



**Lake Erie Region Source Protection Committee
Agenda**

Thursday, October 30, 2025

1:00 pm

Auditorium

Grand River Conservation Authority

400 Clyde Road, Box 729

Cambridge, ON N1R 5W6

Pages

1. Call to Order
2. Roll Call and Certification of Quorum – 14 Members Constitute a Quorum (2/3 of Members plus Chair)
3. Chair's Remarks
4. Updates
 - a. Source Protection Authority Liaison, Catfish Creek Conservation Authority
 - b. Ministry of the Environment, Conservation and Parks
 - c. Conservation Ontario
5. Review of Agenda
6. Declarations of Pecuniary Interest
7. Minutes of the Previous Meeting
8. Hearing of Delegations
9. Presentations
10. Correspondence

a.	T. McCarthy, Minister of the Environment, Conservation and Parks to Chair Challinor (GRCA) and Chair Walsh (LERSPC) regarding approval of the Section 34 amendments to the Grand River Source Protection Plan for the City of Hamilton (June 12, 2025)	1
b.	T. McCarthy, Minister of the Environment, Conservation and Parks to Chair Challinor (GRCA) and Chair Walsh (LERSPC) regarding approval of the Section 34 amendment to the Grand River Source Protection Plan for the County of Brant (July 25, 2025)	2
c.	T. McCarthy, Minister of the Environment, Conservation and Parks to Chair Challinor (GRCA) and Chair Walsh (LERSPC) regarding approval of the Section 34 amendment to the Grand River Source Protection Plan for the City of Brantford (July 25, 2025)	3
d.	Conservation Ontario to the Ministry of Municipal Affairs and Housing Provincial Planning Branch formal comments on ERO Postings #025-0461, #025-0462 and #025-0463 regarding the Protect Ontario by Building Faster and Smarter Act, 2025 (June 11, 2025)	4
e.	Conservation Ontario to the Ministry of the Environment, Conservation and Parks formal comments on ERO Posting #025-0730, "Proposed changes to provide flexibility for water taking activities" (July 31, 2025)	11
f.	T. McCarthy, Minister of the Environment, Conservation and Parks to Chair Williamson (CSPC) response to letter on Office of the Auditor General of Ontario's special report on Safety of Non-Municipal Drinking Water and Recommendation 15 (June 23, 2025)	13
g.	Ministry of the Environment, Conservation and Parks to Chair Hunt (TCCSPR) and Program Manager Taylor (TCCSPR) response to letter regarding concerns about the number of water technician College science program courses (June 12, 2025)	14
h.	City of Guelph to the Ministry of the Environment, Conservation and Parks formal comments on PTTW Applications for Wellington Quarry #0821-BCSLAK and Glen Christy Quarry #1000142989 (July 22, 2025)	16

11. Reports

a.	SPC-25-10-01 Source Protection Program Update	54
	THAT report SPC- 25-10-01 Source Protection Program Update be received as information.	

- b. SPC-25-10-02 Section 36 Draft Updated Long Point Region Assessment Report and Source Protection Plan

THAT report SPC-25-10-02 Section 36 Draft Updated Long Point Region Assessment Report and Source Protection Plan be received as information.

AND THAT the Lake Erie Region Source Protection Committee release the draft updated Long Point Region Assessment Report and Source Protection Plan for pre-consultation and public consultation.

12. Business Arising from Previous Meetings

- a. Local aggregate threat request under Technical Rule 119: Discussion has been referred to the Lake Erie Region IWG for further consideration
- b. MECP response on implementation of the Auditor General's recommendations concerning non-municipal drinking water systems

13. Other Business

14. Closed Meeting

15. Next SPC Meeting

March 26, 2026 at 1:00 p.m.

16. Adjourn



357-2025-549

June 12, 2025

Mr. John Challinor II, Chair
Grand River Conservation Authority
400 Clyde Road, PO Box 729
Cambridge, ON N1R 5W6

Mr. Steve Walsh, Chair
Lake Erie Region Source Protection
Committee
400 Clyde Road, PO Box 729
Cambridge, ON N1R 5W6

Dear Mr. Challinor and Mr. Walsh:

It is a pleasure to inform you that the Ministry has completed the review of the amended Grand River Source Protection Plan, including the Assessment Report, related to proposed updates to vulnerability and threats assessments for Lynden Municipal Drinking Water System within the City of Hamilton and to add new non-binding source protection plan policies to address future liquid hydrocarbon pipeline threats.

I approve the amendments pursuant to section 34 of the *Clean Water Act, 2006*. These amendments will take effect on the day a notice of this decision is posted to Ontario's Environmental Registry.

I appreciate the dedication of the local municipalities, source protection authorities and committees, and all our partners and stakeholders for their work and contributions to these amendments to ensure Ontario's municipal drinking water sources continue to be protected.

Our strong protection framework will continue to help ensure Ontario's drinking water is held to high safety standards and that sources of drinking water in the province are protected from contamination and depletion for future generations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Todd McCarthy".

Todd McCarthy
Minister of the Environment, Conservation and Parks

c: Shari Dahmer, Source Protection Program Manager, Lake Erie Region Source
Protection Authority
Kirsten Service, Director, Conservation and Source Protection Branch, MECP



357-2025-1292

July 25, 2025

John Challinor II, Chair
Grand River Conservation Authority
400 Clyde Road, PO Box 729
Cambridge, ON N1R 5W6

Steve Walsh, Chair
Lake Erie Region Source Protection
Committee

Cambridge, ON N1R 5W6

Dear Mr. Challinor and Mr. Walsh:

It is a pleasure to inform you that the Ministry has completed the review of the amended Grand River Assessment Report and Grand River Source Protection Plan related to the chapters for the County of Brant.

I approve the amendments pursuant to section 34 of the *Clean Water Act, 2006*. These amendments will take effect on the day a notice of this decision is posted to Ontario's Environmental Registry.

I appreciate the dedication of the local municipalities, source protection authorities and committees, and all our partners and stakeholders for their work and contributions to these amendments to ensure Ontario's municipal drinking water sources continue to be protected.

Our strong protection framework will continue to help ensure Ontario's drinking water is held to high safety standards and that sources of drinking water in the province are protected from contamination and depletion for future generations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Todd McCarthy', with a long, sweeping underline.

Todd McCarthy
Minister of the Environment, Conservation and Parks

c: Shari Dahmer, Source Protection Program Manager, Lake Erie Source Protection
Region
Kirsten Service, Director, Conservation and Source Protection Branch



357-2025-1293

July 25, 2025

John Challinor II, Chair
Grand River Conservation Authority
400 Clyde Road, PO Box 729
Cambridge, ON N1R 5W6

Steve Walsh, Chair
Lake Erie Region Source Protection
Committee

Cambridge, ON N1R 5W6

Dear Mr. Challinor and Mr. Walsh:

It is a pleasure to inform you that the Ministry has completed the review of the amendments to the City of Brantford chapters of the Grand River Assessment Report and Grand River Source Protection Plan.

I approve the amendments pursuant to section 34 of the *Clean Water Act, 2006*. These amendments will take effect on the day a notice of this decision is posted to Ontario's Environmental Registry.

I appreciate the dedication of the local municipalities, source protection authorities and committees, and all our partners and stakeholders for their work and contributions to these amendments to ensure Ontario's municipal drinking water sources continue to be protected.

Our strong protection framework will continue to help ensure Ontario's drinking water is held to high safety standards and that sources of drinking water in the province are protected from contamination and depletion for future generations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Todd McCarthy", with a long horizontal flourish extending to the left.

Todd McCarthy
Minister of the Environment, Conservation and Parks

c: Kaitlyn Rosebrugh, Senior Source Protection Program Coordinator, Lake Erie Source Protection Region
Kirsten Service, Director, Conservation and Source Protection Branch



June 11, 2025

Ministry of Municipal Affairs and Housing Provincial Planning Branch
777 Bay Street, 13th Floor
Toronto, ON
M7A 2J3

Re: Conservation Ontario's comments on "Proposed Planning Act and City of Toronto Act, 2006 Changes (Schedules 3 and 7 of Bill 17 - Protect Ontario by Building Faster and Smarter Act, 2025)" (ERO#025-0461), "Proposed Regulations- Complete Application" (ERO#025-0462), and the "Proposed Regulation- As-of-right Variations from Setback Requirements" (ERO#025-0463).

Bill 17, *Protect Ontario by Building Faster and Smarter Act, 2025*, received Royal Assent on June 5, 2025, amending eight pieces of legislation, including the *Planning Act* and *City of Toronto Act, 2006*. The amendments alter or exempt certain planning requirements and approval processes related to minor variances and elementary schools, enable enhanced oversight for projects proceeding through a Minister's Zoning Order (MZO), and provide regulation-making authority to create rules regarding study requirements for complete applications.

Conservation Ontario is the voice of Ontario's 36 Conservation Authorities.

Conservation Ontario supports the government's commitment to timely and transparent planning and development approvals.

- We appreciate the provincial government's continued commitment to ensuring development does not occur on hazardous lands, as noted in ERO#025-0461.
- Strong natural hazard planning and regulatory frameworks are essential to protect housing, sensitive institutional uses such as schools, hospitals and care facilities, critical infrastructure, and the public from natural hazard impacts, including flooding and erosion.

Conservation Ontario is committed to the goals of:

- **Protecting people, property, and infrastructure from the impacts of natural hazards; and,**
- **Protecting sources of municipal drinking water.**

Conservation Ontario believes that achieving these goals requires informed planning supported by a comprehensive understanding of hazard areas and significant (drinking water) threat policies within municipal jurisdictions.

- Municipalities rely on Conservation Authorities¹ for mapping for hazardous lands and sites in municipal planning documents, including Official Plans and Zoning By-Laws.
- Working with Source Protection Authorities, municipal planning documents further incorporate significant drinking water threat policies that must be 'conformed with' and other policies that they 'have regard to' arising from their local Source Protection Plan.

Conservation Ontario provides the following comments on select aspects of these proposals. A summary is provided in Attachment 1. These comments are limited to changes implemented through Bill 17 and are not reflective of the full suite of proposed changes as outlined in the Province's Bill 17 Technical Briefing Deck.

1. Minor Variances (As-of-Right Variations from Setback Requirements)

- Bill 17 enables new regulation-making authority to allow variations to a municipal zoning by-law to be permitted "as of right" if a proposal is within a percentage of the required setback on specified lands (currently proposed to be 10%).
- These provisions would only apply to buildings or structures on urban residential lands outside of the Greenbelt Area and would further exclude any area that is within 120 m of certain hazardous lands (including shorelines) and lands within 300 m of most railways.

Conservation Ontario supports process improvements to facilitate safe housing and infrastructure development, while ensuring that development occurs outside of hazardous lands.

- Recent publications^{2,3,4} highlight limited municipal capacity to map and effectively manage flooding and other natural hazards, emphasizing the need for collaborative partnerships with Conservation Authorities to ensure hazardous areas are accurately reflected in municipal planning documents.

¹ Ontario Ministry of Municipal Affairs and Housing. (2024). *Provincial Planning Statement, 2024*. Policy 5.2. Government of Ontario.

² Office of the Auditor General of Ontario. (2022). *Value-for-Money Audit: Climate Change Adaptation: Reducing Urban Flood Risk*.

³ Office of the Auditor General of Ontario. (2024). *Follow-up on the 2022 Performance Audit: Climate Change Adaptation: Reducing Urban Flood Risk*.

⁴ McNeil, D. (2019). *Ontario's Special Advisor on Flooding Report to Government: An Independent Review of the 2019 Flood Events in Ontario*.

- To ensure “as-of-right” setback reductions do not have the effect of siting development in areas impacted by natural hazards, Conservation Authorities will continue to collaborate with municipal partners to ensure current hazard mapping is incorporated into municipal Official Plans and Zoning By-Laws.

2. Study Requirements and Certified Professionals

- Bill 17 enables new regulation-making authority to specify the type and topics of studies/reports that may be requested as part of a complete application under the *Planning Act* and limit complete application study/report requirements to what is currently outlined in Official Plans, unless otherwise approved by the Minister.
- Applications made under the *Planning Act* are often accompanied by municipally requested technical studies or reports to confirm site constraints, policy compliance, and assess impacts on infrastructure, municipal drinking water sources, and public health and safety.

Conservation Ontario recommends future regulations enable municipalities to require studies/reports used to confirm consistency with provincial policies related to natural hazards and applicable drinking water source protection policies as part of a complete application.

- Supporting studies and reports provide approval authorities with technical information to make informed decisions on development proposals.
- These studies ensure the proposed development does not negatively impact natural hazards, safeguard sources of municipal drinking water, and maintain a high standard of public safety.
- A list of potential study/report topics and types is provided in Attachment 2.

- Amendments further require municipalities to accept studies/reports prepared by “prescribed professionals” as “final” for the purpose of determining a complete application.
- It is anticipated that a range of professions / professional designations may be included in a future regulation, each with varying technical expertise to support the development of municipally-requested studies/reports.

Conservation Ontario recommends the regulation clarify the specific designations and expertise for “prescribed professionals”, specific to each report type, to ensure studies/reports are prepared by appropriate professionals.

3. Streamlined Planning Approval for Schools

- Bill 17 provides “as-of-right” permission to locate public elementary and high schools on urban lands zoned for residential uses. The Bill further exempts the placement of all portable classrooms at public schools from site plan control.

Conservation Ontario supports efforts to facilitate timely and safe development of institutional uses, such as schools and day-care facilities.

- As previously noted, we recommend municipal zoning resources be updated to ensure development is not situated in hazardous lands or sites, further to prohibitions in policy 5.2.6 (a) of the Provincial Planning Statement, 2024.
- Consideration should also be given to scoping “as-of-right” provisions to exclude areas subject to natural hazards and/or areas where safe access cannot be achieved.

Conservation Ontario recommends in lieu of the requirement for a Zoning By-Law Amendment, a streamlined review process to confirm that natural hazards do not pose a safety threat for the siting of schools and day-care facilities.

- Conservation Authorities are prepared to assist municipal partners with an expedited review to help facilitate timely and safe development.

4. Minister’s Zoning Orders

- Bill 17 provides the Minister with the ability to impose enforceable conditions on municipalities or proponents that must be met before a use permitted by a Minister’s Zoning Order comes into effect.

Conservation Ontario supports using this new authority to improve transparency and effective implementation of MZOs.

For example, conditions could be applied to request completion of satisfactory studies/reports, or inclusion of appropriate safeguards for drinking water sources or against the impacts of natural hazards (e.g., flooding and erosion).

Conservation Ontario requests that the Province, when considering a request for a Minister’s Zoning Order, consult with affected municipalities and Conservation Authorities on potential conditions.

Thank you for the opportunity to review and provide comments on “Proposed Planning Act and City of Toronto Act, 2006 Changes (Schedules 3 and 7 of Bill 17 - Protect Ontario by Building Faster and Smarter Act, 2025)” (ERO#025-0461), “Proposed Regulations– Complete

Application" (ERO#025-0462), and the "Proposed Regulation- As-of-right Variations from Setback Requirements" (ERO#025-0463). We would be pleased to further discuss these comments at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Bonnie Fox". The signature is fluid and cursive, with the first name "Bonnie" and the last name "Fox" clearly distinguishable.

Bonnie Fox
Policy and Planning Director

c.c. Conservation Authority CAOs/GMs

Attachment 1: Summary

1. Conservation Ontario supports the government's commitment to timely and transparent planning and development approvals.
2. Conservation Ontario is committed to the goals of:
 - a. Protecting people, property, and infrastructure from the impacts of natural hazards and
 - b. Protecting sources of municipal drinking water
3. Conservation Ontario believes that achieving these goals requires informed planning supported by a comprehensive understanding of hazard areas and significant (drinking water) threat policies within municipal jurisdictions.
4. Conservation Ontario supports process improvements to facilitate safe housing and infrastructure development, while ensuring that development occurs outside of hazardous lands.
5. Conservation Ontario recommends future regulations enable municipalities to require studies/reports used to confirm consistency with provincial policies related to natural hazards and applicable drinking water source protection policies as part of a complete application.
6. Conservation Ontario recommends future regulations clarify the specific designations and expertise for "prescribed professionals", specific to each report type, to ensure studies/reports are prepared by appropriate professionals.
7. Conservation Ontario supports efforts to facilitate timely and safe development of institutional uses, such as schools and day-care facilities.
 - a. Conservation Ontario recommends in lieu of the requirement for a Zoning By-Law Amendment, a streamlined review process to confirm that natural hazards do not pose a safety threat for the siting of schools and day-care facilities.
8. Conservation Ontario supports the use of new MZO authority to improve transparency and effective implementation of MZOs.
 - a. Conservation Ontario requests that the Province, when considering a request for a Minister's Zoning Order, consult with affected municipalities and Conservation Authorities on potential conditions.

Attachment 2: Potential Studies/Reports that Municipalities may request to support complete applications under the *Planning Act*

The following studies are examples of what may be required to support informed decisions on applications submitted under the *Planning Act*. These lists are not exhaustive. The specific proposal, geographic context, and applicable local policies will further scope necessary studies. Where study/report recommendations are put forward by Conservation Authorities through their mandatory plan review and input roles, CAs will work with municipal partners to scope study requirements to capture necessary details to support municipal decision-making.

1. Studies required by Source Protection Plan policies. Examples include, but are not limited to:

- a. Groundwater Impact Studies (in areas identified as significant Groundwater Recharge Areas).
- b. Hydrogeological analysis / risk assessment (where proposed development may pose risk to vulnerable aquifers).
- c. Water balance assessment.
- d. Intake / wellhead vulnerability mapping.
- e. Transport Pathway Vulnerability Assessment.

2. Studies required to assess consistency with provincial natural hazard policies (e.g., PPS, 2024) and conformity with natural hazard policies in provincial plans. Examples include, but are not limited to:

- a. Detailed site plan / site screening report.
- b. Studies/ reports to assess potential flooding hazards (*e.g., flood plain study reports, flood hazard assessments, hydraulic modelling, topographic report, grading plan, drainage catchment assessments, post-development drainage plans, etc.*)
- c. Studies / reports to assess potential erosion hazards (*e.g., geotechnical investigations / assessments, erosion hazards assessments [meander belts, slope stability, etc.], sediment and erosion control plans, etc.*)
- d. Studies / reports to assess potential shoreline/coastal hazards (*e.g., coastal hazard / engineering assessment, shoreline stability report, etc.*)
- e. Studies / reports to assess potential wetland hazards/impacts (*e.g., hydrological evaluations / water balance, wetland delineation study, scoped Environmental Impact Study, etc.*)
- f. Studies / reports to assess potential stormwater management needs (*e.g., stormwater management report, functional servicing report, etc.*)



July 31, 2025

Permissions Modernization Team
Client Services and Permissions Branch
Ministry of the Environment, Conservation and Parks
135 St. Clair Avenue West
Toronto, ON
M4V 1P5

Re: Conservation Ontario's comments on "Proposed changes to provide flexibility for water taking activities" (ERO#025-0730).

Water taking activities in Ontario are governed by the *Ontario Water Resources Act* and associated regulations. Proponents seeking to take over 50,000 litres of water per day from the environment are required to obtain a permit to take water (with limited exceptions). The Ministry of the Environment, Conservation and Parks is proposing regulatory amendments to Ontario Regulation 387/04 (Water Taking and Transfer) to introduce flexibility through a new, streamlined permit to take water (PTTW) application process to apply where a permit was in place that was cancelled, expired, or revoked.

Conservation Ontario is the voice of Ontario's 36 Conservation Authorities (CAs). We offer the following comments further to CA mandatory programs and services, including natural hazard management (e.g., drought and low water response) and drinking water source protection.

Conservation Ontario supports the government's commitment to protect and responsibly manage water resources, while exploring opportunities to provide flexibility while maintaining oversight.

- We support the proposal to apply appropriate conditions to the new, streamlined process, including that the proposed water taking is from the same location, source, for the same amount or less, and same purpose as the previously issued PTTW.
- We support the proposal to ensure applications submitted through the streamlined process are reviewed by Ministry staff to ensure compliance with applicable requirements.

Section 7 of Ontario Regulation 387/04 requires a Director who is considering an application for a PTTW to give notice to “any conservation authority within whose area of jurisdiction the proposed water taking is located”.

Conservation Ontario recommends that the process of notifying all affected municipalities and Conservation Authorities be retained in the proposed streamlined application process.

- To access the streamlined process, proponents may apply within one year of the cancellation, expiry or revocation of the original PTTW. Notification would provide clarity to impacted municipalities and CAs that the water taking activity is resuming in accordance with the original PTTW.
- Providing notice to local Conservation Authorities supports the delivery of CA mandatory programs and services as enumerated in O. Reg. 686/21, including natural hazard protection, drought and low water response, and drinking water source protection.
- Timely and consistent notification supports effective CA management of potential impacts associated with the water taking and a fulsome understanding of current water quantity stressors within their watershed jurisdiction. For example, CAs may use this information to inform modelling (hydrological, flood, drought) to support the delivery of mandatory programs and services.

Thank you for the opportunity to review and provide comments on “Proposed changes to provide flexibility for water taking activities” (ERO#025-0730). We would be pleased to further discuss these comments at your convenience.

Sincerely,

Nicholas Fischer

Nicholas Fischer
Policy and Planning Specialist

c.c. Conservation Authority CAOs/GMs

**Ministry of the Environment,
Conservation and Parks**

**Ministère de l'Environnement,
de la Protection de la nature et des
Parcs**



Office of the Minister

Bureau du ministre

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357-2025-847

June 23, 2025

Mr. John C. Williamson
Chair, Cataraqui Source Protection Committee
Email: willj@kos.net

Dear Mr. Williamson:

Thank you for your letter regarding the Office of the Auditor General of Ontario's special report on the Safety of Non-Municipal Drinking Water. I am grateful for your ongoing support as Chair of the Cataraqui Source Protection Committee.

The Ministry of the Environment, Conservation and Parks (MECP) remains dedicated to protecting local drinking water sources and ensuring that communities across Ontario can trust the quality and quantity of their drinking water. Ontario's drinking water is among the best protected in the world. Our comprehensive legislation and strong monitoring, reporting and enforcement help to ensure that drinking water is held to Ontario's high safety standards.

Thank you for highlighting Recommendation 15, which relates to potential measures to increase source water protection for non-municipal drinking water supplies. The MECP is taking actions to address the Auditor General's recommendations, many of which are already underway, as we continue our efforts to enhance the protection of the province's drinking water.

As part of the Auditor General's performance audit, a follow-up report on the status of the implementation of their recommendations will be published, typically within two years after issuing the initial audit report. This follow-up report provides an update on the MECP's progress in implementing the recommendations.

Thank you again for your dedication. We look forward to continuing our partnership to protect Ontario's drinking water.

Sincerely,

A handwritten signature in blue ink, appearing to read "Todd McCarthy".

Todd McCarthy
Minister of the Environment, Conservation and Parks

c: Kirsten Service, Director, Conservation and Source Protection Branch, MECP
Sue Edwards, Manager, Technical and Program Delivery, MECP

357-2025-620

June 12, 2025

Jim Hunt
Chair
Trent Conservation Coalition Source
Protection Region

Keith Taylor
Program Manager
Trent Conservation Coalition Source
Protection Region
Email: keith.taylor@ltc.on.ca

Dear Jim Hunt and Keith Taylor:

Thank you for your letter to Minister McCarthy regarding your concerns about the number of college science programs in Ontario, particularly those related to water technician courses. I am responding on behalf of the minister.

The Ministry of the Environment, Conservation and Parks (MECP) appreciates the Trent Conservation Coalition Source Protection Committee's dedication to safeguarding Ontario's drinking water sources and ensuring the effectiveness of our multi-barrier approach to water safety.

We recognize that well-trained and skilled drinking water operators are essential to maintaining the high standards of water quality that Ontarians expect. Ensuring the long-term sustainability of this workforce is vital to the continued protection of Ontario's drinking water.

Publicly assisted colleges in Ontario are separate legal entities. Each college's Board of Governors is responsible for its governance, management and administration, including decisions related to program development, closures and delivery locations.

Currently, five colleges offer active ministry-funded water technician programs, and 12 colleges offer active ministry-funded environmental technician programs. In 2024, two colleges informed the Ministry of Colleges, Universities, Research Excellence and Security of the cancellation of their environmental technician programs. For further information related to water technician programs, please contact the Ministry of Colleges, Universities, Research Excellence and Security.

In partnership with the Ministry of Education; the Ministry of Labour, Immigration, Training and Skills Development; the Ministry of Colleges, Universities, Research Excellence and Security and the MECP, a comprehensive strategy is being developed to support the attraction, recruitment and retention of water operators in Ontario. Representatives from post-secondary institutions are involved to ensure college courses align with workforce needs.

We look forward to continued dialogue with the Trent Conservation Coalition Source Protection Region to ensure the ongoing protection and safety of Ontario's drinking water.

...2

Jim Hunt and Keith Taylor
Page 2.

Thank you again for writing.

Sincerely,

Al-Noor Jamal

Al-Noor Jamal
A/Director, Environmental Policy Branch
Ministry of the Environment, Conservation and Parks

c: The Honourable Nolan Quinn, Minister of Colleges, Universities, Research Excellence
and Security
The Honourable Paul Calandra, Minister of Education
The Honourable David Piccini, Minister of Labour, Immigration, Training and Skills
Development

July 22, 2025

Sent by Email

Mr. Neil Taylor, M.Sc.,
Supervisor, Permit to Take Water Unit, Environmental Permissions Branch,
Ontario Ministry of the Environment, Conservation and Parks,
135 St Clair Ave W.,
Toronto, ON, M4V 1P5

Ms. Sarah Day M.Sc., Water Supervisor (Acting)
Technical Support Section, West Central Region
Ministry of the Environment, Conservation and Parks
119 King Street West, 12th Floor
Hamilton, ON L8P 4Y7

**RE: City of Guelph Comments on PTTW Applications: Ministry Reference
Numbers 0821-BCSLAK (Lafarge Canada Inc.), and 1000142989 (James
Dick Construction Ltd.)**

Dear Mr. Taylor and Ms. Day,

This letter follows two previous communications from the City of Guelph related to two active Permit to Take Water (PTTW) applications:

Communication # 1: December 23, 2024 (*Re: PTTW Application (Reference Number: 0821-BCSLAK) Lafarge Canada Inc., 7501 Wellington Rd 124, Guelph-Eramosa Township, Wellington County*); and,

Communication # 2: January 8, 2025 (*RE: Notification of Application for a Permit to Take Water – James Dick Construction Ltd- Glen Christie Quarry (ERO# 019-9325).*

These previous letters have been included as attachments for ease of reference. Lafarge Canada Inc. (Lafarge) has applied to amend their current Permit to Take Water (PTTW Number 2718-7S3RM7) and Certificate of Approval Industrial Sewage Works at their Wellington County Pit and Quarry (Wellington Quarry) located on the south side of Highway 124, in the Townships of Guelph-Eramosa and Puslinch, Ontario. Notice of the PTTW application was posted on the Environmental Registry of Ontario (ERO # 019-0240) in June 2019.

Near the Wellington Quarry, James Dick Construction Ltd has also applied for a new PTTW (Ministry Reference Number 1000142989) for the Glen Christie Quarry operation located on Part Lots 1, 2, and 3 Concession 4, in the Township of Puslinch, Wellington County, Ontario. Notice of the PTTW application was posted on the Environmental Registry of Ontario (ERO # 019-9325) on October 29, 2024.

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Canada
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guelph.ca

July 22, 2025

RE: City of Guelph Comments on PTTW Applications: Ministry Reference Numbers 0821-BCSLAK (Lafarge Canada Inc.), and 1000142989 (James Dick Construction Ltd.)

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As stated in previous communications, the City of Guelph has significant concerns about the potential individual and cumulative impacts of the proposed water takings on the City's current and future municipal water supply capacity. The City previously retained Montrose Environmental Solutions Ltd (Montrose) to model the impacts of the proposed dewatering of the Wellington Quarry on Guelph's water supply capacity, with the results highlighted in communication #1 (Matrix, 2024).

Regarding the Glen Christie Quarry, the City has communicated to the MECP the significant limitations of the MTE groundwater model (MTE, 2024), which make it unsuitable for assessing potential impacts on Guelph's municipal water supply (as noted in communication #2). While the previous communication provides significantly more details on the model limitations, in summary, the MTE model:

- Does not include the City's municipal supply wells and thus cannot evaluate the cumulative impacts on the City's water supply based on the proposed James Dick Construction water takings.
- Cannot predict impacts on the Gasport Formation (the main supply aquifer for the City's municipal wells), specifically as the hydraulic head regime in the formation is fixed by boundary conditions along the model's periphery, making drawdown assessment impossible.
- Only considers a 1-meter drawdown interval, whereas drawdown extends well beyond this interval, with significant impacts to water supply capacity.
- Utilizes bedrock geology and hydraulic property interpretations that are not well justified and inconsistent with those based on high-quality field datasets in the City's updated Groundwater Flow Model.

The City retained Montrose to conduct additional modelling and documentation work to assess the individual and cumulative impacts of these two potential water takings on the City's water supply capacity (Montrose, 2025a). This work was conducted using the 2025 City of Guelph Groundwater Flow Model, which just underwent a major update and calibration and does not have the limitations outlined above (Montrose, 2025b).

Four modelling scenarios were conducted to assess the water takings as proposed in the PTTW applications:

- 1) Dewatering and Excavation of the 10-Year Wellington Quarry Footprint
- 2) Dewatering and Excavation of Glen Christie Quarry – Lower Quarry Lake (MTE simulated scenario)
- 3) Dewatering and Excavation of Glen Christie Quarry - Lower Quarry Lake and Northeast Cell
- 4) Combined Dewatering and Excavation at Both Wellington Quarry and Glen Christie Quarry.

July 22, 2025

RE: City of Guelph Comments on PTTW Applications: Ministry Reference Numbers 0821-BCSLAK (Lafarge Canada Inc.), and 1000142989 (James Dick Construction Ltd.)

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The results of all scenarios demonstrate a measurable negative impact on the City of Guelph's water supply capacity as a result of the proposed water takings. This has direct implications for the City to meet drinking water needs for the provincially mandated population growth initiatives. These model results and estimated reduced flow capacity under the simulated scenarios are presented below.

Note, only wells with >0.01 m of additional predicted drawdown are included in the tables. The estimates below relating the reduced capacity to equivalent population and single-family households are based on a consumption of $0.16 \text{ m}^3/\text{person}/\text{day}$, and the average household size of 2.5 in Guelph (Statistics Canada, 2023).

Scenario 1 – Dewatering and Excavation of the 10-Year Wellington Quarry Footprint

This scenario was simulated previously using an older version of the Guelph Groundwater Flow Model and presented in Communication #1 noted above (model data from Matrix (2024)). This scenario simulates excavation and dewatering of the Wellington Quarry to the 10-year excavation footprint at an elevation of 285 m asl with a sump pump maintaining a groundwater elevation of 283 m asl. The predicted impacts of this water taking are presented in Table 1, with an overall predicted reduction of **$545 \text{ m}^3/\text{day}$** supply from the City's wellfield. Using current demands, this translates to the equivalent water resources of approximately **3,406 people**, or **1,362 single family households**. Note this simulation does not include drought conditions, which was demonstrated to exacerbate this to over $20,000 \text{ m}^3/\text{day}$, as described in Communication #1 and Matrix (2024).

Table 1: Simulated Additional Drawdown and Reduction in Municipal Well Capacity Associated with Dewatering and Excavation of 10-Year Wellington Quarry Footprint (Montrose, 2025a).

Calico	110	0.03	3
Dean	110	0.36	40
Downey	240	0.72	174
Emma	170	0.05	9
Helmar	45	0.05	2
Membro Replacement (Rocco)	300	0.38	115
Paisley	45	0.4	18
Park	250	0.06	14
Queensdale	25	0.49	12
Sacco	23	0.04	1
Smallfield	26	0.07	2
University	200	0.48	96
Water Street	207	0.29	59

(a) AECOM (2021)

Total: 545

Person Equivalent
(@ $0.16 \text{ m}^3/\text{day}/\text{person}$): 3,406

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Scenario 2: Dewatering and Excavation of Glen Christie Quarry – Lower Quarry Lake (MTE simulated scenario)

This scenario involved repeating the simulation by MTE in support of the PTTW by James Dick Construction Ltd. (MTE, 2024) using the updated 2025 City of Guelph Groundwater Flow Model, removing the four major limitations described above. This simulation did not include dewatering at Wellington Quarry. The results of the simulation predict that drawdown to 10 cm extends well beyond the MTE study area in both the Guelph and Gasport Formation aquifers. The impacts to the Guelph Production wells are presented in Table 2. The overall reduction in the City's flow capacity associated with dewatering at the Lower Quarry Lake was estimated as **55 m³/day**, or the equivalent of water capacity of **344 people**, or **138 single family households**. Again, this is under typical conditions and not drought conditions, where these negative impacts would be intensified.

Table 2: Scenario 2 - Simulated Additional Drawdown and Reduction in Municipal Well Capacity Associated with Dewatering and Excavation of Glen Christie Quarry - Lower Quarry Lake (Montrose, 2025a).

Dean	110	0.04	4
Downey	240	0.08	18
Membro Replacement (Rocco)	300	0.04	13
Paisley	45	0.05	2
Queensdale	25	0.06	1
University	200	0.05	10
Water Street	207	0.03	7

(a) AECOM (2021)

Total: 55
Person Equivalent
(@ 0.16 m³/day/person): 344

Scenario 3: Dewatering and Excavation of Glen Christie Quarry - Lower Quarry Lake and Northeast Cell

This simulated scenario included excavation and dewatering at the Glen Christie Quarry at both the Lower Quarry Lake and Northeast Cell to an elevation of 270 m asl with a sump pump maintaining a groundwater elevation of 270 m asl. This scenario does not include dewatering at Wellington Quarry. This scenario repeats the simulation by MTE in support of the PTTW by James Dick Construction Ltd. (MTE 2024) but evaluates potential impacts to the City's municipal water supply and the Gasport Formation. Analysis of these impacts were not possible using the MTE model. The overall reduction in the City's flow capacity associated with dewatering at the Lower Quarry Lake and Northeast Cell was estimated to be **129 m³/day**, or the equivalent of water capacity of **806 people**, or **322 single family households** (Table 3).

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Table 3: Scenario 3 - Simulated Additional Drawdown and Reduction in Municipal Well Capacity Associated with Dewatering and Excavation at Glen Christie Quarry (Montrose, 2025a).

Calico	110	0.02	2
Dean	110	0.09	10
Downey	240	0.18	43
Membro Replacement (Rocco)	300	0.09	28
Paisley	45	0.1	5
Queensdale	25	0.12	3
Smallfield	26	0.02	1
University	200	0.12	23
Water Street	207	0.07	14

(a) AECOM (2021)

Total: **129**
Person Equivalent
(@ 0.16 m³/day/person): **806**

Scenario 4: Cumulative Impact of Glen Christie Quarry and Wellington Quarry

This simulated scenario examined the cumulative effects of excavation and dewatering of the Lower Quarry Lake and Northeast Cell at the Glen Christie Quarry to an elevation of 270 m asl and excavation and dewatering of the Wellington Quarry to the full licensed excavation footprint at an elevation of 285 m asl. A sump pump in each quarry maintains a groundwater elevation of 270 m asl and 283 m asl, respectively. The overall reduction in the City's flow capacity associated with excavation and dewatering at the Glen Christie and Wellington Quarries was estimated at **1266 m³/day**, or the equivalent of water capacity of **7913 people**, or **3,165 single family households** (Table 4).

Table 4: Scenario 4 - Simulated Additional Drawdown and Reduction in Municipal Well Capacity Associated with Dewatering and Excavation at Wellington Quarry to Full Excavation Footprint and Glen Christie Quarry (Montrose, 2025a).

Well	Estimated Specific Capacity ^a (m ³ /d/m)	Additional Drawdown (m)	Estimated Reduced Flow Capacity (m ³ /d)
Arkell 14	350	0.02	8
Arkell 15	1,490	0.02	35
Arkell 6	860	0.02	19
Arkell 7	730	0.02	17
Arkell 8	260	0.02	5
Calico	110	0.08	9
Dean	110	0.8	88
Downey	240	1.47	353
Emma	170	0.12	21
Helmar	45	0.1	5
Membro Replacement (Rocco)	300	0.86	257

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Well	Estimated Specific Capacity ^a (m ³ /d/m)	Additional Drawdown (m)	Estimated Reduced Flow Capacity (m ³ /d)
Paisley	45	0.89	40
Park 1	250	0.13	32
Queensdale	25	0.98	25
Sacco	23	0.11	2
Smallfield	26	0.17	5
University	200	1.07	213
Water Street	207	0.64	132

(a) AECOM (2021)

Total: **1,266**
Person Equivalent
(@ 0.16 m³/day/person): **7,913**

These estimated impacts reflect only those on the City of Guelph's supply wells and do not include impacts on other municipalities such as the Region of Waterloo, numerous private well owners, or the surface water bodies and wetlands near the quarry properties. The updated simulations presented above demonstrated a significant impact on the City's water supply capacity of up to **1,266 m³/day**, equivalent to **7,913 people** or **3,165 single family households**. However, these simulations did not include drought conditions, which have been shown to exacerbate these impacts significantly (Communication #1; Matrix, 2024). The most recent simulations also did not include a water reinjection program, which was previously demonstrated to minimize the impact of the Wellington Quarry water taking on the City's supply wells (Communication #1; Matrix, 2024).

The City requests that the MECP not approve the Lafarge PTTW amendment for the Wellington Quarry or the James Dick Construction Ltd. PTTW application for the Glen Christie Quarry unless suitable mitigation measures, such as an injection program, are included as conditions of the PTTW. Groundwater flow modeling results from the recently updated 2025 Guelph Groundwater Flow Model demonstrate significant cumulative detrimental impacts on the City of Guelph's permitted municipal water supply due to the proposed groundwater taking. This threatens our current and future drinking water sources, as well as our potential for future housing growth, making it imperative to preserve existing capacity.

The City is willing to work with the MECP and proponents of these PTTWs to establish equitable solutions to mitigate the effects of the proposed quarry dewatering on the City's municipal water supply. Should there be a need for further clarification or information, please do not hesitate to reach out.

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Sincerely,



Emily Stahl, M.Eng., P.Geo.

Manager, Technical Services & Risk Management Official,

Environmental Services, **Water Services**

City of Guelph

E Emily.Stahl@guelph.ca

CC: Region of Waterloo- Karl Belan, Wellington Source Protection- Kyle Davis, Grand River Conservation Authority- Sonja Strynatka, enviropermissions, Intergovernmental (City of Guelph), City of Guelph- Wayne Galliher and Jonathan Munn

References:

AECOM Canada Ltd. (AECOM). 2021. City of Guelph Water Supply Master Plan, Task 3 - Water Supply Capacity Assessment (Draft). Prepared for City of Guelph. Guelph, Ontario. July 2021.

