



**ENGO Statement of Expectations on Watershed Based Source
Water Protection**

**Comparison to Technical Experts Committee Report and
Implementation Committee Report both dated November, 2004**

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**Prepared by: Theresa McClenaghan
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ENGO STATEMENT

TEC & IC REPORTS

<p>ENGO Statement 1.0 – Universal Level of Protection</p> <ul style="list-style-type: none"> • Source water protection planning framework be used in all watersheds in Ontario • Protect individual well users as well as municipally operated systems • Protect watersheds in north as well as south • Protect groundwater and surface water from non-point cumulative threats • Protect groundwater and surface water from point source threats • Protect water sources re both quality and quantity • Source protection planning based on the precautionary principle • Ministry of Environment remain ultimately accountable and responsible for source protection planning 	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • integrated into watershed-based program for the protection of all water and all water users (GP 5, 9, 10) • human use of water priority; especially risks that may affect water use by large numbers of people (GP 13) • involvement of Medical Officers of Health for private protection (GP 14) • vulnerable areas includes aquifer protection zones of high or extremely high vulnerability will protect private users in those areas (TEC 58, 59) • Private and municipal supplies to treat if surface water source (TEC 36, 77) • comprehensive program to address private supplies with focus on pathogen contamination (TEC 123) • No specific recommendations in TEC re watersheds in the north • Measures to reduce pathogen loading (TEC 35, 36, 46, 47) • Nutrient management and farm water protection planning (Table 6.3) • Protect quality and quantity (GP 10) • Evaluate sustainability of recharge and discharge impacts; consider tolerance of ecosystem to changes in flows and levels (TEC 24, 25) • Private Services, Appendix 11 <p>IC REPORT RECOMMENDATIONS:</p> <ul style="list-style-type: none"> • Details of approach for Northern Ontario yet to be proposed by Ministry of Environment (p. 8) • Transboundary issues Rec. 4 • Implementation tools deal with both water quality and water quantity issues • Private water wells Rec. 115
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	<ul style="list-style-type: none"> • Precautionary approach a guiding principle (page 4) • Non-point sources / cumulative loading (Recommendations 100 – 102)
<p>ENGO Statement 2.0 – Appropriate Planning Scale and Scope</p> <ul style="list-style-type: none"> • Plan by watershed with appropriate sharing of resources • Protection of all waters including shorelines, wetlands, woodlands because of integral ecological contribution to source water protection • Recognize intrinsic groundwater – surface water relationship 	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Plan at the watershed-level (GP 5) • Protect all water and water uses including for environmental needs (GP 10) • Ground and surface water connections to be recognized in water budgets (TEC 19) • See also TEC recommendations summarized in comparison to ENGO Statement 4.0 below <p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Section 2 – Source Protection Planning Process • Sustainable funding recommendations section 6.5 • Implementation principles section 1.4
<p>ENGO – Statement 3.0 – Thorough Public Participation</p>	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Message from the Technical Experts Committee (page iv) <p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Implementation Principles: Shared responsibility and stewardship, Public Participation and Transparency, Clear Accountability, Effective Decision-Making (pages 4 – 6) • Access / Sharing Information (section 2.9, recommendation 7) • Notification of Source Protection Plans (section 3.4, recommendation 11) • Plan Implementation, Monitoring, Amendment (section 3.5, recommendations 12 – 14) • Education and Outreach, (section 4.8, recommendation 26)
<p>ENGO – Statement 4.0 – Integration with Existing Legislation</p> <ul style="list-style-type: none"> • Integration with Great Lakes programs • Integration with flood and drought 	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • All sources of water including Great Lakes to be addressed (GP 10) • Communities drawing water from Great lakes must participate (GP 24) • Protection necessary also for

