



## Raisin-South Nation Source Protection Region

### Source Protection Committee Meeting Agenda

November 13, 2025

1:00 p.m.

Location: **Virtual Meeting – Microsoft Teams**

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1. Call to Order
  2. Chair's Remarks
  3. Approval of Agenda
  4. Declaration of Conflict of Interest
  5. Approval of Minutes
    - a. Source Protection Committee Minutes of April 2, 2025 1-4
  6. New Business
    - a. Section 36 Amendment Update: Claire Lemay and Jason Symington 5-28
    - b. Bill 56 Discussion (verbal): Jason Symington
  7. Community Engagement: Roundtable
  8. Date of Next SPC Meeting: TBC
  9. Adjournment

## **Raisin-South Nation Source Protection Committee**

### **Draft Minutes**

**April 02, 2025 – 10:00 a.m.**

**Location: South Nation Conservation Administration Office  
38 Victoria Street, Finch, Ontario**

- PRESENT:** Raymond Beauregard, Chair  
Theresa Bergeron, United Counties of Stormont, Dundas and Glengarry  
Michel Kearney, City of Ottawa  
Idalia Milan, Eastern Ontario Health Unit Liaison (virtual)  
Jeannette Mongeon, Agriculture  
Don Munro, General Public  
Walter Oeggerli, Agriculture (virtual)  
Dominique Lefebvre, United Counties of Prescott and Russell (virtual)  
Jacqueline Pemberton, Agriculture  
Robert Rathbun, City of Cornwall  
Tom Van Dusen, General Public (virtual)  
Elaine Kennedy, Great River Network  
Glenn Mackey, United Counties of Leeds and Grenville  
Blair Walker, Aggregates  
Stephen Wilson, Commercial / Industrial
- REGRETS:** Brian McGillis, Raisin Region Source Protection Authority Liaison  
François St-Amour, South Nation Source Protection Authority Liaison  
Monika Lemke, Ministry of Environment, Conservation, and Parks Liaison
- STAFF:** Carl Bickerdike, Chief Administrative Officer, SNC  
Claire Lemay, Senior Planner, SNC  
Laura Crites,  
John Mesman  
Erin Thorne,  
Kelsey Smith  
Phil Barnes  
Jason Symington, Project Manager, RRCA
- GUESTS :** Tessa Di Iorio  
Danielle Ward,  
Doug Renaud



## 1. Call to Order

Raymond Beauregard, Chair, welcomed all in attendance and called the meeting to order at 10:03 AM.

## 2. Chairman's Remarks

Raymond Beauregard, Chair, welcomed all in attendance. Ray provided a verbal update on recent happenings with the Drinking Water Source Protection program and welcomed guest presenters Danielle Ward from the Township of North Dundas and Tessa Di Iorio from the City of Ottawa; both providing their municipalities Section 34 updates.

## 3. Approval of Agenda

Resolution #1/25

Moved by: Michel Kearney

Seconded: Elaine Kennedy

CARRIED

## 4. Declaration of Conflict of Interest

None.

## 5. Delegations / Presentations

Staff presented project and program updates.

## 6. Approval of Minutes

Resolution #2/25

Moved by: Glenn Mackey

Seconded: Theresa Bergeron

That the minutes of the November 14, 2024 meeting of the Raisin-South Nation Source Protection Committee be approved

CARRIED

## 7. New Business

### a) Project Manager's Update

Resolution #3/25

Moved by: Don Munro

Seconded: Jacqueline Pemberton

That the Raisin-South Nation Source Protection Committee receive and file the Project Manager's Update.

CARRIED

## **b) 2024 Risk Management Official Annual Report Summary**

Resolution #4/25

Moved by: Theresa Bergeron

Seconded: Elaine Kennedy

That the Raisin-South Nation Source Protection Committee receive and file the 2024 Risk Management Official Annual Report Summary.

CARRIED

## **c) 2024 Annual Progress Report**

Resolution #5/25

Moved by: Elaine Kennedy

Seconded: Blair Walker

THAT the Source Protection Committee receive the 2024 Annual Progress Report;

AND FURTHER THAT, in the opinion of the Source Protection Committee, implementation of the Source Protection Plan is progressing well/on target;

AND FURTHER THAT staff be directed to include the Source Protection Committee's comments on implementation progress in the 2024 Annual Report for to the Ministry of Environment, Conservation and Parks.

CARRIED

## **d) New/Modified Drinking Water Systems Update**

Resolution #6/25

Moved by: Michel Kearney

Seconded: Jacqueline Pemberton

THAT the Source Protection Committee receive the New/Modified Drinking Water Systems Update

CARRIED

Resolution #7/25

Moved by: Theresa Bergeron

Seconded: Michel Kearney

THAT the Source Protection Committee send a letter to the Township of North Dundas recommending a peer-review of the technical work supporting the s.34 application for Wellfield 8.

CARRIED

Resolution #8/25

Moved by: Jacqueline Pemberton

Seconded: Elaine Kennedy



THAT the Source Protection Committee send a letter of support to the City of Ottawa endorsing the Section 34 amendment process for the Greely municipal well to ensure the Source Protection Plan policies are applied in a timely manner.

CARRIED

**8. Community Engagement: Roundtable Discussion**

- Jacqueline Pemberton shared her experience as a speaker during the March 20, 2025 Farmland Trust Forum discussing her role in the agricultural community and as a member of the SPC.
- The SPC recognized Jacqueline Pemberton's induction to the Dundas Agricultural Hall of Fame.