AECOM Canada Ltd. (AECOM). 2022. Final Water Supply Master Plan Update. Prepared for the City of Guelph. Guelph, Ontario. July 2022.

Matrix Solutions Inc., a Montrose Environmental Company (Matrix). 2024. Groundwater Modelling of the 10-Year Lafarge Wellington Quarry Footprint. Version 2.0. Prepared for City of Guelph and Lafarge Canada Inc. Guelph, Ontario. February 2024.

Montrose Environmental Solutions Canada Inc. 2025a. "Groundwater Modelling of the Glenchristie Quarry and Wellington Quarry." Version 0.1. Draft prepared for the City of Guelph. June 2025.

Montrose Environmental Solutions Canada Inc. 2025b. "City of Guelph Groundwater Flow Model Update." Version 1.0. Report prepared for the City of Guelph, June 2025.

MTE Consultants (MTE). 2024. Glenchristie Quarry – Hydrogeology Assessment Report. Prepared for James Dick Construction Ltd. Kitchener, Ontario. October 2024.

Permit to Take Water Unit, Environmental Permissions Branch

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<https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/index.cfm?Lang=E>



Sent by email.

December 23, 2024

Ms. Sarah Day M.Sc., Water Supervisor (Acting)
Technical Support Section, West Central Region
Ministry of the Environment, Conservation and Parks
119 King Street West, 12th Floor
Hamilton, ON L8P 4Y7

Attention: Ms. Day

Re: PTTW Application (Reference Number: 0821-BCSLAK) Lafarge Canada Inc., 7501 Wellington Rd 124, Guelph-Eramosa Township, Wellington County

Lafarge Canada Inc. (Lafarge) has applied to amend their current Permit to Take Water (PTTW Number 2718-7S3RM7) and Certificate of Approval Industrial Sewage Works at their Wellington County Pit and Quarry (Wellington Quarry) located on the south side of Highway 124, in the Townships of Guelph-Eramosa and Puslinch, Ontario. Notice of the PTTW application was posted on the Environmental Registry of Ontario (ERO # 019-0240) in June 2019.

The proposed permit amendment seeks approval for dewatering of the quarry to a minimum elevation of 285 m above sea level (asl; the approximate mapped top of the Vinemount Member of the Eramosa Formation that is generally considered a groundwater aquitard). Lafarge's proposed dewatering rates are still evolving but are on the order of 19,300 m³/day for short-term (assumed approximately 60 days) dewatering for storm events and approximately 4,100 m³/day for daily operations (WSP, Technical Memo, September 4, 2024). As the City is mandated to continue to achieve accelerated growth targets, for context, the daily operational taking equates to over 20,000 City of Guelph resident's daily water use (calculated at 167 Liters/ per person/ per day).

In 2019, Lafarge engaged with the City of Guelph (the City) to update and apply the *City of Guelph and Township of Guelph/Eramosa, Tier Three Water Budget and Local Area Risk Assessment* (Tier 3 Water Budget; Matrix 2017 - <https://www.sourcewater.ca/source-protection-areas/grand-river-source-protection-area/grand-river-water-budget-studies/guelph-and-guelph-eramosa-tier-3/>) groundwater model to evaluate the potential water supply and environmental impacts from the expansion of the Wellington Quarry. The numerical groundwater flow model (Tier 3 Model) was updated to better reflect existing conditions at the site based on new data, to simulate excavation and dewatering of the quarry, and to assess a potential reduction in capacity of the City's municipal wells and impacts to adjacent surface water features.

The City retained Matrix Solutions Inc., according to the City's contract with Lafarge, to complete and document the modeling work based on scopes of work provided by

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Lafarge and Golder Associates Inc. and work plans developed by Matrix. Matrix worked with the City, Lafarge, and Golder to complete the technical work in 2020 to 2024, which included sharing data between parties and consultations during data analysis, conceptual and numerical model refinement, and numerical model calibration. Once the model was re-calibrated to site conditions, the model was used to assess several dewatering, excavation depth and impact mitigation scenarios at the request of the Lafarge team. The project leveraged the experience and local knowledge of these parties gained through multiple years of data collection and analysis at the site and in the City of Guelph. The work produced the following modeling reports:

- Matrix Solutions Inc. 2021a. “Groundwater Modelling Report for Amendment of the Permit to Take Water for the Lafarge Canada Inc. Wellington County Quarry.” Version 0.2. Draft prepared for City of Guelph and Lafarge Canada Inc. Guelph, Ontario. February 2021.
- Matrix Solutions Inc. 2021b. “Private Water Well Impact Evaluation for Lafarge Canada Inc. Wellington County Quarry.” Version 1.0. Prepared for the City of Guelph and Lafarge Canada Inc. Guelph, Ontario. June 8, 2021.
- Matrix Solutions Inc. 2021c. “Groundwater Modelling Report for Amendment of the Permit to Take Water for the Lafarge Canada Inc. Wellington County Quarry.” Version 0.2. Draft prepared for City of Guelph and Lafarge Canada Inc. Guelph, Ontario. February 2021.
- Matrix Solutions Inc. 2021d. “Additional Excavation Scenario Modelling for Amendment of the Permit to Take Water for the Lafarge Canada Inc. Wellington County Quarry. Report prepared for the City of Guelph, Ontario. May 2021.
- Matrix Solutions Inc. 2024. “Groundwater Modelling of the 10-Year Lafarge Wellington Quarry Footprint.” Version 2.0. Report prepared for City of Guelph and Lafarge Canada Inc. Guelph, Ontario. February 2024.

The City of Guelph had committed to the Ministry of Environment, Conservation and Parks (MECP) in 2019 to provide comments on the Lafarge PTTW application once the modeling studies had been completed. Since the more recent Lafarge technical documents somewhat contradict the details of the original 2019 PTTW application and appear to change the intent of the application, the City continues to have uncertainties on the details of the Lafarge proposal. In order to ensure that the City fully understands the Lafarge application and to provide accurate comments to the MECP, the City had prepared a list of questions (October 8, 2024) for Lafarge to clarify its PTTW application. Lafarge has responded to the City’s questions (November 12, 2024) and has provided some additional details on its PTTW application. This response was shared with the MECP on November 26. However, the details of the application continue to evolve as Lafarge clarifies and provides more details. Some details on the actual water taking, assurances on the depth of excavation, the proposed Monitoring Program and proposed mitigation measures (i.e., Contingency Plan) are still outstanding. The City had subsequently sought further clarification from the MECP

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(email to Sarah Day/MECP November 26, 2024). The MECP, in an email to the City on December 12, 2024, indicated that the Lafarge PTTW application currently consists of the following:

1. June 24, 2019, PTTW Application, including Attachment 2 Location of Water Taking and Attachment 6 Technical Study Report
2. May 2021 report from Matrix Solutions Inc. titled “Groundwater Modelling Report for Amendment for the Permit to Take Water for the Lafarge Canada Inc., Wellington County Quarry” (this is considered an addendum to the PTTW application and supporting information to item #6)
3. June 8, 2021, letter from Matrix Solutions Inc. titled “Re: Private Water Well Impact Evaluation for Lafarge Canada Inc. Wellington County Quarry” (this is considered an addendum to the PTTW application and supporting information to Section 15.1 of item #1)
4. Aug 12, 2021, letter from Golder Associates Inc. titled “Interpretation of the Letter Entitled Private Water Well Impact Evaluation for Lafarge Canada Inc. by Matrix Solutions Inc. dated June 8, 2021” (this is considered an addendum to the PTTW application and supporting information to Section 15.1 of item #1)
5. Aug 12, 2021, technical memo from Golder Associates Inc. titled “MECP Groundwater Response for the Wellington Site” (this is a response from Lafarge’s consultant to additional information requested by TSS on Aug 30, 2019)
6. February 9, 2024, report from Matrix Solutions Inc. titled “Groundwater Modelling of the 10-Year Lafarge Wellington Quarry Footprint” (this is considered an addendum to the PTTW application and updates the Technical Study from item #1)
7. March 14, 2024, memo from WSP Canada Inc. titled “Interpretive Memo: Groundwater Modeling of the 10-Year Lafarge Wellington Quarry Footprint” (this is considered an addendum to the PTTW application and is a summary of item #6)
8. April 11, 2024, memo from WSP Canada Inc. titled “Re: Proposed Framework for Lafarge-City of Guelph Joint Monitoring Program for the Lafarge Wellington Quarry” (this is considered an addendum to the application)
9. Sept 4, 2024, technical memo from WSP Canada Inc. titled “Re: Dewatering Estimates for the proposed Below Water Extraction from Lafarge Wellington” (this is considered an addendum to the PTTW application and updates the requested rates of taking from item #1)
10. Sept 16, 2024 email from Lafarge summarizing the requested changes to the quarry sump water taking amounts based on the Sept 4, 2024 technical memo (this is considered an addendum to the PTTW application and along with the technical memo updates the requested rates of taking from item #1)
11. As the City is not interested in entering into a Joint Monitoring Program with Lafarge (item #8), the Ministry has requested that Lafarge provide a revised Monitoring Program and Contingency Plan to reflect this and replace item #8. The ministry has not yet received the revised Plan.

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The City has not received Items 4, 5 and 10 nor has it received the revised Monitoring Program and Contingency Plan (Item 11), similarly to the MECP. On this basis, the City considers the PTTW application to be incomplete and critical information on the application is still unavailable for review and comments by the City. Regardless, the MECP has requested the City's comments by December 24, 2024. Under objection of an unreasonable timeframe, the City has provided the following comments for MECP Director consideration. The modeling reports, noted above, should be reviewed in conjunction with these comments.

The City reserves the right to provide additional comments to the MECP if additional information is provided to the City in the future and prior to a decision being made on the application. In addition, these comments will be provided to Guelph City Council in early January and Council may wish to provide additional comments on the Lafarge PTTW application.

Summary of Comments:

1. Lafarge's proposed water taking will adversely impact the City's water supply capacity, with losses of up to 20,000 m³/day under future demand and drought conditions, if mitigation measures are not implemented.
2. Given the significant changes to the Lafarge proposed water taking, MECP Director should consider re-posting the PTTW application to the ERO to provide the public and agencies the opportunity to comment on the revised application.
3. The Lafarge water taking will adversely impact the local area water budget for which the City relies upon for its existing and future water supply. This will impact future water availability to support housing growth, and the growth targets of the City.
4. The MECP Director should consider the impacts of the proposed water taking on the local area water balance, sustainable aquifer yield and impacts to the municipal water supply system.
5. Lafarge has presented a minimalist approach with a 10-year footprint whereas the final impacts of the quarry are likely to be much greater.
6. Lafarge's proposed offsite groundwater monitoring program is insufficient to monitor effects on the City's water supply.
7. The City is supportive of an injection well(s) as a mitigation measure, but the City requires more details on the implementation.
8. The MECP Director should consider a 5-year renewal period to allow for confirmation of the effects of dewatering through a more comprehensive monitoring program and as a trigger for the implementation of the injection well program.
9. The MECP Director should consider the cumulative effects of the proposed Lafarge water taking, in view of a recent permit proposal for similar dewatering of the adjacent Glenchristie Quarry by James Dick Construction Ltd. (Environmental Registry of Ontario (ERO) on October 29, 2024, under Number 019-9325).

10. The MECP Director should consider the potential for adverse impacts on local domestic wells and Provincially Significant Wetlands as predicted by the modeling studies.
11. The proposed Lafarge water taking will change the draft WHPA-Q resulting in more work and additional costs for local Source Protection Programs.
12. The City requests a meeting with the Ministry's reviewers, affected municipalities including Wellington Source Protection, Region of Waterloo and the Grand River Conservation Authority in early 2025 prior to the issuance of the PTTW. The purpose of this meeting will be to discuss all the comments provided, and the Ministry's response. This request is consistent with the draft WHPA-Q Water Quantity Policies provided to the MECP.

It is the City's opinion that the MECP should not issue the Lafarge PTTW unless there are suitable mitigation measures, such as the injection well(s) program identified in the 10 Year Footprint Modeling Report, included as a condition of the permit. Clear and unambiguous measures to mitigate adverse impacts to the City's water supply capacity would establish the necessary baseline conditions to protect the City's currently permitted water takings; maintain local groundwater resources in the watershed to establish new servicing capacity to meet mandated Provincial growth targets; and meet new housing needs in our community.

Comment Details:

1. Lafarge's proposed water taking will adversely impact the City's water supply capacity with losses of up to 20,000 m³/day under future demand and drought conditions, if mitigation measures are not implemented.

Lafarge and the City have conducted groundwater flow modeling studies to assess the effects of the proposed water taking on the City's water supply. Various model scenarios were used to evaluate impacts including excavation areas of 51 and 24 hectares, excavation depths to 285 and 280 masl and existing and future water demand. A scenario was also used to assess impacts of the Lafarge water taking in a drought period. The results are presented in summary in Table 1. The modeling studies demonstrate that the Lafarge dewatering will adversely impact the City's water supply resulting in lost water supply capacity. The loss of water supply capacity can range from 91 to 437 m³/day which represents water supply for 569 to 2,731 people (i.e., daily per capita residential consumption of 167 L per person). The most significant impacts are during drought conditions where the loss of water supply could range from 1,763 to 20,175 m³/day or the equivalent of water supply for 10,557 to 120,808 people.

Table 1 – Summary of Modeling Results (Matrix, 2021a, 2021d, 2024)

Model Scenario		Lost Water Supply Capacity (m ³ /day)	Equivalent Residents
Excavation Area (ha)	Excavation Depth (masl)		
51	285	286	1,713
24	285	91 to 160	545 to 958
51	280	367 to 437	2,198 to 2,617
24	285	1,763 to 20,175 (Drought Scenario)	10,557 to 120,808
24	285	0 (Injection Scenario)	0

If effective mitigation measures are implemented such as an injection well, the adverse impacts to the City's water supply are shown to be reduced to zero. The modeling of an injection well, returning approximately 500 m³/day to the Gasport Formation, will mitigate impacts on the City's water supply (see below). The City requests that this mitigation measure (i.e., an injection well program) be added as a condition of the permit.

2. Given the significant changes to the Lafarge proposed water taking, MECP Director should consider re-posting the PTTW application to the ERO to provide the public and agencies the opportunity to comment on the revised application.

The Lafarge PTTW application has change significantly from the original 2019 PTTW application posted to the ERO. The size of the dewatering area (51 ha vs 24 ha), the duration of the water taking (10 years only), the rate of dewatering (one rate for 60 days and another rate for routine operation) and the potential for impacts to City wells, private wells and wetlands have increased, all of which are different from the 2019 application. Public and agency comments on the original 2019 PTTW application are no longer valid or consistent with the revised application of today. Given the significant changes to the Lafarge proposed water taking, MECP Director should consider re-posting the PTTW application to the ERO to provide the public and agencies the opportunity to comment on revised application. Re-posting of the application will also encourage increased transparency and enhanced ongoing engagement with the public as part of the Ministry's environmental decision making.

3. The Lafarge water taking will adversely impact the local area water budget for which the City relies upon for its existing and future water supply

The local area water budget was determined during the Tier 3 Water Budget and Local Area Risk Assessment (Matrix, 2017). The water budget risk assessment showed that there is a significant risk that the City will not be able to meet future allocated demands under drought conditions. Since the risk assessment is based on a comparison between the available water budget and the water budget

consumed by local water taking, the additions of the Lafarge water taking will further increase the water quantity risk. With a higher water quantity risk, it will be more difficult for the City to find new water supplies for its future growth.

The impacts on the water budget resulting from the Lafarge proposed water taking also will reduce local baseflows which will result in impacts to the Speed River, the Provincial Significant Wetland adjacent to Lafarge and other local surface waters. Reductions in baseflows will also make development of new municipal water supplies more difficult in the future since there will be less available water for new supplies which may restrict municipal growth.

4. The MECP Director should consider the impacts of the proposed water taking on the local area water balance, sustainable aquifer yield and impacts to the municipal water supply system.

Lafarge has presented a minimalist approach with a 10-year footprint whereas the final impacts. Given that the Tier 3 Water Budget project has identified a Significant Risk level for the water supplies of the City of Guelph and Guelph-Eramosa Township and details of the water budget and sustainable yield are available in the report, a proposed water taking in a WHPA-Q with a Significant Risk level warrants further consideration. The Director should consider the implications of this water taking in this particular case in the context of Ontario's Water Taking and Transfer Regulation O.Reg. 387/04, regardless of the current status of the WHPA-Q and the development of source protection water quantity policies. The Tier 3 Water Budget study has demonstrated that the local area has the potential for water supply shortages and the addition of the Lafarge quarry dewatering will further compound the issue and further decrease water quantity. Since the City has raised concerns regarding the significant water quantity risk in the local area, the MECP Director should consider issues relating to water availability, including the potential impact of the proposed water taking on the water balance and sustainable aquifer yield, and existing uses of water for municipal residential systems. The Director should request further information from the applicant on the proposed water taking (O.Reg. 387/04) to demonstrate that the Lafarge water taking will not adversely impact the sustainable use of the local aquifers for municipal water supply.

5. Lafarge has presented a minimalist approach with a 10-year footprint whereas the final impacts of the quarry are likely to be much greater.

In the 2019 PTTW application, the proposed "Initial Extraction Area" of 51.25 ha is reported to be to a depth of 285 masl and "remain above the Vinemount Member of the Eramosa Formation" however the extraction area in the Aggregate Resources Act (ARA) license is 119.35 ha and to a depth of 280 masl. Lafarge has since stated that the PTTW application is limited to 24 ha which is considered to be the area that may be excavated in the 10-year period of the PTTW. There have been no absolute assurances provided by Lafarge that the quarry excavation would remain above the

Vinemount Aquitard and the City is concerned that the quarry operations may expand into the Vinemount and to the full licensed area at some point in the future. Lafarge has already proposed to excavate to an elevation of 283 masl to provide a sump for the dewatering. If Lafarge excavates to the full extent of its aggregate license, then the impacts will be much greater than the results provided in the 10-year Footprint Modeling Report (see Table 1).

Lafarge has indicated that subsequent expansions and changes to the PTTW would include assessments of existing and future impacts caused by the expansion. However, this would rely on the ability of monitoring programs to identify existing and future impacts, particularly to municipal water supplies. Lafarge has not provided sufficient details of its proposed Monitoring Program and Contingency Plan (see below) for the City to have confidence that it could adequately detect and separate out impacts caused by quarry dewatering from other environmental factors.

6. Lafarge's proposed offsite groundwater monitoring program is insufficient to monitor effects on the City's water supply.

Lafarge has proposed an offsite groundwater monitoring program consisting of two locations and three monitoring intervals (i.e., Guelph, Goat Island and Gasport hydrostratigraphic units) at each location for a total of six monitoring intervals (WSP, April 11, 2024). Lafarge has asked the City to enter into a Joint Monitoring Program however, the City is reluctant to enter into such a program. Further details must be provided on the program and how it would be implemented before the City would consider participating in any Lafarge monitoring programs.

Regardless of the City's participation, the proposed monitoring program is insufficient to monitor effects of the quarry dewatering on the City's water supply wells; there are too few monitoring locations to be effective. To be effective, the monitoring program would need to have a series of monitoring wells in lines extending from the quarry to the Queensdale Wells, the Dolime Quarry and the Downey Well. Each line of wells should consist of at least three, equally spaced locations with three monitoring intervals at each location. As a minimum, this monitoring network would provide nine locations and 27 monitoring intervals. It is expected, subject to more details, a monitoring network, as described, may be suitable to map the potentiometric surfaces in the Gasport and Guelph Formations, establish the groundwater divide(s) between the quarry and the City wells and, with continuous monitoring, to detect changes over time resulting from quarry dewatering.

The City notes that the groundwater flow modeling has shown that there will be an impact on the City's water supply. This is to be expected. There will be a reduction in the local area water budget and the quarry dewatering from the bedrock will reduce the quantity of groundwater available for municipal water supply. However, the ability of a monitoring program to detect changes will be challenging. The quarry dewatering will occur over 10 years with a gradual lowering of the water

level in the quarry. During the 10-year period, there will be variability in the climate/weather with wet years, dry years and average years and uncertain effects of climate change. Similarly, the pumping regime in the area of the quarry and within the City with change with variable quarry production rates and variable City water supply demand. The City is in the middle of a Class Environmental Assessment project (i.e., the Southwest Guelph Water Supply Project) to obtain more water supply from the Southwest Quadrant of the City, including capturing water that currently flows to the Dolime Quarry. Adding another source of bedrock dewatering on the west side of the City will complicate the project and may reduce the available groundwater supply. All of these effects will complicate the interpretation of the monitoring program with respect to impacts on the City's water supply. The City is concerned that, without a comprehensive monitoring and reporting program with oversight by the MECP, a complicated hydrogeological regime will allow impacts on the City's currently permitted water supply and undermine the City's ability to meet growth targets directed by the Province.

7. The City is supportive of an injection well(s) as a mitigation measure but require more details on the implementation.

In the 10-year Footprint Modeling Report, Lafarge presented an injection well as a modeling scenario. The injection well was modelled as a 500 m³/day injection into the Gasport Formation which was found to mitigate the impacts and loss of water supply capacity on the City's water supply wells. The City is supportive of the use of an injection well(s) to mitigate impacts on the City's water supply wells. However, the City is concerned about how Lafarge is proposing to implement the injection well program. It is our understanding that Lafarge is now proposing the use of injection well(s) as a Contingency Plan to be implemented as part of a Condition of the PTTW and, as stated by Lafarge, "should it be determined that the Lafarge Quarry has had material impacts on the City of Guelph municipal wells." The City is concerned that this approach will put the onus on the City to demonstrate that the quarry dewatering has impacted the City's water supply. Given the complexities identified in the monitoring program above, the City does not want this situation to occur. An acceptable approach for the City is for the injection well(s) to be a requirement of the PTTW and to be implemented in the immediate future (i.e., within the first 5 years of the PTTW). In this way, the impacts to the City's water supply are mitigated and it reduces the reliance on the monitoring program for the determination of impacts. The City is not supportive of a Contingency Plan that is triggered at some point in the future based on Lafarge's interpretation of potential impacts on the City's wells or lack thereof. The City requests that this mitigation measure (i.e., an injection well program) be added as permanent condition of the permit.

8. The MECP Director should consider a 5-year renewal period to allow for confirmation of the effects of dewatering through a more comprehensive monitoring program and as a trigger for the implementation of the injection well program.

Given the uncertainties identified with a monitoring program and the lack of details provided by Lafarge, the MECP Director should consider reducing the renewal period down to 5 years. This shorter renewal period would allow for the evaluation of the monitoring program to determine if it is adequate to detect the effects of quarry dewatering and to allow for changes in the program, if necessary. The 5-year period could also provide for a comprehensive monitoring report as a condition of the renewal and upgrades could be required to the monitoring program unless Lafarge could demonstrate the effectiveness of the program.

The 5-year renewal period could also be used as a trigger to implement the injection well program. Following 5 years of excavation and dewatering, the effects of dewatering should be detectable in the monitoring program assuming the monitoring program is comprehensive and effective. Implementing the injection well program at 5 years would also prevent impacts on the City's water supply which the modeling had determined to be significant at the 10-year period.

9. The MECP Director should consider the cumulative effects (i.e., as per Principle #4 of the Permit to Take Water Manual) of the proposed Lafarge water taking in view of a recent permit proposal for similar dewatering of the adjacent Glenchristie Quarry by James Dick Construction Ltd.

The proposed Lafarge water taking, its technical studies and the recent groundwater flow modeling studies conducted for the local-scale impact assessment did not consider the potential cumulative effects of another water taking in the local area. James Dick Construction Ltd., in ERO Notice 019-9325, has applied for a water taking consisting of 13,752 m³/day for 120 days per year for the Lower Quarry Lake dewatering and 9,936 m³/day for the Quarry Sump for 365 days per year. This proposed water taking should be added to the 19,300 m³/day for short-term (assumed to be 60 days) dewatering for storm events and approximately 4,100 m³/day for daily operations from Lafarge to assess the cumulative effects of the combined water takings. Since the local area has been designated as having a significant water quantity risk, the Director should initiate an assessment of the impact of the combined water takings on the local water balance or sustainable yield of the bedrock aquifers to better understand the cumulative impact of these takings on surface water and groundwater resources, particularly municipal water supply. If these additional water takings are permitted, the local area water quantity risk is likely to move from only under drought conditions to future demand conditions or, worse case, existing water demand conditions. These cumulative effects from the combined water takings could have significant implications for Guelph regarding finding new water supplies and reaching municipal growth targets mandated by the province.

10. The MECP Director should consider the potential for adverse impacts on local domestic wells and Provincially Significant Wetlands as predicted by the modeling studies.

The 10-year Footprint Modeling Report predicts significant impacts to private wells. Seven wells are predicted to exceed the available drawdown in the wells. This level of impact was not reported in the original 2019 PTTW application and well owners have not been informed of this new information. If the predicted impacts occur, the well owners are likely to lose use of the wells which would constitute an adverse impact to the well owner. The MECP Director should consider the magnitude of this impacts and the potential success of Lafarge's proposed mitigation measures to ensure they are adequate to protect the well owners.

As predicted in the 10-year Footprint Modeling Report, local discharge to the Speed River is reduced by 31% due to the excavation dewatering, while regional discharge is reduced by 4%. If these impacts occur, it is expected that the PSW will be adversely impacted. Lafarge has proposed mitigation measures to address the impact by returning some water to the wetlands. However, the measures may not be successful. Water introduced to the wetlands is likely to infiltrate to the bedrock and, given the fractured nature of the bedrock and the deep dewatering occurring adjacent to the wetlands, most of the water infiltration is likely to flow back to the excavation and not benefit the wetlands. Adverse impacts on the wetland are likely to occur.

11. The proposed Lafarge water taking will change the WHPA-Q resulting in more work and additional costs for local Source Protection Programs

The Tier 3 Water Budget and Local Area Risk Assessment delineated a WHPA-Q designed to protect municipal water quantity as outlined by the Clean Water Act. The Tier 3 Water Budget and Local Area Risk Assessment was accepted, on behalf of the Province of Ontario, by MECP in April 2017, for use in the Lake Erie Source Protection Region in the Grand River Source Protection Programs. The current WHPA-Q includes the Lafarge Quarry. The WHPA-Q is based on the the combined area that is the cone of influence of the City's well system plus the whole of the cones of influence of all other wells that intersect that area (MECP Technical Rules: Assessment Report, Rule 53, 2021). The WHPA-Q, therefore, should include the dewatering for the excavation of the Lafarge Quarry and the resulting drawdown and effects on the cone of influence (i.e., the WHPA-Q will get larger resulting from the additional drawdown from the Lafarge Quarry). However, the quarry dewatering was not included in the delineation of the WHPA-Q in 2017. Therefore, the WHPA-Q will change because of this new water taking. As a direct result of the new PTTW, if it were to be issued, the local municipalities (Region of Waterloo, City of Guelph and Wellington County), the Lake Erie Source Protection Authority (i.e., GRCA) and the MECP will be required to update the Grand River Assessment Report, the WHPA-Q and the Tier 3 Water Budget report to be representative of existing conditions. Additional Significant Drinking Water Threats may be identified in the expanded WHPA-Q. This generates a significant amount of work and costs for the municipalities, GRCA and MECP that should be taken into consideration, including social, economic, and scientific considerations, in the review of the PTTW application and its implications with respect to the Clean Water Act.

Ms. Sarah Day
December 23, 2024

RE: **PTTW Application (Reference Number: 0821-BCSLAK) Lafarge Canada Inc., 7501 Wellington Rd 124, Guelph-Eramosa Township, Wellington County**

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12. The City requests a meeting with the Ministry's reviewers, affected municipalities including Wellington Source Protection, Region of Waterloo and the Grand River Conservation Authority in early 2025 prior to the issuance of the PTTW.

The purpose of this meeting will be to discuss all the comments provided, and the Ministry's response. This request is consistent with the draft WHPA-Q Water Quantity Policies provided to the MECP.

Closing:

It is the City's opinion that the MECP should not issue the Lafarge PTTW unless there are suitable mitigation measures, such as the injection well(s) program identified in the 10 Year Footprint Modeling Report, included as a condition of the permit. Clear and unambiguous measures to mitigate adverse impacts to the City's water supply capacity are necessary to establish baseline conditions to protect the City's currently permitted water takings and maintain local groundwater resources in the watershed to establish new servicing capacity to meet mandated Provincial growth targets and new housing needs in our community.

The City is willing to apply its resources and to work with the MECP and Lafarge to come to equitable solutions to mitigate the effects of the proposed quarry dewatering on the City's municipal drinking water supply. We will await further discussions with the MECP on how our comments are addressed.

Sincerely,



Emily Stahl, M.Eng., P.Geo., Manager Technical Services

IDE-Environmental Services, **Water Services**

City of Guelph

E Emily.stahl@guelph.ca

Cc: Wayne Galliher; Nectar Tampacopoulos; Jayne Holmes;
InterGovernmental.Relations@guelph.ca; enviopermissions@ontario.ca;

Sent by email

January 8, 2025

Mr. Neil Taylor, M.Sc.
Supervisor, Permit to Take Water Unit, Environmental Permissions
Branch,
Ontario Ministry of the Environment, Conservation and Parks,
135 St Clair Ave W.,
Toronto, ON, M4V 1P5

Attention: Mr. Taylor

**RE: Notification of Application for a Permit to Take Water –
James Dick Construction Ltd- Glen Christie Quarry (ERO#
019-9325)**

James Dick Construction Limited (JDC) has applied for a Permit to Take Water (PTTW) and an Environmental Compliance Approval (ECA) for the Glen Christie Quarry operation located on Part Lots 1, 2, and 3 Concession 4, in the Township of Puslinch, Wellington County, Ontario. The PTTW application was posted on the Environmental Registry of Ontario (ERO) on October 29, 2024, under Number 019-9325. Water will be taken for aggregate extraction dewatering purposes at the Glen Christie Quarry. The address of the site is 2145 Waterloo Regional Road 24 in Cambridge, Ontario. JDC currently operates the quarry under Class A License No. 5482, which is licensed under the Aggregate Resources Act (ARA) to remove aggregate below water table down to an elevation of 270 metres above sea level (masl) in accordance with the approved ARA Site Plans dated January 13, 1994. Details of the proposed water taking as listed in the ERO posting are as follows:

Source Name: Lower Quarry Lake

purpose: aggregate extraction - dewatering
maximum number of hours of taking per day: 24
maximum volume per day (litres): 13,752,000
maximum number of days of taking per year: 120
period of taking: January 1 to December 31 for 10 years

Source Name: Quarry Sump

purpose: aggregate extraction - dewatering
maximum number of hours of taking per day: 24
maximum volume per day (litres): 9,936,000
maximum number of days of taking per year: 365
period of taking: January 1 to December 31 for 10 years

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The proposed water taking qualifies as a Category 3 permit: water takings are anticipated to have the highest potential of causing unacceptable environmental impact or interference.

JDC had retained MTE Consultants Inc. (MTE) to complete a Hydrogeological Assessment for the purpose of obtaining the proposed PTTW and an ECA for the Glen Christie Quarry. As stated by MTE: *"The Hydrogeological Assessment Report, which continued to expand through the pre-consultation period characterizes the geology and hydrogeology of the Site, within the regional scale context of the Study Area, to develop a Hydrogeological Conceptual Site Model (HCSM). The HCSM helps us to understand the relationship between the local and regional groundwater flow system with respect to the shallow bedrock unit (Guelph Formation) and deep bedrock unit (Gasport Formation) to aid in the development of a numerical groundwater flow model using FEFLOW (Finite-Element Flow). The FEFLOW groundwater model was important for evaluating how dewatering operations will affect the groundwater system to ensure protection of sensitive receptors within a predicted one-metre drawdown bedrock zone-of-influence (bedrock ZOI). Furthermore, the groundwater model quantified how much groundwater taking to apply for in the PTTW application (9,217,900L/day) to maintain dry working conditions in the Lower Quarry Lake and the Northeast Cell."*

The City of Guelph (City) has prepared the following comments on the proposed JDC PTTW application. The City has relied on the Hydrogeological Assessment Report and associated appendices, prepared by MTE. The City has also relied upon information prepared as part of its Source Protection Program including the City of Guelph-Guelph Eramosa Township (GGET) Tier 3 Water Budget and Local Area Risk Assessment (Matrix, 2017 - <https://www.sourcewater.ca/source-protection-areas/grand-river-source-protection-area/grand-river-water-budget-studies/guelph-and-guelph-eramosa-tier-3/>).

The City will not provide comments on the Environmental Compliance Approval. The ECA is for stormwater management works which comprise of Stormwater Control, Quantity Control and Erosion Control works and include a quarry sump, a settling basin, and a rock crib and will discharge to the Speed River. The City considers the ECA to be outside of its jurisdiction and other agencies such as the Grand River Conservation Authority (GRCA) and Wellington County are better suited to providing comments on the ECA application.

The City has organized its comments in two categories:

1. Comments with respect to the methodologies used in the Hydrogeological Assessment Report; and
2. Comments with respect to potential impacts, particularly on the City's water supply system. The City has summarized the comments and provided further details below.

The City reserves the right to provide additional comments to the MECP if additional information is provided to the City in the future and prior to a decision being made on the application. In addition, these comments will be provided to Guelph City Council in early January and Council may wish to provide additional comments on the PTTW application.

Summary Comments on Methodologies

The City's primary comments on the methodologies used in the Hydrogeological Assessment Report are with respect to the Groundwater Flow Model Report provided in Appendix J.

1. The MTE groundwater flow model, developed to assess the impacts of the quarry dewatering, does not include the City's municipal wells in the model area.
2. The bedrock hydraulic conductivity values determined by field measurements on-site do not match the final calibrated model hydraulic conductivities.
3. The MTE groundwater flow model does not represent the site geology adequately and appears different from the geology found in the City's regional groundwater flow model.
4. The MTE groundwater model is calibrated to on-site water level data only and therefore the representativeness of off-site conditions is questionable.
5. The MTE groundwater flow model results do not match the regional groundwater flow conditions in the Gasport Formation as shown in Figure J.19.
6. The MTE model is not considered to be representative of existing hydrogeological conditions at the site or regional area and should not be used to predict future environmental conditions.
7. Water quality data should be carefully evaluated to determine if it is suitable for discharge to the Speed River as part of the dewatering program.

Summary Comments on Impacts

As noted, the MTE Hydrogeological Assessment Report did not assess the impacts of the quarry dewatering on the City's water supply wells, nor did it apply the MTE groundwater flow model in assessing the effects on the water budget and sustainability of the quarry dewatering. On this basis, the City provides the following comments:

1. The proposed Glen Christie water taking will adversely impact the local area water budget for which the City relies upon for its existing water supply and may limit future available water supply available to support Provincially mandated growth.
2. The MECP Director should consider the cumulative effects (i.e., as per Principle #4 of the Permit to Take Water Manual) of the proposed Glen Christie water taking considering the active PTTW application for similar dewatering of the adjacent Lafarge Canada Ltd. Wellington Quarry.
3. JDC's proposed groundwater monitoring program is insufficient to monitor effects off-site and on the City's water supply.
4. The MECP Director should consider the potential for adverse impacts on local private wells and Provincially Significant Wetlands as may be predicted by an updated groundwater modeling study.
5. The proposed Glen Christie water taking will change the GGET WHPA-Q resulting in more work and additional costs for local Source Protection Programs.
6. The MECP Director should consider the impacts of the proposed water taking on the water balance, sustainable aquifer yield and impacts to the municipal water supply system.
7. The City requests a meeting with the Ministry's reviewers, affected municipalities including Wellington Source Protection, Region of Waterloo and the Grand River Conservation Authority in early 2025 prior to the issuance of the PTTW to discuss comments provided by these agencies.

Details on Methodologies

- 1. The MTE groundwater flow model, developed to assess the impacts of the quarry dewatering, does not include the City's municipal wells in the model area.**

The Glen Christie Quarry, as determined by the Tier 3 Water Budget project (Matrix, 2017), lies within the Wellhead Protection Area for water quantity (WHPA-Q) for the Guelph and Guelph Eramosa Township (GGET) water supply systems. The WHPA-Q is defined as the cone of influence for the GGET water supply wells in the Gasport Formation and is demarcated by the 2 m drawdown contour (see Figure 5.2 in Matrix, 2017). The City's wells, as major water user in the area, would be considered a direct influence on hydraulic heads and groundwater flow in the Gasport Formation. Since the Glen Christie Quarry lies within the cone of influence of the City's water supply system, we would have expected the groundwater flow model to include the City's wells. However, the MTE model area stops short of the City to the northeast and does not include the City's wells. As a result, the City does not consider the groundwater flow model to be representative of groundwater flow conditions in the area and the model is unable to consider impacts associated with a major groundwater user in the area. This is a major deficiency in the model and renders any results determined by the model with respect to impacts on water use to be highly suspect.

Similarly to the GGET WHPA-Q, the Glen Christie Quarry lies just outside of the WHPA-Q for the Region of Waterloo Cambridge East water supply system. As is the case for the City wells, the MTE groundwater flow model does not include the Region of Waterloo Cambridge East wells. The cone of influence of the Cambridge WHPA-Q is likely to also influence hydraulic heads and groundwater flow at the Glen Christie Quarry. Not including the Cambridge water supply wells in the MTE groundwater flow model is also considered to be a major deficiency in the model and further renders any interpretations with respect to predicted impacts on water use to be questionable.

2. The bedrock hydraulic conductivity values determined by field measurements on-site do not match the final calibrated model hydraulic conductivities.

MTE report that "hydraulic conductivity (K) estimates for subsurface sediment and bedrock units were locally measured by MTE through single well hydraulic response tests (slug testing)." The resultant K values ranged from 1.3×10^{-3} m/sec to 2.0×10^{-2} m/sec. The range for the Guelph Formation was 1.9×10^{-3} to 1.3×10^{-2} while estimated geometric K mean value for the Guelph Formation series of monitoring wells is 4.7×10^{-3} m/sec. The Gasport Formation had a range of 4.9×10^{-3} to 2.0×10^{-2} m/s. In comparison, the final calibrated hydraulic conductivities used in the model were 1×10^{-7} to 2×10^{-5} m/s for the Guelph Formation and 1×10^{-5} m/s for the Gasport Formation (see

Table 3.2 in Appendix J). The model hydraulic conductivities are at least two to three orders of magnitude lower than the field measured hydraulic conductivities. MTE stated: "These results are higher than those previously recorded by other consultants as they may be representative of potential fracture flow features in the limestone bedrock aquifer unit (Guelph Formation)."

MTE should explain the differences and assess why the model does not match the field-measured hydraulic conductivities. If the higher field-measured hydraulic conductivities are representative of fracture features, then it would be expected that the model should reflect higher bulk hydraulic conductivities for the bedrock as well. If the higher field-measured hydraulic conductivities are representative of the bedrock formations, then the dewatering rates are likely to be considerably higher than predicted by the model and the zone of influence of the quarry may be much larger than predicted by the current model.

