



June 13, 2008

Hon John Gerretsen  
Minister of the Environment  
12th Floor, 135 St. Clair Avenue West  
Toronto, Ontario M4V 1P5

Dear Minister Gerretsen,

**RE: Proposal for the creation of a feedback mechanism for monitoring the progress and performance of Source Protection Committees**

The implementation of the *Clean Water Act, 2006* is well underway. The great majority of Source Protection Committees ('SPCs') have posted their proposed Terms of Reference ('TOR'). Soon, work on Areas' and Regions' Assessment Reports will begin in earnest, and within a few years Ontario will witness the application of nineteen Source Protection Plans. The end result of all this work by SPCs will be comprehensive source water protection for millions of Ontarians.

However, as can be seen in a summary table on SPCs' proposed TOR recently produced by the Canadian Environmental Law Association and Environmental Defence, there are variations in the comprehensiveness of the draft TOR. This is not surprising. In the first place, differences in population size, soil, climate and the nature of threats to source water among Source Protection Areas and Regions would lead us naturally to expect at least some differences in the range of TOR comprehensiveness. Moreover, there are differences among SPCs, such as committee size, the technical expertise of members, members' previous experience on committees, and the degree to which an Area's or Region's interests are represented. The development of the TOR was even interrupted in several Areas and Regions because of cancelled meetings in the winter, when poor weather conditions kept SPCs from keeping to their schedules; a more hurried development of parts of these SPCs' TOR might have resulted from these interruptions. As SPCs move through the various stages of the source protection process, further delays and differences in the comprehensiveness of Assessment Reports and Source Protection Plans will probably be experienced and observed.

Each SPC's experience of the source protection process is unique. As a consequence of these unique experiences, there are differences in the pace at which SPC work is completed and in the comprehensiveness of the work itself. We think that a feedback mechanism for monitoring the progress of SPCs and the comprehensiveness of their work should be established by the MOE. Through the use of surveys, the MOE could monitor SPC progress and performance. Responses from individual SPC members, when cross-referenced with the responses of counterpart members on other SPCs, could prove

insightful. The results of a feedback mechanism would also allow for comparisons between and among SPCs.

We believe the monitoring of SPC progress and performance would help to standardize source protection efforts across Source Protection Areas and Regions. In addition, innovative and successful developments on one SPC would be identified; these developments could then be shared with other SPCs through the MOE. Ultimately, this could very well result in more effective Source Protection Plans.

We thank you in advance for your consideration of this proposal.

Yours sincerely,



Christopher Waffle  
Source Protection Campaigner  
Canadian Environmental Law Association



Mike Layton  
Program Coordinator  
Environmental Defence

c.c. Gail Beggs, Deputy Minister, Ministry of the Environment  
Ian Smith, Director, Source Protection Programs Branch, Ministry of the Environment  
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