

**TO: Chair and Members of the Source Protection Committee
Meeting #1/25, February 19, 2025**

**FROM: Behnam Doulatyari, Senior Manager, Watershed Plans and
Source Water Protection**

RE: CTC Program Update

RECOMMENDED RESOLUTION

THAT the CTC Source Protection Committee receive the staff report CTC Program Update for information.

EXECUTIVE SUMMARY

This report includes updates on: CTC staffing; provincial guidance; recent program meetings with Program Managers, Risk Management and MECP staff; revisions to prescribed instrument policy language; CTC Implementation Working Group meetings; upcoming CTC Source Protection Plan amendments; FUEL-2 policy implementation; 2024 program survey results; and upcoming Committee meeting schedule.

CTC staff update

Tim Ellis has joined the CTC source protection team as the new Coordinator, Source Water Protection at Credit Valley Conservation (CVC). Tim will be responsible for supporting the administration and coordination of the CTC Drinking Water Source Protection program, which includes supporting the operation of the Source Protection Committee. Tim has recently completed a Master of Public Health in Occupational and Environmental Health from the University of Toronto, and holds a Bachelor of Engineering in Bioengineering from McGill University. His work experiences spans interdisciplinary project coordination, research, and program development in non-profit and public health organizations.

Provincial & program updates

Updated Source Protection Planning s.34 Guidance Bulletin

In October 2024, the Ministry of the Environment, Conservation and Parks' (MECP) Conservation and Source Protection Branch released an updated Source Protection Planning Bulletin: Overview of Requirements for Amendments to Assessment Reports and Source Protection Plans under Section 34 of the *Clean Water Act, 2006*. This update outlines the Section 34 amendment process and seeks to streamline requirements for submission of amendments to the Ministry. The CTC is

using the guidance for the current Town of Erin amendment as well as for upcoming Section 34 amendments.

Risk Management Officials/Inspectors Seminar

The Program Manager attended a Risk Management Officials/Inspectors (RMO/RMI) Seminar at the Grand River Conservation Authority on October 29, 2024. The discussion covered success stories in education and outreach, the sharing of plan implementation resources, the process of RMO and RMI appointments, regulation of drinking water threats, and included a panel on priorities and challenges for the Drinking Water Source Protection (DWSP) program.

Program Manager's meetings

Program Managers met with Ministry of the Environment, Conservation and Parks (MECP) staff on December 4, 2024 in the CVC boardroom where discussion included: prescribed instrument policy use, implementation and revisions; updates to MECP guidance for completion of amendments to Section 34 of the *Clean Water Act, 2006*; and collaboration across Source Protection Regions.

SPC Chair's meetings

The next Source Protection Committee Chairs meeting is expected to occur in late March or April 2025.

Prescribed instrument policies

In 2024, several Source Protection Committees in eastern Ontario have proposed new minimum requirements in their prescribed instrument policies for significant drinking water threat activities. Other Source Protection Regions/Areas are also proposing to include similar requirements in their Source Protection Plans. These requirements involve the inclusion of vulnerable area information and protocols for emergency and spills response in the affected provincial instruments. The MECP has denied these proposed revisions and requested affected policies be revised to allow provincial ministries to consider including the requested information in them, rather than require them to do so (see Agenda Item 8.1).

The CTC Source Protection Committee has endorsed similar requirements in policies updated for conformity with 2021 Technical Rules, for example FUEL-2. Proposed [updates](#) to these policies were [endorsed](#) by the CTC Source Protection Committee on February 21, 2024 (Meeting #1/24). This approach is actively being considered for other prescribed instrument policies being updated. Discussions between the MECP and the affected Source Protection Regions/Areas are ongoing and closely followed by CVSPA staff.

Implementation Working Group updates

The CTC Implementation Working Group (IWG) met virtually on November 13, 2024. The discussion covered: an update on the Town of Erin s.34 amendment and policy gaps to be addressed through the s.36 update; a web-based information management system to support municipal implementation; requirements for sewage policy updates to conform with the 2021 Technical Rules; and municipal water quality sampling.

The CTC IWG met again on February 6, 2025. The discussion included: an update on the municipal enumeration of significant drinking water threats for the s.36 update; revisions to draft sewage policies; proposed prescribed instrument minimum requirements language; and updates to the proposed transport pathways policies, along with a related upcoming workshop. The next IWG meeting is scheduled for March 5, 2025.

Update on Source Protection Plan amendments and consultations

Town of Erin Section 34 amendment

Public consultation on the proposed Town of Erin s.34 amendments ran from December 4, 2024, to January 22, 2025. A total of 88 public submission comments were received. All comments relate to one or more environmental groups focused on the purchase of the “Blue Triton” well by the Town of Erin, as well as concerning enumeration of significant drinking water threat activities for Well E9.