The issues with the hydraulic conductivity values can also be raised for the hydraulic conductivities used in model calibration. MTE has provided Figure J.13: *Modelled Hydraulic Conductivity Cross Section View* to illustrate the hydraulic conductivity distribution beneath the site. This cross section aligns with the model regional cross section provided in Figure J.7. It would appear that the southwest portion of the Guelph Formation and the entire Eramosa Formation were assigned a hydraulic conductivity value of 1×10^{-7} m/s while the northeast portion of the Guelph Formation was assigned a hydraulic conductivity of 4×10^{-6} m/s. These hydraulic conductivities are three to four orders of magnitude lower than the field-measured hydraulic conductivities. In addition, the deeper formations, presumably the Goat Island and Gasport Formations, have higher hydraulic conductivities of 2×10^{-5} to 2×10^{-4} m/s (note the discrepancies with formation values presented in Table 3.2: *Summary of Horizontal Hydraulic Conductivity (K) Values and MODEL Calibrated K Values*). The City is concerned that these hydraulic conductivities are not representative. MTE should explain how they were derived, why the Guelph Formation has two different values with an order of magnitude difference and what the effect of a relatively tight layer (i.e., 1×10^{-7} m/s), with scientific basis, has on the response to dewatering. The City is concerned that the distribution of hydraulic conductivity has biased the model to minimize potential environmental impacts and that the model cannot be relied upon to make predictions on environmental impacts.

3. The MTE groundwater flow model does not represent the site geology adequately and appears different from the geology found in the City's regional groundwater flow model.

The City had difficulties understanding the geology used in the MTE model. MTE stated: "The limited local data set could not capture the regional hydrostratigraphic layers beyond the limits of the Site so other information was required to extend the model layers beyond the Site." It would appear that MTE used regional data from the Cambridge East groundwater model (Golder, 2017) to extrapolate the hydrostratigraphic units across the model area, but it is not clear how this was done, nor does MTE provide details on the model layers and their extent. It appears that the primary bedrock units were the Guelph Formation (see Figure J.12a) and the Gasport Formation (see Figure J.12b) but no other information such as formation top elevations or thicknesses is provided for the hydrostratigraphic layers outside of the Study Area. Since no information was provided, the validity of the interpretation cannot be assessed.

Based on the limited information provided, the City has identified some potential issues with the geological interpretation in the model. The geological cross sections (Figures J.3 to J.7) show the site geology based on the logging of boreholes on-site. Boreholes typically identified only the Guelph and Gasport Formations beneath the site, but the geology used in the model appears to be in conflict with the site geology. The model geology in the cross sections (see Figure J.7 for example) show the Guelph Formation, Eramosa Formation, Goat Island Formation and the Gasport Formation and the borehole logs, with only the Guelph and Gasport Formations, do not match the model geology. The City would have expected the model geology to align with the borehole geology and, since it does not, the representativeness of the model geology is questionable.

The City has also compared the MTE model geology to the geology found in the City's regional groundwater flow model. The City's model has been updated to improve the geological interpretation, including the use of current information for the Lafarge Wellington Quarry located to the east of Glen Christie Quarry, therefore, superseding the 2017 Cambridge East model. We found some discrepancies but since not much hydrostratigraphic information was provided by MTE, it was a little difficult to interpret. From the City's interpretation of the geology, the Guelph Formation is present in the area but it may be thin or absent at the site and to the north. The Eramosa Formation (Reformatory Quarry Member) is present beneath the site and the

Eramosa Formation (Vinemount Member) pinches out to the east in the area of the Lafarge Quarry. The Goat Island Formation is also present beneath the site but is absent to the northeast. The Gasport Formation is the dominant formation in the area with thickness ranging from 20 to 60 meters. While it is difficult to understand how MTE has constructed its hydrostratigraphic layers, it appears that some or all of the Eramosa Formation was rolled into the Guelph Formation and the Goat Island Formation was interpreted as part of the Gasport Formation. Given these discrepancies, MTE should be asked to explain their geological interpretation in greater detail and provide more information (geological descriptions, formation top elevations and thicknesses) for all the hydrostratigraphic units used in the model. Until MTE provides more details, the geological interpretation is considered to be questionable and should not be relied upon as representative across the model area.

4. The MTE groundwater model is calibrated to on-site water level data only and therefore the representativeness of off-site conditions is questionable.

MTE presents Figure J.17 as a calibration plot of the simulated versus observed groundwater levels from site data. The plot consists of fourteen observation points with five in the Guelph Formation and only two in the Gasport Formation. With only seven bedrock calibration points, the reliability of the calibration is questionable and is very questionable for the Gasport Formation with only two data points. No off-site data was used in the calibration and therefore the representativeness of the off-site calibration cannot be assessed. With a model area of 4,600 ha and a site area of approximately 90 ha, the calibration data represents less than 2% of the model area. MTE could have used off-site data such as water well records or aggregate reports to supplement the calibration data but they chose not to. As a result, the calibration to on-site water levels is not considered representative of off-site conditions and should not be used to predict impacts of dewatering off-site.

5. The MTE groundwater flow model results do not match the regional groundwater flow conditions in the Gasport Formation as shown in Figure J.19.

MTE has provided Figure J.19 – Simulated Groundwater Flow – Gasport Formation that shows a comparison between simulated groundwater contours in the Gasport Formation in comparison to simulated groundwater contours in the Gasport Formation from the Cambridge East Tier 3 Model. A careful inspection of the two models

show conflicting groundwater flow directions. The Cambridge East Tier 3 model has groundwater flow converging on the Speed River in the area of the Glen Christie Quarry while the MTE model has groundwater flowing through the site towards Cambridge to the south. In places, the two models have groundwater flowing in opposite directions (i.e., groundwater flow to the west-northwest in the area to the east of the quarry in the Cambridge East model and groundwater flow to the southeast in the same area in the MTE model). The only area where the two models match is the northwest where the MTE model was assigned a constant head of 315 masl to match the same head from the Cambridge East model. MTE use Figure J.19 to state: "The simulated groundwater flow patterns reasonably represent the regional groundwater flow conditions represented by the... Gasport Formation contours (Figure J.19) as predicted by the Tier 3 numerical groundwater flow models." (see Section 4.2.1 *Steady State Calibration to Monitoring Well Water Levels*). The City disagrees; the MTE model does not match the regional groundwater flow conditions and therefore the MTE model is not appropriately calibrated. If a model is not appropriately calibrated, then the model should not be used to predict future groundwater flow conditions resulting from quarry dewatering.

6. The MTE model is not considered to be representative of existing conditions at the site or regional area and should not be used to predict future environmental conditions.

To be considered as a well calibrated model, a model must be representative of the key elements of the hydrogeological system within a regional context, the parameter values used in the model must be within physically realistic ranges, and the model must provide an acceptable match to observed data on both regional and local scales. The City has found that the MTE model meets none of these criteria. As a result, the model should not be relied upon to make predictions of future environmental impacts.

The City offered to the MECP to model the quarry dewatering using the City's regional groundwater flow model. However, the MECP chose not to allow the City the time to complete the modeling studies prior to submitting comments.

The City recommends that the MECP allow the City to work with the JDC and MTE to develop reliable groundwater flow model(s) for use in evaluating the site and, perhaps, to use the City's model as a better calibrated, more up to date, more reliable model. An updated model must include the City's and Region's water supply wells. With a more reliable model, it will be possible to assess the potential environmental effects of the proposed dewatering of the quarry. Once a well-

calibrated model has been developed, it can be applied to the dewatering scenarios to update the proposed dewatering rates, re-define the Zone of Influence of the dewatering and to re-evaluate the potential impacts on the City's water supply wells and other environmental impacts.

7. Water quality data should be carefully evaluated to determine if it is suitable for discharge to the Speed River as part of the dewatering program.

MTE has presented water quality data in Table 7: *Groundwater and Surface Water Quality*. MTE then goes on to state: "Baseline water chemistry for both groundwater and surface water samples were compared against the Provincial Water Quality Objectives (PWQO) and the Ontario Drinking Water Quality Standards (ODWQS). There were no groundwater exceedances with respect to either the PWQO or the ODWQS." The City's review of the water quality data indicated that there were exceedances of the PWQO for some of the water samples for Strontium, Zinc, and pH. The groundwater quality from the monitoring wells is likely representative of the water quality that may be pumped from the bedrock as part of the dewatering and, therefore the discharge of groundwater to the river may impact water quality in the Speed River.

Strontium concentrations greater than the PWQO of 0.01 mg/L were found in most monitoring wells and even some surface water samples. Zinc, at concentrations greater than the PWQO of 0.02 mg/L, was found in a couple of Gasport Formation monitoring wells. Zinc concentrations greater than the PWQO are commonly found in the Gasport Formation groundwater and can present some challenges for discharge into surface waters.

The high pH levels (i.e., greater than pH of 8.5) are likely due to the historic liming operations and the significant Lime Disposal Area shown in the ARA Site Plans and in Google Maps (see also 360° photographs of the Lime Disposal Area in Google Street View). Google Maps also show an area of stressed vegetation to the southwest of the disposal area. The Lime Disposal Area may present groundwater contamination issues that should be considered in the PTTW application with respect to discharge of water to the Speed River.

Details on Impacts

1. The proposed Glen Christie water taking will adversely impact the local area water budget for which the City

relies upon for its existing water supply and may limit future available water supply available to support Provincially mandated growth.

The local area water budget was determined during the Tier 3 Water Budget and Local Area Risk Assessment (Matrix, 2017). The water budget risk assessment showed that there is a significant risk that the City will not be able to meet future allocated demands under drought conditions. Since the risk assessment is based on a comparison between the available water budget and the water budget consumed by local water taking, the additions of the Glen Christie water taking will further increase the water quantity risk. With a higher water quantity risk, the City may lose water supply capacity, not be able to operate its wells at the current capacities and limit the City to find new water supplies to facilitate community growth directives of the Province. If the City loses water supply capacity, it will be necessary to replace the lost capacity at great costs to the City. All of this amounts to an adverse impact on the City's water supply system and potential future housing. An estimation of the impacts cannot be completed within the timeline provided by the MECP for comments on this application.

The impacts on the water budget resulting from the Glen Christie proposed water taking also will reduce local baseflows which will result in impacts to the Speed River, the Provincial Significant Wetland adjacent to Glen Christie and other local surface waters. Reductions in baseflows will also make development of new municipal water supplies more difficult in the future since there will be less available water for new supplies which may restrict municipal growth.

2. The MECP Director should consider the cumulative effects (i.e., as per Principle #4 of the Permit to Take Water Manual) of the proposed Glen Christie water taking in view of the ongoing PTTW proposal for similar dewatering of the adjacent Lafarge Canada Ltd. Wellington Quarry.

The proposed Glen Christie water taking, its technical studies and the MTE groundwater flow modeling studies conducted for the local-scale impact assessment did not consider the potential cumulative effects of another water taking in the local area. Lafarge Canada Inc. (Lafarge) has applied to amend their current Permit to Take Water (PTTW Number 2718-7S3RM7) at their Wellington County Pit and Quarry (Wellington Quarry) located on the south side of Highway 124, approximately 2.2 km to the east of the Glen Christie Quarry. Notice of

the Lafarge PTTW application was posted on the Environmental Registry of Ontario (ERO # 019-0240 - <https://ero.ontario.ca/notice/019-0240>) in June 2019 and the MECP review of the application is still active. The Lafarge proposed permit amendment seeks approval for dewatering of the Wellington Quarry to a minimum elevation of 285 masl (i.e., the approximate mapped top of the Vinemount Member of the Eramosa Formation). Lafarge's proposed dewatering rates are still evolving but are on the order of 19,300 m³/day for short-term (assumed approximately 60 days) dewatering for storm events and approximately 4,100 m³/day for daily operations (WSP, Technical Memo, September 4, 2024). Combined, the proposed permitted Lafarge and Glen Christie water takings are 33,052 m³/day for short-term taking (i.e., 60 days for Lafarge and 120 days for Glen Christie) and 14,036 m³/day for daily operations. For comparison, the City's average demand in 2023 was 46,837 m³/day.

Since the local area has been designated as having a significant water quantity risk, the Director should initiate an assessment of the impact of the combined water takings on the local water balance or sustainable yield of the bedrock aquifers to better understand the cumulative impact of these takings on surface water and groundwater resources, particularly municipal water supply. If these additional water takings are permitted, the local area water quantity risk is likely to move from only under drought conditions to future demand conditions or, worse case, existing water demand conditions. These cumulative effects from the combined water takings could have significant implications for Guelph and Region of Waterloo regarding maintaining existing water supply capacities, finding new water supplies, and reaching municipal growth targets mandated by the Province.

3. JDC's proposed groundwater monitoring program is insufficient to monitor effects off-site and on the City's water supply.

JDC has proposed a groundwater monitoring program that consists of 14 on-site monitoring wells. No off-site monitoring is proposed. The proposed monitoring program is insufficient to monitor effects of the quarry dewatering on the City's water supply wells; there are no monitoring locations between the quarry and the City's water supply wells to be effective. Monitoring would also need to consider the groundwater effects from a similar and simultaneous dewatering of the Lafarge Quarry to the east. To be effective, the monitoring program would need to monitor, in conjunction with Lafarge, a series of monitoring wells in the bedrock formations in lines extending from the

quarry to the Queensdale Well, the Dolime Quarry and the Downey Well. Monitoring information could be shared with Lafarge but could consist of shared monitoring locations between Glen Christie Quarry and Lafarge Quarry and between Lafarge Quarry and the City municipal wells (i.e., Queensdale Well and Downey Well). The Region of Waterloo may also wish to have monitoring wells positioned to monitor potential effects on its water supply wells too. It is expected, subject to more details, a monitoring network, as described, may be suitable to map the potentiometric surfaces in the Guelph and Gasport Formations and to establish the groundwater conditions between the Glen Christie Quarry, the Lafarge Quarry and the City wells. With continuous monitoring, the combined monitoring programs of JDC and Lafarge may be able to detect hydrogeological changes over time resulting from quarry dewatering.

The City notes that the groundwater flow modeling for Lafarge Quarry (Matrix, 2024) has shown that there will be an impact on the City's water supply from the Lafarge dewatering. This is to be expected, and the effects will be further compounded if the Glen Christie Quarry dewatering is added to the total water taking. There will be a reduction in the local area water budget and the combined quarry dewatering from the bedrock will reduce the quantity of groundwater available for municipal water supply. However, the ability of a monitoring program to detect changes will be challenging.

The quarry dewatering will occur over an extended time period (i.e., Glen Christie and Lafarge are both proposed for 10 years) with a gradual lowering of the water levels in the quarries as dewatering proceeds. During this time period, there will be variability in the climate/weather with wet years, dry years and average years and uncertain effects of climate change. Similarly, the pumping regime in the area of the quarries and within the City will change with variable quarry production rates and variable City water supply demand. The City is in the middle of a Class Environmental Assessment project (i.e., the Southwest Guelph Water Supply Class Environmental Assessment) to obtain more water supply from the Southwest Quadrant of the City, including capturing water that currently flows to the Dolime Quarry (i.e., another quarry on the west side of the City). Adding two additional sources of bedrock dewatering to the west of the City will complicate the Class EA project and may reduce the available groundwater supply.

All of these effects will complicate the interpretation of the monitoring program with respect to impacts on the City's water supply and future new housing potential. The City is concerned that, without a comprehensive monitoring and reporting program and oversight by the MECP, a complicated hydrogeological regime will allow JDC and Lafarge to obfuscate the impacts of their quarry dewatering and claim no impacts on the City's water supply or blame each other for the impacts.

4. The MECP Director should consider the potential for adverse impacts on local private wells and Provincially Significant Wetlands as may be predicted by an updated modeling study.

The MTE groundwater flow model is not considered to be reliable. Once a suitably calibrated flow model is developed for the site, it can be used to re-evaluate impacts on private wells and the Provincial Significant Wetland (PSW). However, given the similarities to the Lafarge dewatering and the impacts predicted from the Lafarge groundwater modeling, it is expected that there will be significant impacts to the private wells and PSW. If the predicted impacts occur, the well owners are likely to lose use of the wells which would constitute an adverse impact to the well owner. The MECP Director should consider the magnitude of this impacts and the potential success of JDC's proposed mitigation measures to ensure they are adequate to protect the well owners from loss of use of their wells.

It is expected that a revised groundwater flow model will confirm reductions in baseflow to local surface waters and wetlands. If these impacts occur, it is expected that the PSW will be adversely impacted. JDC has proposed mitigation measures to address the impacts by returning some water to the wetlands (i.e., flow augmentation to Tributary 4). However, the measures may not be successful. Water introduced to the wetlands is likely to infiltrate to the bedrock and, given the fractured nature of the bedrock surface and the deep dewatering occurring adjacent to the tributary and wetlands, most of the water infiltration is likely to flow back to the excavation and not benefit the tributary or wetlands. Adverse impacts on the tributary and PSW are likely to occur.

5. The proposed Glen Christie water taking will change the WHPA-Q resulting in more work and additional costs for local Source Protection Programs

The Tier 3 Water Budget and Local Area Risk Assessment delineated a WHPA-Q designed to protect municipal water quantity. The GGET Tier 3 Water Budget and Local Area Risk Assessment was accepted, on behalf of the Province of Ontario, by MECP in April 2017, for use in the Lake Erie Source Protection Region in the Grand River Source Protection Programs. The current GGET WHPA-Q includes the Glen Christie Quarry.

The WHPA-Q is based on the the combined area that is the cone of influence of the City's well system plus the whole of the cones of influence of all other wells that intersect that area (MECP Technical Rules: Assessment Report, Rule 53, 2021). There is also an overlap with a similar WHPA-Q from the Region of Waterloo's water supply wells in Cambridge which also includes part of the Glen Christie Quarry. The existing WHPA-Q's, therefore, should include the dewatering for the excavation of the Glen Christie Quarry and the resulting drawdown and effects on the cone of influence (i.e., the WHPA-Q's will get larger resulting from the additional drawdown from the Glen Christie Quarry). However, the quarry dewatering was not included in the delineation of the GGET WHPA-Q in 2017. Therefore, the WHPA-Q will change as a result of this new water taking. As a direct result of the new PTTW, if it were to be issued, the local municipalities (Region of Waterloo, City of Guelph and Wellington County), the Lake Erie Source Protection Authority (i.e., GRCA) and the MECP will be required to update the Grand River Assessment Report, the WHPA-Q and the Tier 3 Water Budget report to ensure the WHPA-Q is representative of existing conditions.

Additional Significant Drinking Water Threats (i.e., permitted water taking such as the proposed Glen Christie PTTW) may be identified in the expanded WHPA-Q and a notice of a new transport pathway will be required. This generates a significant amount of work and costs for the municipalities and GRCA that should be taken into consideration. The potential enlargement of the WHPA-Q may also impose constraints on other groundwater users and landowners which will have political implications.

The MECP Director should include these social, economic, and scientific considerations of new water takings in the review of the PTTW application similar to those considered by municipalities for any water

takings.

6. The MECP Director should consider the impacts of the proposed water taking on the water balance, sustainable aquifer yield and impacts to the municipal water supply system.

Given that the Tier 3 Water Budget project has identified a Significant Risk level for the water supplies of the City of Guelph and Guelph-Eramosa Township and details of the water budget and sustainable yield are available in the report, a proposed water taking in a WHPA-Q with a Significant Risk level warrants further consideration. The Director should consider the implications of this water taking in this case in the context of the Water Taking and Transfer Regulation O.Reg. 387/04, regardless of the current status of the WHPA-Q and the development of source protection water quantity policies.

The Tier 3 Water Budget study has demonstrated, scientifically, that the local area has the potential for water supply shortages and the addition of the Glen Christie Quarry dewatering will further compound the issue and further decrease water quantity. Since the City is hereby raising concerns regarding the significant water quantity risk in the local area, the MECP Director should consider issues relating to water availability, including the potential impact of the proposed water taking on the water balance and sustainable aquifer yield, and existing uses of water for municipal and residential systems.

The Director should request further information from the applicant on the proposed water taking (i.e., applying O.Reg. 387/04) to demonstrate that the Glen Christie water taking will not adversely impact the sustainable use of the local aquifers for municipal water supply. As noted above, MTE did not consider the effects on the municipal water wells in its Hydrogeological Assessment Report.

7. The City requests a meeting with the Ministry's reviewers, affected municipalities including Wellington Source Protection, Region of Waterloo and the Grand River Conservation Authority in early 2025 prior to the issuance of the PTTW.

The purpose of this meeting will be to discuss all the comments provided by all affected agencies, and the Ministry's response. This request is consistent with the draft WHPA-Q Water Quantity Policies provided to the MECP.

Closing

Within these comments, prepared for the MECP, the City has identified several significant issues that must be addressed before the MECP considers the JDC application for the PTTW for the Glen Christie Quarry. The primary issue is the representativeness of the MTE groundwater flow model. The City believes the model is not well calibrated and should not be used to make predictive analyses on the potential effects of the quarry. Since the model does not include the City and Region of Waterloo's water supply wells in the model area, the model cannot be used to predict impacts on municipal water supplies. The Glen Christie Quarry is found with the WHPA-Q of the GGET water supply systems, not including the municipal wells in the model is a fatal flaw in the applicability of the groundwater flow model. Until this primary issue and other issues identified herein by the City are addressed, the full impacts of the quarry dewatering cannot be assessed.

The City is willing to apply its resources and to work with the MECP and JDC to improve the understanding of the effects of the quarry on the City's water supply wells. Through these comments we formally request again an extension of the PTTW decision to at least March 31, 2025, to provide a detailed response which would include our use of the Guelph Groundwater Flow Model to examine some of the above noted concerns. This analysis would include the potential impact on the City's ability to meet accelerated housing targets provided by the Province of Ontario.

The City requests that the MECP not approve the JDC PTTW application for the Glen Christie Quarry until further information is provided and the City can model the potential influence of the water taking on the municipal wells. Updates to the groundwater flow modeling and an assessment of the cumulative effects of this quarry and the proposed Lafarge Quarry are required before the MECP decides on the JDC application. If MECP approves the PTTW application without completing the necessary model updates and cumulative effects assessment, the City would consider this as a cause for appeal of the permit to ensure appropriate protection of the City's drinking water systems.

We will await further discussions with the MECP on how the City's comments are addressed.

Mr. Neil Taylor, M.Sc.

January 8, 2025

RE: **Notification of Application for a Permit to Take Water – James Dick Construction Ltd- Glen Christie Quarry (ERO# 019-9325)**

Page 18 of 18

Sincerely,

A handwritten signature in black ink, appearing to read 'Emily Stahl', with a stylized loop at the end.

Emily Stahl, M.Eng. P.Geo., Manager, Technical Services
IDE- Environmental Services, **Water Services**
City of Guelph
E Emily.stahl@guelph.ca

Dave Belanger, P.Geo., Sr. Hydrogeologist
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Cc: Wayne Galliher; Nectar Tampacopoulos; Jayne Holmes;
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Lake Erie Region Source Protection Committee

Report number: SPC-25-10-01

Date: October 30, 2025

To: Lake Erie Region Source Protection Committee

Subject: Source Protection Program Update

Recommendation:

THAT report SPC- 25-10-01 Source Protection Program Update be received as information.

Report:

Source Protection Committee Membership

On August 22, 2025, the Grand River Source Protection Authority re-appointed Matthew Jauernig and Amy Domaratzki to the Lake Erie Region Source Protection Committee (the Committee) for another four-year term as municipal and public interest representatives, respectively.

Sara Curley-Smith was also appointed as a second representative for Six Nations of the Grand River. S. Curley-Smith replaces Rod Whitlow who was appointed in February 2025.

Provincial and Program Updates

Program Managers Meeting

Program Managers from each Source Protection Region met with Ministry of Environment, Conservation and Parks (MECP) staff on July 23, 2025. MECP provided updates on provincial accomplishments and initiatives, as well as guidance on certain program areas such as financial progress reporting and prescribed instrument policy implementation. Program Managers shared the [25 Years of Source Water Protection video](#) and presented on the continued value of Source Protection Committees.

The next Program Managers meeting is planned for in-person on November 20, 2025.

Proposed Changes to the *Clean Water Act, 2006* and Associated Regulations

On October 20, 2025, the Province released two *Environmental Bill of Rights* postings related to proposed changes to the *Clean Water Act, 2006* and associated regulations, now open for public consultation.

1. [ERO No. 025-1060](#) "Accelerating and improving protections for Ontario's drinking water sources" describes proposed legislative amendments to the *Clean Water Act*. Additional information is contained in Schedule 1 of [Bill 56](#). The comment period closes on November 19, 2025.

2. [ERO No. 025-1104](#) “Regulatory changes for accelerating and improving protections for Ontario’s drinking water sources” describes proposed amendments to regulations under the *Clean Water Act* and *Safe Drinking Water Act*. The comment period closes December 4, 2025.

The proposals are intended to facilitate more timely amendment of source protection plans and reduce duplication and standardize use of prescribed instrument policies. Conservation Ontario and the Grand River Conservation Authority are reviewing these proposals.

MECP Prescribed Instrument Policies

Trent Conservation Coalition, Quinte, and Cataraqui Source Protection Regions proposed changes to prescribed instrument policy wording through the Section 36 updates to their Source Protection Plans. The proposed policies required prescribed instruments managing significant drinking water threats to identify the vulnerable area and drinking water system and to include a set of minimum requirements for managing threats. This policy wording was proposed for both existing and future instruments.

MECP did not approve the original proposed policies and entered negotiations to determine policy wording that would satisfy all parties. The result is an agreed-upon approach for the review and amendment of existing and future Environmental Compliance Approvals (ECAs), as well as annual reporting, that will be implemented by MECP province-wide. This includes:

- providing in the annual report the identification approval numbers of ECAs managing significant drinking water threat activities and the details of the instrument conditions that manage the threat; and
- identifying the vulnerable area and name of the drinking water system in the instrument and including a condition for emergency response protocols, where feasible.

Lake Erie Region is proposing revised prescribed instrument and monitoring policies through the Section 36 update to the Long Point Region Source Protection Plan to reflect the above approach. These policies are provided for the Committee’s consideration through report SPC-25-10-02.

ERO No. 019-6928 Decision and new Ontario Regulation 137/25

O.Reg. 137/25 took effect on September 1, 2025 and streamlines the permission process for certain storm water management works by allowing proponents to self-register for approval through the Environmental Activity and Sector Registry (EASR).

Current prescribed instrument and monitoring policies in Lake Erie Region Source Protection Plans explicitly refer to Environmental Compliance Approvals, excluding EASR registrations that may also manage significant drinking water threats.

Revised policies have been proposed through the Section 36 update to the Long Point Region Source Protection Plan to address the new EASR regulation. These policies are provided for the Committee’s consideration through report SPC-25-10-02.

It is anticipated that MECP will review the proposed policies during consultation for Long Point Region. MECP feedback will help inform how and when similar policies will be incorporated into other Lake Erie Region Source Protection Plans.

Implementation Working Group

The Implementation Working Group met virtually on September 18, 2025. Discussion focused on the new EASR regulation and potential Source Protection Plan policy implications. Members were supportive of capturing significant threat EASR registrations under prescribed instrument policies and adding annual reporting requirements to approved monitoring policies.

Section 36 Update Timelines

Long Point Region

A second submission extension request was approved by MECP. The revised deadline to submit the updated Source Protection Plan is December 31, 2026.

A full Section 36 update package for the Long Point Region Assessment Report and Source Protection Plan is included in the Committee agenda package through report SPC-25-10-02. A combined pre-consultation and public consultation is planned for November 2025.

Grand River

Technical work and policy revisions are progressing well for municipalities in the Grand River Source Protection Area.

A request for a revised Minister's Order has proposed splitting the Section 36 update into two phases, allowing for high-priority technical work and policy updates to be completed first.

Phase 1 includes Assessment Report and Source Protection Plan updates for the City of Guelph, Region of Waterloo and the County of Wellington. The proposed target for final submission of Phase 1 is October 2027.

A revised Minister's Order has not yet been provided by MECP.

Section 34 Drinking Water System Amendments

Table 1 in **Appendix A** outlines the current status of Section 34 amendments to the Grand River Assessment Report and Source Protection Plan. A total of four amendments were completed and approved by MECP between April and July 2025.

Guelph-Guelph / Eramosa Township (G-GET) Water Quantity

The Section 34 amendment incorporating the G-GET Tier 3 water budget and water quantity policies into the Grand River Source Protection Plan was presented to the Committee on June 12, 2025 through report SPC-25-06-05.

Pre-consultation with municipalities and provincial ministries responsible for policy implementation began on September 8, 2025. This is the first phase of formal consultation.

The councils of affected municipalities will receive reports and consider recommendations to endorse the Section 34 amendment throughout October and November, 2025. Following receipt of supporting municipal resolutions, and any necessary revisions to the policies, public consultation will begin in 2026.

A Community Liaison Group (CLG) established in 2018 provides a forum for interest holders and residents to communicate their perspectives and observations on water quantity policy development. The CLG will be engaged to discuss the draft policies during public consultation.

Source Protection Committee Meeting Schedule:

- March 26, 2026
- June 25, 2026

Prepared by:

Kaitlyn Rosebrugh
Senior Source Protection Program Coordinator

Approved by:

Janet Ivey
Director, Water Resources

Appendix A

Table 1 LESPR drinking water system amendment consultation and submission timelines

SPP	Amendment	Drinking Water System(s) & Wellfields (where applicable)	Affected Municipalities	Early Engagement	Pre-Consultation	Public Consultation	Submission
Grand River	S.34 ROW	Waterloo: Erb Street Kitchener: Strange Street Cambridge: Blair Road Waterloo: William Street	Region of Waterloo City of Cambridge City of Kitchener City of Waterloo Township of North Dumfries	Complete	Complete	Complete	Approved
Grand River	S.34 Brant	Airport Mount Pleasant St. George Paris	County of Brant	Complete	Complete	Complete	Approved
Grand River	S.34 Brantford	Brantford	City of Brantford County of Brant	Complete	Complete	Complete	Approved
Grand River	S.34 Hamilton	Lynden	City of Hamilton	Complete	Complete	Complete	Approved
Grand River	S.34 G -GET Tier 3	Guelph Rockwood Hamilton Drive	City of Guelph Wellington County Guelph/Eramosa Township Township of Puslinch Town of Erin Region of Halton Town of Milton Town of Halton Hills Region of Waterloo Woolwich Township Dufferin County Township of East Garafraxa	Complete	Ongoing Fall 2025	2026	2026 or 2027

LAKE ERIE REGION SOURCE PROTECTION COMMITTEE

Report number: SPC-25-10-02

Date: October 30, 2025

To: Lake Erie Region Source Protection Committee

Subject: Section 36 Draft Updated Long Point Region Assessment Report and Source Protection Plan

Recommendation:

THAT report SPC-25-10-02 Section 36 Draft Updated Long Point Region Assessment Report and Source Protection Plan be received as information.

AND THAT the Lake Erie Region Source Protection Committee release the draft updated Long Point Region Assessment Report and Source Protection Plan for pre-consultation and public consultation.

Summary:

The Long Point Region Assessment Report and Source Protection Plan have been updated under Section 36 of the *Clean Water Act, 2006* as per a revised Minister's Order issued on June 5, 2025. The primary focus of the update is to bring technical work and policies into conformity with the 2021 Technical Rules.

Over the past year, the Source Protection Committee (the Committee) has reviewed summaries of proposed technical work and policy approaches. This report presents the full Section 36 amendment package, including draft policy text, for the Committee's consideration.

Following Committee endorsement of the draft updates, amended sections of the Assessment Report, Source Protection Plan and Explanatory Document will be released for a combined pre-consultation and public consultation planned for November 10 to December 19, 2025. Final submission to the Ministry of the Environment, Conservation and Parks (MECP) is on target for the deadline of December 31, 2026.

Report:

Background

The original Long Point Region Source Protection Plan (the Plan) came into effect in 2016 and initiated efforts to protect municipal drinking water sources in the Long Point Region watershed. The Plan has undergone amendments in 2019 and 2020 to reflect evolving technical and policy needs.

A current update to the Plan is being conducted under Section 36 of the *Clean Water Act, 2006*, following a revised Minister's Order issued on June 5, 2025.

This order updated the original directive from December 17, 2019, and extends the submission deadline to December 31, 2026.

The proposed amendments are numerous, but minor in nature, and focus on enhancing readability, bringing information up to date, and ensuring that the Plan continues to meet the objectives of the *Clean Water Act, 2006*.

The Section 36 Update Process

The Section 36 update requires technical work and Plan policies to comply with the 2021 Technical Rules. Affected municipalities include Oxford County, Norfolk County, Haldimand County, and the Municipality of Bayham. No First Nations bands with reserve lands are impacted.

On June 20, 2024 the Committee received report SPC-24-06-03 outlining the implications of the 2021 Technical Rules and the scope of technical work and policy updates necessary to complete the conformity exercise. Following review by the Committee, staff initiated the Plan amendment process.

Between June 2024 and January 2025, staff provided the Committee with the following reports to share proposed policy approaches, grouped by threat category:

- SPC-24-06-04 for waste
- SPC-24-06-05 for sewage
- SPC-24-10-03 for chemicals
- SPC-24-11-03 for agricultural activities
- SPC-25-01-06 for road salt and snow

Early engagement with MECP and the Ministry of Agriculture, Food and Agribusiness (OMAFRA) was completed in April 2025. Minor revisions to the Plan were made to address Ministry feedback.

As part of this report, the Committee is provided with the full Section 36 package, including proposed policy wording, for consideration prior to initiating formal consultation as required under Ontario Regulation 287/07.

Summary of Updates – Assessment Report:

Section 36 amendments to the Assessment Report include updated:

- drinking water system descriptions;
- risk and threat assessments for each municipal drinking water system;
- mapping; and
- water quality issues evaluations.

The document was also reformatted to remove duplicated information, reduce editing burden, and enhance readability.

Identification of significant drinking water threats was completed by the municipalities in Long Point Region in accordance with the 2021 Technical Rules and is summarized as follows:

- Oxford County — 319 activities across 108 properties
See Tables 4-6, 4-9, 4-12, 4-13, 4-19 and 4-20 of the Assessment Report.
- Norfolk County — 372 activities across 87 properties
See Tables 5-5, 5-9, 5-10 and 5-12 of the Assessment Report.
- Haldimand County — 1 activity on 1 property, and 1 conditions site.
See Table 6-5 of the Assessment Report.
- Municipality of Bayham — 12 activities on 5 properties
See Table 7-3 of the Assessment Report.

There were no re-delineations of Wellhead Protection Areas (WHPAs), Intake Protection Zones (IPZs) or Issue Contributing Areas for Long Point Region.

A more detailed summary of amendments is attached in **Appendix A**.

Summary of Updates – Source Protection Plan

Section 36 amendments to the Plan and supporting documents are summarized in **Table 1** below. A more detailed summary of amendments is attached to this report in **Appendix A**.

Table 1: Summary of Section 36 updates to the Long Point Region Source Protection Plan

Proposed updates	Document chapters	Description of updates
Administrative text revisions and document reformatting	Volume I Non-municipal sections of Volume II Explanatory Document	Editorial edits focused on fixing errors, removing duplicated information, and enhancing readability. All mandatory content required by legislation was maintained. These proposed updates were endorsed by the Committee on September 26, 2024 through report SPC-24-09-06.
Creation of a new Plan-wide Policies chapter	Chapter 2, Volume II	A new Plan-wide Policies chapter consolidates policies directed at provincial ministries and other agencies into fewer policies. This chapter also includes new policies for liquid hydrocarbon pipelines. More information is provided below in subsection 1 and in Appendix B .

Proposed updates	Document chapters	Description of updates
Revised General Policies	Municipal chapters of Volume II	General Policies were revised ensure legal correctness, consistency among municipalities, and to streamline annual reporting. More information is provided below in subsection 2.
New, revised or removed Prescribed Drinking Water Threat Policies	Municipal chapters of Volume II	Threat policies were updated to comply with the 2021 Technical Rules, to better align with existing regulatory frameworks (e.g. <i>the Nutrient Management Act, 2002</i>) and to address implementation challenges identified by municipalities and/or ministries. More information is provided below in subsection 3 and in Appendix C .
Removal of non-mandatory map Schedules	Municipal chapters of Volume II	The Implementation Working Group confirmed that municipalities no longer refer to the map Schedules, as digital and online mapping tools are preferred. These maps have a high edit burden with limited use. This change is being implemented across Source Protection Plans in Lake Erie Region.
Updated policy rationale	Explanatory Document	Policy rationale has been amended to reflect the Section 36 policy updates. The document has been reformatted significantly to enhance its functionality, including adding Policy Identifiers that can be searched by readers looking for specific policy information.

1. New Plan-wide Policies Chapter:

Proposed policy text for the Plan-wide Policies chapter (Chapter 2, Volume II) is presented in a Policy Comparison Table in **Appendix B**.

Policies directed at provincial ministries and other agencies were removed from municipal chapters and consolidated into fewer policies. The new policies were assigned the identifier “LPSPA”, as they apply broadly to the Long Point Source Protection Area.

Prescribed instrument policies were combined where the approach was the same for multiple subthreats and were re-organized by applicability (existing or future) and approach (manage or prohibit). Local nuances in policy approach were maintained by creating separate policies for certain municipalities as needed. In

Volume II of the Plan, the Plan-wide policies are sectioned by implementing body, rather than by threat category.

Noteworthy updates, as reflected in the new Plan-wide policies, are described below:

- General policies directed at provincial ministries were expanded to apply to the entire Long Point Region Source Protection Area. It is unclear why certain municipalities did not include these policies originally and there were no concerns with expanding applicability.
- The monitoring policy for prescribed instruments (new identifier: LPSPA-CW-1.4) was updated to include additional reporting requirements for MECP. Prescribed instrument policies were revised to include the minimum terms and conditions that MECP is implementing Province-wide for ECAs managing significant drinking water threats. MECP will be identifying the vulnerable area and drinking water system in ECA instruments, and will add conditions related to emergency response protocols, where feasible and appropriate.
- The permission process for storm water management works has been streamlined through a new Ontario Regulation 137/25 that took effect on September 1, 2025. This regulation allows proponents to self-register for approval of certain storm water works through the Environmental Activity and Sector Registry (EASR). Lake Erie Region prescribed instrument and monitoring policies explicitly referred to ECAs, inherently excluding EASR registrations that may also be managing significant drinking water threats. Proposed revisions to these policies now address the new EASR regulation. The language of proposed monitoring policy LPSPA-CW-1.6 has been future proofed to apply for all EASR-eligible significant threat activities (not exclusively storm water management works).
- Policies directed at OMAFA were revised to better align with the regulatory framework of the *Nutrient Management Act, 2002* and to reflect OMAFA's limitations for amending prescribed instruments. Prescribed instrument policies will now apply only to activities subject to a Nutrient Management Strategy or NASM Plan directly approved by OMAFA. Part IV policies (in municipal chapters) were updated or introduced to mirror the prescribed instrument policies and close any implementation gaps. This approach was presented to the Committee on November 28, 2024 through report SPC-24-11-03.
- New policies are included to address significant, moderate and low threats related to liquid hydrocarbon pipelines. These policies are being incorporated into all four Lake Erie Region Source Protection Plans.

