



November 9, 2020

George Jacoub, Water Research Scientist - Hydrologist
Ministry of Environment, Conservation and Parks
Source Protection Programs Branch
Source Protection Planning Unit
40 St Clair Avenue West – 14th floor
Toronto ON M4V 1M2

Dear George,

Thank you for the opportunity to review and comment on the proposed amendments to the Director Technical Rules made under section 107 of the Clean Water Act (ERO # 019-2219).

As one of the Project Managers responsible for delivering the Source Protection Program at a local level, I have seen and commented on earlier drafts of these revisions at various stages over the previous years, including at Chairs meetings, in a pre-consultation workshop, and (via colleagues) through a number of issue-specific working groups. In reviewing these proposals, I can see comments I provided earlier in the process reflected here, and appreciate knowing that my comments have been heard.

I have no further comments specific to the proposed revisions themselves, however I do have some points that I will require additional clarification on, in order to implement the proposed changes in an amended Source Protection Plan:

- Are Source Protection Plans to be updated to reflect the proposed changes to the Circumstances, or are these changes intended to only apply to any amendments which may be forthcoming to add new (or expanded) drinking water systems to existing Assessment Reports?
- How does 'processed organic waste' differ from non-agricultural source material? Is this material to which existing NASM prescribed instruments do not apply? If that is the case, do other Provincial prescribed instruments exist which Source Protection Committees should be aware of?
- To expand on the above, if any of the new or amended circumstances have associated prescribed instruments, please provide an overview of those instruments to Source Protection Committees, to ensure that they understand their policy options to address significant drinking water threats.
- Do the proposed changes to the circumstances related to the storage of commercial fertilizer apply to all land uses, or are they still restricted to storage for retail sale or in relation to its application, or at a facility associated with manufacturing and wholesale, as in the current circumstances?

Finally, I feel I should note that members of the South Georgian Bay Lake Simcoe Source Protection Committee feel that there were insufficient opportunities for the agricultural community to review and comment on these proposed revisions earlier in the process. In a meeting with the Minister's office earlier this year, several of my SPC members were led to believe that an opportunity would be provided to participate on a committee supporting this project, however that opportunity did not materialize.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bill Thompson", with a long horizontal flourish extending to the right.

Bill Thompson
Manager, Watershed Plans and Strategies

Cc: Lynn Dollin, Chair, South Georgian Bay Lake Simcoe Source Protection Region