**9. Date of Next Meeting**

To be confirmed.

**10. Adjournment**

Resolution #9/25

Moved by: Theresa Bergeron

THAT the Source Protection Committee meeting of April 2, 2025 be adjourned at 11:49 a.m.

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Raymond Beauregard  
Chair

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Jason Symington  
Project Manager

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**To:** Raisin-South Nation Source Protection Committee  
**From:** Claire Lemay, Senior Planner  
**Date:** October 17, 2025  
**Subject:** Section 36 Amendment Update

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## **RECOMMENDATION:**

THAT the Source Protection Committee receive the Section 36 Amendment Update report; and

THAT staff be directed to revise the Source Protection Plan, Explanatory Document, and Assessment Reports as recommended within this report and that any adjustments captured in the meeting minutes will be considered for inclusion in the final submission to the Ministry; and

THAT the resulting updates be included in the amended Raisin-South Nation Source Protection Plan, Raisin Region Assessment Report and South Nation Assessment Report; and further

THAT staff be directed to submit the amended Source Protection Plan and Assessment Reports to the Ministry of the Environment Conservation and Parks.

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## **Background:**

On November 30, 2018, our Section 36 Workplan was submitted to the Ministry of Environment, Conservation and Parks (MECP) in compliance with the order dated October 23, 2014, under Section 36 of the Clean Water Act. On July 22, 2019, we received an amended order from the Minister, which outlined the requirements governing the contents and timeframes for the review process of any updates.

Since then, staff have been working to implement the revisions specified in the order and to align our Source Protection documents with the revised 2021 Technical Rules.

The revised Source Protection Plan (SPP) and Assessment Reports (ARs) were submitted for Early Engagement on July 11, 2023, with comments from the MECP received on November 22, 2023.

Drafts of the revised SPP and ARs were published online and sent to MECP for review and comments on December 10, 2025.

The Public Consultation period was open from December 10, 2024, to January 31, 2025.

Staff received comments from the MECP on August 6, 2025. Several minor changes to policies are requested in the comments from MECP.

## Discussion:

A summary of all comments received through the Public Consultation process is included in Appendix 1 of this report. Comments received from residents through the public consultation process do not necessitate any changes to the Source Protection Plan or to the Assessment Reports.

A copy of the comment letter from MECP Conservation and Source Protection Branch is included as Appendix 2 of this report.

An updated Summary of Changes Log is included as Appendix 3 of this report, including the changes requested by MECP (noted in blue text in the document). Staff recommends that all changes requested by MECP be included in the updated Source Protection Plan.



Claire Lemay, RPP MCIP  
Senior Planner  
Raisin-South Nation Source Protection  
Region



Jason Symington,  
Project Manager  
Raisin-South Nation Source Protection  
Region

## Appendix 1 - Summary of Comments received from Public Consultation

**Table A: Comments received from Implementing Bodies**

<b>Implementing Bodies</b>				
<b>Organization</b>	<b>Response Received</b>	<b>Comment</b>	<b>R-SN SPR Response</b>	<b>Status</b>
OMAFA	No			
MTO	No			
MNR	No			
TSSA	No			
MMAH	No			
Environment Canada	No			
Transport Canada	Yes	Clarification on why they are being consulted	Explained the SWP program and roles of Implementing Bodies. They were satisfied with the response and had no further comments or concerns.	No further action required.
Ontario Energy Board	No			
Canada Energy Regulator	No			



**Table B: Comments received from Municipalities**

<b>Municipalities</b>				
<b>Organization</b>	<b>Response Received</b>	<b>Comment</b>	<b>R-SN SPR Response</b>	<b>Status</b>
Augusta	No			
Alfre-Plantagenet	No			
Casselman	No			
Clarence-Rockland	No			
Edwardsburg-Cardinal	No			
Elizabethtown-Kitley	No			
Nation	No			
North Dundas	No			
North Glengarry	Yes	Clarification on why they are being consulted	Explained the SWP program and roles of the municipality.	No further action required.
North Grenville	No			
North Stormont	No			
Russell	No			
South Dundas	No			
South Stormont	No			
Champlain	No			
East Hawkesbury	No			
South Glengarry	No			
Cornwall	No			
Ottawa	No			
Hawkesbury	No			
Prescott	No			

**Table C: Comments received from Residents & Members of the Public**

<b>Public Inquiries</b>				
<b>Organization</b>	<b>Response Received</b>	<b>Comment</b>	<b>R-SN SPR Response</b>	<b>Status</b>
Concerned landowner	Yes	Resident concerned the burden of septic inspection falls on the landowners and suggest possible relocation of the municipal well.	Explained the proposed changes under the s.36 update, the policies of the SPP as well as the safe septic program.	No further action required.
Concerned landowner	Yes	Resident concerned with the interpretation of the wording within the SPP	Explained the proposed changes under the s.36 update and that the wording follows that of the Act. Noted that the RMO, being trained by the Province, takes these situations case by case when finalizing RMPs.	No further action required.
Concerned landowner	Yes	Resident provided their opinion regarding tree cutting and stormwater, but no questions were asked.	No follow up required.	No further action required.
Concerned landowner	Yes	Non-Resident concerned about proposed development near their parents' property which is in an IPZ.	Explained the DWSP and the pertinent policies relating to the proposed development.	No further action required.
Concerned landowner	Yes	Resident, not currently located in a vulnerable area, concerned about a proposed industrial development and the impacts to a SGRA.	Explained that the municipality used the SGRA mapping and requested a hydrogeological assessment to provide recommendation and guidelines for future property owners.	No further action required.
Concerned landowner	Yes	Questioned how the revisions may impact several properties owned in the region.	Reviewed each property and discussed how the policies may apply.	No further action required.
Concerned landowner	Yes	Questioned how the revisions may impact their property.	Discussed the proposed updates and how it may impact their existing RMP.	No further action required.
Concerned landowner	Yes	Questioned how the fuel policies may apply to their property.	The fuel policies were discussed in general and how they may apply based on certain conditions.	No further action required.