2. Updates to General Policies (Municipal):

Section 36 updates to the General Policies for the Long Point Region municipalities include the following:

- Municipal Official Plans and Zoning By-laws are required conform with the relevant policies of the Source Protection Plan. Monitoring policies require municipalities to report when this conformity exercise is completed. These policies were updated to ensure that reporting follows adoption of Official Plan and Zoning By-law amendments by council. This will address inconsistent responses in annual reporting and enhance the Source Protection Authority's understanding of municipal progress on Plan implementation.
- Current monitoring policies for education and outreach programs include additional reporting requirements that are not required by legislation and have been deemed onerous. As such, these monitoring policies were revised to reduce the reporting burden and to reflect how policies are currently being implemented.

3. Updates to Prescribed Drinking Water Threat Policies (Municipal):

Proposed policy text for Oxford County, Norfolk County, Haldimand County and the Municipality of Bayham is presented in the Policy Comparison Tables in **Appendix C**.

Reference to past reports is provided in the tables to indicate where the Committee has previously reviewed proposed policy approaches.

A high-level summary of noteworthy revisions is provided as follows:

- Editorial revisions for consistent language and policy structure. Redundant or unnecessary wording removed, as appropriate.
- Updated threat nomenclature to align with the 2021 Technical Rules.
- Revised policy wording or sidebar information to ensure that policies now apply to the correct vulnerable areas and/or circumstances under the 2021 Technical Rules.
- New, revised or removed policies to address concerns identified by the municipality, including updated thresholds to trigger a policy (e.g. storage quantities, area sizes) that will improve implementability.
- Revised agricultural threat policies to better align with the regulatory framework of the *Nutrient Management Act, 2002* and to reflect the limitations of prescribed instruments. Municipal Risk Management Officials have also reviewed and confirmed preferred policy approaches for Nitrate WHPA-ICAs (SPC-24-11-03).

Consultation Process

As per the revised Minister's Order, consultation on the Section 36 update is being streamlined through a combined pre-consultation and public consultation period. The consultation is planned for November 10 to December 19, 2025.

Consultation will engage policy implementors, properties believed to be engaged in significant drinking water threat activities, and the general public. Formal notification will be issued through letters, public notices, and online postings. Copies of the updated Assessment Report, Source Protection Plan and Explanatory Document will be available online and in hard copy at municipal offices and at the Grand River Conservation Authority. Public meetings are not required.

The 40-day consultation period meets regulatory requirements and allows stakeholders to review proposed amendments and submit comments.

Next Steps

A combined pre-consultation and public consultation period for the Section 36 update is planned to begin November 10, 2025. Comments received during consultation will be brought back to the Committee at a future meeting before the Section 36 update is finalized for submission to MECP.

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**Appendix A: Summary of Section 36 Amendments to the
Assessment Report and Source Protection Plan**

Summary of Section 36 Amendments to the Assessment Report and Source Protection Plan

The following provides a high-level summary of amendments made to the Long Point Region Assessment Report and Source Protection Plan under Section 36 of the *Clean Water Act, 2006*.

Assessment Report

Multiple Sections:

- General formatting edits, including map referencing. Editorial text revisions to remove duplicate information, reduce edit burden, and enhance reliability.
- Reference to “Provincial Groundwater Monitoring Network Wells” revised to “Provincial Groundwater Monitoring Network Locations”
- “Issue Contributing Areas” terminology revised to include Wellhead Protection Area (WHPA-ICA)
- Maps and text revised to align with Ministry of Environment, Conservation and Parks 2021 Technical Rules for percent impervious surface categories
- Individual “Identification of Drinking Water Quality Threats” tables removed from each drinking water system section and consolidated into a single table in Chapter 3.
- Transport Pathway maps removed. Transport Pathway Area of Influence maps retained.

Chapter 2: Watershed Characterization

- Updated municipal user data, including the removal of future population projections and revised land cover values and water use
- Updated Map 2-1 with municipal names and surrounding Source Protection Regions

Chapter 3: Water Quality Risk Assessment

- Improved description of water quality risk assessment methodology
- Inserted consolidated “Identification of Drinking Water Quality Threats” table

Chapter 4: County of Oxford

- Updated drinking water system descriptions, methods and/or data, where appropriate
- Updated threats data and water quality issues evaluation
- Tillsonburg serviced area map updated to clearly distinguish between areas directly serviced by Tillsonburg and those served by surrounding systems

Chapter 5: Norfolk County

- Updated drinking water system descriptions, methods and/or data, where appropriate
- Updated threats data and water quality issues evaluation
- Intrinsic Vulnerability and related layers for Simcoe smoothed
- Maps reordered

Chapter 6: Haldimand County

- Updated drinking water system descriptions, methods and/or data, where appropriate
- Updated threats data and water quality issues evaluation

Chapter 7: Elgin County – Municipality of Bayham

- Updated drinking water system descriptions, methods and/or data, where appropriate
- Updated threats data and water quality issues evaluation. Nitrate WHPA-ICA monitoring was added to the water quality issues evaluation.
- Intrinsic Vulnerability and related layers for Richmond smoothed

Chapter 11: State of Climate Change Research in LER

- Removed duplicated subsections on climate change effects

Chapter 12: Consideration of Great Lakes Agreements

- Revisions to Long Point Region Watershed and Great Lakes Agreements to update information and improve structure

Chapter 13: Conclusions

- Removed repetitive content to reduce editing burden

Chapter 14: References

- Updated and reorganized as needed.

Source Protection Plan Volume I:

Multiple Sections:

- Re-organized and edited text to update information, improve flow and accessibility, reduce editing burden, eliminate duplicate content and transition resources online (see report SPC-24-09-06). Similar to edits applied to the Assessment Report and Explanatory Document.

Mapping Revisions

- Map 2-1 updated to include municipal names and surrounding Source Protection Regions

- Map 3-1 removed due to redundancy.

Source Protection Plan Volume II:

Introductory Chapters

- Removed or revised duplicate content to reduce editing burden.
- Section 1.0 – Introduction removed entirely; subsequent sections renumbered accordingly.

All Chapters

- Map Schedules removed
- Policies Revised
 - Editorial updates to correct errors, standardize language and policy structure, and update terminology and threat nomenclature
 - Sidebar revisions to reflect correct policy applicability in accordance with 2021 Technical Rules
 - Risk Management Plan policy revisions to remove redundant wording regarding alignment with prescribed instruments, as already outlined in relevant legislation.

Chapter 2: Plan-wide Policies for the Long Point Region Source Protection Area

- New chapter created for Plan-wide policies, including:
 - Removal of all policies directed at provincial ministries and other agencies from individual municipal chapters and consolidation into fewer policies.
 - New policy identifiers assigned to the consolidated policies.
 - Inclusion of definitions and Policy Lists
- New and revised policies to include additional annual reporting requirements for MECP and address the new Ontario Regulation 137/25
- Revised policies to better align with existing regulatory frameworks (e.g. *Nutrient Management Act*).
- New policies for the prescribed threat liquid hydrocarbon pipelines: LPSPA-NB-8.1, LPSPA-NB-8.2, LPSPA-NB-8.3, LPSPA-NB-8.4
- New policy directed at the Ministry of Transportation related to road signage: LPSPA-NB-7.1

Chapter 3: Oxford County Source Protection Plan Policies

Policy Identifier Update

- All policy identifiers updated to include prefix “LP” signifying Long Point Region

Revised policies:

OC-LP-CW-1.1.2, OC-LP-CW-1.2, OC-LP-CW-1.8, OC-LP-CW-1.9, OC-LP-NB-1.15, OC-LP-CW-2.4, OC-LP-CW-2.5, OC-LP-CW-12.1, OC-LP-CW-13.1, OC-LP-CW-15.1, OC-LP-CW-16.1, OC-LP-CW-16.2, OC-LP-CW-18.1

New policies:

OC-LP-MC-1.1.3, OC-LP-CW-3.10, OC-LP-CW-6.2, OC-LP-CW-6.3, OC-LP-CW-7.3, OC-LP-CW-7.4, OC-LP-CW-12.2, OC-LP-CW-12.3, OC-LP-CW-16.3, OC-LP-CW-18.2

Removed policies:

OC-NB-1.7, OC-CW-1.11, OC-CW-1.12, OC-NB-1.14, OC-NB-1.16, OC-CW-1.17, OC-MC-1.18, OC-NB-1.19, OC-MC-2.1, OC-MC-2.3, OC-MC-3.3, OC-MC-3.4, OC-MC-3.5, OC-MC-3.6, OC-MC-3.7, OC-MC-3.8, OC-MC-3.9, OC-MC-6.1, OC-MC-7.1, OC-MC-7.2, OC-CW-13.2, OC-CW-17.1, OC-NB-19.1

Chapter 4: Norfolk County Source Protection Plan Policies

Revised policies:

NC-CW-1.1.2, NC-CW-1.2, NC-CW-1.6, NC-CW-1.9, NC-CW-1.10, NC-NB-1.15, NC-NB-1.16, NC-CW-2.2, NC-CW-2.4, NC-MC-3.7, NC-CW-4.1, NC-CW-5.4, NC-CW-6.1, NC-CW-10.1, NC-CW-10.2, NC-CW-16.3

New policies:

NC-MC-1.1.3, NC-CW-3.9.1, NC-CW-3.10, NC-CW-5.1.1, NC-CW-5.3.1, NC-CW-7.3, NC-CW-10.1.1

Removed policies:

NC-NB-1.7, NC-CW-1.12, NC-CW-1.13, NC-NB-1.17, NC-CW-1.18, NC-MC-2.1, NC-MC-2.3, NC-MC-3.3, NC-MC-3.5, NC-MC-3.6, NC-MC-3.8, NC-MC-3.9, NC-MC-4.2, NC-MC-5.1, NC-MC-5.3, NC-CW-15.1, NC-MC-16.4, NC-MC-17.1, NC-NB-17.6, NC-NB-17.7, NC-NB-17.8, NC-NB-17.9, NC-NB-19.1

Chapter 5: Haldimand County Source Protection Plan Policies

Policy Identifier Update

- All policy identifiers updated to include prefix “LP” signifying Long Point Region

Revised policies:

HC-LP-CW-1.1.2, HC-LP-CW-1.3, HC-LP-CW-1.4, HC-LP-CW-1.5, HC-LP-MC-1.7, HC-LP-NB-1.9, HC-LP-MC-10.1

New policies:

HC-LP-MC-1.1.3, HC-LP-CW-3.14

Removed policies:

HC-CW-1.6, HC-NB-1.8, HC-CW-1.10, HC-MC-2.1, HC-MC-2.2, HC-MC-3.1, HC-NB-3.2, HC-MC-3.5, HC-MC-3.7, HC-MC-3.9, HC-MC-3.10, HC-NB-3.11, HC-LP-NB-3.12, HC-MC-3.13, HC-MC-4.1, HC-MC-5.1, HC-NB-6.1, HC-CW-11.1

Chapter 6: Elgin County – Municipality of Bayham Source Protection Plan Policies

Policy Applicability Update

- Nitrate WHPA-ICA added to the sidebar to indicate additional area where policies apply, no change made to the policy content itself

Revised policies:

EC-CW-1.1.2, EC-CW-1.2, EC-CW-1.6, EC-CW-1.9, EC-CW-1.10, EC-NB-1.16, EC-CW-1.17, EC-MC-5.1, EC-MC-5.2, EC-CW-6.4, EC-CW-7.1.1, EC-CW-8.2, EC-CW-17.2, EC-CW-17.3

New policies:

EC-MC-1.1.3, EC-CW-3.9, EC-CW-6.1.1, EC-CW-6.3.1, EC-CW-8.3

Removed policies:

EC-NB-1.7, EC-CW-1.12, EC-CW-1.13, EC-CW-1.18, EC-MC-2.1, EC-MC-2.2, EC-MC-3.3, EC-MC-3.5, EC-MC-3.6, EC-MC-3.7, EC-MC-3.8, EC-MC-6.1, EC-MC-6.3, EC-CW-16.1, EC-MC-17.4, EC-NB-18.1

Appendix B: Policy Comparison Table for Proposed Plan-wide Policies in Chapter 2 of Source Protection Plan Volume II

PROPOSED PLAN-WIDE POLICIES FOR THE LONG POINT REGION SOURCE PROTECTION AREA

General policies directed at Provincial Ministries

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
Not applicable.	LPSPA-MC-1.1.1	Implementation and Timing	This source protection plan came into effect on July 1, 2016, the effective date specified in the Notice of Approval posted on the Environmental Registry of Ontario. Amendments to the Source Protection Plan are permitted in accordance with the <i>Clean Water Act, 2006</i> , and the General Regulations. The effective date for new and amended policies, including but not limited to the addition of new drinking water threats and regulated areas and activities, is the date of posting of the Notice of Approval of the amendment provisions on the Environmental Registry of Ontario.	This policy is already included in each municipal chapter and must be added to the new Plan-wide chapter as well.
OC-LP-CW-1.1.2 d) NC-CW-1.1.2 e) HC-LP-CW-1.1.2 b) EC-CW-1.1.2 e)	LPSPA-MC-1.1	Implementation and Timing	Except as set out below and/or as otherwise established in individual policies, the policies contained in this Source Protection Plan shall come into effect on the date set by the Minister. a) For Section 43 of the <i>Clean Water Act, 2006</i> if an activity was engaged in a particular location before the relevant policies within this Source Protection Plan takes effect, amendments to Prescribed Instruments shall be completed within three (3) years from the date the Source Protection Plan takes effect.	No changes.
OC-LP-CW-1.2 c) NC-CW-1.2 b) EC-CW-1.2 b)	LPSPA-MC-1.2	Transition	Notwithstanding the definition of Existing, where a significant drinking water threat activity is being proposed by way of a new or amended prescribed instrument, it shall be considered existing for the purposes of complying with the applicable significant drinking water threat policies provided that the application for the new or amended prescribed instrument was deemed to be complete by the applicable approval authority as of the date this Source Protection Plan takes effect.	Applicability expanded to include Norfolk, Haldimand and Bayham. NC-CW-1.2 and EC-CW-1.2 only referred to Environmental Compliance Approvals. This policy captures all prescribed instruments.
OC-NB-1.7 NC-NB-1.7 EC-NB-1.7	LPSPA-NB-1.3	Incentive Program Policies	The Ministry of the Environment, Conservation and Parks and other provincial ministries shall consider providing continued funding and support for incentive programs to protect existing and future drinking water sources and address significant drinking water threats, such as the Ontario Drinking Water Stewardship Program and Rural Water Quality Program.	Applicability expanded to include Haldimand. Approved policy for Oxford did not include the Rural Water Quality Program.
OC-CW-1.11 NC-CW-1.12 HC-CW-1.6 EC-CW-1.12	LPSPA-CW-1.4	Monitoring	Where the Source Protection Plan policies may result in amendments to a Prescribed Instrument or the issuance of a new Prescribed Instrument, the applicable Ministry shall summarize the actions taken the previous year to implement the policies and provide a written report summarizing this information to the Source Protection Authority and the County or the Municipality by February 1 st of each year. The Ministry of the Environment, Conservation and Parks shall include:	Policy wording revised to include additional reporting requirements for the Ministry of the Environment, Conservation and Parks (MECP) related to Environmental Compliance Approvals. The additional wording reflects the collaborative effort of Source Protection Regions and the MECP to improve annual reporting on prescribed instrument policy implementation (SPC-25-10-01).

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
			a) the identification approval numbers for all Environmental Compliance Approvals that are managing activities that are significant drinking water threats and were reviewed during the preceding calendar year; and b) details of the Prescribed Instrument including a description of the conditions of the Prescribed Instrument that will ensure that the activity ceases to be, or does not become, a significant drinking water threat.	
OC-CW-1.12 NC-CW-1.13 EC-CW-1.13	LPSPA-CW-1.5	Monitoring	Where the Source Protection Plan policies prohibit an activity through the use of a prescribed instrument, the applicable Ministry shall summarize the actions taken the previous year to implement the policies and provide a written report summarizing this information to the Source Protection Authority and the County by February 1 st of each year.	Applicability expanded to include Haldimand.
Not applicable. New policy.	LPSPA-CW-1.6	Monitoring	Where the Source Protection Plan policies prohibit an activity from registration on the Environmental Activity and Sector Registry (EASR), or where a registered activity must meet specific requirements to manage a significant drinking water threat, the Ministry of the Environment, Conservation and Parks must provide a written report summarizing this information to the Source Protection Authority and the County or the Municipality by February 1st of each year. The report shall include: a) application numbers for all EASR registrations that are managing activities that are significant drinking water threats and were registered during the preceding calendar year, including a summary of any actions taken to address non-compliance with Ontario Regulation 137/25 requirements.	New policy to address new Ontario Regulation 137/25 that streamlines permissions for certain stormwater management works through registration on the Environmental Activity and Sector Registry (EASR). Related monitoring policies LPSPA-CW-1.4 and LPSPA-CW-1.5 explicitly refer to reporting requirements for Environmental Compliance Approvals (ECAs) and do not include EASR registrations that may also be managing significant drinking water threats. The Ministry of the Environment and Parks has recommended that the monitoring policies for ECAs and the EASR be kept separate. The language in the policy has been future-proofed to require reporting on any significant threat activity that currently, or may someday, be eligible for approval through EASR (not exclusively storm water management works) (SPC-25-10-02).
OC-NB-1.15 b) NC-NB-1.15 b) EC-NB-1.16 b)	LPSPA-NB-2.1	Strategic Action: Spill Prevention, Spill Contingency or Emergency Response Plans	To ensure spill prevention plans, contingency plans, and emergency response plans are updated for the purpose of protecting municipal drinking water sources with respect to spills that occur within a WHPA along highways, or railway lines, the Ministry of the Environment, Conservation and Parks is requested to provide mapping of the vulnerable areas identified by municipalities to the Spills Action Centre to assist them in responding to reported spills along transportation corridors.	Minor text edit to allow policy to stand alone. No change in policy intent.
HC-NB-1.8	LPSPA-NB-2.2	Strategic Action: Spill Prevention, Spill Contingency or Emergency Response Plans	To reduce the risks to drinking water from spills that occur within an Intake Protection Zone along highways, railway lines and shipping lanes, the Ministry of the Environment, Conservation and Parks is encouraged to incorporate mapping of Intake Protection Zones into their Emergency Response Plan and Spills Action Centre mapping, respectively. The mapping should be included in both the Emergency	No changes.

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
			Response Plan and Spill Action Centre resource mapping within two (2) years of the Source Protection Plan taking effect.	
OC-NB-1.16	LPSPA-NB-2.3	Strategic Action: Transport Pathways	The Ministry of the Environment, Conservation and Parks should consider providing sufficient staff and financial resources to ensure the effective implementation of ongoing programs to decommission abandoned water wells, in accordance with <i>O. Reg. 903 of the Ontario Water Resources Act, 1990</i> .	Applicability expanded to include Norfolk and Bayham.
OC-NB-1.14 NC-NB-1.17	LPSPA-NB-2.4	Specify Action: Information Sharing (Environmental Compliance Approvals)	The Ministry of the Environment, Conservation and Parks should, collaboratively with the County and/or Municipality, develop a consultation process related to document sharing and consultation on the issuance and/or notification of Prescribed Instruments, which could be used to guide information exchange between the agencies to protect municipal drinking water sources.	Applicability expanded to include Haldimand and Bayham.
Not applicable. New policy.	LPSPA-NB-2.5	Specify Action: Inspections and compliance for significant drinking water threat activities	The Ministry of the Environment, Conservation and Parks should prioritize inspections and compliance activities for Prescribed Instruments and Environmental Activity and Sector Registry (EASR) registrations that are managing significant drinking water threat activities and with closest proximity to the drinking water supply to ensure the activities they regulate cease to be, or never become, significant drinking water threats.	New policy requesting the Ministry of the Environment, Conservation and Parks (MECP) prioritize inspections and compliance activities for approvals that are managing significant drinking water threats. Proposed text also refers to registration under the Environmental Activity and Sector Registry (EASR) to reflect the new EASR Regulation <i>O. Reg. 137/25</i> that came into effect on September 1, 2025 (SPC-25-10-02). Source Protection Plan policies cannot be directed towards EASR registrants such as developers, landowners or businesses. Therefore, this policy is appropriately directed towards MECP and calls for the protection of drinking water sources through their established regulatory framework.
OC-MC-1.18	LPSPA-MC-5.1	Prescribed Instruments issued under the <i>Nutrient Management Act, 2002</i>	Any Prescribed Instrument approved and issued by the Ministry of Agricultural, Food and Agribusiness under the <i>Nutrient Management Act, 2002</i> that is used for the purposes of obtaining an exemption from a Risk Management Plan under section 61 of <i>O. Reg. 287/07</i> shall incorporate terms and conditions that, when implemented, manage the regulated activities such that those activities cease to be, or never become, significant drinking water threats. OMAFA is expected to review all Prescribed Instruments subject to their approval in areas where the regulated activities are, or would be, significant drinking water threats to ensure the Prescribed Instruments contain such terms and conditions.	Applicability expanded to include Norfolk, Haldimand and Bayham. The Ministry of Agriculture, Food and Agribusiness (OMAFA) has indicated that they do not review and approve all prescribed instruments under the <i>Nutrient Management Act, 2002</i> (e.g. Nutrient Management Plans). Proposed policy LPSPA-MC-5.1 has been re-revised to only apply to prescribed instruments that are directly approved and issued by OMAFA.
OC-NB-1.19	LPSPA-NB-5.2	Specify Action: Information Sharing (Prescribed Instruments issued under the <i>Nutrient Management Act, 2002</i>)	The Ministry of Agriculture, Food and Agribusiness (OMAFA), and other creators/issuers of Prescribed Instruments under the <i>Nutrient Management Act, 2002</i> , are expected to consult with the Risk Management Official with respect to any modifications or requirements that may need to be incorporated into such Prescribed Instruments to ensure the activities they regulate cease to be or never become significant drinking water threats.	Applicability expanded to include Norfolk, Haldimand and Bayham.

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
Not applicable. New policy.	LPSPA-NB-7.1	Strategic Action: Source Protection Signage	In accordance with Section 22 (7) of the <i>Clean Water Act, 2006</i> , the Ministry of Transportation should maintain source protection signs installed along Provincial Highways within the applicable drinking water vulnerable areas.	New policy requested during early engagement with MECP. The Ministry of Transportation (MTO) reports annually on maintenance of the Vulnerable Area Road Sign initiative, but noted a policy gap for Long Point Region (i.e. only the Kettle Creek Source Protection Plan had a signage policy). Through this policy, MTO can now provide a report for the correct Source Protection Area.

Policies addressing Prescribed Drinking Water Threats

Threat 1.0 – The establishment, operation or maintenance of a waste disposal site within the meaning of Part V of the *Environmental Protection Act, 1990*

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
OC-MC-2.1 NC-MC-2.1 HC-MC-2.2 EC-MC-2.2	LPSPA-MC-3.1	Existing Prescribed Instrument - Manage	To ensure that any Existing waste disposal sites within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> subject to an Environmental Compliance Approval cease to be significant drinking water threats, the Ministry of the Environment, Conservation and Parks (MECP) shall review and, where necessary, amend Environmental Compliance Approvals to incorporate appropriate terms and conditions. Where feasible, MECP shall identify in the Prescribed Instrument that the activity is a significant drinking water threat located within the vulnerable area and the name of the associated municipal drinking water system, and include a condition for emergency response protocols. Terms and conditions may also include: a) requirements for monitoring/reporting; b) leak/contamination detection, capture and treatment methods; and c) runoff prevention techniques.	Policies combined and moved. Minimum requirements added for identifying vulnerable areas and municipal drinking water systems in the Prescribed Instrument. This reflects recent MECP guidance and the negotiated terms to be applied Province-wide following approval of the Section 36 updates to the Trent Conservation Coalition, Quinte and Cataraqui Source Protection Plans (SPC-25-10-01). Additional terms and conditions wording adapted from NC-MC-2.1.
OC-MC-2.3 NC-MC-2.3 HC-MC-2.1 EC-MC-2.1	LPSPA-MC-3.2	Future Prescribed Instrument - Prohibit	To ensure that any Future waste disposal sites within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> subject to an Environmental Compliance Approval never become significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall prohibit these activities through the Environmental Compliance Approval process.	Policies combined and moved. No changes.

Threat 2.0 – The establishment, operation or maintenance of a system the collects, stores, transmits, treats or disposes of sewage

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
OC-MC-3.5 NC-MC-3.8 HC-MC-3.10	LPSPA-MC-3.3	Existing Prescribed Instrument - Manage	To ensure that any Existing industrial effluent discharges cease to be significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall review and, where necessary, amend Environmental Compliance Approvals to incorporate appropriate terms and conditions. Where feasible, MECP shall identify in the Prescribed Instrument that the activity is a significant drinking water threat located within the vulnerable area and the name of the associated municipal drinking water system, and include a condition for emergency response protocols. Terms and conditions may include: a) requirements for monitoring/reporting by the proponent; and b) education of operators and a high level of effluent treatment.	Policies combined and moved. Minimum requirements added for identifying vulnerable areas and municipal drinking water systems in the Prescribed Instrument. This reflects recent MECP guidance and the negotiated terms to be applied Province-wide following approval of the Section 36 updates to the Trent Conservation Coalition, Quinte and Cataraqui Source Protection Plans (SPC-25-10-01). Additional terms and conditions wording adapted from HC-MC-3.10.
OC-MC-3.3 NC-MC-3.3 HC-MC-3.1 EC-MC-3.3 OC-MC-3.8 NC-MC-3.9 HC-MC-3.9 EC-MC-3.8	LPSPA-MC-3.4	Existing Prescribed Instrument - Manage	To ensure that any Existing: i) on-site sewage works subject to an Environmental Compliance Approval under the <i>Ontario Water Resources Act, 1990</i>; ii) outfall from storm water management facility or stormwater drainage system; or iii) storm water infiltration facility cease to be significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall review and, where necessary, amend Environmental Compliance Approvals to incorporate appropriate terms and conditions and shall ensure that registrants of storm water management works on the Environmental Activity and Sector Registry (EASR) comply with the requirements of Ontario Regulation 137/25. Where feasible, MECP shall identify in the Prescribed Instrument that the activity is a significant drinking water threat located within the vulnerable area and the name of the associated municipal drinking water system, and include a condition for emergency response protocols. Terms and conditions may also include: a) requirements for monitoring by the proponent, regular maintenance, and use of best practices; b) periodic removal of accumulated sediment from storm water management facilities and lining of storm water ponds; c) mandatory septic system inspections at least every five (5) years, and upgrading systems to current standards, if necessary; d) annual reporting to the municipality of any monitoring and inspection programs required and their results; and e) any other requirements to address site conditions.	Policies combined and moved. Threat nomenclature updated to address the 2021 Technical Rules (SPC-24-06-05). The approved prescribed instrument policies explicitly refer to Environmental Compliance Approvals. The proposed policy text has been modified to clarify that stormwater management activities eligible for approval under the Environmental Activity and Sector Registry (EASR) are also being considered (SPC-25-10-02). Minimum requirements added for identifying vulnerable areas and municipal drinking water systems in the Prescribed Instrument. This reflects recent MECP guidance and the negotiated terms to be applied Province-wide following approval of the Section 36 updates to the Trent Conservation Coalition, Quinte and Cataraqui Source Protection Plans (SPC-25-10-01). Additional terms and conditions wording adapted from NC-MC-3.3 and HC-MC-3.1 (septics) and HC-MC-3.9 (stormwater).

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
OC-MC-3.7 NC-MC-3.5 EC-MC-3.5 OC-MC-3.5 NC-MC-3.8 EC-MC-3.7	LPSPA-MC-3.5	Existing Prescribed Instrument - Manage	To ensure that any Existing: i) sanitary sewers; ii) outfall of a combined sewer overflow (CSO) or a sanitary sewer overflow (SSO) from a manhole or wet well; iii) sewage pumping station or lift station wet well, a holding tank, or a tunnel; or iv) wastewater treatment facilities and associated parts cease to be significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall review and, where necessary, amend Environmental Compliance Approvals to incorporate appropriate terms and conditions. Where feasible, MECP shall identify in the Prescribed Instrument that the activity is a significant drinking water threat located within the vulnerable area and the name of the associated municipal drinking water system, and include a condition for emergency response protocols. Terms and conditions may also include: a) requirements for monitoring by the proponent, regular maintenance and use of best practices; and b) for wastewater treatment facilities: strict criteria for effluent quality, appropriate sizing to reduce by-passes, and requirements for regular inspections and proactive maintenance of the works to prevent unplanned discharges.	Policies combined and moved. Threat nomenclature updated to address the 2021 Technical Rules (SPC-24-06-05). Minimum requirements added for identifying vulnerable areas and municipal drinking water systems in the Prescribed Instrument. This reflects recent MECP guidance and the negotiated terms to be applied Province-wide following approval of the Section 36 updates to the Trent Conservation Coalition, Quinte and Cataraqui Source Protection Plans (SPC-25-10-01). Additional terms and conditions wording for wastewater collection adapted from OC-MC-3.7, NC-MC-3.5, EC-MC-3.5, HC-MC-3.7 and HC-MC-3.9.
OC-MC-3.6 NC-MC-3.6	LPSPA-MC-3.6	Future Prescribed Instrument - Prohibit	To ensure that any Future: i) industrial effluent discharges; or ii) outfall of a combined sewer overflow (CSO) or a sanitary sewer overflow (SSO) from a manhole or wet well never become significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall prohibit these activities through the Environmental Compliance Approval process.	Policies combined and moved. Threat nomenclature updated to address the 2021 Technical Rules (SPC-24-06-05).
OC-MC-3.6 NC-MC-3.6 EC-MC-3.6	LPSPA-MC-3.7	Future Prescribed Instrument - Prohibit	To ensure that any Future wastewater treatment facilities and associated parts never become significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall prohibit these activities through the Environmental Compliance Approval process.	Policies combined and moved. Threat nomenclature updated to address the 2021 Technical Rules (SPC-24-06-05).
OC-MC-3.4 OC-MC-3.9	LPSPA-MC-3.8	Future Prescribed Instrument - Prohibit	To ensure that any Future: i) on-site sewage works subject to an Environmental Compliance Approval under the <i>Ontario Water Resources Act, 1990</i>; ii) outfall from storm water management facility or stormwater drainage system; or iii) storm water infiltration facility	Policies combined and moved. This separate policy is required for Oxford, as they have chosen to prohibit future occurrences of these threat activities in WHPA-A and WHPA-B. Threat nomenclature updated to address the 2021 Technical Rules (SPC-24-06-05). The approved prescribed instrument policies explicitly refer to Environmental Compliance Approvals. The

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
			never become significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall prohibit this activity through the Environmental Compliance approval process or the Environmental Activity and Sector Registry (EASR) process in accordance with Ontario Regulation 137/25.	proposed text has been modified to clarify that stormwater management activities eligible for approval under the Environmental Activity and Sector Registry (EASR) are also being prohibited (SPC-25-10-02).
OC-MC-3.7 NC-MC-3.5 HC-MC-3.7 EC-MC-3.5	LPSPA-MC-3.9	Future Prescribed Instrument - Manage	To ensure that any Future: i) sanitary sewers; or ii) sewage pumping station or lift station wet well, holding tank or a tunnel never become significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall review and, where necessary, amend Environmental Compliance Approvals to incorporate appropriate terms and conditions. Where feasible, MECP shall identify in the Prescribed Instrument that the activity is a significant drinking water threat located within the vulnerable area and the name of the associated municipal drinking water system, and include a condition for emergency response protocols. Terms and conditions may also include requirements for monitoring by the proponent, regular maintenance and use of best practices.	Policies combined and moved. Threat nomenclature updated to address the 2021 Technical Rules (SPC-24-06-05). Minimum requirements added for identifying vulnerable areas and municipal drinking water systems in the Prescribed Instrument. This reflects recent MECP guidance and the negotiated terms to be applied Province-wide following approval of the Section 36 updates to the Trent Conservation Coalition, Quinte and Cataraqui Source Protection Plans (SPC-25-10-01). Additional terms and conditions wording adapted from OC-MC-3.7, NC-MC-3.5, EC-MC-3.5 and HC-MC-3.7 and is consistent with LPSPA-MC-3.5.
NC-MC-3.9 HC-MC-3.9 EC-MC-3.8	LPSPA-MC-3.10	Future Prescribed Instrument - Manage	To ensure that any Future: i) outfall from a storm water management facility or storm water drainage system; ii) storm water infiltration facility never become significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall review and, where necessary, amend Environmental Compliance Approvals to incorporate appropriate terms and conditions and shall ensure that registrants of storm water management works on the Environmental Activity and Sector Registry (EASR) comply with the requirements of Ontario Regulation 137/25. Where feasible, MECP shall identify in the Prescribed Instrument that the activity is a significant drinking water threat located within the vulnerable area and the name of the associated municipal drinking water system, and include a condition for emergency response protocols. Terms and conditions may also include: a) requirements for monitoring by the proponent, regular maintenance and use of best practices; b) periodic removal of accumulated sediment and lining of storm water ponds; and c) any other requirements to address site conditions.	Policies combined and moved. Threat nomenclature updated to address the 2021 Technical Rules (SPC-24-06-05). The approved prescribed instrument policies explicitly refer to Environmental Compliance Approvals. The proposed text has been modified to clarify that stormwater management activities eligible for approval under the Environmental Activity and Sector Registry (EASR) are also being considered (SPC-25-10-02). Minimum requirements added for identifying vulnerable areas and municipal drinking water systems in the Prescribed Instrument. This reflects recent MECP guidance and the negotiated terms to be applied Province-wide following approval of the Section 36 updates to the Trent Conservation Coalition, Quinte and Cataraqui Source Protection Plans (SPC-25-10-01). Additional terms and conditions wording adapted from HC-MC-3.9 and tweaked slightly for consistency with LPSPA-MC-3.4.

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
OC-MC-3.3 OC-MC-3.8	LPSPA-MC-3.11	Future Prescribed Instrument - Manage	To ensure that any Future: i) on-site sewage works subject to an Environmental Compliance Approval under the <i>Ontario Water Resources Act, 1990</i>; ii) outfall from storm water management facility or stormwater drainage system; or iii) storm water infiltration facility never become significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall review and, where necessary, amend Environmental Compliance Approvals to incorporate appropriate terms and conditions and shall ensure that registrants of storm water management works on the Environmental Activity and Sector Registry (EASR) comply with the requirements of Ontario Regulation 137/25. Where feasible, MECP shall identify in the Prescribed Instrument that the activity is a significant drinking water threat located within the vulnerable area and the name of the associated municipal drinking water system, and include a condition for emergency response protocols. Terms and conditions may also include: a) requirements for monitoring by the proponent, regular maintenance, and use of best practices; b) periodic removal of accumulated sediment from storm water management facilities and lining of storm water ponds; c) mandatory septic system inspections at least every five (5) years, and upgrading systems to current standards, if necessary; d) annual reporting to the municipality of any monitoring and inspection programs required and their results; and e) any other requirements to address site conditions.	Policies combined and moved. This separate policy is required for Oxford, as they have chosen to manage future occurrences of these threat activities in the Nitrate WHPA-ICA outside of WHPA-A and WHPA-B. Threat nomenclature updated to address the 2021 Technical Rules (SPC-24-06-05). The approved prescribed instrument policies explicitly refer to Environmental Compliance Approvals. The proposed text has been modified to clarify that stormwater management activities eligible for approval under the Environmental Activity and Sector Registry (EASR) are also being considered (SPC-25-10-02). Minimum requirements added for identifying vulnerable areas and municipal drinking water systems in the Prescribed Instrument. This reflects recent MECP guidance and the negotiated terms to be applied Province-wide following approval of the Section 36 updates to the Trent Conservation Coalition, Quinte and Cataraqui Source Protection Plans (SPC-25-10-01). Additional terms and conditions wording adapted from NC-MC-3.3 and HC-MC-3.1 (septics) and HC-MC-3.9 (storm water). It is added here for consistency with LPSPA-MC-3.4.
HC-MC-3.10 HC-MC-3.1 HC-MC-3.5	LPSPA-MC-3.12	Future Prescribed Instrument - Manage	To ensure that any Future: i) industrial effluent discharges; or ii) on-site sewage systems subject to an Environmental Compliance Approval under the <i>Ontario Water Resources Act, 1990</i>; or iii) wastewater treatment facilities and associated parts never become significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall review and, where necessary, amend Environmental Compliance Approvals to incorporate appropriate terms and conditions. Where feasible, MECP shall identify in the Prescribed Instrument that the activity is a significant drinking water threat located within the vulnerable area and the name of the associated municipal drinking water system, and include a condition for emergency response protocols.	Policies combined and moved. This separate policy is required for Haldimand because they have chosen to manage future occurrences of these threat activities. Threat nomenclature updated to address the 2021 Technical Rules (SPC-24-06-05). Minimum requirements added for identifying vulnerable areas and municipal drinking water systems in the Prescribed Instrument. This reflects recent MECP guidance and the negotiated terms to be applied Province-wide following approval of the Section 36 updates to the Trent Conservation Coalition, Quinte and Cataraqui Source Protection Plans (SPC-25-10-01).

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
			Terms and conditions may also include: a) requirements for monitoring/reporting by the proponent and regular maintenance; b) education of operators and a high level of effluent treatment; c) mandatory septic system inspections at least every five (5) years, and upgrading systems to current standards, if necessary; d) annual reporting to the municipality of any monitoring and inspection programs required and their results; e) any other requirements to address site conditions; and f) for wastewater treatment facilities: strict criteria for effluent quality, appropriate sizing to reduce by-passes, and requirements for regular inspections and proactive maintenance of the works to prevent unplanned discharges.	Additional terms and conditions wording adapted from HC-MC-3.10 (industrial effluent), HC-MC-3.5 (wastewater treatment), and NC-MC-3.3 and HC-MC-3.1 (septics). Final wording was revised slightly for consistency with LPSPA-MC-3.4.
HP-MC-3.7 EC-MC-3.5	LPSPA-MC-3.13	Future Prescribed Instrument - Manage	To ensure any Future outfall of a combined sewer overflow (CSO) or a sanitary sewer overflow (SSO) from a manhole or wet well never become a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall review and, where necessary, amend Environmental Compliance Approvals to incorporate appropriate terms and conditions. Where feasible, MECP shall identify in the Prescribed Instrument that the activity is a significant drinking water threat located within the vulnerable area and the name of the associated municipal drinking water system, and include a condition for emergency response protocols. Terms and conditions may also include requirements for monitoring by the proponent, regular maintenance, and use of best practices.	Policies combined and moved. This separate policy is required for Haldimand and Bayham because they have chosen to manage future occurrences of this threat activity. Minimum requirements added for identifying vulnerable areas and municipal drinking water systems in the Prescribed Instrument. This reflects recent MECP guidance and the negotiated terms to be applied Province-wide following approval of the Section 36 updates to the Trent Conservation Coalition, Quinte and Cataraqui Source Protection Plans (SPC-25-10-01). Additional terms and conditions wording adapted from OC-MC-3.7, NC-MC-3.5, EC-MC-3.5 and HC-MC-3.7 and is consistent with LPSPA-MC-3.5 and LPSPA-MC-3.9.
HC-MC-3.11	LPSPA-NB-3.14	Existing / Future Specify Action (non-binding)	To ensure that any Existing or Future industrial effluent discharges cease to be, or never become, significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall consider information in the approved Long Point Region Assessment Report and treat significant drinking water threat facilities as one of the program priorities when identifying facilities for inspection.	No change.