Previously, the Town undertook technical work required under the Clean Water Act to identify wellhead protection areas and enumerate significant drinking water threats in the spring of 2024. The preferred solution to provide additional supply capacity and redundancy for the Town’s municipal drinking water systems, selected through an [Environmental Assessment](#) (completed in 2020), included Well E9 and interconnecting the existing Hillsburgh (where the Blue Triton well is located) and Erin drinking water systems (subject of our amendment), which has not yet taken place. The CTC Source Protection Committee [directed staff](#) to take necessary actions to acquire municipal endorsements of the proposed amendments, conduct relevant consultation and prepare the final submission to the Ministry. Town and County council endorsed the proposed amendment on [Oct 24th](#) and [Oct 31st](#) of 2024, respectively.

The above-referenced reports included information related to potential significant drinking water threat activities present in the wellhead protection areas for E9. This includes up to 10 properties that may have existing *significant drinking water threat* activities that would be regulated under the Clean Water Act. The term *significant drinking water threat* was taken out of context in several of the comments received during the public consultation. The commenters implied that the enumeration of these activities makes E9 “risky”, when in fact, the identification of relevant potential threats is the first step to ensure they are managed appropriately. Confirmation of these activities will take place in the coming months by Wellington Source Water Protection.

Most submissions followed a standardized template (with occasional variation) advocating for the acquisition of the Blue Triton well in Hillsburgh and referencing concerns about the potential safety risks associated with well E9. None of the submissions appear to be from (or associated with) the landowners from parcels within the wellhead protections areas that were contacted directly by mail as part of the consultation.

All comments have been shared with municipal staff at the Town of Erin and with Wellington Source Water Protection. No revisions to the Credit Valley Assessment Report or CTC Source

Protection Plan are required based on the submission comments. Staff are preparing the amendment submission package, which will include all public consultation comments received. The Credit Valley Source Protection Authority (CVSPA) is responsible for submission to the MECP.

FUEL-2 implementation update

At meeting [#1/24](#) of the CTC Source Protection Committee, committee members requested additional information about implementation of CTC Source Protection Plan prescribed instrument policies directed to provincial agencies. Specific requests were raised about implementation status of FUEL-2 within ARA License #6512.

This site is located within the WHPA-B of Caledon Village Wells 3 & 3B, where the vulnerability score increased from 6 (per original 2008 technical study) to 10 (per amendment approved in 2023 – See meeting [#2/24](#) [correspondence item 8.3](#)), leading to the storage and handling of liquid fuels being considered a significant drinking water threat and subject to CTC FUEL-2 policy. This is a Prescribed instrument policy directed to the Ministry of Natural Resources (MNR) to prohibit future handling and storage of liquid fuels at an aggregate extraction site, located in WHPA-A and -B (10). For existing significant drinking water threats, the policy requires that the prescribed instrument be reviewed to ensure appropriate terms and conditions are included so that the activity ceases to be a significant drinking water threat.

The current ARA licence #6512 did not consider the current CTC FUEL-2 policy as it had previously too low of a vulnerability score to have significant drinking water threats related to fuel. CVSPA staff, in collaboration with partners in Peel Region, have been in contact with MNR and are discussing potential updates to the ARA license and engagement with the operator to meet the requirements of the FUEL-2 policy, including considering the proposed updates to the policy.

For context, proposed [updates](#) to CTC Source Protection Plan FUEL policies were [endorsed](#) by the CTC source protection committee at meeting [#1/24](#), and will be included in the upcoming submission under s.36 of the Clean Water Act. The proposed policy for existing significant drinking water threats includes minimum requirements in the prescribed instrument for inclusion of vulnerable area information and protocols for emergency and spills response.

CTC 2024 program survey

In December 2024, CTC program staff opened an online survey on Drinking Water Source Protection (DWSP) program implementation in the CTC. This survey was provided to CTC Source Protection Committee members, and municipal staff across the CTC involved in source water protection. This is the second year for the survey, and is intended to be annual assessment. The results of the survey have been shared with the Committee.

Upcoming Meeting Schedule

In accordance with SPC direction provided at meeting [#3/22](#), upcoming SPC meetings are generally scheduled as “hybrid” meetings, hosted at the Credit Valley Conservation head office.

Upcoming meeting dates and locations:

- March 19, 2025 1-4 p.m. (hybrid: @ CVC head office & TEAMS)
- April 24, 2025 1-4 p.m. (hybrid: @ CVC head office & TEAMS)
- May 28, 2025 1-4 p.m. (hybrid: @ CVC head office & TEAMS)
- June 25, 2025 1-4 p.m. (hybrid: @ CVC head office & TEAMS)

Report prepared by:

Behnam Doulatyari, Senior Manager, Watershed Plans and Source Water Protection, Credit Valley Conservation

T: 905-670-1615, ext. 3790

Email: behnam.doulatyari@cvc.ca

Craig Jacques, Senior Specialist, Watershed Plans and Source Water Protection, Credit Valley Conservation

T: 905-670-1615, ext. 5510

Email: craig.jacques@cvc.ca

Date: February 12, 2025