**Table C: Comments received from the Ministry of the Environment Conservation and Parks**

<b>MECP Public Consultation Comments</b>		
<b>Comment</b>	<b>R-SN SPR Response</b>	<b>Status</b>
<p><u>Policy SNOW-3</u></p> <p>The proposed edits to SNOW-3 reflect several considerations.</p> <ul style="list-style-type: none"> <li>o MECP has already considered source protection in the issuance of prescribed instruments for existing stormwater drainage system outfall that serves a snow disposal facility or area, which occurred either when issuing the permit or during permit review when the plans came into effect.</li> <li>o The wording “When and where appropriate” captures that there may be circumstances in the future that require review of existing ECAs (e.g., new WHPA delineated or changes to the technical rules that would affect new ECAs).”</li> <li>o The recommendation to include the word “applicable” in front of “prescribed instruments” for the effective date reflects that only some instruments may need to be reviewed.</li> </ul>	Staff acknowledge the comment. Recommend incorporating changes.	Addressed
<p><u>Policy SEWG-2</u></p> <p>The rationale for the proposed changes to SEWG-2 are as follows:</p> <ul style="list-style-type: none"> <li>• “When and where appropriate” captures that there may be circumstances in the future that require review of existing ECAs (e.g., new WHPA delineated or changes to the technical rules that would affect new ECAs).</li> <li>• The removal of “Instruments that exist before the day the plan takes effect must be reviewed and, if necessary, amended within three years” reflects that this work has already been completed.</li> </ul>	Staff acknowledge the comment. Recommend incorporating changes.	Addressed
<p><u>Policy SEWG-3</u></p> <p>It is recommended that Policy SEWG-3 include an exemption for wastewater treatment facilities and associated parts where the upgraded components are intended to improve environmental performance of the existing plant to reduce spills/overflows to the environment. For example, increasing emergency storage capacity by adding additional sewage holding tanks.</p>	Staff acknowledge the comment. Recommend incorporating changes.	Addressed

<p><u>Policy SEWG-6</u></p> <p>Regarding Policy SEWG-6 relates to the ministry's review of environmental compliance approvals for existing/future onsite sewage system.</p> <p>Additionally, please consider incorporating the following:</p> <ul style="list-style-type: none"> <li>• The ministry has previously reviewed environmental compliance approvals issued for large on-site septic systems and incorporated terms and conditions for works identified as a significant threat. Since 2015, the ministry has been evaluating proposals for new/amended large onsite systems to identify significant threats and determine if conditions are needed to address prescribed instrument policies. The ministry continues to identify and review existing ECAs as a result of source protection plan amendments on an annual basis to confirm if the ministry's standard operating policy can be applied and if updated conditions are required.</li> </ul>	<p>Staff acknowledge the comment. Recommend incorporating changes.</p>	<p>Addressed</p>
<p><u>Policy SEWG-7</u></p> <p>Regarding <b>Policy SEWG-7</b>, which manages existing and future Storm water management (SWM) facilities, including infiltration facilities, please incorporate the following guidance:</p> <ul style="list-style-type: none"> <li>• Municipal CLI-ECAs require future SWM facilities to consider source protection plan policies and the MECP Standard Operating Policies during design of the works. For existing and future works, CLI-ECAs must contain conditions for Operations and Maintenance Manual Procedures to have regard to local source protection plan policies.</li> <li>• For private stormwater facilities not covered by CLI-ECAs, the ministry has previously reviewed environmental compliance approvals and incorporated terms and conditions for works identified as a SDWT. Since 2015, the ministry has been evaluating proposals for new/amended ECAs to identify significant threats and determine if conditions are needed to address prescribed instrument policies. The ministry continues to identify and review existing ECAs as a result of source protection plan amendments on an annual basis to confirm if the ministry's standard operating policy can be applied and if updated conditions are required.</li> </ul>	<p>Staff acknowledge the comment. Recommend incorporating changes.</p>	<p>Addressed</p>

<p><u>Appendix A, List C</u></p> <p>Please amend Appendix A, List C on Page 59 to include 'SEWG-1B', replacing the reference to 'SEWG-1',</p>	<p>Staff acknowledge the comment. Recommend incorporating changes.</p>	<p>Addressed</p>
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**Jason Symington**  
**Drinking Water Protection Project Manager**  
**Raisin-South Nation Source Protection Region**  
**c/o Raisin Region Conservation Authority**  
**18045 County Road 2**  
**P.O. Box 429**  
**Cornwall ON K6H 5T2**

August 6, 2025

Dear Mr. Jason Symington,

Thank you for considering the comments provided as part of pre-consultation on Raisin-South Nation Source Protection Region's section 36 updates to its assessment reports and source protection plan, and for providing the Conservation and Source Protection Branch (CSPB) with the opportunity to submit additional comments during the public consultation phase. The following comments are provided for your further consideration as you prepare the updated AR and SPP for final submission.