<p>management plans</p> <ul style="list-style-type: none"> • Integration with Fisheries protection programs • Integration with risk habitat and species recovery programs • Adoption of more stringent requirements for water quality or quantity 	<p>downstream recipients such as Great Lakes, St. Lawrence River and James Bay (GP 25)</p> <ul style="list-style-type: none"> • Long term water supply strategy including conservation plans (TEC 21) • Evaluate what reductions in aquifer recharge and discharge are sustainable (TEC 24) • Source protection to address natural areas (TEC 85) • Continually improve protection and restoration in natural areas (TEC 91) • Section 7 – Ecological Protection • Include loss of wetlands and riparian zones in threats inventories and develop process to protect and restore in subsequent source protection cycles (TEC 86) • Include percentage of landscape comprised of natural areas that performs hydrological function in water budgets; analyze to continuously improve and rank importance (TEC 87 & 88) • Artificial wetlands and buffer strips to reduce vulnerability of intake protection zones (TEC 90) • Initial source protection plans to describe natural areas and benefits to source water and ecological sustainability (TEC 91) • Drinking water source protection to take precedence over other provincial & municipal legislation, policies, regulations impacting drinking water (GP 15) <p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Great Lakes, (section 2.8, Rec 6) • Integration with other programs (section 2.7, Recommendation 5) • Provincial authority (section 4.3, recommendations 18 – 20) • Municipal Authority (section 4.4, recommendation 21) • Land Securement (section 4.5, recommendations 22-23)
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	<ul style="list-style-type: none"> • Issue Specific Implementation Tools (section 5) • Ontario Low Water Response (section 5.24.3 (recommendation 114) • Sustainable Funding for Source Protection (section 6.5, recommendations 119 – 124)
<p>ENGO – Statement 5.0 – First Nations</p>	<p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • First Nations, section 2.5, recommendation 3 • Federal Government, section 2.4, recommendations 2, 3 • Transboundary Issues, section 2.6, recommendation 4 • Integration with other Programs, section 2.7, recommendation 5 • Great Lakes, section 2.8, recommendation 6 • Accessing, Sharing Information, section 2.9, recommendation 7 • Plan Implementation, monitoring, amendment, section 3.5, recommendation 13 • Assessment of Funding Needs / Potential costs of source protection planning and implementation, section 6.5, recommendations 117, 118 • Sustainable funding for source protection, section 6.5, recommendations 119 – 124
<p>ENGO – Statement 6.0 – Conservation Authorities</p> <ul style="list-style-type: none"> • Responsibility and accountability of CA’s to be specifically delineated in source protection legislation • CA’s and others responsible must be provided with adequate resources • coordination of adjoining CA’s • technical integration across provincial ministries, public access to databases • Source Protection Planning Committees to be inclusive of the public • reconsider size of CA’s in north 	<p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Roles and responsibilities, section 2.3, recommendation 1 • Technical Assessment / Plan Development roles and responsibilities, section 2.3.1 • Transboundary issues, section 2.6 • Accessing / sharing information, section 2.9, recommendation 7 • Training needs, section 2.10, recommendation 8 • Interim measures, section 3.3, recommendation 10 • Notification of source protection plans, section 3.4, recommendation 11 • Plan Implementation, monitoring,

	<p>amendment, section 3.5, recommendations 12, 13</p> <ul style="list-style-type: none"> • Funding Principles, section 6.3, recommendation 116 • Funding Needs, section 6.4, recommendations 117, 118 • Sustainable funding, section 6.5, recommendations 119 – 124 • Financial Incentives and Assistance, section 6.7, recommendation 128 • Details re governance in north still to be proposed (page 8)
<p>ENGO – Statement 7.0 – New Municipal Powers, Roles and Requirements</p> <ul style="list-style-type: none"> • Province to work with municipalities, other stakeholders to develop appropriate new municipal powers for purposes of source water protection • Municipal accountability and authority to be specifically delineated • Official Plans to be updated to be consistent with approved Source Protection Plans • Pesticide and sewer / septic system use by-laws incorporating provincially set standards and provisions • water conservation plans • no net increase in total water use • incentives and rebates for water conservation measures • public education regarding impacts of activities in watershed • downstream municipalities contribute to source protection efforts upstream 	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Prov govt. encourage and help municipalities and CA’s facilitate actions that will ensure ecological sustainability of source waters not used for drinking water (recommendation 84) • PPS to reflect TEC recommendations (guiding principle 6) • Source protection plans should specify measures to retain water on land and to conserve water (guiding principle 7) • conservation programs to ensure efficient water use and retention of water on landscape (guiding principle 8) • Communities that draw drinking water from Great lakes must participate in all source protection activities that influence their watershed (guiding principle 24) • Downstream protection (guiding principle 25) • Continually reduce current and future risks through risk reduction activities and wise planning (guiding principle 28) • Municipalities to maintain a long-term (50 year) water supply strategy with water supply needs, conservation plans and planned sources (recommendation 21) • Drinking water protection actions by 2003 (recommendations 122 – 128)

