



Thames - Sydenham and Region
c/o Upper Thames River Conservation Authority
1424 Clarke Road, London, ON, N5V 5B9

September 17, 2009

Ian Smith
Director - SOURCE PROTECTION PROGRAMS BRANCH
8th Flr
2 St Clair Ave W
Toronto ON M4V1L5

Re: Comments on Source Protection Plan discussion paper

Dear Ian

I am pleased to submit the attached comments on the Source Protection Plan discussion paper on behalf of the Thames-Sydenham and Region Source Protection Committee. These comments were developed through a workshop that the Source Protection Committee held on August 17, as well as subsequent discussions at the Committee meeting of September 11th. The workshop included many of the Source Protection Committee members as well as CA staff and municipal planners. The workshop was focused on a high level consideration of the tools discussed in the discussion paper rather than detailed drafting of policies. The attached package includes a page of comments developed by the Source Protection Committee, a summary from the workshop sessions, the 4 case study worksheets and the completed form requested by the MOE.

The feedback from the workshop included not only comments on the tools discussed in the paper, but also on the plan development process and implementation requirements.

- It was evident that considerable information and expertise will be needed by the Committee beyond the technical information contained in the Assessment Reports. Direct access to the appropriate expertise and knowledge during plan development will be critical to the development of the Source Protection Plan.
- Sustained funding through plan development and implementation will be critical to the success of the plan. Funding for the implementation of the programs and policies is a significant concern of the Source Protection Committee and other participants in the workshop.
- Maintenance of information systems and communication lines will be critical through plan implementation. Enhancement or development of monitoring programs will be critical to the review and improvement of Source Protection Plans in the future.

Lower Thames Valley Conservation Authority
100 Thames Street, Chatham, Ontario,
N7L 2Y8

St. Clair Region Conservation Authority
205 Mill Pond Cres., Strathroy, Ontario,
N7G 3P9

Upper Thames River Conservation Authority
1424 Clarke Road, London, ON
N5V 5B9

phone 519-354-7310, fax 519-352-3435

phone 519-245-3710, fax. 519-245-3348

phone 519-451-2800, fax 519-451-1188



- Enforcement of policies in the plan was also a concern of the participants, but the Source Protection Committee anticipates that these will be addressed by other regulations in the future.

The workshop also offered the committee and staff an opportunity to explore the process for policy development. It was apparent that the Committee is anxious to embark on that phase of the work.

Thank you for the opportunity to comment; we look forward to future consultations regarding the regulations and rules of the Clean Water Act. If you have any questions on the attached please do not hesitate to contact me.

Yours truly,
Thames-Sydenham and Region

Bob Bedggood, Chair
Source Protection Committee

cc Source Protection Committee
Chris Tasker

The Source Protection Plan

Discussion Paper Comments

1. The Source Protection Planning (SPP) framework needs to be flexible, providing a range of compliance approaches. The SPP framework must also have the ability to require monitoring data on an ongoing basis as well as good technical and GIS information.
2. Provincial instruments for various activities provide an opportunity to regulate certain activities; however costs and scheduling for the improvements must consider the ability of the implementer to pay and may require ongoing Provincial funding support.
3. Training requirements will be significant and will be required at various stages from plan development through implementation and enforcement. Much of this training is best provided provincially. Training needs to be made available to a range of recipients, including :
 - Provincial instrument issuers
 - Provincial enforcement officers
 - Risk management officials and inspectors
 - Municipal building officials and other staff
 - Committee members
4. A complete list of standards, guidelines, BMPs, programs, and other options needs to be developed. Although the Risk Management Catalogue may satisfy some of these needs, it is anticipated the Source Protection Committee will need access to expert advice to assist the Source Protection Committee during plan development.
5. Incentives are far more effective than regulation in dealing with many of the risks to drinking water. This needs to be emphasized in the regulation. In particular,
 - Sustained funding is critical to the success of these programs
 - Use of incentives will allow the beneficiary to participate as a partner in the implementation
 - Recognition of environmental goods and services needs to be considered as a tool in implementation
 - Rewarding those who voluntarily undertake activities needs to be considered in the policies and programs proposed in the plans.
 - Not all incentives need to be monetary
 - Profile local champions/case studies utilizing these examples as leaders to encourage broader acceptance of the risk reduction methods.
6. Research and technology must be continued and embraced as a way to reduce risks to drinking water. Risk reduction research needs to be considered in the development of policies and built into new research program funding.
7. There needs to be better integration with Federal legislation, standards and instruments as some of these may be the best route to reduce the risks to drinking water.
8. In their Source Protection Plans, the SPC should have the ability to make suggestions to Provincial Regulatory Authorities for enhancements to their programs that might reduce risks. Where SPCs believe that, for consistency or other reasons, a provincial approach is required this option needs to be available to the Source Protection Committee.