Threat 3.0 – The application of agricultural source material (ASM) to land

Threat 4.0 – The storage of agricultural source material (ASM)

Threat 6.0 – The application of non-agricultural source material (NASM) to land

Threat 7.0 – The handling and storage of non-agricultural source material (NASM)

Threat 21.0 – The use of land as livestock grazing or pasturing land, an outdoor confinement area or farm animal yard

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
NC-MC-4.2 NC-MC-16.4 EC-MC-17.4	LPSPA-MC-6.1	Existing Prescribed Instrument – Manage	To ensure that any Existing: i) storage of agricultural source material (ASM); or ii) outdoor confinement area or farm animal yard subject to a Nutrient Management Strategy approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA) under the <i>Nutrient Management Act, 2002</i> cease to be significant drinking water threats, OMAFRA shall review and, where necessary, amend the applicable Prescribed Instruments to incorporate appropriate terms and conditions.	Policies combined and moved. For Norfolk, the policy only applies in WHPA-B. Policy revised to better align with the regulatory framework of the <i>Nutrient Management Act, 2002</i> . The Prescribed Instrument policy only applies to activities that are subject to a Nutrient Management Strategy directly approved by OMAFRA (SPC-24-11-03). Policy applicability has been expanded to include Bayham for the storage of agricultural source material (ASM). Bayham did not previously have a prescribed instrument policy for this threat activity, but would like to rely on existing regulatory tools where available and effective.
OC-MC-7.1 NC-MC-5.3 EC-MC-6.3	LPSPA-MC-6.2	Existing Prescribed Instrument – Manage	To ensure that any Existing handling and storage of non-agricultural source material (NASM) subject to a NASM Plan approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA) under the <i>Nutrient Management Act, 2002</i> cease to be significant drinking water threats, OMAFRA shall review and, where necessary, amend the NASM Plans to incorporate appropriate terms and conditions.	Policies combined and moved. For Norfolk, the policy only applies in WHPA-B. Policy revised to better align with the regulatory framework of the <i>Nutrient Management Act, 2002</i> . The Prescribed Instrument policy only applies to activities that are subject to a NASM Plan directly approved by OMAFRA (SPC-24-11-03). Removed reference to processed organic waste regulated under the <i>Environmental Protection Act, 1990</i> , as these materials are now included in the revised waste subthreat categories under the 2021 Technical Rules (SPC-24-06-04).
OC-MC-6.1 NC-MC-5.1 EC-MC-6.1 OC-MC-7.2	LPSPA-MC-6.3	Existing / Future Prescribed Instrument – Prohibit	To ensure that any: a) Existing or Future application of non-agricultural source material (NASM); or b) Future handling and storage of non-agricultural source material (NASM) subject to a NASM Plan approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA) under the <i>Nutrient Management Act, 2002</i> cease to be, or never become, significant drinking water threats, OMAFRA shall prohibit these activities through the NASM Plan process.	Policies combined and moved. For Norfolk, this policy does not apply in a Nitrate WHPA-ICA. Policy revised to better align with the regulatory framework of the <i>Nutrient Management Act, 2002</i> . The Prescribed Instrument policy only applies to activities that are subject to a NASM Plan directly approved by OMAFRA (SPC-24-11-03). Removed reference to processed organic waste regulated under the <i>Environmental Protection Act, 1990</i> , as these materials are now included in the revised waste subthreat categories under the 2021 Technical Rules (SPC-24-06-04).

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
				Policy applicability has been expanded to include Norfolk and Bayham. These municipalities did not previously have a prescribed instrument policy for future occurrences of these threat activities, but they would like to rely on existing regulatory tools where available and effective.
Not applicable. New policy.	LPSPA-MC-6.4	Existing / Future Prescribed Instrument – Prohibit	To ensure that any Existing or Future outdoor confinement area or farm animal yard subject to a Nutrient Management Strategy approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA) under the <i>Nutrient Management Act, 2002</i> ceases to be, or never becomes, a significant drinking water threat, OMAFA shall prohibit this activity through the Nutrient Management Strategy process.	Policy moved. No change. This separate policy is required for Oxford because they have chosen to prohibit both existing and future outdoor confinement areas and farm animal yards. Policy revised to better align with the regulatory framework of the <i>Nutrient Management Act, 2002</i> . The Prescribed Instrument policy only applies to activities that are subject to a Nutrient Management Strategy directly approved by OMAFA (SPC-24-11-03).
HC-MC-4.1 HC-MC-5.1	LPSPA-MC-6.5	Existing / Future Prescribed Instrument – Manage	To ensure that any: a) Future storage of agricultural source material (ASM); b) Existing or Future application of non-agricultural source material (NASM); or c) Existing or Future handling and storage of non-agricultural source material (NASM) subject to a Prescribed Instrument approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA) under the <i>Nutrient Management Act, 2002</i> cease to be, or never become, significant drinking water threats, OMAFA shall review and, where necessary, amend the applicable Prescribed Instruments to incorporate appropriate terms and conditions.	Policies combined and moved. No change. This separate policy is required for Haldimand, to maintain their unique local policy approach for managing these threat activities. Removed the Future application of agricultural source material (ASM) from the policy to address OMAFA early engagement comments. OMAFA does not review and approve Nutrient Management Plans used to regulate the application of ASM. Haldimand does not apply any Part IV regulatory tools; therefore, this threat activity will be managed by the municipality under the education and outreach policy HC-LP-CW-1.3.
NC-MC-4.2 NC-MC-16.4	LPSPA-MC-6.6	Future Prescribed Instrument – Manage	To ensure that any Future: i) storage of agricultural source material (ASM); or ii) outdoor confinement area or farm animal yard subject to a Nutrient Management Strategy approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA) under the <i>Nutrient Management Act, 2002</i> never become significant drinking water threats, OMAFA shall review and, where necessary, amend Nutrient Management Strategies to incorporate appropriate terms and conditions.	Policies combined and moved. Policy revised to better align with the regulatory framework of the <i>Nutrient Management Act, 2002</i> . The Prescribed Instrument policy only applies to activities that are subject to a Nutrient Management Strategy directly approved by OMAFA (SPC-24-11-03). This separate policy is required for Norfolk as they have chosen to manage both existing and future occurrences of these threat activities in WHPA-B, and rely strictly on Part IV tools to prohibit in WHPA-A.
Not applicable. New policy.	LPSPA-MC-6.7	Future Prescribed Instrument – Prohibit	To ensure that any Future: i) storage of agricultural source material (ASM); or ii) outdoor confinement area or farm animal yard	New policy (applies only in Bayham) to better align with the regulatory framework of the <i>Nutrient Management Act, 2002</i> . The Prescribed Instrument policy only applies to activities that are subject to a Nutrient

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
			subject to a Nutrient Management Strategy approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA) under the <i>Nutrient Management Act, 2002</i> never becomes a significant drinking water threat, OMAFA shall prohibit this activity through the Nutrient Management Strategy process.	Management Strategy directly approved by OMAFA (SPC-24-11-03). Bayham did not previously have a prescribed instrument policy for these threat activities, but would like to rely on existing regulatory tools where available and effective. This separate policy is required for Bayham because they have chosen to prohibit only future occurrences of these threat activities.

Threat 10.0 – The application of pesticide to land

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
HC-MC-6.1	LPSPA-NB-3.15	Future Specify Action (non-binding)	To ensure that any Future application of pesticide to land never becomes a significant drinking water threat, the Ministry of the Environment, Conservation and Parks should consider developing source water protection training materials for permit applicants under the <i>Pesticides Act, 1990</i> . Further, the Ministry should prioritize inspections of pesticide permit holders for lands within the Nanticoke Industrial Pumping Station Intake Protection Zones 1 and 2.	No changes.

Threat 19.0 – 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 Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
NC-MC-17.1	LPSPA-MC-4.1	Existing / Future Prescribed Instrument - Manage	To ensure that any Existing, increased or New consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be, or never becomes, a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall ensure that groundwater Permit To Take Water approvals include appropriate terms and conditions to ensure the long-term sustainability. The Ministry should consider the following condition for inclusion - a phased approach to assess impacts before the permit is fully approved and the requirement for appropriate monitoring.	Policy moved. No changes.
NC-NB-17.6	LPSPA-NB-4.2	Existing / Future Specify Action (non-binding)	To ensure that any Existing and Future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be, or never becomes, a significant drinking water threat, the Ministry of the Environment, Conservation and Parks should support and fund the	Policy moved. No changes.

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
			ongoing maintenance of the Long Point Region Tier 3 Water Budget model.	
NC-NB-17.7	LPSPA-NB-4.3	Existing / Future Specify Action (non-binding)	To ensure that any Existing and Future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be, or never becomes, a significant drinking water threat, the Ministry of the Environment, Conservation and Parks is encouraged to fund Norfolk County municipal capacity to support water management decisions and updates to their Integrated Sustainable Master Plan.	Policy moved. No changes.
NC-NB-17.8	LPSPA-NB-4.4	Existing / Future Specify Action (non-binding)	To ensure that any Existing and Future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be, or never becomes, a significant drinking water threat, the Ministry of the Environment, Conservation and Parks should use findings from the Long Point Region, Catfish Creek and Kettle Creek Tier 2 Water Quantity Stress Assessment and the Long Point Region Tier 3 Water Budget and Local Area Risk Assessment to reassess the High Water Use Designation for Norfolk County.	Policy moved. No changes.
NC-NB-17.9	LPSPA-NB-4.5	Existing / Future Specify Action (non-binding)	To ensure that any Existing and Future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be, or never becomes, a significant drinking water threat, the Ministry of the Environment, Conservation and Parks should consider the prioritization of water uses in Simcoe where a permitted water taking could impact the sustainability of the municipal water supply given challenges in locating new water supplies in Norfolk County.	Policy moved. No changes.

Threat 22.0 – The establishment and operation of a liquid hydrocarbon pipeline

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
OC-NB-19.1 NC-NB-19.1 HC-NB-12.1 EC-NB-18.1	LPSPA-NB-8.1	Specify Action (non-binding)	To ensure that the establishment and operation of a liquid hydrocarbon pipeline within the meaning of <i>O. Reg. 210/01</i> under the <i>Technical Safety and Standards Act, 2000</i> or that is subject to the <i>Canadian Energy Regulator Act, 2019</i> , never becomes a significant, moderate or low drinking water threat, the Canada Energy Regulator or the Ontario Energy Board should ensure that the Source Protection Authority and the County are provided the location of any new proposed pipeline.	Policies combined and moved. No changes.
Not applicable.	LPSPA-NB-8.2	Specify Action (non-binding)	To ensure the establishment and operation of a liquid hydrocarbon pipeline within the meaning of <i>O. Reg. 210/01</i> under the <i>Technical Safety and Standards Act, 2000</i> or that is subject to the <i>Canadian Energy Regulator Act, 2019</i> never becomes a significant, moderate or low drinking water threat, the Canada Energy Regulator, Ontario Energy Board, Technical Standards and Safety Authority (TSSA),	Consistent pipeline policies are being adopted across Lake Erie Region and have been incorporated into the Section 36 updates to the Kettle Creek and Catfish Creek Source Protection Plans, as well as recent Section 34 amendments to the Grand River Source

Policy Identifier(s) from municipal chapters	New Plan-wide Policy Identifier	Policy approach	Policy text	Description of changes / rationale
			and Impact Assessment Agency should ensure that drinking water source protection is considered as a risk factor in their decision making framework.	Protection Plan. The policies address significant, moderate and low drinking water threats.
Not applicable.	LPSPA-NB-8.3	Specify Action (non-binding)	To ensure the establishment and operation of a liquid hydrocarbon pipeline within the meaning of <i>O. Reg. 210/01</i> under the <i>Technical Safety and Standards Act, 2000</i> or that is subject to the <i>Canadian Energy Regulator Act, 2019</i> never becomes a significant, moderate or low drinking water threat, pipeline owners should ensure that best available source protection information is used such as up to date vulnerable areas in assessment reports when developing, operating and maintaining liquid hydrocarbon pipelines, including developing and updating emergency planning zones (EPZs).	Consistent pipeline policies are being adopted across Lake Erie Region and have been incorporated into the Section 36 updates to the Kettle Creek and Catfish Creek Source Protection Plans, as well as recent Section 34 amendments to the Grand River Source Protection Plan. The policies address significant, moderate and low drinking water threats.
Not applicable.	LPSPA-NB-8.4	Specify Action (non-binding)	To ensure the establishment and operation of a liquid hydrocarbon pipeline within the meaning of <i>O. Reg. 210/01</i> under the <i>Technical Safety and Standards Act, 2000</i> or that is subject to the <i>Canadian Energy Regulator Act, 2019</i> never becomes a significant, moderate or low drinking water threat, pipeline owners should, upon request by the County, reimburse costs borne by the County where work in relation to this activity is required by a regulator with regards to protecting drinking water sources or where the work identified by the drinking water system owner is supported based on due diligence and best practices as it relates to source protection and the protection of public health. Examples may include but are not limited to spill clean-up and rehabilitation activities, events-based modelling or other technical work required to support current vulnerability scoring.	Consistent pipeline policies are being adopted across Lake Erie Region and have been incorporated into the Section 36 updates to the Kettle Creek and Catfish Creek Source Protection Plans, as well as recent Section 34 amendments to the Grand River Source Protection Plan. The policies address significant, moderate and low drinking water threats.

**Appendix C: Policy Comparison Tables for Prescribed Threat Policies in the Municipal Chapters of Source Protection Plan
Volume II**

OXFORD COUNTY– POLICIES ADDRESING PRESCRIBED DRINKING WATER THREATS

Threat 1.0 – The establishment, operation or maintenance of a waste disposal site within the meaning of Part V or the *Environmental Protection Act, 1990*

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC-MC-2.1 <u>REMOVED</u> Existing Prescribed Instrument WHPA-A v.10; WHPA-B v.10; WHPA-B v.8; WHPA-C v.8; Nitrate WHPA-ICA	For any existing waste disposal site within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> that is subject to an Environmental Compliance Approval, where this activity is a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall review, and where necessary, amend Environmental Compliance Approvals to incorporate terms and conditions that, when implemented, ensure the activity ceases to be a significant drinking water threat.	Not applicable.	Policy OC-MC-2.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.1.
OC- <u>LP</u> -CW-2.2 Existing Part IV-RMP WHPA-A- v.10; WHPA-B- v.10; WHPA-B v.8; WHPA-C v.8; ICA (NIT)	For any existing waste disposal site, or aspect thereof, within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> that is not subject to an Environmental Compliance Approval, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure the activity ceases to be a significant drinking water threat.	To ensure that any Existing waste disposal sites within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> not subject to an Environmental Compliance Approval cease to be significant drinking water threats, where these activities are significant drinking water threats, these activities shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Regional location (LP) added to the policy identifier. WHPA-B-v.8, WHPA-C-v.8 and Nitrate WHPA-ICA removed from the sidebar for correctness, as waste subthreats exempt from an ECA are not significant in these areas under the 2021 Technical Rules. Editorial revisions for consistent language and formatting.
OC-MC-2.3 <u>REMOVED</u> Future Prescribed Instrument WHPA-A v.10; WHPA-B v.10; WHPA-B v.8; WHPA-C v.8; Nitrate WHPA-ICA	For any new waste disposal site within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> that requires an Environmental Compliance Approval, where this activity would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall prohibit this activity through the Environmental Compliance Approvals process to ensure the activity never becomes a significant drinking water threat.	To ensure that any Future waste disposal sites within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> subject to an Environmental Compliance Approval never become significant drinking water threats, where these activities would be significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall prohibit these activities through the Environmental Compliance Approval process.	Policy OC-MC-2.3 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.2.
OC- <u>LP</u> -CW-2.4 Future Part IV- Prohibit WHPA-A- v.10; WHPA-B- v.10; WHPA-B v.8; WHPA-C v.8; ICA (NIT)	With the exception of the following waste disposal site threat subcategories: a. storage of wastes described in clauses (p), (q), (r), (s), (t), or (u) of the definition of hazardous waste, or in clause (d) of the definition of liquid industrial waste; or b. storage of hazardous or liquid industrial waste, where any new waste disposal site, or aspect thereof, within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> , that does not require an Environmental Compliance Approval, would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited so that it never becomes a significant drinking water threat.	To ensure that any Future waste disposal sites within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> not subject to an Environmental Compliance Approval never become significant drinking water threats, where these activities would be significant drinking water threats, and where the amount of waste generated is greater than 100 kilograms per month, these activities shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Removed the specified wastes (subsections a and b) due to changes in subcategories under the 2021 Technical Rules (SPC-24-06-04). These wastes are regulated by MECP through ECAs and are automatically exempt from this Part IV policy. Added a threshold for policy applicability (as requested by the municipality) for effective implementation. The prohibition only applies where the amount of waste generated is greater than 100 kilograms per month. Regional location (LP) added to the policy identifier. WHPA-B-v.8, WHPA-C-v.8 and Nitrate WHPA-ICA removed from the sidebar for correctness, as waste subthreats exempt from an ECA are not significant in these areas under the 2021 Technical Rules. Editorial revisions for consistent language and formatting.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- LP -CW-2.5 Future Part IV- RMP WHPA-A- v.10; WHPA-B- v.10; WHPA-B-v.8; WHPA-C-v.8; ICA (NIT)	Where a new waste disposal site, or aspect thereof, within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> does not require an Environmental Compliance Approval and comprises one of the following waste disposal site threat subcategories: a. storage of wastes described in clauses (p), (q), (r), (s), (t), or (u) of the definition of hazardous waste, or in clause (d) of the definition of liquid industrial waste; or b. storage of hazardous or liquid industrial waste, and where such a waste disposal site would be a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to manage the activity such that it never becomes a significant drinking water threat. The requirements of the risk management plan may be based on Ministry of the Environment, Conservation and Parks tools and requirements for such activities, as set out in the <i>Environmental Protection Act, 1990</i>, but may also include any modifications or additional requirements that are deemed necessary or appropriate by the Risk Management Official.	To ensure that any Future waste disposal sites within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> not subject to an Environmental Compliance Approval never become significant drinking water threats, where these activities would be significant drinking water threats, and where the amount of waste generated is less than 100 kilograms a month, these activities shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Removed the specified wastes (subsections a and b) due to changes in subcategories under the 2021 Technical Rules (SPC-24-06-04). These wastes are regulated by MECP through ECAs and are automatically exempt from this Part IV policy. Added a threshold for policy applicability (as requested by the municipality) for effective implementation. The Risk Management Plan (RMP) only applies where the amount of waste generated is less than 100 kilograms per month. Regional location (LP) added to the policy identifier. WHPA-B-v.8, WHPA-C-v.8 and Nitrate WHPA-ICA removed from the sidebar for correctness, as waste subthreats exempt from an ECA are not significant in these areas under the 2021 Technical Rules. Removed additional text regarding RMP requirements. Municipal Risk Management Officials have noted this wording was no longer necessary. Editorial revisions for consistent language and formatting.

Threat 2.0 – The establishment, operation or maintenance of a system the collects, stores, transmits, treats or disposes of sewage

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- LP -CW-3.1 a) Existing/Future Specify Action WHPA-A- v.10; WHPA-B- v.10 Nitrate WHPA-ICA b) Future Specify Action WHPA-A-v.10; WHPA-B-v.10 c) Future Specify Action Nitrate WHPA-ICA (outside WHPA-A and WHPA-B-v.10)	For any existing onsite sewage system or onsite sewage system holding tank regulated under the <i>Ontario Building Code Act, 1992</i> including expansions, modifications or replacements of such systems; or for any new onsite sewage system or onsite sewage system holding tank regulated under the <i>Ontario Building Code Act, 1992</i> that is required for a municipal water supply well; or for any new onsite sewage system or onsite sewage system holding tank regulated under the <i>Ontario Building Code Act, 1992</i> that is located within an ICA, but outside of a WHPA-A or a WHPA-B with a vulnerability score of 10, where these activities are, or would be, significant drinking water threats, the County shall implement an onsite sewage systems maintenance inspection program, as required by the <i>Ontario Building Code Act, 1992</i>, to ensure these activities cease to be or never become significant drinking water threats.	To ensure that any: a. Existing onsite sewage works regulated under the <i>Ontario Building Code Act, 1992</i> including expansions, modifications or replacements of such systems; or b. Future onsite sewage works regulated under the <i>Ontario Building Code Act, 1992</i> required for a municipal water supply well; or c. Future onsite sewage works regulated under the <i>Ontario Building Code Act, 1992</i> located in a Nitrate WHPA-ICA, but outside of a WHPA-A or a WHPA-B with a vulnerability score of 10 cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the County shall implement an onsite sewage systems maintenance inspection program, as required by the <i>Ontario Building Code Act, 1992</i>.	On-site sewage “systems” renamed to sewage “works” as per the 2021 Technical Rules (SPC-24-06-05). Regional location (LP) added to the policy identifier. Editorial revisions for consistent language, formatting and policy structure.
OC- LP -MC-3.2 Future Land Use Planning WHPA-A- v.10; WHPA-B- v.10	For a new onsite sewage system or onsite sewage system holding tank regulated under the <i>Ontario Building Code Act, 1992</i>, with the exception of: a. a new onsite sewage system or onsite sewage system holding tank regulated under the <i>Ontario Building Code</i>	To ensure that any Future onsite sewage works regulated under the <i>Ontario Building Code Act, 1992</i>, except for:	On-site sewage “systems” renamed to sewage “works” as per the 2021 Technical Rules (SPC-24-06-05). Regional location (LP) added to the policy identifier.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
	<i>Act, 1992</i>, that is required for a municipal water supply well; or b. a new onsite sewage system or onsite sewage system holding tanks regulated under the <i>Ontario Building Code Act, 1992</i> that is located within an ICA, but outside of a WHPA-A or WHPA-B with a vulnerability score of 10, where these activities would be significant drinking water threats, the Area Municipalities shall amend their respective Zoning By-laws to prohibit uses, buildings and/or structures that would require a new onsite sewage system or onsite sewage system holding tank to be located within such areas, to ensure these activities never become significant drinking water threats.	a. Future onsite sewage works regulated under the <i>Ontario Building Code Act, 1992</i> required for a municipal water supply well; or b. Future onsite sewage works regulated under the <i>Ontario Building Code Act, 1992</i> located in a Nitrate WHPA-ICA, but outside of a WHPA-A or WHPA-B with a vulnerability score of 10 never become significant drinking water threats, where these activities would be significant drinking water threats, the Area Municipalities shall amend their respective Zoning By-laws to prohibit uses, buildings and/or structures that would require Future onsite sewage works to be located within such areas.	Editorial revisions for consistent language, formatting and policy structure.
OC-MC-3.3 <u>REMOVED</u> Existing/Future Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10 Nitrate WHPA-ICA (outside WHPA-A and WHPA-B v. 10)	For an existing onsite sewage system or onsite sewage system holding tank subject to an Environmental Compliance Approval in accordance with the <i>Ontario Water Resources Act, 1990</i>; or for any new onsite sewage system or onsite sewage system holding tank subject to an Environmental Compliance Approval in accordance with the <i>Ontario Water Resources Act, 1990</i> that is located within an ICA, but outside of a WHPA-A or a WHPA-B with a vulnerability score of 10, where these activities are, or would be, significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall review, and where necessary, amend Environmental Compliance Approvals, to incorporate terms and conditions that, when implemented, ensure these activities cease to be or never become significant drinking water threats. The terms and conditions should include, but not necessarily be limited to, requirements for the proponent/applicant to undertake mandatory monitoring of groundwater impacts, contingencies in the event that drinking water quality is adversely affected, regular and ongoing compliance monitoring, mandatory system inspections at least every five (5) years, annual reporting to the Source Protection Authority and the County on any required inspection or monitoring programs and upgrading of these onsite sewage systems to current standards, where necessary.	Not applicable.	Policy OC-MC-3.3 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.4 and LPSPA-MC-3.11.
OC-MC-3.4 <u>REMOVED</u> Future Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10	For a new onsite sewage system or onsite sewage system holding tank requiring an Environmental Compliance Approval, in accordance with the <i>Ontario Water Resources Act, 1990</i> that is located within a WHPA-A or WHPA-B with a vulnerability score of 10, where these activities would be significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall prohibit these activities through the Environmental Compliance Approvals process to ensure these activities never become significant drinking water threats.	Not applicable.	Policy OC-MC-3.4 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.8.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC-MC-3.5 <u>REMOVED</u> Existing Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10; WHPA-B-v.8; WHPA-C-v.8; Nitrate WHPA-ICA	For any existing sewage treatment plant effluent discharges, storage of sewage, combined sewer discharge to surface water, industrial effluent discharge or sewage treatment plant bypass discharge to surface water, where these activities are significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall review, and where necessary, amend Environmental Compliance Approvals to incorporate terms and conditions that, when implemented, ensure these activities cease to be significant drinking water threats.	Not applicable.	Policy OC-MC-3.5 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.3 and LPSPA-MC-3.5.
OC-MC-3.6 <u>REMOVED</u> Future Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10; WHPA-B-v.8; WHPA-C-v.8; Nitrate WHPA-ICA	For any new sewage treatment plant effluent discharge or storage of sewage, combined sewer discharge to surface water, industrial effluent discharge or sewage treatment plant discharge to surface water, where these activities would be significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall prohibit these activities through the Environmental Compliance Approvals process to ensure these activities never become significant drinking water threats.	Not applicable.	Policy OC-MC-3.6 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.6 and LPSPA-MC-3.7.
OC-MC-3.7 <u>REMOVED</u> Existing/Future Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA	For any existing or new sanitary sewer and related pipes, where this activity is, or would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall ensure that the Environmental Compliance Approval for this activity is prepared, or, where necessary, amended to incorporate terms and conditions that, when implemented ensure this activity ceases to be or will never become a significant drinking water threat. The terms and conditions may include, but not necessarily be limited to, requirements for regular maintenance and inspections by the holder of the Environmental Compliance Approval.	Not applicable.	Policy OC-MC-3.7 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.5 and LPSPA-MC-3.9.
OC-MC-3.8 <u>REMOVED</u> Existing/Future Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA	For any existing stormwater management facility that discharges stormwater, or for any new storm water management facility that discharges storm water located within an ICA, where the drainage area associated with the storm water management facility is less than or equal to 100 hectares, where such activities are, or would be, a significant drinking water threat; the Ministry of the Environment, Conservation and Parks shall review and, if necessary, amend Environmental Compliance Approvals to incorporate terms and conditions that, when implemented, will ensure this activity ceases to be or never becomes a significant drinking water threat.	Not applicable.	Policy OC-MC-3.8 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.4 and LPSPA-MC-3.11.
OC-MC-3.9 <u>REMOVED</u> Future Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10;	For any new stormwater management facility that would discharge stormwater where this activity would be a significant drinking water threat, except for: a new storm water management facility that discharges storm water located within an ICA, where the drainage area associated with the storm water management facility is less than or equal to 100 hectares, the Ministry of the Environment, Conservation and Parks shall prohibit this activity through the Environmental Compliance	Not applicable.	Policy OC-MC-3.9 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.8.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
	Approvals process to ensure this activity never becomes a significant drinking water threat.		
OC-LP-CW-3.10 Existing/Future Specify Action WHPA-A-v.10; WHPA-B-v.10	Not applicable. New policy.	To ensure that any Existing or Future: i) sanitary sewer; ii) outfall of a combined sewer outflow (CSO) or a sanitary sewer overflow (SSO) from a manhole or wet well; iii) sewage pumping station or lift station wet well, a holding tank or a tunnel; iv) outfall from a storm water management facility or storm water drainage system; or v) storm water infiltration facility that qualify for Consolidated Linear Infrastructure (CLI-ECA) preauthorization cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the County shall adhere to the terms and conditions incorporated into the CLI-ECA to protect drinking water sources.	New policy that requires municipal compliance with conditions in Consolidated Linear Infrastructure Environmental Compliance Approvals (CLI-ECA). This policy supports implementation of the new CLI-ECA framework and aligns municipal internal processes and Source Protection Plan policies (SPC-24-06-05).

Threat 3.0 – The application of agricultural source material (ASM) to land

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC-LP-CW-4.1 Existing/Future Part IV-Prohibit WHPA-A-v.10	For any new or existing application of agricultural source material to land within a WHPA-A, where this activity is, or would be, a significant drinking water threat, it shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited to ensure this activity ceases to be or never becomes a significant drinking water threat.	To ensure that any Existing or Future application of agricultural source material to land in a WHPA-A, ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.
OC-LP-CW-4.2 Existing/Future Part IV-RMP WHPA-B-v.10 Nitrate WHPA-ICA (outside WHPA-A)	For any new or existing application of agricultural source material to land outside of a WHPA-A, where this activity is, or would be, a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity ceases to be or never becomes a significant drinking water threat. The requirements of the Risk Management Plan will generally be based on the requirements of a Nutrient Management Plan and/or Strategy under the <i>Nutrient Management Act, 2002</i>, but may also include any modifications or additional requirements deemed necessary or appropriate by the Risk Management Official, particularly where such activity is located within an ICA. However, nothing in this policy grants the Risk Management Official the authority to specify requirements for a Prescribed Instrument issued under the <i>Nutrient Management Act, 2002</i>, or where a person is seeking an exemption from a Risk Management Plan under section 61 of <i>O. Reg 287/07</i>.	To ensure that any Existing or Future application of agricultural source material to land outside of a WHPA-A, ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Regional location (LP) added to the policy identifier. Removed additional text regarding Risk Management Plan requirements. Municipal Risk Management Officials have noted this wording was no longer necessary. Editorial revisions for consistent language and formatting.

Threat 4.0 – The storage of agricultural source material (ASM)

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- LP-CW-5.1 Future Part IV-Prohibit WHPA-A- v.10; WHPA-B- v.10	For any new storage of agricultural source material within a WHPA-A or WHPA-B with a vulnerability score of 10, where this activity would be a significant drinking water threat, it shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited to ensure this activity never becomes a significant drinking water threat.	To ensure that any Future storage of agricultural source material in a WHPA-A or WHPA-B with a vulnerability score of 10, never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.
OC- LP-CW-5.2 a) Existing Part IV-RMP WHPA-A- v.10; WHPA-B- v.10 Nitrate WHPA-ICA b) Future Part IV-RMP Nitrate WHPA-ICA (outside WHPA-A and WHPA-B v. 10)	For any existing storage of agricultural source material or new storage of agricultural source material located within an ICA, but outside of a WHPA-A or a WHPA-B with a vulnerability score of 10, where this activity is, or would be, a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity ceases to be or never becomes a significant drinking water threat. The requirements of the Risk Management Plan will generally be based on the requirements of a Nutrient Management Plan and/or Strategy under the <i>Nutrient Management Act, 2002</i> , but may also include any modifications or additional requirements deemed necessary or appropriate by the Risk Management Official, particularly where such activity is located within an ICA. However, nothing in this policy grants the Risk Management Official the authority to specify requirements for a prescribed instrument issued under the <i>Nutrient Management Act, 2002</i> , or where a person is seeking an exemption from a risk management plan under section 61 of <i>O. Reg 287/07</i> .	To ensure that any: a. Existing storage of agricultural source material; or b. Future storage of agricultural source material in a Nitrate WHPA-ICA but outside of a WHPA-A or a WHPA-B with a vulnerability score of 10, ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Regional location (LP) added to the policy identifier. Removed additional text regarding Risk Management Plan requirements. Municipal Risk Management Officials have noted this wording was no longer necessary. Editorial revisions for clarity, consistent language, formatting and policy structure.

Threat 6.0 – The application of non-agricultural source material (NASM) to land

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC-MC-6.1 REMOVED Existing/Future Prescribed Instrument WHPA-A- v.10; WHPA-B- v.10; Nitrate WHPA-ICA	For any existing or future application of non-agricultural source material to land where this activity is, or would be, a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs or the Ministry of the Environment, Conservation and Parks, as applicable, shall prohibit this activity through the Non-Agricultural Source Material (NASM) Plan process, in accordance with the <i>Nutrient Management Act, 2002</i> , or through the Environmental Compliance Approval process, in accordance with the <i>Environmental Protection Act, 1990</i> , to ensure this activity ceases to be or never becomes a significant drinking water threat.	Not applicable.	Policy OC-MC-6.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-6.3.
OC-LP-MC-6.2 Existing/Future Part IV-Prohibit WHPA-A-v.10; WHPA-B-v.10	Not applicable. New policy.	To ensure that any Existing or Future application of non-agricultural source material to land (NASM) in a WHPA-A or a WHPA-B with a vulnerability score of 10 ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, and where this activity is not subject to a NASM Plan <i>under the Nutrient Management Act, 2002</i> or the NASM Plan is not approved by the	New policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy only applies for threat activities that are not subject to a NASM Plan directly approved by OMAFA. The prohibition aligns with the general Lake Erie Region approach for agricultural threats (SPC-24-11-03).

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
		Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	
OC-LP-MC-6.3 Existing/Future Part IV-RMP Nitrate WHPA-ICA (outside WHPA-A or WHPA-B-v.10)	Not applicable. New policy.	To ensure that any Existing or Future application of non-agricultural source material to land (NASM) in a Nitrate WHPA-ICA but outside of a WHPA-A or a WHPA-B with a vulnerability score of 10 ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, and where this activity is not subject to a NASM Plan under the <i>Nutrient Management Act, 2002</i> or the NASM Plan is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	New policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy applies for threat activities that are not covered by NASM Plans directly approved by OMAFA (SPC-24-11-03). The County prefers to use Risk Management Plans (RMP) for portions of the Nitrate WHPA-ICA that fall outside of the most vulnerable areas. This is where activities pose less risk and this aligns with the County's approach for ASM (SPC-24-11-03).

Threat 7.0 – The handling and storage of non-agricultural source material (NASM)

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC-MC-7.1 REMOVED Existing Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA	For any existing facility for the handling and storage of non-agricultural source material where this activity is a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs, or Ministry of the Environment, Conservation and Parks, as applicable, shall review, and if necessary, amend the required Non-Agricultural Source Material (NASM) Plan, in accordance with the <i>Nutrient Management Act, 2002</i> , or Environmental Compliance Approval, in accordance with the <i>Environmental Protection Act, 1990</i> , to ensure such Plans/Compliance Approvals incorporate terms and conditions that, when implemented, ensure this activity ceases to be a significant drinking water threat.	Not applicable.	Policy OC-MC-7.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-6.2.
OC-MC-7.2 REMOVED Future Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA	For any new handling and storage of non-agricultural source material, where this activity would be a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs or Ministry of the Environment, Conservation and Parks, as applicable, shall prohibit this activity through the Non-Agricultural Source Material (NASM) Plan process in accordance with the <i>Nutrient Management Act, 2002</i> , or through the Environmental Compliance Approval process in accordance with the <i>Environmental Protection Act, 1990</i> , to ensure this activity never becomes a significant drinking water threat.	Not applicable.	Policy OC-MC-7.2 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-6.3.
OC-LP-CW-7.3 a) Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA b) Future	Not applicable. New policy.	To ensure that any: a) Existing handling and storage of non-agricultural source material (NASM); or b) Future handling and storage of NASM in a Nitrate WHPA-ICA but outside of a WHPA-A or a WHPA-B with a vulnerability score of 10	New policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy applies for threat activities that are not covered by NASM Plans directly approved by OMAFA (SPC-24-11-03). The County prefers to use a Risk Management Plans (RMP) for portions of the Nitrate WHPA-ICA that fall

Part IV - RMP Nitrate WHPA-ICA (outside WHPA-A or WHPA-B-v.10)		ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, and where this activity is not subject to a NASM Plan under the <i>Nutrient Management Act, 2002</i> or where the NASM Plan is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	outside of the most vulnerable areas. This is where activities pose less risk and this aligns with the County's approach for ASM (SPC-24-11-03).
OC-LP-CW-7.4 Future Part IV-Prohibit WHPA-A-v.10; WHPA-B-v.10	Not applicable. New policy.	To ensure that any Future handling and storage of non-agricultural source material (NASM) in a WHPA-A or a WHPA-B with a vulnerability score of 10 never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, and where this activity is not subject to a NASM Plan under the <i>Nutrient Management Act, 2002</i> or where the NASM Plan is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	New policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy only applies for threat activities that are not subject to a NASM Plan directly approved by OMAFA. The prohibition aligns with the general Lake Erie Region approach for agricultural threats (SPC-24-11-03).

Threat 8.0 – The application of commercial fertilizer to land

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- LP-CW-8.1 Existing/Future Part IV-RMP WHPA-A- v.10; WHPA-B- v.10; Nitrate WHPA-ICA Currently does not apply to the application of commercial fertilizer in the Norwich or Springford well systems due to managed land and livestock density calculations	For the existing or future application of commercial fertilizer to land, on properties zoned for any other use than residential, where this activity is, or would be, a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity ceases to be or never becomes a significant drinking water threat.	To ensure that any Existing or Future application of commercial fertilizer to land ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat on properties zoned for any use other than residential, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Regional location (LP) added to the policy identifier. Removed the sidebar note exempting commercial fertilizer application in the Norwich and Springford well systems for policy future-proofing. Editorial revisions for consistent language and formatting.
OC- LP-CW-8.2 Existing/Future Education & Outreach WHPA-A-v.10; WHPA-B-v.10; Nitrate-WHPA-ICA	For the existing or future application of commercial fertilizer to land, on properties zoned exclusively for residential purposes in the Area Municipal Zoning By-Laws, where this activity is, or would be, a significant drinking water threat, the County, in collaboration with the Conservation Authority, Area Municipalities, the Ministry of the Environment, Conservation and Parks, and/or other bodies wherever possible, shall develop and implement an education and outreach program directed at the owners and/or occupants of such properties to ensure this activity ceases to be or never becomes a significant drinking water threat. The program may include, but not necessarily be limited to, the provision of education material	To ensure that any Existing or Future application of commercial fertilizer to land, ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat on properties zoned exclusively for residential purposes, the County, in collaboration with the Conservation Authority, Area Municipalities, the Ministry of the Environment, Conservation and Parks, and/or other bodies wherever possible, shall develop and implement an education and outreach program directed at the owners and/or occupants of such properties The program may include, but not necessarily be limited to, the provision of education material and information about the nature of the threat and how commercial fertilizer can be applied appropriately.	Minor text revision to remove a redundant reference to zoning in Area Municipal Zoning By-Laws. Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
	and information about the nature of the threat and how commercial fertilizer can be applied appropriately.		

