



November 9, 2020

George Jacoub  
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**Subject: Director Technical Rules (<https://ero.ontario.ca/notice/019-2219>).**

Dear Dr. G. Jacoub;

Thank you for the opportunity to review and comment on the Source Water Protection Technical Rules, which is presently on the ERO for a period of 90 days ending November 9<sup>th</sup> 2020.

I have no further comments specific to the proposed revisions themselves. However, below I have outlined a few points that seek additional clarity 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? This includes the delivery of the Part IV powers on the already established Risk Management Plans.
- How does 'processed organic waste' differ from non-agricultural source material? Is this material to which existing NASM prescribed instruments do not apply?
- If any 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.

Sincerely

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cc. Bill Thompson, LSRCA  
Lynn Dollin, Chair- South Georgian Bay Lake Simcoe Source Protection Committee