### **Comments on updated Source Protection Plan (SPP)**

To aid your review and revisions, I have attached a table containing recommended edits on the draft policies **SNOW-3**, **SEWG-3**, **SEWG-6**, **SEWG-7** and to **Appendix A, List C**, as it pertains to **SEWG-1b**. The comments are also summarized below.

#### **Policy SNOW-3**

The proposed edits to **SNOW-3** reflect several considerations.

- MECP has already considered source protection in the issuance of prescribed instruments for existing stormwater drainage system outfall that serves a snow disposal facility or area, which occurred either when issuing the permit or during permit review when the plans came into effect.
- The wording "When and where appropriate" captures that there may be circumstances in the future that require review of existing ECAs (e.g., new WHPA delineated or changes to the technical rules that would affect new ECAs)."
- The recommendation to include the word "applicable" in front of "prescribed instruments" for the effective date reflects that only some instruments may need to be reviewed.

*Draft SNOW-3 policy text (with edits in red):*

**When and where applicable**, existing approvals from the Ministry of the Environment, Conservation and Parks under the Ontario Water Resources Act, 1990 for stormwater drainage system outfalls that serve a Snow Disposal Facility or Area should be

reviewed and amended to ensure that the activity ~~does not become is not a significant drinking water threat or ceases to be~~ a significant drinking water threat.

If amendments are required, where feasible, the Ministry will:

- identify in the prescribed instrument that the activity is a significant drinking water threat located within the wellhead protection area and/or the intake protection zone, and the name of the associated municipal drinking water system as identified in the Raisin-South Nation source protection plan, and
- include a condition for emergency response protocols. ~~At a minimum, the prescribed instrument shall include reference to the applicable vulnerable area and protocols for emergency responses related to protecting the drinking water source.~~

**Applicable** prescribed instruments should be reviewed and amended within three years of the Source Protection Plan taking effect, or any plan amendment, as applicable.

## Policy SEWG-2

The rationale for the proposed changes to **SEWG-2** are as follows:

- “When and where appropriate” captures that there may be circumstances in the future that require review of existing ECAs (e.g., new WHPA delineated or changes to the technical rules that would affect new ECAs).
- The removal of “Instruments that exist before the day the plan takes effect must be reviewed and, if necessary, amended within three years” reflects that this work has already been completed.

*Draft SEWG-2 policy text (with edits in red):*

**When and where applicable**, existing Approvals under the Ontario Water Resources Act, 1990 (as amended) for wastewater collection and treatment facilities and associated parts, including:

- Wastewater Treatment Facilities and Associated Parts;
- Outfall of a Combined Sewer Overflow (CSO), or a Sanitary Sewer Overflow (SSO) from a Manhole or Wet Well; and
- Industrial Effluent Discharges

shall be reviewed to ensure they contain conditions to protect sources of drinking water where they would be a significant drinking water threat. If the instrument does not meet these requirements, the MECP shall amend it to include additional terms and conditions to manage the threat.

Where the activity is associated with low-risk systems that qualify for Consolidated Linear Infrastructure (CLI) preauthorization, the municipality shall consult with the Source Protection Authority to ensure the works consider sources of drinking water.

~~Instruments that exist before the day the plan takes effect must be reviewed and, if necessary, amended within three years.~~

### Policy SEWG-3

It is recommended that **Policy SEWG-3** include an exemption for wastewater treatment facilities and associated parts where the upgraded components are intended to improve environmental performance of the existing plant to reduce spills/overflows to the environment. For example, increasing emergency storage capacity by adding additional sewage holding tanks.

### Policy SEWG-6

Regarding **Policy SEWG-6** relates to the ministry's review of environmental compliance approvals for existing/future onsite sewage system.

Additionally, please consider incorporating the following:

- The ministry has previously reviewed environmental compliance approvals issued for large on-site septic systems and incorporated terms and conditions for works identified as a significant threat. Since 2015, the ministry has been evaluating proposals for new/amended large onsite systems to identify significant threats and determine if conditions are needed to address prescribed instrument policies. The ministry continues to identify and review existing ECAs as a result of source protection plan amendments on an annual basis to confirm if the ministry's standard operating policy can be applied and if updated conditions are required.

### Policy SEWG-7

Regarding **Policy SEWG-7**, which manages existing and future Storm water management (SWM) facilities, including infiltration facilities, please incorporate the following guidance:

- Municipal CLI-ECAs require future SWM facilities to consider source protection plan policies and the MECP Standard Operating Policies during design of the works. For existing and future works, CLI-ECAs must contain conditions for Operations and Maintenance Manual Procedures to have regard to local source protection plan policies.
- For private stormwater facilities not covered by CLI-ECAs, the ministry has previously reviewed environmental compliance approvals and incorporated terms and conditions for works identified as a SDWT. Since 2015, the ministry has been evaluating proposals for new/amended ECAs to identify significant threats and determine if conditions are needed to address prescribed instrument policies. The ministry continues to identify and review existing ECAs as a result of source protection plan amendments on an annual basis to confirm if the ministry's standard operating policy can be applied and if updated conditions are required.

The proposed text deletion is provided in red.