	<p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Municipal Authority (section 4.4, recommendation 21) • Pesticides (section 5.10, recommendations 51 – 58) • Septic systems (sections 5.17, recommendations 81 – 83) • Interim measures (section 3.3, recommendation 10) • Status of source protection plans (section 3.6, recommendations 15, 16) • Water conservation (section 5.24.2, recommendations 112 – 113) • Financial incentives and assistance (section 6.7, recommendation 128) • Participation of private system owners (section 6.7.2 (recommendations 131 – 133))
<p>ENGO – Statement 8.0 – Adequate Funding</p> <ul style="list-style-type: none"> • Adequate resources to all authorities responsible for developing and implementing source protection plans (including CA’s, municipalities, First Nations and others) • Including funding, funding tools, technical expertise, training • Federal and provincial financing programs and tools to be leveraged together • provincial revenue sources for sparsely populated areas that have an important role for downstream users • pricing tools, water meters • Conservation land tax amendments • incentives • Ministry guidebooks for source protection plans • utilization of science and new research for source water protection goals to be greatly enhanced 	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Section 8, Data requirements and Management • Rec 95, adequate long-term funding for maintaining information and data-bases • Rec 96, adequate training for those generating well information • Rec 97, reciprocal agreements and free flow of info • Rec 98, free and open data movement • Section 9, Research, data and information needs • Rec 112, sustainable, long-term funding to address fundamental research, data and information needs <p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Section 6, Funding of Source Water Protection • Section 6.3, Funding Principles • Recommendations 116 – 118 • Section 6.5, Sustainable Funding for Source Protection, Recommendations 119 – 124 • Section 6.6, Ontario Funding Model, Specific recommendations • Recommendations 125 – 127 • Section 6.7, Financial Incentives and Assistance

	<ul style="list-style-type: none"> • Recommendations 128 – 130 • Section 6.7.2, Participation of Private System Owners • Recommendations 131 – 133 • Section 4.5, Land Securement • Recommendations 22, 23 • Recommendation 5, Integration with other programs • Recommendation 17, provincial source protection guidance manual
<p>ENGO – Statement 9.0 – Conservation</p> <ul style="list-style-type: none"> • Source protection plans must include development of water budgets • Source protection plans must include development of water conservation standards • Based on assessment of cumulative impacts of all water takings in the watersheds • Publicly reported • Reflected in permits to take water with specific, measurable and enforceable conservation requirements of the permit holder 	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Conservation programs province wide (GP 8) • Source protection plans to include water conservation (Table 6.3) • Source protection must deal with quantity issues (GP 8) • Budgets based on both ground and surface water (TEC 19) • Water budgets to include ground and surface water connections (TEC 23) • Long term water supply strategies including conservation plans (Table 6.3) • Mapping and analysis to define groundwater contributions to maintenance of Great Lakes and surface waters - research (94) • Permits to take water recommendations recommendations 113 - 121 <p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Section 5.24, Water Quantity / Water Conservation • Recommendations 104 – 111 – improvements to Permit to Take Water system • Recommendations 112, 113 – water conservation • Recommendation 114 – Ontario Low Water Response • Recommendation 115 – Private Water Wells
<p>ENGO – Statement 10.0 – Water Taking Charges</p> <ul style="list-style-type: none"> • Apply levies to water taking 	<p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Section 6.6.2, Water Taking Charges • Recommendation 126

<p>activities</p> <ul style="list-style-type: none"> • Revenue from those charges allocated back to source protection system • Allocated to source protection planning, data collection, public education, implementation, monitoring • Should not create perverse impacts on water quantity • Equitable distribution of funds over all watersheds • Full range of tools should be ensured for sustainable resourcing to CA's, municipalities, province and others to carry out implementation 	<ul style="list-style-type: none"> • Section 6.5 Sustainable Funding for Source Protection • Section 6.6 An Ontario Funding Model • Section 6.7.2 Participation of private owners
<p>ENGO – Statement 11.0 – Infrastructure Watershed wide benefits of source protection</p> <ul style="list-style-type: none"> • Economic benefits of source protection over-ride costs • As soon as possible vulnerable and sensitive ground and surface water areas must be identified and interim protection imposed by the province until long-term source protection plans are approved by the province 	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Planning at watershed level (GP 5) • Integrate into coherent watershed based program for benefit of all water users including wildlife, environmental, human uses (GP 6) • Sustainability and benefit to Great Lakes communities both directly and indirectly (GP 10) • Sustainability requires protection throughout the hydrologic cycle (GP 30) • Risk management for high risk/ high impact situations identified prior to plan approval should be implemented as quickly as is feasible. (TEC 125) <p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Section 3.3, Interim Measures • Rec 10 • Section 2.2.2, Technical Assessment • Section 5.20 Storm Water • Section 5.21 Waste Water • Section 5.17 Septic Systems • Section 3.6 Status of Source Protection Plans, Recommendations 15, 16
<p>ENGO – Statement 12.0 – Integration with Great Lakes Protection</p>	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • All sources of water including Great

