

**TO: Chair and Members of the Source Protection Committee  
Meeting #2/25, March 19, 2025**

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

**RE: Planning Consideration Discussion Paper**

### **RECOMMENDED RESOLUTION**

**THAT** the CTC Source Protection Committee receive the staff report CTC Planning Consideration Discussion Paper for information.

### **EXECUTIVE SUMMARY**

The discussion paper attached to this report provides a holistic overview of the recent changes to the statutory, regulatory and policy framework within which the *Clean Water Act, 2006* and the CTC Source Protection Plan functions. It has been developed to inform discussion on an upcoming comprehensive update of the CTC Source Protection Plan (Plan) and identify potential policy concerns.

### **Background**

The most significant part of the Minister of the Environment, Conservation and Parks' Order on July 22, 2019, identifying the "mandatory updates" to the CTC Source Protection Plan and the three Assessment Reports under Section 36 of the *Clean Water Act, 2006*, is a comprehensive review and update of the CTC Source Protection Plan policies. Since the passage of the *Clean Water Act, 2006* (Act) nineteen years ago, many changes to the statutory, regulatory and policy framework within which the Act and the CTC Source Protection Plan functions, have taken place. The comprehensive update provides the opportunity for a holistic look at the shifting regulatory environment and the potential cumulative impact from a range of regulatory changes proposed by the Ministry of the Environment, Conservation and Parks since 2023, that if implemented, may impact the effectiveness of CTC Source Protection Plan policies.

The discussion paper (**Attachment 1**) reviews some of the major findings and recommendations of the Walkerton Judicial Inquiry, still very relevant on the 25<sup>th</sup> anniversary; examines the role of Prescribed Instruments in protecting drinking water sources in the CTC Source Protection Region; highlights a few recently enacted and proposed statutory and regulatory changes by the Province in relation to drinking water protection in the CTC Source Protection Region; as well as providing observations about potential policy concerns resulting from these changes.

The paper emphasizes the precautionary principal and the proactive intent of CTC Source Protection Plan policies, and the significant reliance of the Plan on Prescribed Instruments. As the extent of some proposed reforms has not been revealed, their potential impact is not clear. The updating of sewage and waste policies will proceed as scheduled through the Section 36 update, with potential changes through later amendments. Water quantity policies will be reviewed later this year, and, if feasible, any potential changes will be implemented through the s.36 update process. The validity of assumptions underlying Prescribed Instrument policies will be reviewed through each exercise.

**Report prepared by:**

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**Attachments (1):**

**Attachment 1:** The CTC Source Protection Plan in the 2020s: A Discussion Paper