar to PES-4 within the ASM, NASM, LIV, FER, SWG and FUEL.

Response
Policy GEN-2 and GEN-3 are aimed at MOE regarding funding and incentives.
SPC to discuss NEW GEN-7 policy to include all of the threat activities.

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