<ul style="list-style-type: none"> • The new source water protection regime must be fully integrated with Great Lakes protection. • Those who take water from Great Lakes will benefit from and must participate in source water protection. • Great Lakes programs and Source Protection Plans must integrate the knowledge, data and science that they are all gathering • This information must be publicly accessible • Actual water takings must be tabulated not only on a watershed basis but also on a Great Lakes basin basis • Research in Great Lakes programs and Source Water Protection must be integrated to avoid “silos” of knowledge 	<p>Lakes to be addressed (GP 10)</p> <ul style="list-style-type: none"> • Communities drawing water from Great lakes must participate (GP 24) • Protection necessary also for downstream recipients such as Great Lakes, St. Lawrence River and James Bay (GP 25) • Ensure equitable distribution of source water protection particularly to practices and activities in communities served by Great lakes (TEC 43) • Mapping and analysis to define groundwater contributions to maintenance of Great Lakes and surface waters - research (TEC 112) <p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Section 2.7 Integration with Other Programs • Recommendation 5 – integration with all levels of government • Section 2.8 Great Lakes • Recommendation 6 – ensure source protection incorporated into Great Lakes programs and agreements • Recommendation 15 – consistency of provincial regulation and decisions that affect drinking water with approved source protection plans • Section 5.22, non-point sources, cumulative loadings, Recommendations 100 – 102 • Section 5.23, land drainage, Recommendation 103 • Section 5.24.1, Permits to Take Water • Section 5.24.2, Water Conservation • Section 5.24.3 Ontario Low Water Response • Recommendation 120, sustainable, secure long-term funding • Recommendations listed above re public access to information
<p>ENGO – Statement 13.0 – Enforceable Timelines</p> <ul style="list-style-type: none"> • First source protection plans must be developed and approved in all 	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Risk management activities for significant risks to be implemented as quickly as feasible. (TEC 125)

<p>regions within three years of the legislation being passed</p> <ul style="list-style-type: none"> • Within two years of legislation, each of the source protection plans should have identified the main issues within the planning area and taken initial steps to address each of these issues 	<ul style="list-style-type: none"> • Implement programs and activities in jurisdictions that have begun source protection plans with provincial funds (TEC 122) • Comprehensive program to address private water supplies should be developed and identified with focus on prevention of pathogen contamination (TEC 123) <p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Section 1.4, Guiding Principles – “Phased-in, Prioritized, Results-based” • Section 3.2 Risk Management Measures Identified in Source Protection Plans • Recommendation 9 – plan to describe required outcomes and measures proposed in plan to be adopted
<p>ENGO – Statement 14.0 – Strong Interim Measures</p> <ul style="list-style-type: none"> • The province, municipalities and conservation authorities must use their available powers to protect water sources by taking immediate action with respect to high-risk activities and land uses until Source Protection Plans are approved and implemented • Vulnerable or sensitive areas should be identified and preliminary measures taken to protect them within one year of the legislation being passed • No new policy instruments with the potential to cause significant or irreversible harm to water sources should be issued until source protection plans are in place 	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Risk management activities for significant risks to be implemented as quickly as feasible. (TEC 125) <p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Section 3.3 Interim Measures • Recommendation 10 – Interim action
<p>ENGO – Statement 15.0 – Long-term Monitoring</p> <ul style="list-style-type: none"> • Data must be collected and publicly reported for outcome measures listed in the 2003 Source Protection 	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Sustainable and long-term funding for maintenance of information and databases (TEC 112) • Exchange information and experiences re source protection planning (TEC 98)

<p>Advisory Committee report</p> <ul style="list-style-type: none"> • Technical data on water quality and quantity indicators should be consolidated in a central province-wide, user-friendly database, accessible by the general public 	<ul style="list-style-type: none"> • Provincially managed groundwater inventory (TEC 101) • Extensive data recommendations (TEC 92 – 112) • Recommendations do not explicitly state accessible by general public <p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Section 3.5 Plan Implementation, Monitoring and Amendment • Recommendations 12 – 14 – source protection plans “living documents”; plan implementation monitoring, evaluating, reporting, updating
<p>ENGO – Statement 16.0 – Review of Source Protection Plans</p> <ul style="list-style-type: none"> • Plans should be reviewed and updated regularly to reflect emerging data and science, changes in the watershed and results of outcome monitoring under source protection plans 	<p>TEC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Not explicitly recommended in TEC but assumed throughout • Continual improvement to reduce overall risk (GP 17 and 27, 28) <p>IC REPORT RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Section 3.5 Plan Implementation, Monitoring and Amendment • Recommendations 12 – 14 – source protection plans “living documents”; plan implementation monitoring, evaluating, reporting, updating