*Draft SEWG-7 policy text (with deletions in red):*

A. **When and where applicable**, approvals from the Ministry of the Environment, Conservation and Parks under the Ontario Water Resources Act, 1990, for existing and future Storm Water Management Facilities and Drainage Systems, including an outfall from a Storm Water Management Facility or a Storm Water Infiltration Facility where they would be



a significant drinking water threat, shall be reviewed to ensure they contain conditions to protect sources of drinking water.

Where the activity is associated with low-risk systems that qualify for Consolidated Linear Infrastructure preauthorization, the municipality shall consult with the Source Protection Authority to ensure the works consider sources of drinking water.

Where an existing instrument does not meet these requirements, the Ministry of the Environment, Conservation and Parks shall amend it to include additional terms and conditions to manage the threat.

It is recommended that approval conditions include:

- All future facilities should be built to Enhanced Level Protection (as described in the Stormwater Management Planning and Design Manual, Ministry of the Environment, Conservation and Parks, 2003, as amended).
- Addition of water quality criteria monitoring for chemicals and contaminants associated with the upstream development, in addition to regular total suspended solids monitoring requirements, to help develop a baseline for effluent quality and identify spikes in contaminants for future investigation.
- Ensure existing ponds are inspected yearly and prioritize upgrades/retrofits to ponds/systems in vulnerable areas are prioritized; requirements should be included in the Operation and Maintenance manual to protect drinking water sources.
- Sediment volumes should be measured yearly and provided to the Ministry of the Environment, Conservation and Parks to ensure compliance.
- Naturalization around ponds to act as spill buffers.
- Contain a contingency plan for catastrophic events (>100-year flood) and emergency response.

~~Instruments that exist before the day the Plan takes effect must be reviewed and, if necessary, amended within three years. This policy takes effect when the Source Protection Plan, or any plan amendment, as applicable, takes effect.~~

#### Appendix A, List C

Please amend Appendix A, List C on Page 59 to include 'SEWG-1B', replacing the reference to 'SEWG-1',

We hope these comments are helpful. Please do not hesitate to contact me if you have questions.

Monika Lemke, Program Analyst  
MECP Conservation and Source Protection Branch  
613-876-3376 | [monika.lemke@ontario.ca](mailto:monika.lemke@ontario.ca)

C: Wendy Lavender, Manager, Source Protection Section, CSPB  
Susanne Edwards, Manager, Technical and Program Delivery Section, CSPB  
George Jacoub, Watershed Management-Research Scientist, P.Eng., CSPB

# SUMMARY OF CHANGES

## Section 36 Updates for the Raisin-South Nation Source Protection Plan October, 2025

Per the Section 36 workplan for the Raisin-South Nation Source Protection Region, Conservation Authority (CA) staff reviewed policies with implementation concerns and discussed viable solutions with policy implementers. Recommendations to **keep, amend, remove, add or replace** policies (and parts of) were provided by CA staff for the consideration of the Raisin-South Nation Source Protection Committee (RSNSPC), along with other edits, for the SPC meetings.

**\*Changes made following Public Consultation added in Blue.**

**Table 1: Source Protection Plan (SPP) Change Log**

No.	RSNSPP Section or Policy	Implementation Concern and SPP Update	RSNSPC Discussions Status and CA staff recommendation
1.	Throughout the document	Update “Ministry of Environment and Climate Change” to “Ministry of Environment, Conservation and Parks”; replace “property owner” with “landowner” for consistency; minor wording changes for clarity	<b>Staff recommended: amended policy</b>  SPC endorsed in principle on April 7, 2022
2.	Throughout the document	Removed lists of chemicals of concern from all prescribed drinking water threats.	<b>Change recommended by MECP in early engagement comments.</b>  SPC endorsed in principle January 17, 2024.
3.	Section 1 Introduction	Changes are proposed to the document version number, effective date, composition of the Source Protection Committee (SPC), and Terms of Reference to reflect the Section 36 update to the SPP, changes to SPC membership, and decommissioning of a municipal well.	<b>Staff recommended: amend SPP.</b>  SPC endorsed in principle on April 7, 2022

No.	RSNSPP Section or Policy	Implementation Concern and SPP Update	RSNSPC Discussions Status and CA staff recommendation
4.	<b>Section 2 Policy Development Process</b>	Updated policy example in Prescribed Instruments section; removal of references to Appendices which have been removed; minor wording changes for clarity.	
5.	<b>Section 3 - Agriculture Policy AG-1</b>	<p>Policies AG-1 and AG-2 were combined into a single new policy (AG-1).</p> <p>The previous policy AG-1 directed the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) to review existing and future instruments under the <i>Nutrient Management Act</i>, 2002. Staff met with OMAFRA staff to review the effectiveness of Prescribed Instruments in the context of the Source Protection Policy implementation.</p> <p>OMAFRA staff identified that OMAFRA cannot impose terms and conditions on Nutrient Management Plans (NMP).</p> <p>Following consultation with OMAFRA and MECP, a single Policy (AG-1) is proposed which would require an RMP for all agricultural activities where the activities are or could be an existing or future threat.</p> <p>Where an activity has a prescribed instrument, such as a Nutrient Management Strategy, the landowner or their representative may apply for an exemption from the RMP requirement if it is demonstrated that the prescribed instrument contains conditions that manage the drinking water related threat.</p> <p>Processed Organic Waste; or Waste Biomass added to the list of activities which could constitute a significant drinking water threat.</p>	<p><b>Staff recommended: Replace policies AG-1 and AG-2 with a single new policy AG-1</b></p> <p>SPC endorsed in principle on November 11, 2021 and April 11, 2023</p>
6.	<b>Section 3 - Chemicals Policies CHEM-1 &amp; CHEM-2</b>	The word “residential” was removed. A Provincial working group reviewed the Dense Non-aqueous Phase Liquid (DNAPL) policies to determine if a volume threshold (less	<b>Staff recommended: amend policies.</b>

