



April 29, 2024

The Honourable Doug Ford
Premier of Ontario
Legislative Building
Queen's Park
Toronto ON M7A 1A1

Delivered via E-mail

Dear Premier Ford:

Re: Request for Commitment of Continued Public Funding of Bacteriological Private Well Testing

There have been recent reports from various sources stating that Public Health Ontario has plans to phase out public access to free bacteriological testing for private water wells. The proposed “gradual discontinuation” of this important testing service was described in the Auditor General’s 2023 audit [report](#) as part of a “streamlining” plan that Public Health Ontario has been developing since 2017. Subsequently, Minister Jones has stated in the legislature that the private well water testing will continue.

We write to request written confirmation from you as Premier, that the Ontario government will continue to provide bacteriological testing of private drinking water well samples through the public health units, free of charge. While Minister Jones has stated that the testing will continue, there remain ambiguities in the statements made which continue to cause us concern.

Removing the private well testing service for bacteriological contamination is a terrible idea. We are dismayed that it was ever suggested by Public Health Ontario and that this idea was apparently not questioned or opposed by the Auditor General. We can only assume that both organizations were operating with incomplete information, and/or had forgotten the recommendations of Justice O’Connor on this topic. Basic private well testing is a public health issue. In Ontario, there are approximately 500,000 households whose drinking water comes from their own private wells, which are not subject to the protective provisions of the [Clean Water Act](#) or [Safe Drinking Water Act](#).

Canadian Environmental Law Association

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Ontario municipalities often provide treated drinking water for residents living in major urban areas. Additionally, most of these municipalities are expending important funds on implementing the “multi-barrier” approach to protecting drinking water quality in the province, which is the main lesson learned from the Walkerton tragedy in 2000.

However, these safeguards are not in place for all towns, villages, hamlets, and other locations outside of larger settlement areas. In such places, there is currently only one publicly funded piece of protection in place, and that is the free well water testing to ensure that rural Ontarians are not drinking water containing harmful bacteria such as E. coli.

In his report on the [Walkerton tragedy inquiry](#), Justice O’Connor strongly supported this private water testing system, and he recommended improvements to the province’s regulatory oversight of water well installation and maintenance, which still is overdue in Ontario.

The people most at risk from the misguided proposal to cease testing are vulnerable residents like the children of families who would not be able afford to pay private labs for analysis of water samples; the extended family and friends who come to visit rural homes or small town houses with no one being aware that there may be a bacteriological threat to well water quality; and the public at large through completely preventable increases in drinking waterborne illness and the resulting health care burden. Since the amount of waterborne illness associated with private wells is vastly underestimated, the least that Ontario can do is to ensure that families who do not drink treated municipal water can continue to have their own water well tested for free.

Upon news surfacing of these plans to gradually phase out private well testing, objections were raised by environmental groups, public health advocates, and Source Protection Committees established under the *Clean Water Act*. While Ontario’s Health Minister recently [claimed](#) that “no decisions” have been made on whether to proceed with this plan, the current government subsequently voted to reject a motion that called upon the province to continue this important testing program. Nevertheless, days after this vote, the Health Minister then [announced](#) that the program would be continued after all:

“We will continue to test the well water in the province of Ontario. We’ve had it for decades. I grew up with it. It is a system that many of us understand the value and importance of in rural Ontario because we lived it every single day. We’re going to continue that process.”

CELA and the other undersigned signatories strongly support this governmental commitment to the continuation of free well water testing by public health laboratories.

As noted above, we are unclear why anyone would initially propose the “gradual termination” of the program, but we are pleased that this risky proposal has now been appropriately abandoned by the provincial government. Despite this good news, it is also unclear to us how the free water testing will continue to be carried out in a timely and effective manner since almost half of the regional public health laboratories which do this testing are still slated for closure by the

provincial government. Furthermore, the statement in the legislature by the Minister is not fully clear. We would like you to confirm that the testing will continue to be available in the future to every household and family in Ontario who has a private drinking water well, free of charge, with sample bottles provided, and a method of delivery to the local health unit for timely testing and advice as to results.

We thank you for your attention to this urgent matter. Please direct replies to the undersigned. We would also be happy to meet with you or your staff to discuss our concerns further.

Yours very truly,



Theresa McClenaghan and Richard Lindgren, Canadian Environmental Law Association

Brennain Lloyd, Northwatch

Linda Heron, Ontario Rivers Alliance

Anna-Louise Richardson and Madeleine McDowell, Humber River Calling

cc. Hon. S. Jones, Minister of Health
Hon. A. Khanjin, Minister of Environment, Conservation and Parks
Hon. L. Thompson, Minister of Agriculture Food and Rural Affairs
Mr. Tyler Schulz, Environmental Commissioner of Ontario
Ms. Shelley Spence, Auditor General, Ontario
Dr. Kieran Moore, Medical Officer of Health, Ontario
Mr. Steven Carrasco, Chief Drinking Water Inspector, Ontario
Ms. Michele Grenier, Advisory Council on Drinking Water Quality and Testing Standards