Threat 9.0 – The handling and storage of commercial fertilizer

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- <u>LP</u> -CW-9.1 a) Existing/ Future Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA b) Future Part IV-RMP Nitrate WHPA-ICA	For any existing handling and storage of commercial fertilizer; or for any new handling and storage of commercial fertilizer, where the total mass of all materials stored that contain the commercial fertilizer, in any form including liquid or solid, is less than or equal to 2,500 kilograms, where this activity is, or would be, a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity ceases to be or never becomes a significant drinking water threat.	To ensure that any a. Existing handling and storage of commercial fertilizer; or b. Future handling and storage of commercial fertilizer in a Nitrate WHPA-ICA where the total mass of all materials stored that contain the commercial fertilizer, in any form, is less than or equal to 2,500 kilograms ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Regional location (LP) added to the policy identifier. Minor text edit to clarify that the future portion of the policy only applies to activities in the Nitrate WHPA-ICA (i.e. the handling and storage of commercial fertilizer less than 2,500 kilograms is not significant in a WHPA-A or WHPA-B with a vulnerability score 10). Editorial revisions for clarity, consistent language, formatting and policy structure.
OC- <u>LP</u> -CW-9.2 Future Part IV-Prohibit WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA	For any new handling and storage of commercial fertilizer, where the total mass of all materials stored that contain the commercial fertilizer, in any form including liquid or solid, is greater than 2,500 kilograms, where this activity would be a significant drinking water threat, it shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited to ensure this activity never becomes a significant drinking water threat.	To ensure that any Future handling and storage of commercial fertilizer, where the total mass of all materials stored that contain the commercial fertilizer, in any form, is greater than 2,500 kilograms, never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Regional location (LP) added to the policy identifier. Editorial revisions for consistent language, formatting and policy structure.

Threat 10.0 – The application of pesticide to land

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- <u>LP</u> -CW-10.1 Existing/ Future Part IV-RMP WHPA-A-v.10; WHPA-B-v.10	For the existing or future application of pesticide to land where this activity is, or would be, a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity ceases to be or never becomes a significant drinking water threat.	To ensure that any Existing or Future application of pesticide to land ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Regional location (LP) added to the policy identifier. Editorial revisions for consistent language, formatting and policy structure.

Threat 11.0 – The handling and storage of pesticide

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- <u>LP</u> -CW-11.1 Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10	For any existing facility for the handling and storage of pesticide where this activity is a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity ceases to be a significant drinking water threat.	To ensure that any Existing handling and storage of a pesticide ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Regional location (LP) added to the policy identifier. Editorial revisions for consistent language, formatting and policy structure.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- LP -CW-11.2 Future Part IV-Prohibit WHPA-A-v.10; WHPA-B-v.10	For any new handling and storage of pesticide, where the total mass of all materials stored that contain a pesticide prescribed under the <i>Clean Water Act, 2006</i> , in any form, including liquid or solid, is more than 2500 kilograms, and where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited to ensure this activity never becomes a significant drinking water threat.	To ensure that any Future handling and storage of a pesticide where the total mass of all materials stored that contain a pesticide prescribed under the <i>Clean Water Act, 2006</i> , in any form, is more than 2,500 kilograms never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Regional location (LP) added to the policy identifier. Editorial revisions for consistent language, formatting and policy structure.
OC- LP -CW-11.3 Future Part IV-RMP WHPA-A-v.10; WHPA-B-v.10	For any new handling and storage of pesticide not addressed by policy OC-CW-11.2, where this activity would be a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity never becomes a significant drinking water threat.	To ensure that any Future handling and storage of pesticide not addressed by policy OC-LP-CW-11.2 never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Regional location (LP) added to the policy identifier. Editorial revisions for consistent language, formatting and policy structure.

Threat 13.0 – The handling and storage of road salt

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- LP -CW-12.1 Existing/Future Part IV-Prohibit WHPA-A- v.10; WHPA-B- v.10	For any existing or new handling and storage of road salt, where this activity is, or would be, a significant drinking water threat, it shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited to ensure this activity ceases to be or never becomes a significant drinking water threat.	To ensure that any Existing or Future handling and storage of road salt exposed to precipitation or runoff, on all property uses other than residential, ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To address the 2021 Technical Rules, the generic prohibition policy is revised to apply specifically to the new subthreat category (13.1) road salt exposed to precipitation or runoff. Exposed salt poses the greatest risk and occurs less frequently. This prohibition has minimal impact on the limited properties with identified threats (SPC-25-01-06). Revised text to clarify that this policy does not apply, and has not been implemented, for residential properties. Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.
OC-LP-CW-12.2 Existing/Future Part IV-RMP WHPA-A-v.10; WHPA-B-v.10	Not applicable. New policy.	To ensure any Existing or Future application of road salt or handling and storage of road salt potentially exposed to precipitation or runoff, on all property uses other than a residential, ceases to be, or never becomes, a significant drinking water threat, where this activity is or would be a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To address the 2021 Technical Rules, a policy is added for the new subthreat category 13.2 road salt potentially exposed to precipitation or runoff and to address newly identified threats for the application of road salt. The previous prohibition policy is too restrictive for all of these activities. Mitigation measures in a Risk Management Plan can effectively manage these threats and are implementable for the County (SPC-25-01-06). The proposed text clarifies that the policy does not apply to residential properties.
OC-LP-CW-12.3 Existing/Future Education & Outreach WHPA-A-v.10; WHPA-B-v.10	Not applicable. New policy.	To ensure that any Existing or Future application, handling and storage of road salt on a residential use cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the County shall develop and implement an education and	New policy to address road salt threat activities on residential properties. The softer tool of education and outreach is the most appropriate and implementable for broadly addressing incidental threats (e.g. single family residences) that are not

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
		outreach program directed at the owners and/or occupants of such properties.	enumerated in the Assessment Report (SPC-25-01-06).

Threat 14.0 – The storage of snow

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- LP -CW-13.1 Existing/Future Part IV-RMP WHPA-A- v.10; WHPA-B- v.10 Nitrate WHPA-ICA	For any existing or new storage of snow at or above grade where the storage area is less than or equal to 1 hectare, where this activity is, or would be, a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity ceases to be or never becomes a significant drinking water threat.	To ensure that any Existing or Future storage of snow ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Revised policy to remove circumstances and thresholds as per the 2021 Technical Rules. There is no longer an area threshold for snow storage in a WHPA with a vulnerability score of 10. Risk Management Plans are appropriate and implementable for the limited number of threats identified in the County (SPC-25-01-06). Nitrate WHPA-ICA removed from the sidebar for correctness (storage of snow is not a significant threat in this area). Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.
OC-CW-13.2 REMOVED Future Part IV-Prohibit WHPA-A- v.10; WHPA-B- v.10; Nitrate WHPA-ICA	For any new storage of snow below grade, or for any new storage of snow at or above grade where the storage area exceeds 1 hectare, where this activity would be a significant drinking water threat, it shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited to ensure this activity never becomes a significant drinking water threat.	Not applicable.	Policy removed, below grade storage of snow is no longer a significant threat under the 2021 Technical Rules (SPC-25-01-06).

Threat 15.0 – The handling and storage of fuel

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- LP -CW-14.1 Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10	For any existing handling and storage of fuel, where this activity is a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity ceases to be a significant drinking water threat.	To ensure that any Existing handling and storage of fuel ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.
OC- LP -CW-14.2 a) Future Part IV-Prohibit WHPA-A- v.10; WHPA-B- v.10 b) Future Part IV-RMP WHPA-A-v.10; WHPA-B-v.10	For any new handling and storage of fuel, where this activity would be a significant drinking water threat, a. This activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited to ensure this activity never becomes a significant drinking water threat. b. Notwithstanding OC-CW-14.2a), any handling and storage of fuel required for back-up generators at municipal supply wells shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i>	To ensure that any Future handling and storage of fuel never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, a. This activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited. b. Notwithstanding OC-LP-CW-14.2 a), any handling and storage of fuel required for back-up generators at municipal supply wells shall be designated for the	Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
	and a Risk Management Plan shall be required to ensure this activity never becomes a significant drinking water threat.	purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	

Threat 16.0 – The handling and storage of a dense non-aqueous phase liquid (DNAPL)

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- <u>LP</u> -CW-15.1 a) Existing/ Future Education & Outreach WHPA-A/B/C b) Existing /Future Part IV-RMP WHPA-A/B/C	For any existing or new handling and storage of a dense non-aqueous phase liquid, on properties zoned exclusively for residential and/or environmental protection purposes in the Area Municipal Zoning By-Laws, where this activity is, or would be, a significant drinking water threat, a. The County, in collaboration with the Conservation Authority, Area Municipalities, the Ministry of the Environment, Conservation and Parks, and/or other bodies wherever possible, shall develop and implement an education and outreach program directed at the owners and/or occupants of such properties to ensure this activity ceases to be or never becomes a significant drinking water threat. The program may include, but not necessarily be limited to, the provision of education material and information about the nature of the threat, how DNAPLs can be identified, handled and disposed of appropriately. b. Notwithstanding OC-CW-15.1a., where the quantity and/or volume of DNAPLs handled or stored on a property exceeds that typical of household use, the handling and storage of a dense non-aqueous phase liquid shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity ceases to be or never becomes a significant drinking water threat.	To ensure that any Existing or Future handling and storage of a dense non-aqueous phase liquid, on properties zoned exclusively for residential and/or environmental protection purposes, ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, a. The County, in collaboration with the Conservation Authority, Area Municipalities, the Ministry of the Environment, Conservation and Parks, and/or other bodies wherever possible, shall develop and implement an education and outreach program directed at the owners and/or occupants of such properties. The program may include, but not necessarily be limited to, the provision of education material and information about the nature of the threat, how DNAPLs can be identified, handled and disposed of appropriately. b. Notwithstanding OC-LP-CW-15.1a), where the Future quantity and/or volume of DNAPLs handled or stored on a property will exceed that typical of household use, the handling and storage of a dense non-aqueous phase liquid shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Policy revised to address an implementation challenge identified by the County. The Risk Management Official has been unable to enumerate residential properties where the volume of DNAPLs exceeds typical household use. Existing residential use of DNAPLs has been effectively managed through education and outreach. The portion of the policy that requires a Risk Management Plan (RMP) for existing residential threats is removed. The RMP requirement for future threats is maintained (SPC-24-10-03). Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.
OC- <u>LP</u> -CW-15.2 Existing Part IV-RMP WHPA-A/B/C	For any existing handling and storage of a dense non-aqueous phase liquid, on properties zoned for any other use than residential and/or environmental protection in the Area Municipal Zoning By-Laws, where this activity is a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity ceases to be a significant drinking water threat.	To ensure that any Existing handling and storage of a dense non-aqueous phase liquid, on properties zoned for any use other than residential and/or environmental protection, ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Regional location (LP) added to the policy identifier. Minor text revision to remove a redundant reference to zoning in Area Municipal Zoning By-Laws. Editorial revisions for consistent language and formatting.
OC- <u>LP</u> -CW-15.3 Future Part IV-Prohibit WHPA-A-v.10; WHPA-B-v.10	For any new handling and storage of a dense non-aqueous phase liquid, on properties zoned for any other use than residential and/or environmental protection in the Area Municipal Zoning By-Laws and located within a WHPA-A or B with a vulnerability score equal to ten (10), where this activity would be a significant drinking water threat, it shall be designated for the purpose of Section 57 of the <i>Clean Water</i>	To ensure that any Future handling and storage of a dense non-aqueous phase liquid in a WHPA-A or B with a vulnerability score of ten (10), on properties zoned for any use other than residential and/or environmental protection, never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Regional location (LP) added to the policy identifier. Minor text revision to remove a redundant reference to zoning in Area Municipal Zoning By-Laws. Editorial revisions for consistent language and formatting.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
	<i>Act, 2006</i> and shall be prohibited to ensure this activity never becomes a significant drinking water threat.		
OC- LP -CW-15.4 Future Part IV-RMP WHPA-B-8,6,4; WHPA-C	For any new handling and storage of a dense non-aqueous phase liquid, on properties zoned for any other use than residential and/or environmental protection in the Area Municipal Zoning By-Laws and located within a WHPA-B with a vulnerability score of less than ten (10), or a WHPA-C, where such an activity would be a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity never becomes a significant drinking water threat.	To ensure that any Future handling and storage of a dense non-aqueous phase liquid in a WHPA-B with a vulnerability score of less than ten (10) or a WHPA-C, on properties zoned for any use other than residential and/or environmental protection , never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Regional location (LP) added to the policy identifier. Minor text revision to remove a redundant reference to zoning in Area Municipal Zoning By-Laws. Editorial revisions for consistent language and formatting.

Threat 17.0 – The handling and storage of an organic solvent

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- LP -CW-16.1 Existing Part IV-RMP WHPA-A- v.10; WHPA-B- v.10	For any existing handling and storage of an organic solvent where this activity is a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity ceases to be a significant drinking water threat.	To ensure that any Existing handling and storage of an organic solvent, on properties zoned for any use other than residential and/or environmental protection, ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Policy revised to exclude the handling and storage of organic solvents on residential properties. The County addresses DNAPL and organic solvent threat activities together, and requested that policy approaches for the two threat activities align to reflect the reality of implementation. Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.
OC- LP -CW-16.2 Future Part IV-Prohibit WHPA-A- v.10; WHPA-B- v.10	For any new handling and storage of an organic solvent, where this activity would be a significant drinking water threat, it shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited to ensure this activity never becomes a significant drinking water threat.	To ensure that any Future handling and storage of an organic solvent, on properties zone for any use other than residential and/or environmental protection, never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Policy revised to exclude the handling and storage of organic solvents on residential properties. The County addresses DNAPL and organic solvent threat activities together, and requested that policy approaches for the two threat activities align to reflect the reality of implementation. Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.
OC-LP-CW-16.3 a) Existing/Future Education & Outreach WHPA-A-v.10 WHPA-B-v.10 b) Future Part IV-RMP WHPA-A-v.10 WHPA-B-v.10	Not applicable. New policy.	To ensure that any Existing or Future handling and storage of an organic solvent, on properties zoned exclusively for residential and/or environmental protection, ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, a. The County, in collaboration with the Conservation Authority, Area Municipalities, the Ministry of the Environment, Conservation and Parks, and/or other bodies wherever possible, shall develop and implement an education and outreach program directed at the owners and/or occupants of such properties. The program may include, but not necessarily be limited to, the provision of educational material and information about	New policy to manage the handling and storage of organic solvents on residential properties. The County addresses DNAPL and organic solvent threat activities together, and requested that policy approaches for the two threat activities align to reflect the reality of implementation.

		the nature of the threat, how organic solvents can be identified, handled and disposed of appropriately. b. Notwithstanding OC-LP-CW-16.3a), where the future quantity and/or volume of organic solvents handled or stored on a property will exceed that typical of household use, the handling and storage of an organic solvent shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	
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Threat 18.0 – The management of runoff that contains chemicals used in the de-icing of aircraft

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC-CW-17.1 REMOVED Future Part IV-RMP WHPA-A-v.10; WHPA-B-v.10	For a new airport where there could be runoff containing de-icing chemicals, where this activity would be a significant drinking water threat, it shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure this activity never becomes a significant drinking water threat.	Not applicable.	Policy removed as no airport facilities exist or are anticipated within the municipality.

Threat 21.0 – The use of land as livestock grazing or pasturing land, an outdoor confinement area or farm animal yard

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC- LP -CW-18.1 a) Existing/ Future Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA b) Future Part IV-RMP Nitrate WHPA-ICA	For the existing or future use of land as livestock grazing or pasturing land, an outdoor confinement area or a farm-animal yard, where these activities are, or would be, a significant drinking water threat, they shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required to ensure these activities cease to be or never become a significant drinking water threat.	To ensure that any - Existing livestock grazing or pasturing or outdoor confinement area or farm-animal yard; or - Future livestock grazing or pasturing or outdoor confinement area or farm animal yard in a Nitrate WHPA-ICA cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, and where the outdoor confinement area or farm animal yard is not subject to Nutrient Management Strategy under the <i>Nutrient Management Act, 2002</i> or the Nutrient Management Strategy is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), these activities shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Policy revised to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy applies for threat activities not subject to a Nutrient Management Strategy directly approved by OMAFA (SPC-24-11-03). Policy revised to exclude future threats in WHPA-A and WHPA-B from requiring a Risk Management Plan (RMP) and instead applying a prohibition under new policy OC-LP-CW-18.2. The County noted difficulty in establishing and enforcing RMPs for future threat occurrences in these areas. Prohibition of future activities in WHPA-A and WHPA-B will be easier to enforce and can be captured under the Section 59 process. This also aligns with the general Lake Erie Region approach for agricultural threats. Prohibition of existing activities was also considered; however, this would cause unreasonable hardship on landowners (SPC-24-11-03). Regional location (LP) added to the policy identifier.
OC-LP-CW-18.2 Future Part IV-Prohibit WHPA-A-v.10;	Not applicable. New policy.	To ensure that any Future: - livestock grazing or pasturing; or - outdoor confinement area or farm animal yard	New policy to prohibit future threats in WHPA-A and WHPA-B with a vulnerability score of 10. See rationale above for related changes to OC-LP-CW-18.1 and SPC-24-11-03.

<u>WHPA-B-v.10;</u>		in a WHPA-A or a WHPA-B with a vulnerability score of 10 never become significant drinking water threats, where these activities would be significant drinking water threats, and where the outdoor confinement area or farm animal yard is not subject to a Nutrient Management Strategy under the <i>Nutrient Management Act, 2002</i> or the Nutrient Management Strategy is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), these activities shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	
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Threat 22.0 – The establishment and operation of a liquid hydrocarbon pipeline

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
OC-NB-19.1 <u>REMOVED</u> Future Specify Action WHPA-A v.10; WHPA-B v.10; IPZ-1 v. 9 Monitoring	To ensure that the establishment and operation of a liquid hydrocarbon pipeline within the meaning of <i>O. Reg. 210/01</i> under the <i>Technical Safety and Standards Act, 2000</i> or that is subject to the <i>National Energy Board Act, 1985</i> , never becomes a significant drinking water threat within a WHPA-A and WHPA-B with a vulnerability score of 10, the National Energy Board, Ontario Energy Board, and the pipeline proponent shall provide the Source Protection Authority and the County with the location of any new pipelines proposed within the Source Protection Region. The Source Protection Authority shall document in the annual report the number of new pipelines proposed within WHPAs, where they would be a significant drinking water threat.	Not applicable.	Policy OC-NB-19.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-NB-8.1.

NORFOLK COUNTY– POLICIES ADDRESSING PRESCRIBED DRINKING WATER THREATS

Threat 1.0 – The establishment, operation or maintenance of a waste disposal site within the meaning of Part V or the *Environmental Protection Act, 1990*

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-MC-2.1 REMOVED Existing Prescribed Instrument WHPA-A-v.10; WHPA-B-v.8; WHPA-B-v.10; WHPA-C-v.8; IPZ-1-v.9; Nitrate WHPA-ICA	To ensure that any existing waste disposal site within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> that is subject to an Environmental Compliance Approval ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall review, and if necessary, amend Environmental Compliance Approvals to ensure that terms and conditions are incorporated that, when implemented, ensure that the waste disposal site is managed to reduce the risk to municipal drinking water sources. The terms and conditions may include, as appropriate, ongoing monitoring and leak/contamination detection, capture, and treatment methods, as well as run-off prevention techniques completed by the proponent.	Not applicable.	Policy NC-MC-2.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.1.
NC-CW-2.2 a) Existing Part IV-RMP WHPA-A- v.10 b) Existing/Future Part IV-RMP WHPA-B-v.10; Nitrate WHPA-ICA (outside WHPA-A)	To ensure that any existing waste disposal site within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> which does not require an Environmental Compliance Approval under Part V of the <i>Environmental Protection Act, 1990</i> , ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, within a WHPA-A this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act</i> , 2006 and a Risk Management Plan shall be required.	To ensure that any waste disposal sites within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> not subject to an Environmental Compliance Approval cease to be significant drinking water threats, where these activities are, or would be, significant drinking water threats, a) Existing activities in a WHPA-A; and b) Existing and Future activities outside of a WHPA-A shall be designated for the purpose of Section 58 of the <i>Clean Water Act</i> , 2006 and a Risk Management Plan shall be required.	The requirement for a Risk Management Plan for existing and future activities outside of WHPA-A has been pulled out of NC-CW-2.4 and added to NC-CW-2.2. This ensures that both policies only apply one approach. Editorial revisions for consistent language, formatting and structure.
NC-MC-2.3 REMOVED Future Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10; WHPA-B-v.8; WHPA-C-v.8; IPZ-1-v.9; Nitrate WHPA-ICA	To ensure that the establishment, operation or maintenance of a new waste disposal site within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> that is subject to an Environmental Compliance Approval never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall prohibit this activity within the Environmental Compliance Approvals process.	Not applicable.	Policy NC-MC-2.3 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.2.
NC-CW-2.4 Future Part IV-Prohibit WHPA-A-v.10 b) Existing/Future Part IV-RMP WHPA-B-v.8; WHPA-B-v.10;	To ensure that the establishment, operation or maintenance of a waste disposal site within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> which does not require an Environmental Compliance Approval, ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat,	To ensure that any Future waste disposal sites within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> not subject to an Environmental Compliance Approval in a WHPA-A cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, these activities shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	The requirement for a Risk Management Plan for existing and future activities outside of WHPA-A has been pulled out of NC-CW-2.4 and added to NC-CW-2.2. This ensures that both policies only apply one approach. Editorial revisions for consistent language, formatting and structure.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
WHPA-C-v.8; IPZ-1-v.9 ICA(NIT) (outside WHPA-A)	a) Future activities shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> within a WHPA-A and shall be prohibited. Existing and Future activities shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required within a WHPA-B or C with a vulnerability score greater than or equal to eight (8) and an IPZ with a vulnerability score equal to nine (9) and a Nitrate ICA outside of a WHPA-A.		

Threat 2.0 – The establishment, operation or maintenance of a system the collects, stores, transmits, treats or disposes of sewage

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-3.1 Existing/Future Specify Action WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA	To ensure that any existing or new onsite sewage system and/or onsite sewage system holding tank with a design flow of less than or equal to 10,000 Litres per day and subject to approval under the <i>Ontario Building Code Act, 1992</i> or the <i>Ontario Water Resources Act, 1990</i> ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the County shall implement an onsite sewage system maintenance inspection program, as required under the <i>Ontario Building Code Act, 1992</i>. Inspections should be prioritized based on the proximity to the drinking water supply.	To ensure that any Existing or Future onsite sewage works with a design flow of less than or equal to 10,000 Litres per day and subject to approval under the <i>Ontario Building Code Act, 1992</i> or the <i>Ontario Water Resources Act, 1990</i> cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the County shall implement an onsite sewage system maintenance inspection program, as required under the <i>Ontario Building Code Act, 1992</i>. Inspections should be prioritized based on the proximity to the drinking water supply.	On-site sewage “systems” renamed to sewage “works” as per the 2021 Technical Rules (SPC-24-06-05). Editorial revisions for consistent language and formatting.
NC-MC-3.2 Future Land Use Planning & Specify Action WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA	To ensure that any replacement or new onsite sewage system and/or onsite sewage system holding tank with a design flow of less than or equal to 10,000 Litres per day and subject to approval under the <i>Ontario Building Code Act, 1992</i> or the <i>Ontario Water Resources Act, 1990</i> never becomes a significant drinking water threat, the County shall amend their Official Plan and Zoning By-law to direct land uses relying on these activities to a location on the same property where these activities would not be a significant drinking water threat, where possible. Further, the County shall assess the option of identifying preferred systems (e.g. tertiary treatment) for development.	To ensure that any replacement or Future onsite sewage works with a design flow of less than or equal to 10,000 Litres per day and subject to approval under the <i>Ontario Building Code Act, 1992</i> or the <i>Ontario Water Resources Act, 1990</i> never become significant drinking water threats, where these activities would be significant drinking water threats, the County shall amend their Official Plan and Zoning By-law to direct land uses relying on these activities to a location on the same property where these activities would not be a significant drinking water threat, where possible. Further, the County shall assess the option of identifying preferred systems (e.g. tertiary treatment) for development.	On-site sewage “systems” renamed to sewage “works” as per the 2021 Technical Rules (SPC-24-06-05). Specify Action removed from the sidebar for correctness. Editorial revisions for consistent language and formatting.
NC-MC-3.3 <u>REMOVED</u> Existing Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA	To ensure that an existing onsite sewage system and/or onsite sewage system holding tank with a design flow of greater than 10,000 Litres per day and regulated under the <i>Ontario Water Resources Act, 1990</i> ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall review and, if necessary, amend Environmental Compliance Approvals to incorporate terms and conditions that, when implemented, ensure that these onsite sewage systems are managed to reduce the risk to drinking water sources.	Not applicable.	Policy NC-MC-3.3 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.4.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
	The terms and conditions may include, as appropriate, requirements for the proponent/applicant to undertake mandatory monitoring of groundwater impacts, contingencies in the event that drinking water quality is adversely affected, regular and ongoing compliance monitoring, mandatory system inspections at least every five (5) years, and upgrading of these onsite sewage systems to current standards, if necessary. In addition, the terms and conditions may include annual reporting to the County of any monitoring and inspection programs required and their results.		
NC-MC-3.4 Future Land Use Planning WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA	To ensure that the establishment of a new onsite sewage system and/ or onsite sewage system holding tank with a design flow of greater than 10,000 Litres per day and regulated under the <i>Ontario Water Resources Act, 1990</i> never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, the County shall amend their Official Plan and Zoning By-law to prohibit new development which relies on this type of onsite sewage system.	To ensure that any Future onsite sewage works with a design flow of greater than 10,000 Litres per day and regulated under the <i>Ontario Water Resources Act, 1990</i> never become significant drinking water threats, where these activities would be significant drinking water threats, the County shall amend their Official Plan and Zoning By-law to prohibit future development which relies on these types of onsite sewage works.	On-site sewage “systems” renamed to sewage “works” as per the 2021 Technical Rules (SPC-24-06-05). Editorial revisions for consistent language and formatting.
NC-MC-3.5 <u>REMOVED</u> Existing/Future Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA	To ensure that existing or new sanitary sewer and related pipe cease to be or never become a significant drinking water threat, where this activity is, or would be, a significant drinking water threat the Ministry of the Environment, Conservation and Parks shall ensure that Environmental Compliance Approvals, where required, be prepared and, if necessary, be amended to incorporate terms and conditions that, when implemented, will reduce the risks to the municipal drinking water sources. The terms and conditions may include requirements for regular maintenance and inspections conducted by the proponent.	Not applicable.	Policy NC-MC-3.5 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.5 and LPSPA-MC-3.9.
NC-MC-3.6 <u>REMOVED</u> Future Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10; WHPA-B-v.8; WHPA-C-v.8; IPZ-1-v.9; Nitrate WHPA-ICA	To ensure that the future storage of sewage, treatment plant effluent discharges, combined sewer discharge from a stormwater outlet, industrial effluent discharges and/or sewage treatment plant by-pass discharge to surface water never become a significant drinking water threat, where these activities would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall prohibit these activities within the Environmental Compliance Approval process.	Not applicable.	Policy NC-MC-3.6 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.6 and LPSPA-MC-3.7.
NC-CW-3.7 Existing Specify Action WHPA-A-v.10; WHPA-B-v.10; WHPA-B-v.8; WHPA-C-v.8; IPZ-1-v.9 Nitrate WHPA-ICA	To ensure that the existing storage of sewage and/or sewage treatment plant effluent discharges cease to be significant drinking water threats, where such activities are significant drinking water threats, the County shall promote available programs, such as the Grand River Watershed Wastewater Optimization Program.	To ensure that any Existing wastewater treatment facilities and associated parts cease to be significant drinking water threats, where these activities are significant drinking water threats, the County shall promote available programs aimed at optimizing the operation of wastewater treatment facilities to improve their performance and protect water quality.	Revised subthreat category naming to “wastewater treatment facilities and associated parts” and revised the sidebar to reflect the correct applicability, as per the 201 Technical Rules (SPC-24-06-05). Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. WHPA-B-v.8 and WHPA-C-v.8 removed from the sidebar for correctness, as the wastewater treatment

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
			subthreat category (2.8) is not significant in these areas under the 2021 Technical Rules. Nitrate WHPA-ICA added to the sidebar for correctness, as the wastewater treatment subthreat category is significant in this area under the 2021 Technical Rules. Removed incorrect reference to the Grand River Watershed Wastewater Optimization Program. Editorial edits for consistent language and formatting.
NC-MC-3.8 <u>REMOVED</u> <u>Existing Prescribed Instrument</u> <u>WHPA-A-v.10;</u> <u>WHPA-B-v.10;</u> <u>WHPA-B-v.6;</u> <u>WHPA-C-v.8;</u> <u>IPZ-1-v.9</u>	To ensure that combined sewer discharge from a stormwater outlet, industrial effluent discharges and/or sewage treatment plant by-pass discharge to surface water cease to be significant drinking water threats, where such activities are significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall review, and if necessary, amend Environmental Compliance Approvals to incorporate terms and conditions that, when implemented, will reduce the risks to municipal drinking water sources.	Not applicable.	Policy NC-MC-3.8 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.3 and LPSPA-MC-3.5.
NC-MC-3.9 <u>REMOVED</u> <u>Existing/Future Prescribed Instrument</u> <u>WHPA-A-v.10;</u> <u>WHPA-B-v.10;</u> <u>IPZ-1-9</u> <u>Nitrate WHPA-ICA</u>	To ensure that any existing or new stormwater management facility that discharges stormwater never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall review and, if necessary, amend Environmental Compliance Approvals to incorporate terms and conditions (for example: regular maintenance) that, when implemented, will reduce the risks to municipal drinking water sources.	Not applicable.	Policy NC-MC-3.9 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.4 and LPSPA-MC-3.10.
<u>NC-CW-3.9.1</u> <u>Existing/Future Part IV-RMP</u> <u>WHPA-A-v.10;</u> <u>WHPA-B-v.10;</u> <u>Nitrate WHPA-ICA</u>	Not applicable. New policy.	To ensure that any Existing or Future: i) outfall from a stormwater management facility or stormwater drainage system; or ii) stormwater infiltration facility not subject to an Environmental Compliance Approval, or not required to register on the Environmental Activity and Sector Registry (EASR), cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, these activities shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	New policy to address any stormwater management threat activities that are exempt from Ministry approval requirements as per Ontario Regulation 525/98 under the <i>Ontario Water Resources Act, 1990</i> . Updated Ministry guidance (March 2025) authorized the use of Part IV tools to manage or prohibit these types of activities. Not all municipalities in Lake Erie Region require this policy. Norfolk County specifically requested it be added to their chapter of the Source Protection Plan.
<u>NC-CW-3.10</u> <u>Existing/Future Specify Action</u> <u>WHPA-A-v.10;</u> <u>WHPA-B-v.10</u> <u>Nitrate WHPA-ICA</u>	Not applicable. New policy.	To ensure that any Existing or Future: i) sanitary sewer; ii) outfall of a combined sewer outflow (CSO) or a sanitary sewer overflow (SSO) from a manhole or wet well; iii) sewage pumping station or lift station wet well, a holding tank or a tunnel;	New policy that requires municipal compliance with the conditions in Consolidated Linear Infrastructure Environmental Compliance Approvals (CLI-ECA). This policy supports implementation of the new CLI-ECA framework and aligns municipal internal processes and Source Protection Plan policies (SPC-24-06-05).

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
		iv) outfall from a storm water management facility or storm water drainage system; or v) storm water infiltration facility that qualify for Consolidated Linear Infrastructure (CLI-ECA) preauthorization cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the County shall adhere to the terms and conditions incorporated into the CLI-ECA to protect drinking water sources.	

Threat 3.0 – The application of agricultural source material (ASM) to land

Threat 4.0 – The storage of agricultural source material (ASM)

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-4.1 Existing/Future Part IV-RMP WHPA-B-v.10	To ensure that the existing or future application and storage of agricultural source material to land cease to be or never become significant drinking water threats, for lands not phased-in under the <i>Nutrient Management Act, 2002</i> within a WHPA-B with a vulnerability score equal to ten (10), this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required. The requirements of the Risk Management Plan will generally be based on the requirements of a Nutrient Management Plan and/or Strategy under the <i>Nutrient Management Act, 2002</i> , but may also include any modifications or additional requirements deemed necessary or appropriate by the Risk Management Official.	To ensure that any Existing or Future: a. application of agricultural source material to land; or b. storage of agricultural source material not subject to a Nutrient Management Strategy under the <i>Nutrient Management Act, 2002</i> or where a Nutrient Management Strategy is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), in a WHPA-B with a vulnerability score equal to ten (10), cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, these activities shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Revised policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. For the storage of agricultural source material (ASM), the Part IV policy applies to activities that are not subject to a Nutrient Management Strategy directly approved by OMAFA (SPC-24-11-03). Removed additional text regarding Risk Management Plan requirements. Municipal Risk Management Officials have noted this wording was no longer necessary. Editorial revisions for consistent language, formatting, and structure.
NC-MC-4.2 REMOVED Existing/Future Prescribed Instrument WHPA-B-v.10	To ensure that the existing or future application and storage of agricultural source material to land phased-in under the <i>Nutrient Management Act, 2002</i> within a WHPA-B with a vulnerability score equal to ten (10) ceases to be or never becomes a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs shall review and, if necessary, amend the Nutrient Management Plan/Strategy to incorporate measures and/or terms and conditions that, when implemented, will reduce the risks to municipal drinking water sources.	Not applicable.	Policy NC-MC-4.2 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-6.1 and LPSPA-MC-6.6.
NC-CW-4.3 Existing/Future Part IV-Prohibit WHPA-A-v.10; IPZ-1-v.9	To ensure that the existing or future application and storage of agricultural source material to land within a WHPA-A or IPZ with a vulnerability score equal to nine (9) ceases to be or never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Existing or Future application or storage of agricultural source material in a WHPA-A cease to be or never become significant drinking water threats, where these activities are, or would be, significant drinking water threats, these activities shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Editorial revisions for consistent language and formatting.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-4.4 Existing/Future Education & Outreach WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA IPZ-1-v.9	To ensure that the existing or future application or storage of agricultural source material ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the County shall develop and implement an education and outreach program targeted to individuals storing and applying agricultural source material to land within vulnerable areas.	To ensure that any Existing or Future application or storage of agricultural source material cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the County shall develop and implement an education and outreach program targeted to individuals storing and applying agricultural source material to land within vulnerable areas.	Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Editorial revisions for consistent language and formatting.

Threat 6.0 – The application of non-agricultural source material (NASM) to land

Threat 7.0 – The handling and storage of non-agricultural source material (NASM)

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-MC-5.1 <u>REMOVED</u> Existing/Future Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.9 In the Delhi and Waterford well systems policy only applies to the application of NASM from a meat plant or sewage works	To ensure that the existing and future application of non-agricultural source material to land within a WHPA-A or B with a vulnerability score equal to ten (10) or IPZ with a vulnerability score equal to nine (9) ceases to be or never becomes a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs or the Ministry of the Environment, Conservation and Parks, as applicable, shall revoke, or not approve, any Non-Agricultural Source Material (NASM) Plan, in accordance with the <i>Nutrient Management Act, 2002</i> , or any activity within the Environmental Compliance Approval process in accordance with the <i>Environmental Protection Act, 1990</i> that permits, or would permit, the application of non-agricultural source material within these vulnerable areas.	Not applicable.	Policy NC-MC-5.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-6.3.
NC-CW-5.1.1 Existing/Future Part IV-RMP WHPA-A-v.10 WHPA-B-v.10	Not applicable. New policy.	To ensure that any Existing or Future application of non agricultural source material (NASM) to land in a WHPA-A or B with a vulnerability score equal to ten (10), ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, and where this activity is not subject to a NASM Plan under the <i>Nutrient Management Act, 2002</i> or the NASM Plan is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	New policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy applies to activities that are not subject to a NASM Plan directly approved by OMAFA (SPC-24-11-03). NASM categories that do not require an OMAFA approved NASM Plan often pose less risk, such as leaf and yard material, fruits and vegetable cuttings, crop cuttings and material from non-farm herbivorous animals. Norfolk County has chosen not to prohibit these lesser categories of NASM, as few to no occurrences are likely and a Risk Management Plan can adequately manage the activity without placing unnecessary hardship on landowners.
NC-CW-5.2 Existing/Future Education & Outreach WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA	To ensure that the existing or future application or storage of non-agricultural source material on land ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the County shall develop and implement an education and outreach program targeted to individuals storing and applying non-agricultural source material to land within vulnerable areas	To ensure that any Existing or Future application, handling or storage of non-agricultural source material (NASM) cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the County shall develop and implement an education and outreach program targeted to individuals storing and applying non-agricultural source material to land within vulnerable areas to	Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Editorial revisions for consistent language and formatting.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
IPZ-1-v.9	to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	
NC-MC-5.3 REMOVED Existing Prescribed Instrument WHPA-A-v.10; WHPA-B-v.10	To ensure that the existing handling and storage of non-agricultural source material within a WHPA-A or B with a vulnerability score equal to ten (10) ceases to be a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs, or Ministry of the Environment, Conservation and Parks, as applicable, shall review and, if necessary, amend a Non-Agricultural Source Material (NASM) Plan, in accordance with the <i>Nutrient Management Act, 2002</i> , or an Environmental Compliance Approval, in accordance with the <i>Environmental Protection Act, 1990</i> , to incorporate measures and/or terms and conditions that, when implemented, will reduce the risks to municipal drinking water sources.	Not applicable.	Policy NC-MC-5.3 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-6.2.
NC-CW-5.3.1 Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10	Not applicable. New policy.	To ensure that any Existing handling and storage of non-agricultural source material in a WHPA-A or -B with a vulnerability score equal to ten (10) ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, and where this activity is not subject to a NASM Plan under the <i>Nutrient Management Act, 2002</i> or the NASM Plan is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	New policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy applies to activities that are not subject to a NASM Plan directly approved by OMAFA. The use of a Risk Management Plan aligns with the general Lake Erie Region approach for agricultural threats (SPC-24-11-03).
NC-MGCW-5.4 Future Part IV-Prohibit WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.9	To ensure that any new facility for the handling and storage of non-agricultural source material on lands within a WHPA-A or B with a vulnerability score equal to ten (10) or IPZ with a vulnerability score equal to nine (9) never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Future handling and storage of non-agricultural source material (NASM) in a WHPA-A or B with a vulnerability score equal to ten (10) never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, and where this activity is not subject to a NASM Plan under the <i>Nutrient Management Act, 2002</i> or the NASM Plan is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Revised policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy applies to activities that are not subject to a NASM Plan directly approved by OMAFA (SPC-24-11-03). Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Editorial revisions for consistent language and formatting.