No.	RSNSPP Section or Policy	Implementation Concern and SPP Update	RSNSPC Discussions Status and CA staff recommendation
		<p>than 25 L) should be specified; below this threshold volume, stored DNAPLs would not be considered a significant threat. The working group did not end up recommending this change.</p> <p>The SPP contains wording that permits the Risk Management Official to use professional judgement when evaluating small quantities of DNAPLs (paints, adhesives, cosmetics, shampoos). Currently the policy is specific to residential uses; however, there are similar small incidental quantities in retail and commercial uses as well.</p> <p>The SPC endorsed a proposed change to extend the incidental volume flexibility to other property types rather than introducing the 25 L specific volume threshold.</p>	<p>SPC endorsed in principle on March 8, 2021</p>
7.	<p><b>Section 3 - Fuel</b></p> <p><b>Policies FUEL-1 &amp; FUEL-2</b></p>	<p>Updated references to <i>Ontario Installation Code for Oil-Burning Equipment, Liquid Fuels Handling Code</i>. The areas where a significant threat can occur have changed to include additional Intake Protection Zone areas.</p> <p>The technical rules were also revised to recognize the risk related to the above grade handling and storage of fuel in quantities of 250 L or greater.</p> <p>The Raisin-South Nation policies do not specify storage size, so no changes are required to address the updated technical rules.</p>	<p><b>Staff recommended: keep policies FUEL-1 and FUEL-2</b></p> <p>SPC endorsed in principle on February 22, 2023</p>
8.	<p><b>Section 3 - Pesticides</b></p>	<p>Amendments to Overview and Policy intent sections to reflect policy changes. The 2021 Technical Rules describe circumstances related to the application and storage of pesticides that would be significant threats. The Contaminant List was removed and is no longer an authoritative list.</p>	<p><b>Staff recommended: amend SPP.</b></p> <p>SPC endorsed in principle on February 22, 2023</p>

No.	RSNSPP Section or Policy	Implementation Concern and SPP Update	RSNSPC Discussions Status and CA staff recommendation
		<p>The inference is that the circumstances apply to all pesticides; however, the definition of pesticide can be reasonably tied to Ontario Regulation 63/09 of the Pesticide Act.</p> <p>The proposed introduction section states that the active ingredient should meet criteria set out in the Ontario Regulation 63/09 to be considered a significant threat. The Risk Management Official (RMO) will have discretion and may consult the Ontario allowable list to decide whether a pesticide being used constitutes a significant threat and whether the Risk Management policies apply.</p> <p>It is recommended that the policy approach remain 'manage' as opposed to 'prohibit' given that the list of pesticides is now more encompassing.</p> <p>The policy language leaves it to the discretion of the MECP and/or the RMO to determine the measures appropriate to prevent these activities from causing a threat to our sources of drinking water.</p>	
9.	Section 3 - Pesticides Policy PEST-2	Added reference to the Grower Pesticide Safety course.	<p><b>Staff recommended: amend policy.</b></p> <p>SPC endorsed in principle on February 22, 2023</p>
10.	Section 3 - Pesticides Policy PEST-3	Removed reference to "manufacturing and processing" of pesticides, as this terminology is no longer specified in the technical rules.	<p><b>Staff recommended: amend policy.</b></p> <p>SPC endorsed in principle on February 22, 2023</p>
11.	Section 3 - Salt	Policies amended in response to Technical Rules changes. Volume thresholds and additional criteria were added to	<p><b>Staff recommended: amend policy.</b></p>

No.	RSNSPP Section or Policy	Implementation Concern and SPP Update	RSNSPC Discussions Status and CA staff recommendation
	<b>Policies SALT-2 &amp; SALT-3</b>	<p>reduce scope of the policy's applicability. The circumstances where salt is applied has changed, specifically, the percentage of impervious surface area has decreased.</p> <p>The amount of salt storage has also decreased. A much smaller salt storage can now trigger a significant drinking water threat.</p> <p>The changes to these circumstances shift the focus of salt storage policies from municipal-scale storage facilities to almost all forms of salt storage based on the level of exposure to precipitation.</p> <p>Under the former Technical Rules, there were no significant drinking water threats related to salt application in the Source Protection Region. It is expected there will be a number of new significant drinking water threats in the Region. The new significant drinking water threats will include industrial or commercial establishments with parking lots and walkways that are required to be maintained.</p> <p>In response to early engagement comments from MECP, Policies SALT-2 and SALT-3 have been updated. Prohibition of exposed salt storage is now specified. A combination of Risk Management Plan and Prohibition is specified for partially exposed salt storage, based on volume thresholds. The 500kg volume threshold contained in policies SALT-2 and SALT-3 is based on typical salt storage bins found in the region. Policy SALT-5 (Education and outreach) will address partially exposed salt storage of 500kg or less.</p>	SPC endorsed in principle on April 11, 2023
<b>12.</b>	<b>Section 3 - Salt and Snow Policy SALT-5</b>	Policy modified to change the implementing body from the Salt Institute to the Source Protection Region and local municipalities. Prescribed activities have been updated to	<b>Staff recommended: amend policy</b>