Threat 8.0 – The application of commercial fertilizer to land

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-6.1 Existing/Future Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; Nitrate-WHPA-ICA	To ensure that the existing and future application of commercial fertilizer to land within a WHPA-A or B with a vulnerability score equal to ten (10) or IPZ with a vulnerability score equal to nine (9) ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of	To ensure that the Existing and Future application of commercial fertilizer to land ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Revised policy to also apply within the Nitrate WHPA-ICA. This ensures that all significant threat areas are covered by the policy and education and outreach becomes supplementary to the Risk Management Plan tool. This is consistent with the general Lake Erie Region approach for agricultural threats (SPC-24-11-03).

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
IPZ-1-v.9 Currently does not apply to the application of commercial fertilizer in the Delhi and Waterford well systems due to managed land and livestock density calculations	Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.		Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Removed the sidebar note exempting commercial fertilizer application in the Delhi and Waterford well systems for policy future-proofing. Editorial revisions for consistent language and formatting.
NC-CW-6.2 Existing/Future Education & Outreach WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA- ICA IPZ-1-v.9	To ensure that the existing or future application of commercial fertilizer to land ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the County shall develop and implement an education and outreach program targeted to individuals applying commercial fertilizer to land within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	To ensure that the Existing or Future application of commercial fertilizer to land ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the County shall develop and implement an education and outreach program targeted to individuals applying commercial fertilizer to land within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Editorial revisions for consistent language and formatting.

Threat 9.0 – The handling and storage of commercial fertilizer

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-7.1 Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; Nitrate-WHPA-ICA	To ensure that any existing handling and storage of more than 2,500 Kilograms of commercial fertilizer as defined in <i>O.Reg. 267/03</i> , under the <i>Nutrient Management Act, 2002</i> ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Existing handling and storage of commercial fertilizer more than 2,500 kilograms ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Editorial revisions for consistent language and formatting.
NC-CW-7.2 Future Part IV-Prohibit WHPA-A-v.10; WHPA-B-v.10; Nitrate-WHPA-ICA	To ensure that any future handling and storage of more than 2,500 Kilograms of commercial fertilizer as defined in <i>O.Reg. 267/03</i> under the <i>Nutrient Management Act, 2002</i> never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Future handling and storage commercial fertilizer more than 2,500 kilograms of commercial fertilizer never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Editorial revisions for consistent language and formatting.
NC-CW-7.3 Existing/Future Education & Outreach Nitrate WHPA-ICA	Not applicable. New policy.	To ensure that any Existing or Future handling and storage of less than or equal to 2,500 kilograms of commercial fertilizer ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the County shall develop and implement an education and outreach program targeted to individuals handling and storing commercial fertilizer within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	To address the 2021 Technical Rules, a policy is required for the handling and storage of commercial fertilizer for quantities less than 2,500 kilograms in the Nitrate WHPA-ICA, as there is no volume threshold for significant threats in the WHPA-ICA. A softer policy approach is most appropriate to address these smaller volumes that would be too onerous to manage through stronger regulatory tools.

Threat 10.0 – The application of pesticide to land

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-8.1 Existing/Future Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.9	To ensure that any existing or future application of pesticides ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Existing or Future application of pesticides ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Minor edits for consistent formatting.
NC-CW-8.2 Existing/Future Education & Outreach WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.9	To ensure that the existing or future application of pesticides ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the County shall develop and implement an education and outreach program targeted to individuals applying pesticides to land within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	To ensure that the Existing or Future application of pesticides ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the County shall develop and implement an education and outreach program targeted to individuals applying pesticides to land within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Minor edits for consistent formatting.

Threat 11.0 – The handling and storage of pesticide

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-9.1 Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.9	To ensure that any existing handling and storage of pesticides ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Existing handling and storage of pesticides ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Minor edits for consistent formatting.
NC-CW-9.2 Future Part IV-Prohibit WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.9	To ensure that the future handling and storage of pesticides never become a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Future handling and storage of pesticides never become a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Minor edits for consistent formatting.

Threat 12.0 – The application of road Salt

Threat 13.0 – The handling and storage of road salt

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-10.1 Existing/Future Part IV-RMP WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.9	To ensure that the existing handling and storage of road salt greater than 5,000 tonnes ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Existing or Future handling and storage of road salt potentially exposed to precipitation or runoff a. greater than 100 kilograms in a WHPA-A; or b. greater than 1,000 kilograms in a WHPA-B with a vulnerability score equal to ten (10) ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of	To address the 2021 Technical Rules, the policy is revised to capture the new subthreat category 13.2 road salt potentially exposed to precipitation or runoff and to capture existing and future threats. The outdated threshold of 5,000 tonnes is removed to align with the 2021 Technical Rules. Potentially exposed road salt greater than 100 kg is a significant threat in WHPAs with a vulnerability score of 10. Establishing Risk Management Plans (RMPs) for this

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
		Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	threshold is achievable in the smaller WHPA-A; however, the County requested a larger threshold for WHPA-B (greater than 1,000 kg). This is considered sufficient to address the risk and ensures that the policy is implementable for the municipality in these larger areas. (SPC-25-01-06). Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Editorial revisions for consistent language, formatting, and structure.
NC-CW-10.1.1 Existing/Future Education & Outreach WHPA-A-v.10; WHPA-B-v.10;	Not applicable. New policy.	To ensure that any Existing or Future: i. application of road salt; or ii. handling and storage of road salt potentially exposed to precipitation or runoff greater than 100 kg but less than or equal to 1,000 kilograms in a WHPA-B with a vulnerability score equal to ten (10) ceases to be, or never becomes, a significant drinking water threat, where this activity is or would be a significant drinking water threat, the County shall develop and implement an education and outreach program targeted to individuals applying, handling and storing road salt within these vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	To address the 2021 Technical Rules, a policy is added for the new subthreat category 13.2 road salt potentially exposed to precipitation or runoff and to address newly identified threats for the application of road salt. The County selected a softer tool to manage road salt storage less than 1,000 kg in WHPA-B with a vulnerability score of 10. This ensures that the policy is implementable. Stronger regulatory tools are difficult to implement for these small storage volumes in a larger area and education and outreach can broadly and sufficiently address the risk (SPC-25-01-06).
NC-CW-10.2 Existing/Future Part IV-Prohibit WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.9	To ensure any new handling and storage of road salt greater than 5,000 tonnes never becomes a significant drinking water threat, where this activity would be a significant drinking water threat; this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure any Existing or Future handling and storage of road salt exposed to precipitation or runoff ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To address the 2021 Technical Rules, the policy is revised to capture the new subthreat category 13.1 road salt exposed to precipitation or runoff and to capture both existing and future threats. The outdated threshold of 5,000 tonnes is removed to align with the 2021 Technical Rules. Exposed salt poses the greatest risk and occurs less frequently. Prohibition is reasonable and offers the greatest certainty of protection. It is appropriate to expand the prohibition to existing threats, as the activity will still be allowed, provided it is conducted or designed in a way that prevents salt exposure. This is reasonable to implement, as there is one threat property identified that is owned by the municipality (SPC-25-01-06). Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022.

Threat 14.0 – The storage of snow

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-11.1 Existing/Future Part IV-Prohibit WHPA-A-v.10; WHPA-B-v.10; IPZ-1-v.9 Nitrate WHPA-ICA	To ensure that any existing or new storage of snow ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Existing or Future storage of snow ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Minor edits for consistent formatting.

Threat 15.0 – The handling and storage of fuel

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-12.1 Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10	To ensure that the existing handling and storage of fuel with a volume of more than 250 Litres ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Existing handling and storage of fuel with a volume of more than 250 Litres ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Minor edits for consistent formatting.
NC-CW-12.2 Existing/Future Education & Outreach WHPA-A-v.10; WHPA-B-v.10	To ensure that the existing and future handling and storage of fuel with a volume of more than 250 Litres but not more than 2500 Litres, ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the County shall develop and implement an education and outreach program for property owners with identified fuel oil tanks outlining the requirements of owning a heating oil system including proper maintenance and the steps to be taken if there is a spill or leak detected.	To ensure that any Existing or Future handling and storage of fuel with a volume of more than 250 Litres but not more than 2,500 Litres, ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the County shall develop and implement an education and outreach program for property owners with identified fuel oil tanks outlining the requirements of owning a heating oil system including proper maintenance and the steps to be taken if there is a spill or leak detected.	Minor edits for consistent formatting.
NC-CW-12.3 a) Future Part IV-Prohibit WHPA-A-v.10 b) Future Part IV-RMP WHPA-A-v.10 (emergency back-up generators)	To ensure that any new handling and storage of fuel within WHPA-A never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, i. This activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited. Notwithstanding policy NC-CW-12.3a), fuel handling and storage required for emergency back-up generators shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Future handling and storage of fuel in a WHPA-A never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, a. this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited. b. Notwithstanding policy NC-CW-12.3a), fuel handling and storage required for emergency back-up generators shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Editorial revisions to correct errors and for consistent formatting.
NC-CW-12.4 Future Part IV-RMP WHPA-B-v.10	To ensure that the future handling and storage of fuel within WHPA-B with a vulnerability score equal to ten (10) with a volume of more than 250 Litres never becomes a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Future handling and storage of fuel within WHPA-B with a vulnerability score equal to ten (10) with a volume of more than 250 Litres never becomes a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Minor edits for consistent formatting.

Threat 16.0 – The handling and storage of a dense non-aqueous phase liquid (DNAPL)

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-13.1 Existing Part IV-RMP WHPA-A/B/C	To ensure that any existing handling and storage of a dense non-aqueous phase liquid for industrial, commercial, institutional and agricultural purposes ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Existing handling and storage of a dense non-aqueous phase liquid for industrial, commercial, institutional and agricultural purposes ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Minor edits for consistent formatting.
NC-CW-13.2 Future Part IV-Prohibit WHPA-A-v.10; WHPA-B-v.10	To ensure that any new handling and storage of a dense non-aqueous phase liquid for industrial, commercial institutional and agricultural purposes within WHPA-A or B with a vulnerability score equal to ten (10) never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Future handling and storage of a dense non-aqueous phase liquid for industrial, commercial institutional and agricultural purposes in WHPA-A or B with a vulnerability score equal to ten (10) never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Editorial revisions to for consistent language and formatting.
NC-CW-13.3 Future Part IV-RMP WHPA-B v.<10; WHPA-C	To ensure that any new handling and storage of a dense non-aqueous phase liquid for industrial, commercial, institutional and agricultural purposes never becomes a significant drinking water threat, within a WHPA-B with a vulnerability score less than (10) or WHPA-C, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Future handling and storage of a dense non-aqueous phase liquid for industrial, commercial, institutional and agricultural purposes never becomes a significant drinking water threat, in a WHPA-B with a vulnerability score less than (10) or WHPA-C, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Editorial revisions to for consistent language and formatting.
NC-CW-13.4 Existing/Future Education & Outreach WHPA-A/B/C	To ensure that any existing or new handling and storage of a dense non-aqueous phase liquid ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the County shall implement an education and outreach program to encourage the use of alternative products where available and the proper disposal of these liquids.	To ensure that any Existing or Future handling and storage of a dense non-aqueous phase liquid ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the County shall implement an education and outreach program to encourage the use of alternative products where available and the proper disposal of these liquids.	Minor edits for consistent formatting.

Threat 17.0 – The handling and storage of an organic solvent

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-14.1 Existing Part IV-RMP WHPA-A-v.10; WHPA-B-v.10	To ensure that the existing handling and storage of an organic solvent ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Existing handling and storage of an organic solvent ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Minor edits for consistent formatting.
NC-CW-14.2 Future Part IV-Prohibit WHPA-A-v.10; WHPA-B-v.10	To ensure that any new handling and storage of an organic solvent never becomes a significant drinking water threat, where this activity would be a significant drinking water threat; this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Future handling and storage of an organic solvent never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Minor edits for consistent formatting.

Threat 18.0 – The management of runoff that contains chemicals used in the de-icing of aircraft

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-15.1 <u>REMOVED</u> Future Part IV-RMP WHPA-A-v.v.10; WHPA-B-v.10; IPZ-1-v.9	To ensure that any new airport where there could be runoff containing de-icing chemicals never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Not applicable.	Policy removed, as no airport facilities exist or are anticipated within the municipality.

Threat 21.0 – The use of land as livestock grazing or pasturing land, an outdoor confinement area or farm animal yard

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-16.1 Existing/Future Part IV-RMP WHPA-A-v. 10; WHPA-B-v. 10; IPZ-1-v.9	To ensure that the existing or future use of land for livestock grazing or pasturing located within a WHPA-A or B with a vulnerability score equal to ten (10) or IPZ with a vulnerability score equal to nine (9) ceases to be or never becomes a significant drinking water threat, where these activities are, or would be, a significant drinking water threat, these activities shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Existing or Future use of land for livestock grazing or pasturing in a WHPA-A or B with a vulnerability score equal to ten (10) ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Editorial revisions for consistent language and formatting.
NC-CW-16.2 Future Part IV-Prohibit WHPA-A-v. 10; IPZ-1-v.9	To ensure that any new farm animal yard or outdoor confinement area located within a WHPA-A or IPZ with a vulnerability score equal to nine (9) never become a significant drinking water threat, where these activities would be a significant drinking water threat, these activities shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Future outdoor confinement area or farm animal yard in a WHPA-A never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Editorial revisions for consistent language and formatting.
NC-CW-16.3 i. Existing/Future Part IV-RMP WHPA-A-v. 10; WHPA-B-v. 10; ii. Future Part IV-RMP WHPA-B-v. 10;	To ensure that a farm animal yard or an outdoor confinement area as defined in O. Reg. 267/03 under the <i>Nutrient Management Act, 2002</i> for: i. an existing livestock operation not phased-in under the <i>Nutrient Management Act, 2002</i> within a WHPA-A; or, ii. a new livestock operation not phased-in under the <i>Nutrient Management Act, 2002</i> within a WHPA-B with a vulnerability score equal to ten (10), ceases to be or never becomes a significant drinking water threat, these activities shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required. The requirements of the Risk Management Plan will generally be based on the requirements of a Nutrient Management Plan and/or Strategy under the <i>Nutrient Management Act, 2002</i> , but may also include any modifications or additional requirements deemed necessary or appropriate by the Risk Management Official.	To ensure that any: i. Existing outdoor confinement area or farm animal yard in a WHPA-A; or ii. Future outdoor confinement area or farm animal yard in a WHPA-B with a vulnerability score equal to ten (10), ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, and where this activity is not subject to a Nutrient Management Strategy under the <i>Nutrient Management Act, 2002</i> or the Nutrient Management Strategy is not approved by the Ministry of Agriculture, Food and Agribusiness OMAFA), this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Revised policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy applies to activities that are not subject to a Nutrient Management Strategy directly approved by OMAFA (SPC-24-11-03). Removed additional text regarding Risk Management Plan requirements. Municipal Risk Management Officials have noted this wording was no longer necessary. Editorial revisions for consistent language, formatting and policy structure.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-MC-16.4 REMOVED Existing/Future Prescribed Instrument WHPA-B-v.10	To ensure that a farm animal yard or an outdoor confinement area as defined in O. Reg. 267/03 under the <i>Nutrient Management Act, 2002</i> , for an existing or new livestock operation requiring a Nutrient Management Plan or Strategy in accordance with the <i>Nutrient Management Act, 2002</i> within a WHPA-B with a vulnerability score equal to ten (10) ceases to be or never becomes a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs shall review and, if necessary, amend the required Nutrient Management Plan/Strategy to ensure that such Plan/Strategy incorporates measures and/or terms and conditions deemed necessary to ensure that these activities do not become a risk to municipal drinking water sources.	Not applicable.	Policy NC-MC-16.4 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-6.1 and LPSPA-MC-6.6.
NC-CW-16.5 Existing/Future Education & Outreach WHPA-A-v.10; WHPA-B-v.10; Nitrate WHPA-ICA IPZ-1-v.9	To ensure that the use of land for livestock grazing, pasturing, farm animal yard or an outdoor confinement area for existing or new livestock operations ceases to be or never becomes a significant drinking water threat, where these activities are, or would be, a significant drinking water threat, the County shall develop and implement an education and outreach program targeted to farms with livestock grazing, pasturing, farm animal yards or outdoor confinement areas within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	To ensure that any Existing or Future use of land for livestock grazing, pasturing, outdoor confinement area or farm animal yard cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the County shall develop and implement an education and outreach program targeted to farms with these activities within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	Removed IPZ-1-v.9 from the sidebar for correctness. This area was removed when the Lehman Dam intake was decommissioned in 2022. Editorial revisions for consistent language and formatting.

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 Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-MC-17.1 REMOVED Existing/Future Prescribed Instrument WHPA-Q1	To ensure that any existing, increased or new consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be or never becomes a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall ensure that groundwater Permit To Take Water approvals include appropriate terms and conditions to ensure the long-term sustainability. The Ministry should consider the following condition for inclusion - a phased approach to assess impacts before the permit is fully approved and the requirement for appropriate monitoring.	Not applicable.	Policy NC-MC-17.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-4.1.
NC-MC-17.2 Future Land Use Planning WHPA-Q1 + Service Area	When planning for growth and approving development that is to be serviced by an existing municipal well located within a WHPA-Q1 with a significant risk level, the municipality shall ensure that <i>Planning Act, 1990</i> decisions consider the long-term sustainability of the municipal drinking water system by: a. ensuring the development and any required expansion of the municipal drinking water system is consistent with the Integrated Sustainable Master Plan, including the water allocation threshold; and, b. consulting with the Ministry of the Environment, Conservation and Parks to discuss any necessary amendments to the Permit to Take Water.	When planning for growth and approving development that is to be serviced by an existing municipal well located within a WHPA-Q1 with a significant risk level, the municipality shall ensure that <i>Planning Act, 1990</i> decisions consider the long-term sustainability of the municipal drinking water system by: a. ensuring the development and any required expansion of the municipal drinking water system is consistent with the Integrated Sustainable Master Plan, including the water allocation threshold; and, b. consulting with the Ministry of the Environment, Conservation and Parks to discuss any necessary amendments to the Permit to Take Water.	Minor edits for consistent formatting.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-CW-17.3 Existing/Future Specify Action WHPA-Q1	To ensure that any existing and future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be or never becomes a significant drinking water threat, Norfolk County is encouraged to consider locating additional water supply outside of the WHPA-Q1 where practical.	To ensure that any Existing and Future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be, or never becomes, a significant drinking water threat, Norfolk County is encouraged to consider locating additional water supply outside of the WHPA-Q1 where practical.	Minor edits for consistent formatting.
NC-CW-17.4 Existing/Future Specify Action WHPA-Q1	To ensure that any existing and future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be or never becomes a significant drinking water threat, Norfolk County shall update their Integrated Sustainable Master Plan using the findings from the Long Point Region Tier 3 Water Budget and Local Area Risk Assessment to ensure water allocation does not exceed 80% of the water supply system's firm capacity.	To ensure that any Existing and Future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be, or never becomes, a significant drinking water threat, Norfolk County shall update their Integrated Sustainable Master Plan using the findings from the Long Point Region Tier 3 Water Budget and Local Area Risk Assessment to ensure water allocation does not exceed 80% of the water supply system's firm capacity.	Minor edits for consistent formatting.
NC-CW-17.5 Existing/Future Specify Action WHPA-Q1+ Service Area	To ensure that any existing and future consumptive water takings within the WHPA-Q1 with a significant risk level ceases to be or never becomes a significant drinking water threat, Norfolk County shall update their water conservation plans using the findings from the Long Point Region Tier 3 Water Budget and Local Area Risk Assessment to support the sustainable use of water in areas serviced by a well located within the WHPA-Q1.	To ensure that any Existing and Future consumptive water takings within the WHPA-Q1 with a significant risk level ceases to be, or never becomes, a significant drinking water threat, Norfolk County shall update their water conservation plans using the findings from the Long Point Region Tier 3 Water Budget and Local Area Risk Assessment to support the sustainable use of water in areas serviced by a well located within the WHPA-Q1.	Minor edits for consistent formatting.
NC-NB-17.6 REMOVED Existing/Future Specify Action WHPA-Q1	To ensure that any existing and future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be or never becomes a significant drinking water threat, the Ministry of the Environment, Conservation and Parks should support and fund the ongoing maintenance of the Long Point Region Tier 3 Water Budget model.	Not applicable.	Policy NC-MC-17.6 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-NB-4.2.
NC-NB-17.7 REMOVED Existing/Future Specify Action WHPA-Q1	To ensure that any existing and future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be or never becomes a significant drinking water threat, the Ministry of the Environment, Conservation and Parks is encouraged to fund Norfolk County municipal capacity to support water management decisions and updates to their Integrated Sustainable Master Plan.	Not applicable.	Policy NC-MC-17.7 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-NB-4.3.
NC-NB-17.8 REMOVED Existing/Future Specify Action WHPA-Q1	To ensure that any existing and future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be or never becomes a significant drinking water threat, the Ministry of the Environment, Conservation and Parks should use findings from the Long Point Region, Catfish Creek and Kettle Creek Tier 2 Water Quantity Stress Assessment and the Long Point Region Tier 3 Water Budget and Local Area Risk Assessment to reassess the High Water Use Designation for Norfolk County.	Not applicable.	Policy NC-MC-17.8 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-NB-4.4.
NC-NB-17.9 REMOVED Existing/Future Specify Action WHPA-Q1	To ensure that any existing and future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be or never becomes a significant drinking water threat, the Ministry of the Environment, Conservation and Parks should consider the prioritization of water uses in Simcoe where a	To ensure that any Existing and Future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be, or never becomes, a significant drinking water threat, the Ministry of the Environment, Conservation and Parks should consider the prioritization of water uses in Simcoe where a	Policy NC-MC-17.9 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-NB-4.5.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
	permitted water taking could impact the sustainability of the municipal water supply given challenges in locating new water supplies in Norfolk County.	permitted water taking could impact the sustainability of the municipal water supply given challenges in locating future water supplies in Norfolk County.	
NC-CW-17.10 Existing/Future Education & Outreach WHPA-Q1	To ensure that any existing and future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be or never becomes a significant drinking water threat, Norfolk County shall develop and implement an education and outreach program targeted toward property and business owners within the vulnerable area.	To ensure that any Existing and Future consumptive water taking within the WHPA-Q1 with a significant risk level ceases to be, or never becomes, a significant drinking water threat, Norfolk County shall develop and implement an education and outreach program targeted toward property and business owners within the vulnerable area.	Minor edits for consistent formatting.

Threat 20 – An activity that reduces the recharge of an aquifer

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-MC-18.1 Existing/Future Land Use Planning WHPA-Q2	To ensure that any existing and future activity that reduces the recharge of an aquifer within the WHPA-Q2 with a significant risk level ceases to be or never becomes a significant drinking water threat, Norfolk County is encouraged to maintain pre-development recharge where appropriate.	To ensure that any Existing and Future activity that reduces the recharge of an aquifer within the WHPA-Q2 with a significant risk level ceases to be or never becomes a significant drinking water threat, Norfolk County is encouraged to maintain pre-development recharge where appropriate.	Minor edits for consistent formatting.

Threat 22.0 – The establishment and operation of a liquid hydrocarbon pipeline

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
NC-NB-19.1 <u>REMOVED</u> Future Specify Action WHPA-A-v.10; WHPA-B-v.10 Monitoring	To ensure that the establishment and operation of a liquid hydrocarbon pipeline within the meaning of Ontario Regulation 210/01 under the <i>Technical Safety and Standards Act, 2000</i> or that is subject to the <i>National Energy Board Act, 1985</i> , never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, the pipeline proponent, the National Energy Board, and Ontario Energy Board are encouraged to provide the Source Protection Authority and the County the location of any new proposed pipeline within the County and/or Source Protection Area. The Source Protection Authority should document in the annual report the number of new pipelines proposed within vulnerable areas if a pipeline has been proposed and/or application has been received.	Not applicable.	Policy NC-NB-19.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-NB-8.1.

HALDIMAND COUNTY– POLICIES ADDRESING PRESCRIBED DRINKING WATER THREATS

Education and Outreach Program Policies

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
HC- <u>LP</u> -CW-1.3	To ensure the following activities cease to be or never become significant drinking water threats, where the activities are or would be a significant drinking water threat, the County of Haldimand will develop and implement education and outreach programs for the following activities: - The existing and future establishment, operation or maintenance of a waste disposal site, within the meaning of Part V or the <i>Environmental Protection Act, 1990</i> that does not require an Environmental Compliance Approval. The program should focus on the proper handling, storage and disposal of wastes; - The future storage of sewage and/or sewage treatment plant effluent discharges. The program should focus on improving the knowledge of operators, the general public and elected officials about the performance and operation of sewage treatment plants; - The existing and future application of commercial fertilizer and pesticides to land. The program should encourage the use of best management practices; - The existing handling and storage of commercial fertilizer and pesticides. The program should outline, at a minimum, the requirements of proper maintenance for commercial fertilizer and pesticide storage and the steps to be taken if there is a spill or leak detected; - The existing handling and storage of dense non-aqueous phase liquids (DNAPL) and organic solvents. The program should outline, at a minimum, the requirements of proper maintenance for DNAPL and organic solvents storage and the steps to be taken if there is a spill or leak detected; - The future use of land as livestock grazing or pasturing land, an outdoor confinement area or farm animal yard. The program should encourage landowners to use best management practices.	To ensure the following activities cease to be or never become significant drinking water threats, where these activities are, or would be, significant drinking water threats, Haldimand County will develop and implement education and outreach programs for the following activities: - Existing and Future establishment, operation or maintenance of a waste disposal site, within the meaning of Part V or the <i>Environmental Protection Act, 1990</i> not subject to an Environmental Compliance Approval, that will focus on the proper handling, storage and disposal of wastes related to the following: - PCB waste storage, - storage of subject waste at a waste generation facility that requires generator registration under Section 3 of <i>O.Reg. 347</i>, and - storage of waste at a waste generation facility that is exempt or excluded from generator registration requirements; - Future wastewater treatment facilities and associated parts that will focus on improving the knowledge of operators, the general public and elected officials about the performance and operation of sewage treatment plants; - Existing and Future application of commercial fertilizer and pesticides to land that will encourage the use of best management practices; - Existing handling and storage of commercial fertilizer and pesticides that should outline, at a minimum, the requirements of proper maintenance for commercial fertilizer and pesticide storage and the steps to be taken if there is a spill or leak detected; - Existing and Future handling and storage of fuel, that should outline, at a minimum, the requirements of proper maintenance for fuel storage and the steps to be taken if there is a spill or leak detected; - Existing handling and storage of dense non-aqueous phase liquids (DNAPL) and organic solvents that should outline, at a minimum, the requirements of proper maintenance for DNAPL and organic solvents storage and the steps to be taken if there is a spill or leak detected; and - Future application of agricultural source material or the use of land as livestock grazing or pasturing land, an outdoor confinement area or farm animal yard that should	Policy moved from the General Policies section to the Prescribed Drinking Water Threat Policies section, but policy numbering maintained. Added new waste subthreat categories to align with the 2021 Technical Rules and to clarify which waste disposal sites do not require an Environmental Compliance Approval. Added the handling and storage of fuel to close a policy gap. Policy HC-LP-MC-9.1 does not capture the lower volumes of fuel that can be significant threats under the 2021 Technical Rules (i.e. more than 250 Litres but not more than 2,500 Litres), nor does it capture the existing threat enumerated in the Assessment Report. This education and outreach policy now addresses all volumes of fuel, where significant (SPC-24-10-03). Added the Future application of agricultural source material (ASM) to address the Ministry of Agriculture, Food and Agribusiness (OMAFRA) early engagement comments. OMAFRA does not review and approve Nutrient Management Plans used to regulate the application of ASM (previous prescribed instrument policy HC-MC-4.1). Haldimand does not apply any Part IV regulatory tools; therefore, this threat activity will be managed under this education and outreach policy. Based on current and projected land use, this threat activity is very unlikely to occur. Inclusion of a future threat policy ensures that minimum regulatory requirements are met. Regional location (LP) added to the policy identifier. Minor edits for consistent formatting.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
		encourage landowners to use best management practices.	

Threat 1.0 – The establishment, operation or maintenance of a waste disposal site within the meaning of Part V or the *Environmental Protection Act, 1990*

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
HC-MC-2.1 <u>REMOVED</u> Future Prescribed Instrument IPZ-1-v.10; IPZ-2-v.9	To ensure that any future waste disposal site within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> that is subject to an Environmental Compliance Approval never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall prohibit this activity through the Environmental Compliance Approval process.	Not applicable.	Policy HC-MC-2.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.1.
HC-MC-2.2 <u>REMOVED</u> Existing Prescribed Instrument IPZ-1-v.10; IPZ-2-v.9	To ensure that any existing waste disposal site within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> that is subject to an Environmental Compliance Approval ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall ensure Environmental Compliance Approvals include terms and conditions that, when implemented, will reduce the risk to drinking water sources.	Not applicable.	Policy HC-MC-2.2 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.2.

Threat 2.0 – The establishment, operation or maintenance of a system the collects, stores, transmits, treats or disposes of sewage

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
HC-MC-3.1 <u>REMOVED</u> Existing/Future Prescribed Instrument IPZ-1-v.10	To ensure that any existing or future onsite sewage systems regulated under Section 53 of the <i>Ontario Water Resources Act, 1990</i> ceases to be or never becomes a significant drinking water threat, where such an activity is or would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall ensure Environmental Compliance Approvals include terms and conditions that, when implemented, will reduce the risk to drinking water sources. Terms and conditions may include, but not be limited to, inspection and monitoring protocols and upgrading requirements as system standards change.	Not applicable.	Policy HC-MC-3.1 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.4 and LPSPA-MC-3.12.
HC-NB-3.2 <u>REMOVED</u> Existing Incentive IPZ-1-v.10	To ensure that any existing onsite sewage system, where such an activity is a significant drinking water threat, ceases to be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall consider providing on-going funding through the Ontario Drinking Water Stewardship Program or a similar program for onsite sewage system upgrades and replacements.	Not applicable.	Policy HC-NB-3.2 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-NB-1.3.
HC-LP-MC-3.3 Future Land Use Planning IPZ-1-v.10	To ensure that future onsite sewage systems never become a significant drinking water threat, where such an activity would be a significant drinking water threat, Haldimand County shall only approve o-site sewage systems if:	To ensure that any Future onsite sewage works never become significant drinking water threats, where these activities would be significant drinking water threats, Haldimand County shall only approve onsite sewage works if:	On-site sewage “systems” renamed to sewage “works” as per the 2021 Technical Rules (SPC-24-06-05). Regional location (LP) added to the policy identifier.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
	i. Future lot sizes are sufficient size to accommodate the required, on-site private servicing; and ii. A system evaluation be prepared by a qualified individual has demonstrated, to the satisfaction of Haldimand County, the suitability of the lot size, location of the system and that the system will never become a significant drinking water threat.	i. Future lot sizes are sufficient size to accommodate the required on-site private servicing; and ii. A system evaluation be prepared by a qualified individual has demonstrated, to the satisfaction of Haldimand County, the suitability of the lot size, location of the system and that the system will never become a significant drinking water threat.	Editorial revisions for consistent language, formatting and policy structure.
HC-LP-CW-3.4 Existing Specify Action IPZ-1-v.10	To ensure that any existing onsite sewage-system, including upgrades and replacements to such system, with a design flow of less than or equal to 10,000 Litres per day and subject to approval under the <i>Ontario Building Code Act, 1992</i> or the <i>Ontario Water Resources Act, 1990</i> and located within an Intake Protection Zone, where such an activity is a significant drinking water threat, ceases to be a significant drinking water threat, Haldimand County shall implement a onsite sewage system maintenance inspection program, as required under the <i>Ontario Building Code Act, 1992</i> . Inspections should be prioritized based on the proximity to the drinking water supply.	To ensure that any Existing onsite sewage works, including upgrades and replacements, with a design flow of less than or equal to 10,000 Litres per day and subject to approval under the <i>Ontario Building Code Act, 1992</i> or the <i>Ontario Water Resources Act, 1990</i> , cease to be significant drinking water threats, where these activities are significant drinking water threats, Haldimand County shall implement an onsite sewage system maintenance inspection program, as required under the <i>Ontario Building Code Act, 1992</i> . Inspections should be prioritized based on the proximity to the drinking water supply.	On-site sewage “systems” renamed to sewage “works” as per the 2021 Technical Rules (SPC-24-06-05). Regional location (LP) added to the policy identifier. Editorial revisions for consistent language, formatting and policy structure.
HC-MC-3.5 <u>REMOVED</u> Future Prescribed Instrument IPZ-1-v.10; IPZ-2-v.9	To ensure that the future storage of sewage at a sewage treatment plant and/or sewage treatment plant effluent discharges never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall ensure Environmental Compliance Approvals include terms and conditions that, when implemented, reduce the risk to drinking water sources. The terms and conditions may include, but not be limited to, strict criteria for effluent quality, appropriate sizing to reduce by-passes, and requirements for regular inspections and proactive maintenance of the works to prevent unplanned discharges.	Not applicable.	Policy HC-MC-3.5 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.12.
HC-LP-CW-3.6 Future Specify Action IPZ-1-v.10; IPZ-2-v.9	To ensure that the storage of sewage and/or sewage treatment plant effluent discharges never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, Haldimand County shall continue to participate in available programs such as the Grand River Watershed Wastewater Optimization Program.	To ensure that any Future wastewater treatment facilities and associated parts never become significant drinking water threats, where these activities would be significant drinking water threats, Haldimand County shall continue to participate in available programs such as the Grand River Watershed Wastewater Optimization Program.	Revised subthreat category naming to address the 2021 Technical Rules (SPC-24-06-05). Regional location (LP) added to the policy identifier. Editorial revisions for consistent language, formatting and policy structure.
HC-MC-3.7 <u>REMOVED</u> Future Prescribed Instrument IPZ-1-v.10	To ensure that future sanitary sewers and related pipes never become a significant drinking water threat, where such an activity would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall ensure Environmental Compliance Approvals include terms and conditions that, when implemented, will reduce the risk to drinking water sources. Terms and conditions may include, but not be limited to, increased inspection and monitoring protocols, improved leak detection and documentation of maintenance and repairs.	Not applicable.	Policy HC-MC-3.7 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.9 and LPSPA-MC-3.13.
HC-LP-MC-3.8 Future Land Use Planning	To ensure that any future discharge of stormwater from a stormwater management facility never becomes a significant drinking water threat, where this activity would be a significant	To ensure that any Future: i. outfall from a stormwater management facility or storm water drainage system; or	Revised subthreat category naming to address the 201 Technical Rules (SPC-24-06-05). Regional location (LP) added to the policy identifier.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
IPZ-1-v.10; IPZ-2-v.9	drinking water threat, Haldimand County shall require all new developments with a discharge of stormwater from a stormwater management facility to include an integrated treatment approach for the stormwater and a requirement to explore alternatives to conventional stormwater management facilities.	ii. storm water infiltration facility never become significant drinking water threats, where these activities would be significant drinking water threats, Haldimand County shall require all future developments with a stormwater management facility to include an integrated treatment approach for the stormwater and a requirement to explore alternatives to conventional stormwater management facilities.	Editorial revisions for consistent language, formatting and policy structure.
HC-MC-3.9 <u>REMOVED</u> Existing/Future Prescribed Instrument IPZ-1-v.10; IPZ-2-v.9	To ensure that any existing and future discharge of stormwater from a stormwater management facility never becomes or ceases to be a significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall ensure Environmental Compliance Approvals include terms and conditions that, when implemented, will reduce the risk to drinking water sources. Terms and conditions may include, but not be limited to, current best management practices, requirements for regular maintenance, periodic removal of accumulated sediment, lining of the pond, ongoing monitoring (by the owner) of the contaminant discharges, and other requirements to address site conditions.	Not applicable.	Policy HC-MC-3.9 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.4 and LPSPA-MC-3.10.
HC-MC-3.10 <u>REMOVED</u> Existing/Future Prescribed Instrument IPZ-1-v.10; IPZ-2-v.9	To ensure that existing and future industrial effluent discharges cease to be or never become significant drinking water threats, where such an activity is or would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall ensure Environmental Compliance Approvals include terms and conditions that, when implemented, will meet the objectives of the <i>Clean Water Act, 2006</i> . Terms and Conditions may include, but not be limited to, requirements for monitoring/reporting, education of operators and a high level of effluent treatment.	Not applicable.	Policy HC-MC-3.10 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.3 and LPSPA-MC-3.12.
HC-NB-3.11 <u>REMOVED</u> Existing/Future Specify Action IPZ-1-v.10; IPZ-2-v.9	To ensure that existing and future industrial effluent discharges cease to be or never become significant drinking water threats, where this activity is or would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall consider information in the approved Long Point Region Assessment Report and treat significant drinking water threat facilities as one of the program priorities when identifying facilities for inspection.	Not applicable.	Policy HC-NB-3.11 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-NB-3.14.
HC-NB-3.12 <u>REMOVED</u> Existing Specify Action IPZ-1-v.10; IPZ-2-v.9	To ensure that existing industrial effluent discharges cease to be a significant drinking water threat, where this activity is a significant drinking water threat, Haldimand County will contact industrial operators to request that they provide their emergency contingency and/or protection plan and subsequent updates to Haldimand County on an annual basis and to encourage industrial operators to list significant drinking water threats within these plans to ensure the protection of drinking water sources.	Not applicable.	Policy removed due to municipally-identified implementation challenges.
HC-MC-3.13 <u>REMOVED</u> Future	To ensure that any sewage treatment plant by-pass discharge to surface water never becomes a significant drinking water threat, where such activities would be significant drinking water	Not applicable.	Policy HC-MC-3.13 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.12.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
Prescribed Instr. IPZ-1-v.10; IPZ-2-v.9	threats, the Ministry of the Environment, Conservation and Parks shall ensure Environmental Compliance Approvals include terms and conditions that, when implemented, will reduce the risk to drinking water sources.		
HC-LP-CW-3.14 Existing/Future Specify Action IPZ-1-v.10 IPZ-2-v.9	Not applicable. New policy.	To ensure that any Existing or Future: i) sanitary sewer; ii) outfall of a combined sewer outflow (CSO) or a sanitary sewer overflow (SSO) from a manhole or wet well; iii) sewage pumping station or lift station wet well, a holding tank or a tunnel; iv) outfall from a storm water management facility or storm water drainage system; or v) storm water infiltration facility that qualify for Consolidated Linear Infrastructure (CLI-ECA) preauthorization cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the County shall adhere to the terms and conditions incorporated into the CLI-ECA to protect drinking water sources.	New policy that requires municipal compliance with the conditions in Consolidated Linear Infrastructure Environmental Compliance Approvals (CLI-ECA). This policy supports implementation of the new CLI-ECA framework and aligns municipal internal processes and Source Protection Plan policies (SPC-24-06-05).