No.	RSNSPP Section or Policy	Implementation Concern and SPP Update	RSNSPC Discussions Status and CA staff recommendation
		reflect the changes to Technical Rules. References to best practice documents removed.	SPC endorsed in principle on April 11, 2023
13.	Section 3 - Snow	<p>This is a new section of the plan. In response to MECP early engagement comments, staff split the previous “salt and snow” section into two separate sections – one for salt and one for snow. All snow storage related policies have been removed from the Salt section of the plan.</p> <p>Technical rules changes have resulted in much smaller snow storage areas being a significant threat to drinking water than under previous technical rules. As a result, snow storage policies have shifted from very large-scale storage facilities to small areas of snow storage, including snow storage piles of any size in some areas.</p> <p>New policies have been written to deal with snow storage threats:</p> <p>Policy SNOW-1 requires education and outreach regarding snow storage on commercial and industrial sites.</p> <p>Policy SNOW-2 prohibits existing and future storage of snow at snow dumps.</p> <p>Policies SNOW-3 and SNOW-4 require that existing and future approvals of Snow Disposal Facilities under the Ontario Water Resources Act ensure that they would not cause a significant drinking water threat through their stormwater drainage system outfall.</p> <p><b>Policy SNOW-3 amended to add language “when and where applicable” and “where feasible” to qualify actions to be taken by MECP; also amended to add text to clarify that MECP will identify the municipal drinking water intake for</b></p>	<p><b>Staff recommended: new policies.</b></p> <p>SPC endorsed in principle on January 1, 2024</p> <p><b>*Staff recommends: amend new policies as requested by MECP</b></p>

No.	RSNSPP Section or Policy	Implementation Concern and SPP Update	RSNSPC Discussions Status and CA staff recommendation
		which the activity is a significant drinking water threat and include a condition for emergency response protocols.*	
14.	Section 3 – Sewage	<p>Amendments to Overview and Policy intent sections to reflect policy changes. Updated references to Consolidated Linear Infrastructure Environmental Compliance Approvals.</p> <p>Changes to terminology to be consistent with updated terminology in the Technical Rules. Technical rules changed slightly to include discharge to land, in addition to water for Industrial Effluent Discharge.</p>	<p><b>Staff recommended: amend policy.</b></p> <p>SPC endorsed in principle on June 8, 2023 and January 1, 2024</p>
15.	Section 3 – Sewage Policies SEWG-1, SEWG-2 & SEWG-3	<p>Changes were made to terminology to be consistent with updated terminology in the Technical Rules. Reference to the Ontario Provincial Standard was amended to ensure ongoing accuracy of the reference.</p> <p>A paragraph was added to policy SEWG-2 which applies to Consolidated Linear Infrastructure Environmental Compliance Approvals. Technical rules changed slightly to include discharge to land, in addition to water for Industrial Effluent Discharge.</p> <p>According to the new Technical Rules, the circumstances have been amended to identify the parts, facilities, and structures that pose a risk to sources of drinking water.</p> <p>For sanitary sewers the amended circumstances specify that the force main and rising main are the facilities that pose a higher risk.</p> <p>For outfalls the amended circumstances specify the facilities posing risks including combined sewer overflow and sanitary sewer overflow.</p>	<p><b>Staff recommended: amend policy.</b></p> <p><b>Additional changes to terminology recommended in MECP early engagement comments</b></p> <p>SPC endorsed in principle on June 8, 2023 and January 1, 2024</p> <p><b>*Staff recommends: further amend policies as requested by MECP</b></p>



No.	RSNSPP Section or Policy	Implementation Concern and SPP Update	RSNSPC Discussions Status and CA staff recommendation
		<p>For sewage pumping station or lift station wet well, holding tank or tunnel the amended circumstances specify risks associated with the leakages to groundwater and surface water.</p> <p>There were additional clarifications for final effluent outfall or sewage treatment plant overflow associated with a wastewater treatment facility.</p> <p>The policies were updated to provide this additional clarification for each threat activity.</p> <p><b>Policy SEWG-2 amended to add language “when and where applicable” to qualify actions to be taken by MECP; remove the deadline for reviewing instruments that existed before the plan took effect as this work has already been completed.*</b></p> <p><b>Policy SEWG-3 amended to add an exemption for wastewater treatment facilities and associated parts where the upgraded components are intended to improve environmental performance of the existing plant to reduce sills/overflows to the environment. For example, increasing emergency storage capacity by adding additional sewage holding tanks.*</b></p>	
16.	<b>Section 3 – Sewage</b> <b>Policy SEWG-4</b>	<p>Changes to terminology to be consistent with updated terminology in the Technical Rules.</p> <p>Update to the policy concerning the Shadow Ridge Municipal Well in Greely to reflect its status.</p>	<p><b>Staff recommended: keep policy.</b></p> <p><b>Additional changes to terminology recommended in MECP early engagement comments</b></p>

No.	RSNSPP Section or Policy	Implementation Concern and SPP Update	RSNSPC Discussions Status and CA staff recommendation
			SPC endorsed in principle on June 8, 2023 and January 1, 2024
17.	Section 3 – Sewage Policy SEWG-6	Policy amended to replace text “ceases to be or never becomes” with “does not become” to clarify that the policy applies to potential new threats (as threats that existed before the plan took effect have been addressed). Also amended to remove the deadline for reviewing instruments that existed before the plan took effect as this work has already been completed and to add additional language to recognize work that has been completed and that is ongoing by the Ministry to ensure approvals include conditions relating to source water protection as needed.*	Staff recommended: amend policy  *Staff recommends: further amend policy as requested by MECP
18.	Section 3 – Sewage Policy SEWG-7	Changes were made to terminology and removal of the list of contaminants of concern to be consistent with updated terminology in the Technical Rules.  Updated references to Consolidated Linear Infrastructure Environmental Compliance Approvals. The Consolidated Linear Infrastructure Environmental Compliance Approvals require municipalities to prepare a Source Protection Threat Assessment Report to document the criteria where proposed works in an area may be a significant drinking water threat and their screening process for identifying significant drinking water threats when designing preauthorized sewage/stormwater works.  A reference was added to the required Operation and Maintenance manual for storm water facilities. This manual	Staff recommended: amend policy (a) and remove policy (b)  SPC endorsed in principle on June 8, 2023  *Staff recommends: further amend policy as requested by MECP

No.	RSNSPP Section or Policy	Implementation Concern and SPP Update	RSNSPC Discussions Status and CA staff recommendation
		<p>must include operational and maintenance requirements to protect drinking water sources.</p> <p>Part b of the policy was removed. The previous policy prohibits new stormwater management facilities in WHPA-A and IPZ-1. This policy was developed when the circumstances were less restrictive and would have captured only very large development applications.</p> <p>The new circumstances under the updated technical rules result in virtually all development being identified as a significant drinking water threat. This prohibition policy would prohibit all development that outlets to the WHPA-A and IPZ-1 – essentially prohibiting new development in several communities.</p> <p>The Source Protection policies outside of WHPA-A and IPZ-1 manage the threat using approvals (as noted in the policy above). Amendments propose to treat all vulnerable areas the same by eliminating the prohibition policy, which now captures a far broader scale of developments than originally intended.</p> <p><b>Policy amended as recommended by MECP to add language “when and where applicable” to qualify actions to be taken by MECP, add additional language relating to municipal Consolidated Linear Infrastructure Environmental Compliance Approvals, add additional language to recognize work that has been completed and that is ongoing by the Ministry to ensure approvals include conditions relating to source water protection as needed, remove reference to policy MONITORING-2 as it does not apply, and to modify</b></p>	

No.	RSNSPP Section or Policy	Implementation Concern and SPP Update	RSNSPC Discussions Status and CA staff recommendation
		the text indicating the date the policy takes effect to remove the reference to threats that existed before the plan took effect.*	
19.	Section 3 – Liquid Hydrocarbon Pipelines Policies PIPE-1 & PIPE-2	<p>This is a new section of the SPP, developed in response to the identification of the establishment and operation of a liquid hydrocarbon pipeline as a potential significant drinking water threat following amendments to Ontario Regulation 287/07.</p> <p>Liquid hydrocarbon pipelines exist in the Raisin-South Nation SPR; however, none have been identified as a significant drinking water threat.</p> <p>Both policies PIPE-1 and PIPE-2 are Specified Actions. The policies are non-legally binding. PIPE-1 is to be implemented by the pipeline owner while PIPE-2 is to be implemented by the regulatory authorities. The goal for reducing or eliminating this drinking water threat is to prevent spills due to pipeline ruptures and to have appropriate spill response.</p>	<p><b>Staff recommended: add new policies</b></p> <p>SPC endorsed in principle on March 8, 2021 and again on November 11, 2021</p>
20.	Section 3 – General Policies Policy GENERAL-1	Policy updated to be consistent with changes to policy SALT-5.	
21.	Section 3 – General Policies Policy GENERAL-2	The definition of effective date has been modified to clarify the effective date of amendments to the plan.	
22.	Section 3 – General Policies Policy GENERAL-3	Updated reference to the <i>Planning Act</i> .	
23.	Section 3 – General Policies Policy GENERAL-6	Modified to be consistent with renumbering of Agriculture policies.	

No.	RSNSPP Section or Policy	Implementation Concern and SPP Update	RSNSPC Discussions Status and CA staff recommendation
24.	<b>Section 3 – General Policies</b> <b>Policy GENERAL-10</b>	Policy amended to include spills originating from a hydrocarbon pipeline.	
25.	<b>Section 3 – Monitoring Policies</b> <b>Policy MONITORING-3</b>	Policy amended to remove Nutrient Management Plans/Strategies or Non-Agricultural Source Material Plans from the list for consistency with the removal of policy AG-1. This policy change is consistent with recommendations from OMAFRA staff.	Staff recommended: amend policy.  SPC endorsed in principle on February 22, 2023
26.	<b>Section 4 Policy Implementation</b>	One paragraph was added to the Updating the Plan section to include the current Section 36 amendment process.	
27.	<b>Glossary</b>	Changes to terminology to be consistent with updated terminology in the Technical Rules. Addition of a definition of “Managed Lands”.  Definition of pesticides has been updated to remove the list of specific chemicals in favour of a broader definition. “Application and storage of processed organic waste” and “storage of untreated septage” added to the definition of Waste Disposal Sites in response to Technical Rules changes.	<b>Staff recommended: minor amendments and updated definitions</b>  SPC endorsed changes on: April 11, 2023
28.	<b>Appendix A, List C: Significant threat policies that affect Prescribed Instrument decisions</b>	<b>Change reference to “SEWG-1” to “SEWG-1B” to correspond to the</b>	<b>Staff recommends: amend list as requested by MECP</b>