Threat 3.0 – The application of agricultural source material (ASM) to land

Threat 4.0 – The storage of agricultural source material (ASM)

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
HC-MC-4.1 REMOVED Future Prescribed Instrument IPZ-1-v.10; IPZ-2-v.9	To ensure that the future application and storage of agricultural source materials, where such activities would be significant drinking water threats, never become a significant drinking water threat, the Ontario Ministry of Agriculture, Food and Rural Affairs shall ensure Nutrient Management Strategies and Plans include terms and conditions that, when implemented, will reduce the risk to drinking water sources.	Not applicable.	Policy HC-MC-4.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-6.5 (storage of agricultural source material). The application of agricultural source material is now addressed under the County's education and outreach policy HC-LP-CW-1.3. This change is to align with the <i>Nutrient Management Act, 2002</i> regulatory framework, as OMAFA does not review Nutrient Management Plans and cannot add terms and conditions (SPC-24-11-03) and Haldimand County does not use Part IV regulatory tools to address drinking water threats.

Threat 6.0 – The application of non-agricultural source material (NASM) to land

Threat 7.0 – The handling and storage of non-agricultural source material (NASM)

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
HC-MC-5.1 REMOVED Existing/Future Prescribed Instrument IPZ-1-v.10;	To ensure that the application and storage/handling of non-agricultural source materials (NASM), where NASM is presently regulated under the <i>Nutrient Management Act, 2002</i> or the <i>Environmental Protection Act, 1990</i> cease to be or never become a significant drinking water threats, where such	Not applicable.	Policy HC-MC-5.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-6.5.

IPZ-2-v.9	activities are or would be significant drinking water threats, the Ministry of the Environment, Conservation and Parks or Ontario Ministry of Agriculture, Foods and Rural Affairs shall ensure NASM Plans include terms and conditions that, when implemented, will reduce the risk to drinking water sources.		
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Threat 9.0 – The handling and storage of commercial fertilizer

Threat 10.0 – The application of pesticide to land

Threat 11.0 – The handling and storage of pesticide

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
HC-NB-6.1 REMOVED Future Specify Action IPZ-1-v.10; IPZ-2-v.9	To ensure that the future application of pesticides to land, where such an activity would be a significant drinking water threat, never becomes a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall consider developing source water protection training materials for permit applicants under the <i>Pesticides Act, 1990</i> . Further, the Ministry of the Environment, Conservation and Parks shall prioritize inspections of pesticide permit holders for lands within the Nanticoke Industrial Pumping Station Intake Protection Zones 1 and 2.	Not applicable.	Policy HC-NB-6.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.15.
HC- LP -MC-6.2 Future Land Use Planning IPZ-1-v.10; IPZ-2-v.9	To ensure that the future handling and storage of commercial fertilizer and pesticides, where such activities would be significant drinking water threats, never becomes a significant drinking water threat; related land uses shall be prohibited.	To ensure that any Future handling and storage of commercial fertilizer or pesticides never become significant drinking water threats, where these activities would be significant drinking water threats, related land uses shall be prohibited.	Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.

Threat 13.0 – The handling and storage of road salt

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
HC- LP -CW-7.1 Future Specify Action IPZ-1-v.10; IPZ-2-v.9	To ensure that the future handling and storage of road salt never becomes a significant drinking water threat, where such activities would be significant drinking water threats, Haldimand County shall amend its winter maintenance and salt management plans to identify the Intake Protection Zone areas associated with municipal drinking water systems, include source water protection policies and enhance best management practices in these areas. Haldimand County shall amend its winter maintenance and salt management plans in accordance with this policy within five (5) years of the Source Protection Plan approval.	To ensure that any Future handling and storage of road salt never becomes a significant drinking water threat, where these activities would be significant drinking water threats, Haldimand County shall amend its winter maintenance and salt management plans to identify the Intake Protection Zone areas associated with municipal drinking water systems, include source water protection policies and enhance best management practices in these areas. Haldimand County shall amend its winter maintenance and salt management plans in accordance with this policy within five (5) years of the Source Protection Plan approval.	Regional location (LP) added to the policy identifier. Minor edits for consistent formatting.
HC- LP -CW-7.2 Future Specify Action IPZ-1-v.10; IPZ-2-v.9	To ensure that the future handling and storage of road salt never becomes a significant drinking water threat, where such activities would be significant drinking water threats, Haldimand County will engage private de-icing contractors and request they amend their salt management plans to identify the Intake Protection Zones, and to enhance best management practices within these areas.	To ensure that any Future handling and storage of road salt never becomes a significant drinking water threat, where these activities would be significant drinking water threats, Haldimand County will engage private de-icing contractors and request they amend their salt management plans to identify the Intake Protection Zones, and to enhance best	Regional location (LP) added to the policy identifier. Minor edits for consistent formatting.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
	Furthermore, private contractors will be encouraged to obtain “Smart About Salt™” accreditation.	management practices within these areas. Furthermore, private contractors will be encouraged to obtain “Smart About Salt™” accreditation.	
HC- LP -MC-7.3 Future Land Use Planning IPZ-1-v.10; IPZ-2-v.9	To ensure that the future handling and storage of road salt never becomes a significant drinking water threat, where such activities would be significant drinking water threats, future road salt storage facilities, where permitted by the Official Plan and zoning by-law, will only be permitted if the road salt is contained in covered roof storage facilities and a salt impact assessment and/or salt management plan has been completed to the satisfaction of Haldimand County.	To ensure that any Future handling and storage of road salt never becomes a significant drinking water threat, where these activities would be significant drinking water threats, future road salt storage facilities, where permitted by the Official Plan and zoning by-law, will only be permitted if the road salt is contained in covered roof storage facilities and a salt impact assessment and/or salt management plan has been completed to the satisfaction of Haldimand County.	Regional location (LP) added to the policy identifier. Minor edits for consistent formatting.

Threat 14.0 – The storage of snow

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
HC- LP -CW-8.1 Future Specify Action IPZ-1-v.10; IPZ-2-v.9	To ensure that the future storage of snow, where such an activity would be a significant drinking water threat, never becomes a significant drinking water threat, Haldimand County shall prepare and/or amend its municipal planning approvals/ current municipal plans such as its winter maintenance and salt management plans to identify Intake Protection Zone areas associated with municipal drinking water systems, and may include source water protection measures including best management practices to minimize the impact of winter snow storage.	To ensure that any Future storage of snow never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, Haldimand County shall prepare and/or amend its municipal planning approvals/ current municipal plans such as its winter maintenance and salt management plans to identify Intake Protection Zone areas associated with municipal drinking water systems, and may include source water protection measures including best management practices to minimize the impact of winter snow storage.	Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.

Threat 15.0 – The handling and storage of fuel

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
HC- LP -MC-9.1 Future Land Use Planning IPZ-1-v.10	To ensure that the future handling and storage of fuel greater than 2500 Litres never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, related land uses shall be prohibited.	To ensure that any Future handling and storage of fuel greater than 2500 Litres never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, related land uses shall be prohibited.	Regional location (LP) added to the policy identifier. Minor edits for consistent formatting.

Threat 16.0 – The handling and storage of a dense non-aqueous phase liquid (DNAPL)

Threat 17.0 – The handling and storage of an organic solvent

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
HC- LP -MC-10.1 Future Land Use Planning IPZ-1-v.10 IPZ-2-v.9	To ensure that the future handling and storage of dense non-aqueous phase liquids and organic solvents never becomes a significant drinking water threat; related land uses shall be prohibited.	To ensure that any Future handling and storage of dense non-aqueous phase liquids or organic solvents never become significant drinking water threats, where these activities would be significant drinking water threats, related land uses shall be prohibited.	Policy applicability expanded to include the IPZ-2 with a vulnerability score of 9, as the handling and storage of DNAPLs are now significant in an IPZ with a vulnerability score of 9 under the 2021 Technical Rules. Regional location (LP) added to the policy identifier. Editorial revisions for consistent language and formatting.

Threat 18.0 – The management of runoff that contains chemicals used in the de-icing of aircraft

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
HC-CW-11.1 REMOVED Future Specify Action IPZ-1-v.10; IPZ-2-v.9 Monitoring	To ensure that future runoff that contains chemicals used in the de-icing of aircrafts never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, Haldimand County shall encourage the Airport Authority as part of the airport approval process to use existing Federal regulations for the proper management of the runoff from de-icing of aircrafts. Further, Haldimand County shall document any environmental assessments that have been initiated for new airport facilities within vulnerable areas and provide them to the Source Protection Authority.	Not applicable.	Policy removed, as no airport facilities exist or are anticipated within the municipality.

MUNICIPALITY OF BAYHAM – POLICIES ADDRESING PRESCRIBED DRINKING WATER THREATS

Threat 1.0 – The establishment, operation or maintenance of a waste disposal site within the meaning of Part V or the *Environmental Protection Act, 1990*

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-MC-2.1 <u>REMOVED</u> Future Prescribed Instrument WHPA-A-v.10; WHPA-B-v.8	To ensure that the future establishment, operation or maintenance of a waste disposal site within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> that is subject to an Environmental Compliance Approval never becomes a significant drinking water threat, where such activity would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall prohibit this activity through the Environmental Compliance Approval process.	Not applicable.	Policy EC-MC-2.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.2.
EC-MC-2.2 <u>REMOVED</u> Existing Prescribed Instrument WHPA-A-v.10; WHPA-B-v.8	To ensure that any existing waste disposal site within the meaning of Part V of the <i>Environmental Protection Act, 1990</i> that is subject to an Environmental Compliance Approval ceases to be a significant drinking water threat, where such activity is a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall ensure Environmental Compliance Approvals include terms and conditions that, when implemented, will reduce the risk to drinking water sources	Not applicable.	Policy EC-MC-2.2 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.1.
EC-CW-2.3 Existing/Future Education & Outreach WHPA-A-v.10; WHPA-B-v.8 Nitrate WHPA-ICA	To ensure that any existing or future establishment, operation or maintenance of a waste disposal site, within the meaning of Part V or the <i>Environmental Protection Act, 1990</i> that does not require an Environmental Compliance Approval ceases to be or never becomes a significant drinking water threat, where such an activity is, or would be, a significant drinking water threat, the Municipality will develop and implement an education and outreach program. The program should focus on the proper handling, storage and disposal of wastes.	To ensure that any Existing or Future waste disposal sites within the meaning of Part V or the <i>Environmental Protection Act, 1990</i> not subject to an Environmental Compliance Approval cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the Municipality will develop and implement an education and outreach program. The program should focus on the proper handling, storage and disposal of wastes.	Added Nitrate WHPA-ICA to the sidebar for correctness. Editorial revisions for consistent language and formatting.

Threat 2.0 – The establishment, operation or maintenance of a system the collects, stores, transmits, treats or disposes of sewage

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-3.1 Existing/Future Specify Action WHPA-A- v.10 Nitrate WHPA-ICA	To ensure that any existing or new onsite sewage systems and/ or onsite sewage system holding tank, with a design flow of less than or equal to 10,000 Litres per day and subject to approval under the <i>Ontario Building Code Act, 1992</i> or the <i>Ontario Water Resources Act, 1990</i> , ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Municipality shall implement an onsite sewage system maintenance inspection program, as required under the <i>Ontario Building Code Act, 1992</i> . Inspections should be prioritized based on the proximity to the drinking water supply.	To ensure that any Existing or Future onsite sewage works, with a design flow of less than or equal to 10,000 Litres per day and subject to approval under the <i>Ontario Building Code Act, 1992</i> or the <i>Ontario Water Resources Act, 1990</i> , cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the Municipality shall implement an onsite sewage system maintenance inspection program, as required under the <i>Ontario Building Code Act, 1992</i> . Inspections should be prioritized based on the proximity to the drinking water supply.	On-site sewage “systems” renamed to sewage “works” as per the 2021 Technical Rules (SPC-24-06-05). Added Nitrate WHPA-ICA to the sidebar for correctness. Editorial revisions for consistent language and policy structure.
EC-MC-3.2 Future Land Use Planning WHPA-A- v.10	To ensure that any replacement or new onsite sewage system and/or onsite sewage system holding tank, with a design flow of less than or equal to 10,000 Litres per day and subject to approval under the <i>Ontario Building Code Act, 1992</i> or the	To ensure that any replacement or Future onsite sewage works, with a design flow of less than or equal to 10,000 Litres per day and subject to approval under the <i>Ontario Building Code Act, 1992</i> or the <i>Ontario Water Resources Act, 1990</i> , never become	On-site sewage “systems” renamed to sewage “works” as per the 2021 Technical Rules (SPC-24-06-05).

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
Nitrate WHPA-ICA	<i>Ontario Water Resources Act, 1990</i> , never becomes a significant drinking water threat, the Municipality shall amend their Official Plan and Zoning By-law to direct land uses relying on these activities to a location on the same property where these activities would not be a significant drinking water threat.	significant drinking water threats, where these activities would be significant drinking water threats, the Municipality shall amend their Official Plan and Zoning By-law to direct land uses relying on these activities to a location on the same property where these activities would not be a significant drinking water threat.	Added Nitrate WHPA-ICA to the sidebar for correctness. Editorial revisions for consistent language and policy structure.
EC-MC-3.3 REMOVED Existing Prescribed Instrument WHPA-A-v.10	To ensure that an existing onsite sewage system and/or onsite sewage system holding tank, with a design flow of greater than 10,000 Litres per day and regulated under the <i>Ontario Water Resources Act, 1990</i> , ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall review and, if necessary, amend Environmental Compliance Approvals to incorporate terms and conditions that, when implemented, ensure that these onsite sewage systems are managed to reduce the risk to drinking water sources.	Not applicable.	Policy EC-MC-3.3 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.4.
EC-MC-3.4 Future Land Use Planning WHPA-A- v.10 Nitrate WHPA-ICA	To ensure that the establishment of a new onsite sewage system and/or onsite sewage system holding tank with a design flow of greater than 10,000 Litres per day and regulated under the <i>Ontario Water Resources Act, 1990</i> , never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, the Municipality shall amend their Official Plan and Zoning By-law to prohibit new development which relies on this type of onsite sewage system.	To ensure that any Future onsite sewage works, with a design flow of greater than 10,000 Litres per day and regulated under the <i>Ontario Water Resources Act, 1990</i> , never become significant drinking water threats, where these activities would be significant drinking water threats, the Municipality shall amend their Official Plan and Zoning By-law to prohibit future development which relies on this type of onsite sewage system.	On-site sewage “systems” renamed to sewage “works” as per the 2021 Technical Rules (SPC-24-06-05). Added Nitrate WHPA-ICA to the sidebar for correctness. Editorial revisions for consistent language and policy structure.
EC-MC-3.5 REMOVED Existing/Future Prescribed Instrument WHPA-A-v.10	To ensure that existing or new sanitary sewers and related pipes cease to be or never become a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall ensure that Environmental Compliance Approvals include terms and conditions that, when implemented, will reduce the risks to the municipal drinking water sources. The terms and conditions may include requirements for regular maintenance and inspections conducted by the proponent.	Not applicable.	Policy EC-MC-3.5 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.5 and LPSPA-MC-3.9.
EC-MC-3.6 REMOVED Future Prescribed Instrument WHPA-A-v.10;	To ensure that the future storage of sewage or treatment plant effluent discharges never become a significant drinking water threat, where these activities would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall prohibit these activities within the Environmental Compliance Approval process.	Not applicable.	Policy EC-MC-3.6 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.7.
EC-MC-3.7 REMOVED Existing Prescribed Instrument WHPA-A-v.10;	To ensure that the existing storage of sewage or treatment plant effluent discharges cease to be significant drinking water threats, where such activities are significant drinking water threats, the Ministry of the Environment, Conservation and Parks shall review, and if necessary, amend Environmental Compliance Approvals to incorporate terms and conditions that, when implemented, will reduce the risks to the municipal drinking water sources.	Not applicable.	Policy EC-MC-3.7 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-3.5.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-MC-3.8 REMOVED Existing/Future Prescribed Instrument WHPA-A-v.10	To ensure that any existing or new stormwater management facility that discharges stormwater never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, the Ministry of the Environment, Conservation and Parks shall review and, if necessary, amend Environmental Compliance Approvals to incorporate terms and conditions (for example: regular maintenance) that, when implemented, will reduce the risks to the municipal drinking water sources.	Not applicable.	Policy EC-MC-3.8 removed from municipal chapter and adopted into new Plan-wide policies LPSPA-MC-3.4 and LPSPA-MC-3.10.
EC-CW-3.9 Existing/Future Specify Action WHPA-A-v.10; Nitrate WHPA-ICA	Not applicable. New policy.	To ensure that any Existing or Future: i. sanitary sewer; ii. outfall of a combined sewer outflow (CSO) or a sanitary sewer overflow (SSO) from a manhole or wet well; iii. sewage pumping station or lift station wet well, a holding tank or a tunnel; iv. outfall from a storm water management facility or storm water drainage system; or v. storm water infiltration facility that qualify for Consolidated Linear Infrastructure (CLI-ECA) preauthorization cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the Municipality shall adhere to the terms and conditions incorporated into the CLI-ECA to protect drinking water sources.	New policy that requires municipal compliance with the conditions in Consolidated Linear Infrastructure Environmental Compliance Approvals (CLI-ECA). This policy supports implementation of the new CLI-ECA framework and aligns municipal internal processes and Source Protection Plan policies (SPC-24-06-05).

Threat 3.0 – The application of agricultural source material (ASM) to land

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-4.1 Existing/Future Part IV-Prohibit WHPA-A-v.10 Nitrate WHPA-ICA	To ensure that the existing or future application of agricultural source material to land within a WHPA-A ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Existing or Future application of agricultural source material to land ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Expanded the policy to apply in the Nitrate WHPA-ICA, as updated threats enumeration identified significant threats in this area. Removed specific in-text reference to WHPA-A and added Nitrate WHPA-ICA to the sidebar. Editorial revisions for consistent language and formatting.

Threat 4.0 – The storage of agricultural source material (ASM)

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-5.1 Future Part IV-Prohibit WHPA-A-v.10 Nitrate WHPA-ICA	To ensure that the future storage of agricultural source material never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that the Future storage of agricultural source material never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, and where this activity is not subject to a Nutrient Management Strategy under the <i>Nutrient Management Act, 2002</i> , or the Nutrient Management Strategy is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall	Revised policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy only applies for threat activities not subject to a Nutrient Management Strategy directly approved by OMAFA. The prohibition aligns with the general Lake Erie Region approach for agricultural threats (SPC-24-11-03).

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
		be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Added Nitrate WHPA-ICA to the sidebar for correctness. Editorial revision for consistent language.
EC-CW-5.2 Existing Part IV - RMP WHPA-A-v.10 Nitrate WHPA-ICA	To ensure that the existing storage of agricultural source material ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that the Existing storage of agricultural source material ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, and where this activity is not subject to a Nutrient Management Strategy under the <i>Nutrient Management Act, 2002</i> or the Nutrient Management Strategy is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Revised policy as per the general Lake Erie Region approach for agricultural threats and to better align with the <i>Nutrient Management Act, 2002</i> (SPC-24-11-03). The Part IV policy only applies for threat activities not subject to a Nutrient Management Strategy directly approved by OMAFA. The use of an RMP aligns with the general Lake Erie Region approach for agricultural threats (SPC-24-11-03). Added Nitrate WHPA-ICA to the sidebar for correctness. Editorial revision for consistent language.
EC-CW-5.3 Existing/Future Education & Outreach WHPA-A-v.10 Nitrate WHPA-ICA	To ensure that the existing or future storage of agricultural source material ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Municipality shall develop and implement an education and outreach program targeted to individuals storing agricultural source material within vulnerable areas.	To ensure that the Existing or Future storage of agricultural source material ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Municipality shall develop and implement an education and outreach program targeted to individuals storing agricultural source material within vulnerable areas.	Added Nitrate WHPA-ICA to the sidebar for correctness. Editorial revisions for consistent language.

Threat 6.0 – The application of non-agricultural source material (NASM) to land

Threat 7.0 – The handling and storage of non-agricultural source material (NASM)

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-MC-6.1 REMOVED Existing/Future Prescribed Instrument WHPA-A-v.10	To ensure that the existing or future application of non-agricultural source material to land ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs or the Ministry of the Environment, Conservation and Parks, as applicable, shall revoke, or not approve, any Non-Agricultural Source Material (NASM) Plan, in accordance with the <i>Nutrient Management Act, 2002</i> , or any activity within the Environmental Compliance Approval process in accordance with the <i>Environmental Protection Act, 1990</i> that permits, or would permit, the application of non-agricultural source material within these vulnerable areas.	Not applicable.	Policy EC-MC-6.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-6.3.
EC-CW-6.1.1 Existing/Future Part IV-Prohibit WHPA-A-v.10 Nitrate WHPA-ICA	Not applicable. New policy.	To ensure that any Existing or Future application of non-agricultural source material (NASM) to land ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, and where this activity is not subject to a NASM Plan under the <i>Nutrient Management Act, 2002</i> or the NASM Plan is not approved by the Ministry of the Agriculture, Food and Agribusiness (OMAFRA),	New policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy only applies for threat activities that are not subject to a NASM Plan directly approved by OMAFA. The prohibition aligns with the general Lake Erie Region approach for agricultural threats (SPC-24-11-03).

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
		this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	
EC-CW-6.2 Existing/Future Education & Outreach WHPA-A-v.10 Nitrate WHPA-ICA	To ensure that the existing or future application or storage of non-agricultural source material on land ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Municipality shall develop and implement an education and outreach program targeted to individuals storing and applying non-agricultural source material to land within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	To ensure that any Existing or Future application or handling and storage of non-agricultural source material (NASM) cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the Municipality shall develop and implement an education and outreach program targeted to individuals handling, storing and applying NASM to land within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	Expanded the policy to apply in the Nitrate WHPA-ICA, as updated threats enumeration identified significant threats in this area (application of NASM). Editorial revisions for consistent language and formatting.
EC-MC-6.3 REMOVED Existing Prescribed Instrument WHPA-A-v.10	To ensure that the existing handling and storage of non-agricultural source material ceases to be a significant drinking water threat where this activity is, or would be, a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs, or Ministry of the Environment, Conservation and Parks, as applicable, shall review and, if necessary, amend a Non-Agricultural Source Material (NASM) Plan, in accordance with the <i>Nutrient Management Act, 2002</i> , or an Environmental Compliance Approval, in accordance with the <i>Environmental Protection Act, 1990</i> , to ensure that such NASM Plans/Environmental Compliance Approvals incorporate any measures and/or terms and conditions deemed necessary to reduce the risk to municipal drinking water sources.	Not applicable.	Policy EC-MC-6.3 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-6.2.
EC-CW-6.3.1 Existing Part IV-RMP WHPA-A-v.10 Nitrate WHPA-ICA	Not applicable. New policy.	To ensure that any Existing handling and storage of non-agricultural source material (NASM) ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, and where this activity is not subject to a NASM Plan under the <i>Nutrient Management Act, 2002</i> or the NASM Plan is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	New policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy only applies for threat activities that are not subject to a NASM Plan directly approved by OMAFA. The use of an RMP aligns with the general Lake Erie Region approach for agricultural threats (SPC-24-11-03).
EC-CW-6.4 Future Part IV-Prohibit WHPA-A-v.10 Nitrate WHPA-ICA	To ensure that any new handling and storage of non-agricultural source material on lands never becomes a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Future handling and storage of non-agricultural source material (NASM) never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, and where this activity is not subject to a NASM Plan under the <i>Nutrient Management Act, 2002</i> or the NASM Plan is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Revised policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy only applies for threat activities that are not subject to a NASM Plan directed approved by OMAFA. The prohibition aligns with the general Lake Erie Region approach for agricultural threats (SPC-24-11-03). Added Nitrate WHPA-ICA to the sidebar for correctness. Editorial revisions for consistent language and formatting.

Threat 8.0 – The application of commercial fertilizer to land

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-7.1 Existing/Future Part IV-Prohibit WHPA-A-v.10 Nitrate WHPA-ICA (inside WHPA-A) v.10	To ensure that the existing or future application of nitrogen-based commercial fertilizer to land ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat in Wellhead Protection Area A where the vulnerability is equal to ten (10), this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and is therefore prohibited.	To ensure that any Existing or Future application of nitrogen-based commercial fertilizer to land in a WHPA-A ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Added “inside WHPA-A” to the sidebar to reduce confusion on policy applicability. Editorial revisions for consistent language and policy structure.
EC-CW-7.1.1 Existing/Future Part IV-RMP WHPA-B v.8 Nitrate WHPA-ICA (outside WHPA-A) v.8	To ensure that the existing or future application of nitrogen-based commercial fertilizer to land ceases to be a significant drinking water threat, where this activity is a significant drinking water threat in Wellhead Protection Area B where the vulnerability is equal to eight (8), this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that the Existing or Future application of nitrogen-based commercial fertilizer to land in a Nitrate WHPA-ICA outside WHPA-A ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Revised policy text and sidebar to reflect the correct policy applicability (i.e. in a Nitrate WHPA-ICA outside of WHPA-A). Editorial revisions for consistent language and formatting.
EC-CW-7.2 Existing/Future Education & Outreach WHPA-A-v.10 Nitrate WHPA-ICA	To ensure that the existing or future application of commercial fertilizer to land ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Municipality shall develop and implement an education and outreach program targeted to individuals applying commercial fertilizer to land within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	To ensure that the Existing or Future application of commercial fertilizer to land ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Municipality shall develop and implement an education and outreach program targeted to individuals applying commercial fertilizer to land within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	Added Nitrate WHPA-ICA to the sidebar for correctness. Editorial revision for consistent formatting.

Threat 9.0 – The handling and storage of commercial fertilizer

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-8.1 Existing/Future Part IV-Prohibit WHPA-A-v.10 Nitrate WHPA-ICA (inside WHPA-A) v.10	To ensure that the existing or future handling and storage of nitrogen-based commercial fertilizer as defined in <i>O.Reg. 267/03</i> , under the <i>Nutrient Management Act, 2002</i> ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat in Wellhead Protection Area A where the vulnerability is equal to ten (10), this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and is therefore prohibited.	To ensure that any Existing or Future handling and storage of nitrogen-based commercial fertilizer in a WHPA-A ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Added “inside WHPA-A” to the sidebar to reduce confusion on policy applicability. Editorial revisions for consistent language and formatting.
EC-CW-8.2 Existing/Future Part IV-RMP Nitrate WHPA-ICA (outside WHPA-A) v.8	To ensure that any existing or future handling and storage of commercial nitrogen-based fertilizer as defined in <i>O.Reg. 267/03</i> , under the <i>Nutrient Management Act, 2002</i> ceases to be a significant drinking water threat, where this activity is a significant drinking water threat in an Issue Contributing Area where the vulnerability is equal to eight (8), this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Existing or Future handling and storage of commercial nitrogen-based fertilizer in a Nitrate WHPA-ICA outside WHPA-A ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Revised policy text and sidebar to reflect the correct policy applicability (i.e. in a Nitrate WHPA-ICA outside of WHPA-A). Editorial revisions for consistent language and formatting.
EC-CW-8.3 Existing/Future Education & Outreach	Not applicable. New Policy.	To ensure that the Existing or Future handling and storage of commercial fertilizer ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would	New policy that broadly applies to commercial fertilizer storage and captures any non-nitrogen based fertilizers. Education and Outreach as a

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
WHPA-A-v.10: Nitrate WHPA-ICA		be, a significant drinking water threat, the Municipality shall develop and implement an education and outreach program targeted to individuals handling and storing commercial fertilizer within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	supplementary tool aligns with the Lake Erie Region approach for agricultural threats (SPC-24-11-03).

Threat 10.0 – The application of pesticide to land

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-9.1 Existing/Future Part IV-RMP WHPA-A-v.10	To ensure that the existing or future application of pesticides ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Existing or Future application of pesticide to land ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Minor editorial revisions for consistent language and formatting.
EC-CW-9.2 Existing/Future Education & Outreach WHPA-A-v.10	To ensure that the existing or future application of pesticides ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Municipality shall develop and implement an education and outreach program targeted to individuals applying pesticides to land within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	To ensure that the Existing or Future application of pesticide to land ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Municipality shall develop and implement an education and outreach program targeted to individuals applying pesticides to land within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	Minor editorial revisions for consistent language and formatting.

Threat 11.0 – The handling and storage of pesticide

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-10.1 Existing Part IV – RMP WHPA-A-v.10	To ensure that any existing handling and storage of pesticides ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Existing handling and storage of a pesticide ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Minor editorial revisions for consistent language and formatting.
EC-CW-10.2 Future Part IV – Prohibit WHPA-A-v.10	To ensure that the future handling and storage of pesticides never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that the Future handling and storage of a pesticide never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Minor editorial revisions for consistent language and formatting.

Threat 13.0 – The handling and storage of road salt

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-MC-11.1 Future Land Use Planning WHPA-A-v.10	To ensure that the future handling and storage of road salt never becomes a significant drinking water threat, where such activities would be significant drinking water threats, future road salt storage facilities, where permitted by the Official Plan and zoning by-law, will only be permitted if the road salt is contained in covered roof storage facilities and a salt impact assessment and/or salt	To ensure that any Future handling and storage of road salt never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, future road salt storage facilities, where permitted by the Official Plan and zoning by-law, will only be permitted if the road salt is contained in covered roof storage facilities and a salt impact	Editorial revisions for consistent language and formatting. Policy wording already captures new subthreat categories for road salt under the 2021 Technical Rules.

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
	management plan has been completed to the satisfaction of the Municipality.	assessment and/or salt management plan has been completed to the satisfaction of the Municipality.	

Threat 14.0 – The storage of snow

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-12.1 Future Part IV – Prohibit WHPA-A-v.10	To ensure that the future storage of snow never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Future storage of snow never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Editorial revisions for consistent language and formatting.

Threat 15.0 – The handling and storage of fuel

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-13.1 Future Part IV - Prohibit WHPA-A-v.10	To ensure that the future handling and storage of fuel never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Future handling and storage of fuel never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Editorial revisions for consistent language and formatting.

Threat 16.0 – The handling and storage of a dense non-aqueous phase liquid (DNAPL)

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-14.1 Future Part IV – Prohibit WHPA-A-v.10	To ensure that any new handling and facility storage of dense non-aqueous phase liquid for industrial, commercial, institutional and agricultural purposes within WHPA-A never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Future handling and storage of a dense non-aqueous phase liquid for industrial, commercial, institutional and agricultural purposes in a WHPA-A never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Text revision to ensure correct policy applicability. Other minor editorial revisions for consistent language and formatting.
EC-CW-14.2 Future Part IV – RMP WHPA-B-v.8 WHPA-C-v.6	To ensure that any new handling and storage of dense non-aqueous phase liquid for industrial, commercial, institutional and agricultural purposes within WHPA-B or C never becomes a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that any Future handling and storage of a dense non-aqueous phase liquid for industrial, commercial, institutional and agricultural purposes in a WHPA-B or C never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Text revision to ensure correct policy applicability. Other minor editorial revisions for consistent language and formatting.
EC-CW-14.3 Existing/Future Education & Outreach WHPA-A/B/C	To ensure that any existing or new handling and storage of a dense non-aqueous phase liquid ceases to be or never becomes a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Municipality, in consultation with the Township of Malahide, shall implement an education and outreach program to encourage the use of alternative products where available and the proper disposal of these liquids.	To ensure that any Existing or Future handling and storage of a dense non-aqueous phase liquid ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, the Municipality, in consultation with the Township of Malahide, shall implement an education and outreach program to encourage the use of alternative products where available and the proper disposal of these liquids.	Minor editorial revisions for consistent language and formatting.

Threat 17.0 – The handling and storage of an organic solvent

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-15.1 Existing Education & Outreach WHPA-A-v.10	To ensure that any existing handling and storage of an organic solvent ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the Municipality shall implement an education and outreach program to encourage the use of alternative products where available and the proper disposal of these liquids.	To ensure that any Existing handling and storage of an organic solvent ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, the Municipality shall implement an education and outreach program to encourage the use of alternative products where available and the proper disposal of these liquids.	Minor editorial revision for consistent formatting.
EC-CW-15.2 Future Part IV – Prohibit WHPA-A-v.10	To ensure that any new handling and storage of organic solvents never becomes a significant drinking water threat, where this activity would be a significant drinking water threat; this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Future handling and storage of organic solvents never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Minor editorial revision for consistent formatting.

Threat 18.0 – The management of runoff that contains chemicals used in the de-icing of aircraft

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-16.1 <u>REMOVED</u> Future Specify Action WHPA-A-v.v.10	To ensure that future runoff that contains chemicals used in the de-icing of aircrafts never becomes a significant drinking water threat, where such an activity would be a significant drinking water threat, the Municipality shall encourage the Airport Authority as part of the airport approval process to use existing Federal regulations for the proper management of the runoff from de-icing of aircrafts.	Not applicable.	Policy removed, as no airport facilities exist or are anticipated within the municipality.

Threat 21.0 – The use of land as livestock grazing or pasturing land, an outdoor confinement area or farm animal yard

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-CW-17.1 Existing/Future Part IV-RMP WHPA-A-v.10 <u>Nitrate WHPA-ICA</u>	To ensure that the existing or future use of land for livestock grazing or pasturing ceases to be or never becomes a significant drinking water threat, where these activities are, or would be, a significant drinking water threat, these activities shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	To ensure that the Existing or Future use of land for livestock grazing or pasturing ceases to be, or never becomes, a significant drinking water threat, where this activity is, or would be, a significant drinking water threat, this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required.	Added Nitrate WHPA-ICA to the sidebar for correctness. Editorial revisions for consistent language and formatting.
EC-CW-17.2 Future Part IV-Prohibit WHPA-A-v.10 <u>Nitrate WHPA-ICA</u>	To ensure that any new farm animal yard or outdoor confinement area never becomes a significant drinking water threat, where these activities would be a significant drinking water threat, these activities shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	To ensure that any Future outdoor confinement area or farm animal yard never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, and where this activity is not subject to a Nutrient Management Strategy under the <i>Nutrient Management Act, 2002</i> or the Nutrient Management Strategy is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall be designated for the purpose of Section 57 of the <i>Clean Water Act, 2006</i> and shall be prohibited.	Revised policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The Part IV policy only applies for threat activities that are not subject to a Nutrient Management Strategy directly approved by OMAFA. The prohibition aligns with the general Lake Erie Region approach for agricultural threats (SPC-24-11-03). Added Nitrate WHPA-ICA to the sidebar for correctness. Editorial revisions for consistent language and formatting.
EC-CW-17.3	To ensure that an existing farm animal yard or an outdoor confinement area as defined in <i>O. Reg. 267/03</i> under the <i>Nutrient</i>	To ensure that any Existing outdoor confinement area or farm animal yard ceases to be a significant drinking water threat,	Revised policy to better align with the <i>Nutrient Management Act, 2002</i> regulatory framework. The

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
Existing Part IV-RMP WHPA-A-v.10 Nitrate WHPA-ICA	<i>Management Act, 2002</i> for a livestock operation not phased-in under the <i>Nutrient Management Act, 2002</i> ceases to be a significant drinking water threat, where this activity is a significant drinking water threat, these activities shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required. The requirements of the Risk Management Plan will generally be based on the requirements of a Nutrient Management Plan and/or Strategy under the <i>Nutrient Management Act, 2002</i>, but may also include any modifications or additional requirements deemed necessary or appropriate by the Risk Management Official.	where this activity is a significant drinking water threat, and where this activity is not subject to a Nutrient Management Strategy under the <i>Nutrient Management Act, 2002</i> or the Nutrient Management Strategy is not approved by the Ministry of Agriculture, Food and Agribusiness (OMAFRA), this activity shall be designated for the purpose of Section 58 of the <i>Clean Water Act, 2006</i> and a Risk Management Plan shall be required. The requirements of the Risk Management Plan will generally be based on the requirements of a Nutrient Management Strategy, but may also include any modifications or additional requirements deemed necessary or appropriate by the Risk Management Official.	Part IV policy only applies for threat activities that are not subject to a Nutrient Management Strategy directly approved by OMAFA. The use of an RMP aligns with the general Lake Erie Region approach for agricultural threats (SPC-24-11-03). Added Nitrate WHPA-ICA to the sidebar for correctness. Editorial revisions for consistent language and formatting.
EC-MC-17.4. REMOVED Existing Prescribed Instrument WHPA-A-v.10	To ensure an existing farm animal yard or an outdoor confinement area as defined in <i>O. Reg. 267/03</i> , for livestock operations with an existing Nutrient Management Plan or Strategy in accordance with the <i>Nutrient Management Act, 2002</i> cease to be a significant drinking water threat, where these activities are a significant drinking water threat, the Ministry of Agriculture, Food and Rural Affairs shall review and, if necessary, amend the required Nutrient Management Plan/Strategy to ensure that such Plan/Strategy incorporates measures and/or terms and conditions that, when implemented, reduce the risk to drinking water sources.	Not applicable.	Policy EC-MC-17.4 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-MC-6.1.
EC-CW-17.5 Existing/Future Education & Outreach WHPA-A-v.10 Nitrate WHPA-ICA	To ensure that the existing or future use of land for livestock grazing, pasturing, farm animal yard or an outdoor confinement area ceases to be or never becomes a significant drinking water threat, where these activities are, or would be, a significant drinking water threat, the Municipality shall develop and implement an education and outreach program targeted to farms with livestock grazing, pasturing, farm animal yards or outdoor confinement areas within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	To ensure that any Existing or Future use of land for livestock grazing, pasturing, outdoor confinement area or farm animal yard cease to be, or never become, significant drinking water threats, where these activities are, or would be, significant drinking water threats, the Municipality shall develop and implement an education and outreach program targeted to farms with livestock grazing, pasturing, farm animal yards or outdoor confinement areas within vulnerable areas to ensure that those individuals engaged in the activity are educated in methods to reduce the risk to drinking water sources.	Added Nitrate WHPA-ICA for correctness. Editorial revisions for consistent language and formatting.

Threat 22.0 – The establishment and operation of a liquid hydrocarbon pipeline

Policy Identifier	Current Approved Policy (2017 Technical Rules)	Proposed Policy (2021 Technical Rules)	Description of changes / rationale
EC-NB-18.1 REMOVED Future Specify Action WHPA-A-v.10 Monitoring	To ensure that the operation and establishment of a liquid hydrocarbon pipeline within the meaning of Ontario Regulation 210/01 under the <i>Technical Safety and Standards Act, 2000</i> or is subject to the <i>National Energy Board Act, 1985</i> , never becomes a significant drinking water threat, where this activity would be a significant drinking water threat, the pipeline proponent, the National Energy Board and the Ontario Energy Board are encouraged to provide the Source Protection Authority and the Municipality the location of any new proposed pipeline within the Municipality and/or Source Protection Area. The Source Protection Authority should document in the annual report the number of new pipelines proposed within vulnerable areas if a pipeline has been proposed and/or application has been received.	Not applicable.	Policy EC-NB-18.1 removed from municipal chapter and adopted into new Plan-wide policy LPSPA-NB-8.1.